



# **Dacorum Borough Council**

## **Local Planning Framework**

### **DACORUM SITE ALLOCATIONS DPD EXAMINATION IN PUBLIC**

**Statement by Dacorum Borough Council**

**Matter 4: Housing**

**September 2016**

## **Purpose of this statement**

The purpose of this statement is to summarise the Council's position regarding the following matters, issues and questions raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

## Matters raised by Inspector and the Council's response

### 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?

- 1.1 The Council is satisfied that the overall amount of housing provision and its distribution are consistent with the Core Strategy (Examination Document CS4).
- 1.2 As explained in detail in the responses to housing supply here and the questions that follow, the allocations together with other sources of identified housing land and windfalls are sufficient to satisfy and to modestly exceed (by 341) the Core Strategy housing target of 10,750 homes. This is illustrated by Table 3 of the Site Allocations DPD (Examination Document SA4) (reproduced as Table 1 below).

**Table 1: Site Allocations Housing Programme 2006 – 2031**

Source	No. of homes (net)*
Completions 2006 - 2015	3,377*
Commitments as at 1 <sup>st</sup> April 2015	2,569*
Housing schedule (comprising new allocations, Mixed Use Allocations and Local Allocations)	3,246
SHLAA sites	644
Other (non SHLAA) sites	423
Defined locations in Hemel Hempstead	315
Windfall in Residential Areas of the main settlements	500
Gypsy and Traveller pitches	17
Total	11,091*

\* Source: 2014/15 AMR (as at 1<sup>st</sup> April 2015).

- 1.3 This position is only likely to improve given:
- upward adjustments proposed as Major Modifications or Minor Changes to the capacity of some allocations (see response to Question 10 and Appendix to Matter 2);
  - a locally buoyant housing market, particularly in respect of larger housing sites (see Appendix 1 to this response, which provides a summary of progress on the housing allocations and other larger sites);
  - improving levels of completions, commitments and on-site activity (see paragraph 8.4 below); and
  - no allowance being made in the housing programme for small sites on garden land and larger windfalls (see response to Question 4).

- 1.4 The distribution of allocations has been guided by national policy and the approach set out in the Core Strategy under paragraphs 8.7-8.17 (Examination Document CS4). This takes into account the settlement hierarchy (Table 1 of the Core Strategy), Policies CS1: Distribution of Development and CS2: Selection of Development Sites and, where relevant, the indicative settlement distribution in the Place Strategies. The Council has sought, as far as has been practical given the availability of site opportunities, to direct allocations to sustainable locations within and adjoining the three towns and larger villages and to minimise opportunities in areas of development restraint (e.g. the Green Belt and Rural Area).
- 1.5 It is not the function of the Site Allocations DPD (Examination Document SA4) to identify *all* opportunities to meet the Core Strategy housing target. Rather, it is the role of the document to identify a suitable level of allocations that, together with other sources of housing land (commitments, SHLAA sites, windfalls, sites in the East Hemel Hempstead Area Action Plan area etc.), can demonstrate how the housing target can be delivered. This it has achieved with a modest and growing margin to allow for some flexibility (see response to Question 17 below). As noted in response to Matter 2, Question 5, there is not a large pool of sites that have been suggested for allocation that have not been taken forward through the submitted plan. The Council considers that all Core Strategy compliant sites that are assessed as deliverable have been included and allocated.
- 1.6 Paragraphs 2.1 – 2.72 of the Providing Homes and Community Services Background Issues Paper (Examination Document SA4) explains in detail the site selection process and effectively how the allocations have been identified. The Council has undertaken a thorough and proportionate site selection process throughout the different stages of its preparation, taking into account a wide range of potential sources of housing land. This has properly reflected:
- the overall scale of policy compliant and available sites (see Question 2 below);
  - practical considerations over allocation thresholds and their individual site status (e.g. whether a site is being progressed as a planning application or has approval); (see responses to Question 7 and Question 12 below);
  - close working with landowners/developers in progressing sites;
  - decisions over site capacities / densities (see Question 10 below).
- 1.7 The Council is committed to meeting its housing target and to achieving higher overall housing levels than have historically been achieved within the Borough. The existence of the buffer is important as it:
- shows to what extent the housing target can be exceeded;
  - demonstrates that the Council is committed to boosting overall supply (see response to Question 3); and
  - provides flexibility over any potential non-delivery of allocations or other uncertainties (see response to Question 17).

- 1.8 The buffer within the housing programme is only likely to increase (see responses to Questions 2, 3, 5, 8 and 10 below) ensuring a better safety net against uncertainties over the plan period. The Council believes that the buffer is sufficient to address the concerns of objectors and to avoid the need to identify additional allocations (see response to Question 2 below).

**2. Specifically, should more housing be allocated and if so would this be possible prior to the completion of the Green Belt review?**

- 2.1 The early partial review (incorporated within a new Local Plan) is the appropriate mechanism through which to reassess housing need (OAN), within the context of a comprehensive Green Belt review. As explained in response to Matter 2, this technical work is already underway, and it is not possible to make judgments on new allocations in the Green Belt in advance of this process.
- 2.2 The Council does not consider that it is necessary to allocate additional housing sites for a number of reasons. It is satisfied that it has taken forward all reasonable opportunities through the Site Allocations DPD (see response under Question 1). Furthermore, the Council would stress that there is not a pool of alternative sites realistically available to bring forward that are policy compliant (see response under Matter 2, Question 5).
- 2.3 A number of alternative sites promoted by objectors were located in the Green Belt. These cannot be supported on policy grounds (see response to Question 11 to Matter 2). The Core Strategy (Examination Document CS4) sets out a framework for guiding the level and distribution of allocations. Identifying new allocations in the Green Belt would run contrary to this approach, and would also be contrary to guidance in the NPPF (Examination Document REG10). The Core Strategy makes clear that, outside of the Local Allocations, the role of the Site Allocations DPD is to correct minor anomalies to boundaries rather than to make further changes to the Green Belt (paragraph 8.29 of the Core Strategy) to accommodate new development. If there are to be changes to the Green Belt, then this will be done comprehensively through the new Local Plan (incorporating the early partial review of the Core Strategy). This work has already commenced (see response to Matter 2, Questions 3 and 18)
- 2.4 The Council is confident, especially in a currently buoyant housing market that the allocations and other sites set out in the housing programme in Table 1 above will be delivered over the lifetime of the plan. This increase in market confidence is illustrated by Tables 1.1 and 1.2 in Appendix 1 to this document, which show good progress on the housing allocations and larger housing sites. In conjunction with other identified, defined location and windfall sites, the housing target to 2031 can be met.
- 2.5 While the projected surplus over the housing target is reasonable (i.e. 341 units) the following points should be noted:

- A five year supply of housing can be achieved and moderately exceeded (see Table 2.1 and 2.2 in Appendix 2);
- The five year supply does not rely on any small windfalls and the housing programme excludes any large windfall assumptions (see response to Question 4);
- No account can be directly taken of small windfalls on garden land within the housing programme, but their contribution will be significant to future completions (i.e. at around 40 units a year) (see response to Question 4);
- Some capacity assumptions on sites are cautious, and more may be able to be achieved (e.g. a number of SHLAA sites take the mid-point of a range of development scenarios, when in many cases the higher scenario may be closer to the figure actually delivered);
- The capacity of some housing allocations can be increased further (see response to Question 10);
- Preliminary analysis of completions and commitments in the 2015/16 period point to further improvements to the housing programme (see response to Question 8)
- Office conversion to housing under the prior approval process is making a growing contribution to housing supply.

2.6 These factors provide for a modest and growing buffer to adapt to rapid change and any unexpected non-delivery of sites. Bringing forward the Local Allocations under Policy CS3: Managing Selected Development Sites, if required before their specified delivery date, provides additional flexibility during the short to medium term of the housing programme. Such an overall approach will ensure a robust supply of sustainably located sites and support a plan-led approach to housing land supply. In reality, events will be overtaken in due course via the new Local Plan, which will incorporate the early partial review of the Core Strategy.

**3. In the light of Government’s stated objective in paragraph 47 of the National Planning Policy Framework of boosting significantly the supply of housing, should the Council be seeking to constrain the release of the Local Allocations? If so, what is the rationale for this?**

3.1 The Council considers that the Plan housing programme does represent a significant body of housing which is likely to further improve in the future (see paragraph 3.5 below). The Council will continue to take steps through its planning powers and landownership, and through close working with the development industry and other bodies, to ensure delivery and to boost the overall supply of housing land.

3.2 This issue of when the Local Allocations should be released for development was considered in some detail through the Core Strategy Examination. This took account of the context provided by the NPPF (Examination Document REG10), including its objective of boosting significantly the supply of new housing. The Core Strategy Inspector clearly supported the Council’s general approach to phasing in finding the

Core Strategy (Examination Document CS4) sound, subject to a number of Main Modifications (paras. 16-18 of the Inspector's Report: (Examination Document CS6)). With explicit regard to the phasing, delivery and management of development he concluded that:

*"The Council's approach has been satisfactorily justified in the context within which the plan has been prepared."* (paragraph 16)

3.3 The Core Strategy (paragraph 8.17) (Examination Document CS4) advises that:

*"Local Allocations will be held back to encourage urban sites to come forward earlier, to retain countryside for longer and to ensure an appropriate contributions to land supply in the later part of the plan period."*

This same principle is reflected in the Site Allocations document (paragraph 6.26) (Examination Document SUB1) and in the Providing Homes and Community Services Background Issues Paper (paragraphs 2.73-2.80) (Examination Document SA4) in discussing the phasing of allocations.

3.4 The Council has demonstrated that it can be flexible over the phasing of local allocations when circumstances justify, and will continue to be so (see paragraph 3.7 below). Following further consideration of local housing needs and the role the Local Allocation LA5: Icknield Way, west of Tring will play in delivering other essential local infrastructure, the site has been brought forward into Part 1 of the Schedule of Housing Proposals and Sites. Whilst no specific delivery date has been set, this will follow the formal release of the site from the Green Belt i.e. after adoption of the Site Allocations DPD. The reasons for this earlier release of LA5 are set out in the Meeting Homes and Community Needs Background Issues Paper (Examination Document SA4).

3.5 There remain sound planning grounds for continuing to constrain the release of Local Allocations LA1-4 and LA6. These Local Allocations are included in Part 2 of the Schedule of Housing Proposals and Sites in the Site Allocations DPD (Examination Document SUB1) and are planned to bring forward completed homes from 2021 onwards. There have been no fundamental changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to warrant bringing forward these allocations sooner:

- There is no overriding local justification to release them earlier;
- The Council wants to continue to give emphasis to the supply of brownfield sites and future opportunities as sought by national policy (paras. 17 and 111 of the NPPF (Examination Document REG10)).
- Local Allocations are still needed to boost supply in the medium to longer term, to ensure a steady delivery of housing.
- There is no pressing need to bring forward Local Allocations to boost immediate supply. As at 1<sup>st</sup> April 2015, there is a healthy pipeline of housing and the Council can meet and modestly exceed its 5 year housing supply (see Table 1 above and the response to Question 6).

- It is for the early partial review of the Core Strategy (through the new Local Plan) to reassess the current approach to defining sites. This current approach has been endorsed by the Core Strategy Planning Inspector (Examination Document CS6).

3.6 The position on supply is only likely to improve given progress being made with sites, increasing levels of completions and on-site activity, growing levels of commitments and the potential for allocations to deliver additional homes (see response to Question 10).

3.7 Policy CS3: Managing Selected Development Sites already provides sufficient flexibility for Local Allocations to be brought forward, if required. Furthermore, paragraph 6.28 of the Site Allocations DPD makes clear that:

*“.....there will be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021.”*

This approach remains appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. It is also consistent with the wording of paragraph 8.17 of the Core Strategy.

3.8 The Council recognises that the recently completed SHMA and subsequent ONS population and DCLG household projections continue to point to growing housing demand. It does not accept, however, that they justify fundamental changes to the current approach to the Green Belt and allocation of sites in the Site Allocations DPD. This is a separate matter better addressed comprehensively outside of the Site Allocations DPD in taking forward work on the new Local Plan (incorporating the early partial review of the Core Strategy) (see response to Matter 2, Question 3).

**4. Is it assumed that all sites, both commitments and allocations, will be developed during the Plan period? Are all of these sites likely to be developed? What account is taken of windfalls? What rate of windfall development is anticipated over the Plan period?**

4.1 The Council is confident that all of the housing commitments and allocations identified in the Site Allocations DPD will be developed during the Plan period. This assertion is based on our understanding and monitoring of sites, close working with relevant landowners / developers (e.g. the Local Allocations), and in the context of a currently buoyant local housing market. This is reflected in terms of increasing levels of completions and on-site activity, a healthy pipeline of commitments, continuing interest from the development industry to bring forward sites

(see Appendix 1), and the potential for allocations to deliver additional homes (see response to Question 10).

- 4.2 However, it is recognised that circumstances do change and there is the possibility of some sites not being brought forward as expected. Question 17 deals with the issue of uncertainties in more detail. This is inevitable especially given the lengthy timeframe covered by the Plan. The Council is satisfied that policies are sufficiently flexible (see response to Matter 2, Question 7) and that there is flexibility in the Plan and the housing programme (see response to Question 2) to accommodate any delayed delivery of sites. The Council has also put into place robust monitoring processes for key sites and will liaise with landowners / developers at an early stage should activity on these sites not progress as expected. This will enable appropriate action to be taken, and support given, to help the sites come forward.
- 4.3 In terms of windfalls, as at 1<sup>st</sup> April 2015 these do not form a large component of the housing programme at less than 5% of the total supply (see Table 1 above). They are assumed to come forward at a rate of 50 dwellings per annum from year 6 onwards. The windfalls are based on long-term trend analysis of completions from smaller sites (both small new build and conversions and changes of use) (see Table 3.1 in Appendix 3) at an approximate rate of 90 dwellings per annum. The contribution from small windfalls on garden land (of around 40 units a year) has been discounted from the housing programme in accordance with Government guidance (see Table 3.2 in Appendix 3).
- 4.4 It should also be noted that:
- windfalls do not form part of the 5 year housing supply calculations;
  - while no account can be directly taken of small windfalls from garden land their contribution will be significant to future completions; and
  - the housing programme excludes any large windfall assumptions which can also make important contributions to housing supply.

**5. I have looked at the housing trajectory in the CS and the most recent Annual Monitoring Report (AMR). The level of housing completions in the AMR technical appendix (table 7.1) appears to be lower than those projected in the housing trajectory in the CS, produced a few years ago. Is there an explanation for this? Are there any signs of improvement? Is the early partial review taking account of this ongoing shortfall? Does the Council have a strategy for remedying this? Is the housing trajectory in the Plan realistic?**

- 5.1 The Council acknowledges that there are differences between the projected and actual completions as respectively shown in the housing trajectories in the Core Strategy (Appendix 2) and that in the later 2014/15 Authority Monitoring Report (Table 7.1) (Examination Document BP1). The differences cover the period 2012/13-2014/15 and are as follows:

<b>Period</b>	<b>Core Strategy (Appendix 2)</b>	<b>2014/15 AMR (Table 7.1)</b>	<b>Difference</b>
2012/13	241	290	+49
2013/14	535	219	-316
2014/15	668	379	-289
<b>Total</b>	<b>1,444</b>	<b>888</b>	<b>-556</b>

- 5.2 Whilst figures for the 15/16 period have yet to be formally published (see response to Question 8, paragraph 8.4 below), the provisional numbers indicate that the shortfall shown in the table above will be reduced by 220 to 336 when these figures are published. This is due to a significant over-delivery against the 430 dwellings/year target during the latest monitoring period. This demonstrates that the housing market has emerged from recession and that there is no underlying problem with housing supply.
- 5.3 The Council works on the best available housing intelligence at the time of producing each housing trajectory. It is consistently seeking to refine the trajectory through the monitoring process as information is updated on sites in subsequent years. As a result, differences can arise between individual years of projected and actual completions for a variety of reasons. Specifically, these include on-going refinement to SHLAA sites, and delays in key sites progressing through the planning application stage and in being implemented. The Council would stress that it has accurately reflected its understanding of the actual supply at the time, but whilst it can facilitate the progress of sites through the planning system, it can rarely control their practical delivery.
- 5.4 While there may be differences in individual years, any current differences should be seen in the context of:
- A continuing improving housing supply particularly with larger sites (see Table 1.2 in Appendix 1), alongside activity on sites, and increasing levels of completions and commitments. This will progressively help to reduce any shortfall.
  - The housing programme demonstrates that the housing target can be met and modestly exceeded (see Table 1 above).
  - The Council can continue to demonstrate a 5 year supply (see response to Question 8).
  - The potential for some allocations to deliver increased capacities (see response to Question 10).
- 5.5 The Council would stress that the Site Allocations DPD is working to deliver the levels of development set by the Core Strategy (Examination Document CS4). Its role is not to pre-empt the content of the early partial review (through the new Local Plan) (see response Matter 2, Question 16). It is important to note that the preparation of this new Local Plan and the assessment of any future housing target is a separate process and should remain so. This process will have regard to current national policies and associated evidence base at the time of its preparation.

- 5.6 As explained in response to Question 4 above, the Council expects all allocated sites to come forward within the plan period and for the 430 dwelling / year target to be met. However, if there were to be any shortfall, this would be taken into account alongside a range of other factors when establishing a revised target in the new Local Plan.
- 5.7 Given the above, the Council considers that the Plan trajectory is realistic as it can reasonably be and taking into account flexibility in the housing programme. The Council's role will continue to be, wherever possible, to boost supply, monitor delivery and encourage activity on sites.

**6. Where are the existing housing commitments? What form do they take – large or small sites? Is their distribution in accordance with the CS?**

- 6.1 The existing housing commitments are those sites with planning permission or those sites awaiting the completion of a section 106 agreement (see summary in Appendix 4 to this document). They reflect the schedule of sites in each respective year of the Residential Land Position Statement (the latest position being 1<sup>st</sup> April 2015) (Examination Document HG1), which is then taken forward as part of the housing programme through the Authority Monitoring Report (AMR) (Examination Document BP1). The submitted version of the Site Allocations DPD (Examination Document SUB1) incorporates this latest position on commitments.
- 6.2 In reality, the commitments comprise sites in a variety of locations. The majority of decisions on planning permissions principally follow national and local policies. They thus reflect the broad approach to the distribution of development as set out in the Core Strategy (Policies CS1 and CS2) and associated settlement hierarchy (Table 1). Monitoring to-date through the AMR reveals that the bulk of permissions (and subsequent completions) are coming forward in a sustainable manner within the towns and large villages and away from areas of development restraint (i.e. the Green Belt and Rural Area).
- 6.3 The commitments also consist of a variety of types and sizes of sites and are broken down in accordance with the categories set out in the Position Statement as follows:

<b>Category in Position Statement</b>	<b>Comments</b>
Large Sites	New build development of 5 or more homes.
Small Sites	New build development of 4 or less homes.
Conversions / changes of use	Size of sites vary but are typically smaller sites (i.e. of 4 or less) coming forward through the conversion or change of use of

buildings.
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- 6.4 While the majority of conversions and changes of use involve smaller sized sites, the category has recently seen a number of much larger scale sites come forward as a result of the prior approval process for the conversion of offices to residential.
- 6.5 It should also be noted that the commitments help to achieve the housing target for the Borough as a whole and also help deliver the indicative distribution of housing for each settlement under the Place Strategies in the Core Strategy. They broadly reflect the indicative distribution in the Place Strategies.

**7. If sites are deleted from the Plan it seems likely that others will have to be found? If so, is the Council putting forward any additional sites?**

- 7.1 The Council acknowledges that there could be potential for a shortfall in the contribution from allocations to the housing programme if a large number of sites are deleted. However, as all sites within the submitted plan meet the NPPF tests of being deliverable (if in the 5 year supply) or developable (if in longer term programme), it does not consider the deletion of any sites in the submitted plan to be necessary and hence there is no need to identify additional sites.
- 7.2 Only one site is proposed to be wholly deleted under Minor Change<sup>1</sup> MC47 of the Focused Changes from the Part 1 housing schedule (former allocation H/6: 39-41 Marlowes). This will lead to the loss of only 40 homes to the total net capacity. There are two additional deletions (former allocations H/15 and H/16) proposed under Minor Changes MC40 and MC41 of the Focused Changes respectively. However, these simply result in the two allocations moving for the Schedule of Housing Sites to the Schedule of Mixed Use Proposals (as sites MU/8 and MU/9 respectively) to ensure a consistent approach to sites that contain a mix of housing and other uses. All three changes are reflected in the submitted plan (Examination Document SUB1) and the housing programme figures have already been adjusted to reflect the deletion of the Marlowes site.
- 7.3 If the Inspector does require the removal of any sites from the submitted plan, these will be more than made up for by proposed updates to the capacity of allocations (see response to Question 10) which are being put forward through the Main Modifications / Minor Changes process (see response to Matter 2, Questions 1 and 2). These updates reflect a combination of site-specific technical work progressed since the plan was submitted and liaison with landowners, which indicate that higher dwelling capacities can be achieved on some sites than originally assumed (see Appendix 5 to this document). These amendments point to a net increase

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<sup>1</sup> All Minor Changes and wells a Significant Changes (Main Modifications) were consulted upon as part of the Focused Changes process.

of 428 homes (i.e. effectively one year's worth of supply) which more than offset the deletion of the Marlowes site and provide an additional buffer against other unexpected non-delivery or delayed delivery of allocations.

- 7.4 Even if a site is deleted because it has secured planning permission, the practical effect is that it moves from an *allocation* to a *commitment* i.e. there will not ultimately be any net change to the housing programme: rather it just moves from one category to another.
- 7.5 In addition, the Council is not solely reliant on the allocations to meet the Core Strategy housing target. There will continually be other sources of housing land coming forward (e.g. commitments, SHLAA sites and windfalls) to add to the overall supply and offset the loss should any sites be deleted or delayed.

**8. What is the current position with regard to housing supply? Is there a 5 year supply? Is there a 5% buffer? Is there any justification for a 20% buffer?**

- 8.1 The housing programme (see Table 1 above) is updated on an annual basis through the Council's Authority Monitoring Report (AMR). The latest position is set out in detail in the 2014/15 AMR (Examination Document BP1) (see chapter 7 and Appendix 1 in the document). This position is also reflected in the submitted Site Allocations DPD (Examination Document SUB1) and summarised in Table 3 in that document.
- 8.2 As stated in paragraph 6.17 of the submitted plan, the housing programme can meet, and modestly exceed, the Core Strategy target if full account is taken of all potential sources of housing land (see Table 1 above). This provides a reasonable margin to allow some flexibility over supply.
- 8.3 The five year housing position (using data as at 1<sup>st</sup> April 2015) is set out in Appendix 2 to this document. It is clear that the Council can achieve and modestly exceed its 5 year supply requirements under both the 5% and 20% buffer scenarios. However, the 5% buffer is the relevant buffer to apply for the following reasons:
- The Council has a good track record for delivering on its housing target through its Local Plans. Indeed it has met and exceeded specified targets in each of its previous adopted Local Plans.
  - The figures reflect a period when the country was experiencing the biggest recession since the 1930s. Completions that have been achieved to-date are considered to be significant in the face of this major market downturn and as such it is to be expected that delivery rates over a large part of the early plan period have been affected.
  - In reality, the slight under-delivery to-date should be considered in the context of the planning framework to support the delivery not being yet fully in place: the Core Strategy was not adopted until September 2013 and the Site Allocations DPD is advanced, but not yet adopted.

- Under-delivery, in so far as it exists, is related to the market and not the performance of this local planning authority.
- While the current under-delivery against target is disappointing, the shortfall is not critical in the short to medium term: the Council has delivered on 87% of the required target (i.e. 3,377 of 3,870 homes) and it continues to be able to achieve a 5 year supply of housing (see Appendix 2 to this document).
- Supply and site activity is continuing to improve (see Appendix 1 to this document) and this will lead to increasing future rates of completions.

8.4 The Council has not yet been able to formally check and update the housing commitments (as a precursor to updating the full housing programme for 2015/16), but preliminary figures received from Hertfordshire County Council for this monitoring period show that housing completions have substantially improved (c.650 net), giving an excess of 220 units over the 430 annual target; housing commitments remain significant (c.2,600 net); and the level of activity on sites is high. Furthermore, the Council will be seeking to amend the capacity of some allocations to better reflect the latest position on sites (see Appendix 5 to this document). The net effect will be to increase the overall supply of housing land, improve the current 5 year supply position (as set out in the 2014/15 AMR (Examination Document BP1) and as adjusted in Procedural Correspondence document PC2a (Appendix 2)) and further improve on the housing target allowance to allow for any unexpected non-delivery or delayed delivery of sites.

8.5 Given the above factors, the Council remains of the view that a 5% buffer is appropriate for this authority. Even with a 20% buffer, the Council is satisfied that it would still be able to achieve a 5 year supply.

**9. What are the main findings of the Viability Study? Has this work indicated that any sites or uses are likely to be unviable? What are the implications? Is more work necessary?**

9.1 The NPPF states that the cumulative impact of local planning authority standards and policies *'should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle'*. The Council recognises the importance of viability in terms assessing the impact of a range of requirements and contributions in bringing forward schemes. It is satisfied that it has given full consideration to these matters and that all allocations are viable.

9.2 The Council initially tested the viability of the Local Allocations and other strategic sites in 2013 (Examination Document ID4). At the request of the Inspector (Procedural Correspondence document PC3c) the Council has undertaken further work on the three larger Local Allocations (LA1, LA3 and LA5) to explicitly test the impact of the proposed traveller sites, as well as

other updated policy requirements, on their viability (Examination Document HG19). Both studies were undertaken by BNP Paribas Real Estate.

- 9.3 The results of these viability studies demonstrate that all strategic sites, and more recently that the Local Allocations, can viably deliver the proposed development in line with wider policy requirements.
- 9.4 The appraisals in Examination Document HG19 indicate that the inclusion of a limited number of Gypsy and Travellers' pitches on Local Allocations LA1, LA3 and LA5 do not significantly impact on the viability of the sites so as to make them undeliverable. The delivery of such uses on the sites equates to no more than 1.5% of the schemes' overall development costs. This level of costs is unlikely to be a determining factor in whether a developer brings forward these sites or not. Furthermore, the consultants highlighted that their appraisal adopts a cautious approach by not allowing for any income from the Gypsy and Travellers pitches, however it is likely that they will generate revenue which would improve the viability of the schemes (depending on management arrangements).
- 9.5 Where appropriate, the Council takes a flexible approach to applying its policy requirements, will ensure an appropriate balance between delivering the required growth to meet the needs of the local population, affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve competitive returns, as required by the NPPF. This will ensure that sites can come forward and deliver the maximum reasonable quantum of affordable housing. In particular the consultants identified that given the surpluses generated by the sites, were they to come forward with Starter Homes they could also deliver a larger quantum of traditional affordable housing (i.e. affordable rent and shared ownership) over and above the potential 20% Starter Homes requirement.
- 9.6 Maintaining this flexible approach will ensure the '*scale of obligations and policy burdens*' (paragraph 174 of the NPPF) are appropriate in all instances to ensure that sites are, as far as possible, able to be developed viably and thus facilitate the growth envisaged by the Council's plans over the economic cycle, without jeopardising the delivery of the aspirations of the adopted Core Strategy and submitted Site Allocations DPD.
- 9.7 In general terms, the sites have proven to be more viable in 2016 than shown in the 2013 study. This is illustrated in the graphs in Appendix 6 to this document.
- 9.8 The issue of viability was raised by the Inspector as part of early pre-hearing questions (Procedural Correspondence PC3). The Council has responded to this matter under Procedural Correspondence PC3a. This matter is discussed in detail under Question 2 to Matter 6. Key points stemming from the response include:
- The plan is underpinned by appropriate and proportionate viability work and a full understanding of scheme viability;

- Given the inter-relationship with the Core Strategy, viability testing has been part of an existing and ongoing process;
- Detailed viability testing has been carried out on key components that are integral to delivering the approach set out in the Core Strategy as part of the CIL process (e.g. CIL Strategic Sites Testing (Examination Document ID4)) and other technical studies (e.g. Three Dragons affordable housing viability study (Examination Document HG17));
- The cost of on-site infrastructure has been reflected in the viability assessments of larger site allocations (notably highway and utilities infrastructure) and for the purposes of CIL viability testing;
- The Council's Affordable Housing SPD (September 2013) (Examination Document HG2) has helped introduce further flexibility where there are viability concerns;
- Housing sites have been subject to high level viability testing through the Council's 2008 (Examination Document HG13) and/or 2016 Strategic Housing Land Availability Assessments;
- Most of the housing allocations have the support of landowners (or have developer options) and progress on many is already being made through the planning application process; (see Tables 1.1 and 1.2 in Appendix 1); and
- Sites have been, and will continue to be, subject to further testing at the planning application stage.

## **10. How have site densities been determined? How rigid are these figures?**

- 10.1 The assumptions on densities represent a cautious approach, to enable the Council to be satisfied that sufficient land is allocated. They are not rigid limits, and where higher densities can be satisfactorily achieved at the planning application stage, they will be accommodated. This is already happening (see paragraph 10.6 below and Appendix 1 of Matter 2).
- 10.2 The densities applied to the allocations are realistic and reflect a balanced approach to sites, given the high level nature of the Site Allocations DPD and how the allocations vary in scale and location. The Council has not sought to apply any specific standard density for the housing sites, although wherever possible, it has tried to make effective use of land by ensuring a minimum density of 30 dwellings per hectare is achieved e.g. in the case of the Local Allocations.
- 10.3 The Council considers that it has applied an appropriate density in each case taking into account a series of factors including:
- the characteristics of each site (e.g. existing constraints, location, adjoining uses, etc.);
  - previous assumptions on densities in the case of allocations carried forward from the saved Dacorum Borough Local Plan 1991-2011 (Examination Document OT6) (e.g. proposal H/7 land at Turners Hill);

- discussions with landowners on individual sites;
- the use of design scenarios that have helped inform SHLAA sites;
- further technical and feasibility work on key sites;
- on-going progress of sites through the planning application process (e.g. H/12 Former Martindale School, Boxted Road).

- 10.4 It has proved more difficult to set an appropriate overall density for the Local Allocations given the need to take into account the location of sites on the edge of settlements, and the range of infrastructure and facilities that need to be delivered (e.g. proposal LA3). However, in preparing the Pre-Submission document, the Core Strategy assumptions were adjusted to take into account the latest detailed technical work available supporting the Local Allocation sites. This has led to the Council adjusting the capacity upwards in the case of LA1 (from 300 to up to 350 homes) and LA5 (from 180 to 200 homes), and downwards in respect of Local Allocation LA4 (from 60 to 40 homes). On this basis, it considers the densities to be realistic. No objections to the broad dwelling assumptions for each site have been raised by the relevant landowners / developers.
- 10.5 The Council would acknowledge that it has set cautious density figures on a small number of sites to reflect local sensitivities (e.g. H/21 Garden Scene Nursery, Chapel Croft) and / or the availability of limited information at the time to inform decisions on densities (e.g. H/5 Former Hewden Hire site, Two Waters Road). In the case of the latter, the Council has demonstrated its ability to be more flexible. It has sought amendments to the planning requirements (as part of the Focused Changes to the Pre-Submission document) to encourage a higher density, provided the character and setting of the site is protected.
- 10.6 Where circumstances justify, the Council will continue to adjust its assumptions on densities on sites, should information supporting this come to light through the examination process. A number of sites have been subject to early developer discussions / recent planning applications and it is reasonable to amend the original assumption on densities to reflect the outcome of these. The Council is assessing opportunities for increasing densities in the Two Waters area of Hemel Hempstead through ongoing work it has commissioned on the Two Waters Master Plan and, where appropriate, in conjunction with relevant landowners. On the basis of this, the Council feels it is justified to significantly increase the density of proposal H/2 National Grid site from 160 to 350 homes.
- 10.7 Furthermore, the Council is of the view that it is the role of the Site Allocations DPD to help inform decisions on proposal as best it can, and that ultimately the Development Management process is a better approach in which to test precise densities / scales / capacities of new development. In all cases applications that follow on from plan allocations will be expected to comply with the requirements of Core Strategy Policy CS2: Selection of Development Sites, which includes a requirement to '*ensure the most effective use of land,*' together with other relevant policies.

- 10.8 The Council has found in the past that when Plan proposals come forward that they tend to modestly exceed the associated capacity with the allocation. The Council would generally expect the stated capacities to be a minimum to be achieved. It is willing to be flexible on this if the increase in capacity is fully justified (e.g. in terms of design, layout, and parking, etc.) and, in particular, when assessed against local infrastructure requirements and constraints.

**11. At what stage is an allocation considered to be implemented? Given this should any of the site allocations be taken out of the Plan?**

- 11.1 Progress is being made on a number of the allocations since the schedules were originally prepared for the Pre-Submission Site Allocations DPD (Examination Document SUB17). This is to be expected given a buoyant housing market and continuing interest from the development industry to bring forward sites (see Appendix 1 to this document). The Council intends to update the schedule and related planning requirements through a series of Main Modifications and Minor Changes to reflect the latest position on sites, normally taking into account the latest available base monitoring date. Suggested changes to-date are shown in the Appendix to Matter 2.
- 11.2 Simply because a site has received planning permission and was in the early stages of being implemented does not justify its deletion from the plan. The Council would normally only remove a site from the schedule when the scheme was in a very advanced stage of implementation or was fully completed (or it was unlikely to come forward for its intended use (e.g. former allocation H/6: 39-41 Marlowes)). On this basis, none of the allocations in the submitted plan have reached a sufficiently advanced stage to necessitate taking any out of the schedule. This situation will however be kept under review.
- 11.3 As stressed in Question 7 above, even if a site is removed because it has planning permission, the practical effect is that it moves from an *allocation* to a *commitment* i.e. there will not ultimately be any net change to the housing programme. In marginal cases the Council takes the view that it is better for a comprehensive picture to be provided by the plan, for reasons of transparency.

**12. What is the threshold for the inclusion of sites and why?**

- 12.1 The threshold for the inclusion of sites within the housing schedule is explained in paragraph 2.4 of the Providing Homes and Community Services Background Issues Paper (Examination Document SA4). The schedules exclude all sites with a capacity of below 10 homes and/or below 0.3 ha in area. The Council consulted on this methodology at the 2006 Issues and Options stage (Examination Document SA18) and there was broad support for these thresholds. The Council considers that this is a reasonable and practical approach to adopt. It avoids a proliferation of

smaller housing sites where it is more difficult to establish detailed planning requirements and which cannot be easily identified on the Policies Map.

### **13. What are the targets for the provision of affordable housing? What has been achieved in recent years?**

- 13.1 The Council's approach to the provision of affordable housing on allocations has been guided by Core Strategy Policy CS19: Affordable Housing, and the associated Affordable Housing SPD (Examination Document HG2). The general expectation is that 35% of the new dwellings will be affordable homes. However, the Council recognises that this will need to be refined in each case at the planning application stage. Advice would need to be sought from the Council's Strategic Housing team; account would be taken of any relevant local needs assessment; and there may be the requirement to further test viability and assess other site factors. These factors are reflected in criteria a) to d) of Policy CS19: Affordable Housing. The Core Strategy position must also take account of other factors that are outside of the Council's control. These include:
- the NPPG's (Examination Document REG18) approach to affordable housing thresholds which will affect seeking such homes on the smaller allocations;
  - the application, where relevant, of the NPPG's vacant building credit;
  - whether the Government further limits opportunities to secure affordable homes e.g. by extending the prior approvals process to other types of housing schemes; and
  - the impact of the forthcoming introduction of starter homes on the viability, level and mix of traditional forms of affordable housing.
- 13.2 In a small number of cases it will be the Council taking forward the allocations, some of which form part of the Council's affordable homes New Build housing programme. This will potentially mean that such sites will deliver 100% affordable housing (see Appendix 7 to this document).
- 13.3 The position on the provision of affordable homes on the Local Allocations is slightly different. The expectation is that a higher level of affordable homes will normally be delivered, at around 40% of the total homes in each case. This also reflects the position in Policy CS19: Affordable Housing. This level of provision has been demonstrated as being viable in all cases through the testing of viability at different stages of the Site Allocations DPD and in particular through the recent viability work undertaken by consultants BNP Paribas Real Estate (Examination Document HG19) (see response to Question 9 above). This requirement has not been challenged by the respective landowners/developers through either the Core Strategy or Site Allocations processes.
- 13.4 Appendix 7 to this document sets out assumptions for the delivery of affordable homes from the plan allocations. Based on this information, the Council anticipates that the allocations will deliver 1,420 affordable homes over the remaining plan period, although this figure will also be dependent

on the factors outlined above. This represents c.39% of the total supply which is in accordance with and indeed modestly exceeds the target for affordable homes normally sought under Policy CS19 in the Core Strategy.

- 13.5 The level of completions over the Plan period from 1<sup>st</sup> April 2006 to 31<sup>st</sup> March 2015 is set out in the Council's Technical Appendix (Tables 7.9 and 7.10 to the 2014/15 Authority Monitoring Report (Examination Document BP1)). For convenience these are reproduced in Appendix 8 to this document. To date, 931 affordable homes have been delivered through the planning system. This increases to 1,243 homes if account is taken of the Government's First Buy / Home Buy schemes.
- 13.6 It should be noted that the Council is not wholly dependent on the Plan allocations to deliver the required supply of affordable homes. Supply will continue to be boosted from other sources including:
- planning permissions;
  - housing sites in the East Hemel Hempstead Area Action Plan area;
  - SHLAA sites;
  - potential rural exception sites (under Policy CS20 of the Core Strategy); and
  - larger windfall sites.

#### **14. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?**

- 14.1 The type and mix of housing planned in the Site Allocations DPD takes into account the broad approach to housing mix as set out in paragraphs 14.24-14.30 of the Core Strategy and the requirements of Policy CS18: Mix of Housing. The allocations themselves take the form of a range of type, sizes and location of sites (urban/greenfield). They thus lend themselves to meeting different demands for housing. In terms of affordable housing, they also take into consideration the factors set out in response to Question 13 above.
- 14.2 The Council would acknowledge the practical difficulties of meeting a variety of needs on all the allocations, particularly the smaller ones. However, the bigger sites, particularly the larger Local Allocations, are much more able to accommodate a range of types and sizes of homes. For example, LA3 is able to deliver a mix of size of properties, tenure and potentially extra care and other accommodation (see paragraph 5.19-5.24. in the LA3 Master plan (Examination Document LA25)). In addition, the Local Allocations also have an important role in locally boosting the supply of affordable homes, in providing more family homes, and to deliver traveller pitches.
- 14.3 The Council's Affordable Housing SPD (Examination Document HG2) also provides guidance on the mix of housing on sites in terms of affordable homes. It cross refers to existing advice provided by Policies CS18: Mix of

Housing and CS19: Affordable Housing. The document seeks a mix of housing sizes and type to be provided on site (paragraphs 5.8-5.9). As a guide it recommends that where development proposals comprise a mix of houses and flats, the housing size mix of the affordable housing should represent the overall mix of dwellings on the site. Therefore a proportionate mix is sought to ensure a fair proportion of family-sized homes are provided.

- 14.4 All of the allocations will be subject to practical considerations at the planning application stage when a detailed scheme is drawn up, which could affect the nature of homes actually delivered. Policy CS18 states that *'Decisions on the appropriate mix of homes within development proposals will be guided by strategic housing market assessments and housing needs surveys and informed by other housing market intelligence and site specific considerations.'* Such considerations will be reflected in advice received from the Council's Strategic Housing team. However, the Government continues to broaden the type of schemes covered by the prior approvals process. This will limit the control the Council has in seeking a mix of housing on sites e.g. in requiring affordable homes that comply with the current plan requirement of being available in perpetuity.
- 14.4 The Council would stress that it is not solely dependent on the plan allocations to satisfy all identified need for a range of housing accommodation. Other sites such as commitments, SHLAA sites, and windfalls will also play an important role in ensuring a diversity of housing types and specialist accommodation is secured over the Plan period.

**15. Are the allocations based on a robust assessment of infrastructure requirements and their deliverability, including expected sources of funding?**

- 15.1 The Council has taken into account the impact of infrastructure requirements in identifying individual allocations and in preparing the housing schedule in the plan. See also responses to Matter 2, Questions 19 and 20 in terms of respectively flood risk and highways matters. There are not any infrastructure 'show stoppers' that could delay development as set out within the Site Allocations DPD. This assessment is based on consultation responses received from infrastructure providers, both in terms of their feedback on the Site Allocations document itself, and to the associated Infrastructure Delivery Plan (InDP) (Examination Document ID1).
- 15.2 The Council continues to assess the need for new infrastructure with providers through its annual reviews of the InDP to ensure that appropriate actions are taken to address infrastructure needs and issues of delivery. As part of this process, the Council shares its development trajectories with infrastructure providers, including the location and anticipated phasing of the key housing sites and other relevant information.

- 15.3 The only outstanding infrastructure objection to the Site Allocations DPD is from the Environment Agency (EA) and relates to waste water and sewerage capacity in the Borough. However, it is clear from the Statement of Common Ground (Examination Document SG1), that Thames Water, who are responsible for the provision of this infrastructure, are satisfied that the necessary infrastructure upgrades can be carried out to deliver the level of growth set out in the Site Allocations DPD. Amendments made through the Focused Changes process has introduced text to refer to the need for early liaison with Thames Water. Thames Water has confirmed (through supporting representations to the Focused Changes consultation) that they are happy these changes overcome any previous concerns raised.
- 15.4 In terms of the Local Allocations, Officers have clearly advised the landowners to liaise with Thames Water at the earliest opportunity in order to ensure development of these sites is not delayed whilst any necessary technical work and/or infrastructure upgrades take place. The developers of LA3 have already met with Thames Water. The Council understand that at this meeting two temporary contingency options were discussed, should the necessary upgrades to Maple Lodge Waste Water Treatment Work (WWTW) not be completed in time to accommodate demand from this and other planned developments. These options comprise discharging waste to the Berkhamsted WWTW, which has some existing capacity, and/or the temporary on-site storage of waste. The latter option is referred to in the draft master plan prepared for the site (Examination Document LA25).
- 15.5 As the Inspector is aware, the issue of waste water is being addressed longer term through a comprehensive county-wide study, which is currently underway (see response to Matter 2, Question19).
- 15.6 The Council has established an Infrastructure Advisory Group (IAG), as part of its CIL Governance structure, to monitor and manage the delivery of appropriate infrastructure and to allocate CIL funding where it may unblock or expedite delivery and growth.
- 15.7 The Council has taken and is continuing to take into account a wide range of expected funding streams in relation to the deliverability of allocations including from:
- CIL;
  - s106 agreements;
  - the LEP; and
  - other external funding streams.
- 15.8 Appendix A of the InDP clearly sets out potential sources of funding for a range of infrastructure requirements linked to the Local Allocations and other development.

**16. In assessing the speed at which development will come forward on certain sites, has full regard been had to the proposed East Hemel Hempstead Relief Road?**

- 16.1 The Borough Council's Infrastructure Delivery Plan (InDP) Update 2015 (Examination Document ID1) indicates that the North East Relief Road referred to in the Core Strategy will be delivered by 2029, although elements of the scheme have already been implemented or are in the process of implementation. This includes road improvements related to Phase 1 of the Spencers Park scheme and access improvements to the Maylands Gateway site. The proposal largely comprises a series of junction improvements and road widening schemes along an existing route from Green Lane to Redbourn Road, with a potential section of road re-routed around the east and north of Punchbowl Park employment area in St Albans district. It therefore does not comprise a new road link or bypass as implied by its title.
- 16.2 The original North East Relief Road scheme has recently been broadened out in scope and is now known as the 'Maylands Growth Corridor'. Consultants AECOM have been commissioned by the Hertfordshire Local Enterprise Council (LEP) to undertake a more comprehensive piece of work relating to future highway improvements within this part of Hemel Hempstead. This study covers both the Maylands area within Hemel Hempstead together with land to the east within St Albans City and District. The St Albans land is currently within the Green Belt, but is proposed for release through that Council's Strategic Local Plan (currently at preliminary hearing stage). Hertfordshire County Council, Dacorum Borough Council, St Albans City and District Council and The Crown Estate (as principal landowners) are part of the steering group for this longer-term work. The results of this work will either be incorporated within the existing Maylands Growth Corridor project or into a new, more comprehensive scheme. A study of the Maylands Growth Corridor is due to report in October 2016.
- 16.3 These road improvements will be delivered in phases and funded through a combination of s106, CIL, other capital funding and Local Enterprise Partnership (LEP) funding (as part of work to deliver the newly designated Enterprise Zone). Amendments will be included in the InDP Update 2016 to reflect this position. For example, further sections of the route improvements will be delivered alongside housing on Phase 2 of the Spencers Park site, as part of the associated s106. Delivery of the wider Maylands Growth Corridor Scheme is still expected to be 2029.
- 16.4 The Council can confirm that none of the allocations within the Site Allocations DPD is dependent upon the completion of the remaining components of the North East Relief Road, (or the broader Maylands Growth Corridor scheme). Appropriate contributions can continue to be sought from any relevant future development proposals, as those parts of the transport schedule from the Dacorum Borough Local Plan 1991-2011 that relate to the AAP area will be 'saved' (see paragraphs 1.4-1.5 of the introductory text in the Site Allocations Map Book). This will enable

appropriate transport improvements to be secured via site-specific s278 / s106 improvements.

- 16.5 It is also important to understand that the Council has sought to assess the wider impact of transport on the town through the Hemel Hempstead Urban Transport Model (Paramics) Model (see paragraphs 6.23-6.25 of the Sustainable Development Strategy Background Issues Paper (Examination Document SA3). It complements the work on the Maylands Growth Corridor Scheme. Several model runs have been commissioned to date with the latest published run (May 2015) (Examination Document TR1) taking into account more detailed work on allocations as identified in the Site Allocations DPD.
- 16.6 The Paramics model is currently being enhanced to better represent the road network particularly in the East of Hemel Hempstead area and to make use of updated information on travel patterns from the borough-wide (COMET) modelling work. A revised future year model will be developed as part of the process and will be used to continue to test and develop suggested mitigation measures and support on going Site Allocations and Local Plan works.
- 16.7 See also response to Matter 2, Question 20 on highways issues.

**17. Overall, does the Plan deal adequately with uncertainty? Is sufficient consideration given to monitoring and triggers for review?**

- 17.1 The Council is satisfied that there is sufficient flexibility in the Plan to deal with uncertainty as far as it is able to influence housing delivery and the wider housing market. See also the response to Matter 2, Question 7. Plan supply will be increased following upwards amendments to the capacities of a number of key allocations, and local housing activity in terms of permissions, starts and completions is on the rise. Thus there is certainty that housing supply is healthy in the short to medium term. It is difficult to plan for every eventuality given the long timescale of the Plan. In reality, the Site Allocations is shortly to be rolled forward as part of new single Local Plan process (incorporating the early partial review of the Core Strategy) and this will be an opportunity to revisit and, if necessary, revise the approach if changing circumstances justifies this.
- 17.2 The Council will be guided by the implementation, delivery and monitoring frameworks provided through the Core Strategy (respectively Chapters 27 and 29) and Site Allocations DPD (Chapter 18). These frameworks emphasise the importance of:
- Partnership working with the private, public and voluntary sectors;
  - Delivering key projects;
  - A flexible approach to policies to adapt to national guidance and advice, the availability of funding, the viability of schemes, etc;
  - Effective monitoring of development and review of planning policies.

- 17.3 While the Council would acknowledge that the Site Allocations DPD does not identify any new monitoring indicators or triggers these are not considered to be strictly necessary (see response to Matter 2, Question 4). In any event, the Site Allocations DPD would have to take account of national advice and guidance and the Core Strategy already provides a comprehensive framework for monitoring of supply and other matters. There is also a danger that new indicators would only effectively duplicate rather than add to those in the Core Strategy.
- 17.4 The Council's preferred approach is to deal with detailed land supply issues through its Authority Monitoring Report (AMR) process rather than in the Site Allocations DPD itself. The AMR provides greater flexibility to report on issues as they arise and, where appropriate, suggest any course(s) of action.
- 17.5 It is not necessary to add any further detail regarding triggers for plan review – as this process is already required through Section 29: Monitoring of the Core Strategy. Work on this new Local Plan (incorporating early partial review of the Core Strategy) has already commenced (see Matter 2 Question 3).

**Progress on housing sites**

**Table 1.1: Progress on sites within Mixed Use and Housing Schedule (as at 1<sup>st</sup> April 2016)**

<b>Site Allocations Reference</b>	<b>Location</b>	<b>Comment</b>
<b>Mixed Use:</b>		
MU/1	West Herts College site and Civic Zone	Planning permission granted separately on parts of the site for a new college, civic centre (The Forum) and apartments (207 units). The college and civic centre components are currently under construction.
MU/2	Hemel Hempstead Hospital Site	Consultants appointed to carry out a feasibility study covering access and movement and location of hospital facility and delivery of primary school and residential uses. Study commissioned by West Herts Hospital Trust, Herts County Council, HCA and DBC.
MU/3	Paradise / Wood Lane	Part of site already subject to planning approval for 86 homes and is close to completion. Current early interest in developing a further part of the site for housing.
MU/4	Hemel Hempstead Station Gateway	Subject to a Feasibility Study carried out by BDP, Knight Frank and MVA consultancy on behalf of DBC (March 2011). Study also includes indicative layouts. Site also falls within the wider Two Waters area for which wider master planning work is underway to assess the potential for development intensification and the introduction of more residential uses. Current early interest in developing part of the site for a high density, mixed use scheme, including housing.
MU/5	Bunkers Park,	DBC is in advanced stages of purchasing

	Bunkers Lane	land from the Homes and Communities Agency. Internal Council working group established to co-ordinate delivery of new leisure space and cemetery.
MU/6	Land at Durrants Lane / Shootersway	Development Brief drawn up by developers, landowner and DBC: <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/durrants-lane-shootersway-berkhamsted-masterplan-2011">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/durrants-lane-shootersway-berkhamsted-masterplan-2011</a>  Part of site subject to planning approval (92 homes) and under construction.
MU/7	Gossoms End / Billet lane	Planning permission approved for a foodstore and 30 flats.
MU/8	Former police station and library site	Planning permission approved for 23 retirement apartments and a replacement library.
MU/9	Berkhamsted Civic Centre and land to r/o High Street	DBC owned site.
<b>Housing:</b>		
H/1	Land r/o 186-202 Belswains Lane	Ongoing interest in larger site, for which a number of permissions have been given. This is the final part of the larger parcel.
H/2	National Grid and 339-353 London Road	Gas holders removed. Current landowner interest in bringing forward the site. Site also falls within the wider Two Waters area for which wider master planning work is underway to assess the potential for development intensification and the introduction of more residential uses.
H/3	Land at Westwick Farm, Pancake Lane	Site subject to development brief drawn up by agents for landowners and DBC: <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/h42-westwick-farm-development-brief-adopted-2007(web).pdf">http://www.dacorum.gov.uk/docs/default-source/planning-development/h42-westwick-farm-development-brief-adopted-2007(web).pdf</a>  Planning permission approved on southern part of the site for 26 homes, which are

		currently under construction.
H/4	Ebbens Road	Site forms part of wider development brief drawn up by DBC. <a href="http://www.dacorum.gov.uk/docs/default-source/strategic-planning/ebbens-road-development-brief-adopted-2003.pdf">http://www.dacorum.gov.uk/docs/default-source/strategic-planning/ebbens-road-development-brief-adopted-2003.pdf</a>  Continuing active developer interest on (limited) remaining land. Part of site subject to current planning application for 21 flats.
H/5	Former Hewden Hire site, Two Waters Road	Pre-application discussions held with landowner. Application submitted for 36 apartments.
H/6	Leverstock Green Tennis Club, Grasmere Close	Pre-application discussions held with developers.
H/7	Land at Turners Hill	Site owned by HCA and development likely to be linked to progress on MU/2.
H/8	233 London Road	Site promoted by landowner through SHLAA process.
H/9	Apsley Paper Trail land, London Road	Site owned by DBC. Planning permission granted for 50 units. Planning application submitted for an alternative scheme of 31 affordable homes.
H/10	The Point, Two Waters Road	Site owned by DBC. To be developed for affordable homes under DBC's New Build Housing Programme.
H/11	Land r/o St Margarets Way / Datchworth Turn	Town and Village Green application on site refused in April 2015. Site owned by DBC. Site covered by Development Brief: <a href="http://web.dacorum.gov.uk/docs/default-source/planning-development/h38-green-lane-development-brief-adopted-2007(web).pdf">http://web.dacorum.gov.uk/docs/default-source/planning-development/h38-green-lane-development-brief-adopted-2007(web).pdf</a>  Larger area of site now developed.
H/12	Former Martindale School, Boxted Road	DBC owned site. Planning permission approved for 43 homes by previous owners (HCC). DBC to take forward an alternative scheme for around 66 houses and flats.
H/13	Frogmore Road	Recent and ongoing interest in developing

		northern section of the site. Support for residential development stated in representations on Site Allocations by agents (CBRE) acting on behalf of landowners.
H/14	Corner of High Street / Swing Gate Lane	DBC owned site. Planning permission approved for 11 affordable homes.
H/15	Miswell Lane	No recent activity.
H/16	Western Road	<p>Concept statement prepared:  <a href="http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-guidance">http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-guidance</a></p> <p>Parts of site developed. Planning permission granted for remainder of site and/or subject to ongoing developer interest.</p>
H/17	Depot land, Langdon Street	Planning application submitted for 10 homes.
H/18	Land adj to Coniston Road	DBC owned site.
H/19	Corner of Hicks Road / High Street	<p>Part of a site covered by a development brief (Examination Document SS2):  <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/hicks-road-masterplan-june-2012.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/hicks-road-masterplan-june-2012.pdf?Status=Master&amp;sfvrsn=0</a></p> <p>Adjoining land is being brought forward for 75 homes, employment and community facilities.</p>
H/20	Watling Street (r/o Hicks Road / High Street)	<p>Land comprises small element of wider site covered by a development brief (Examination Document SS2):  <a href="http://www.dacorum.gov.uk/docs/default-source/planning-development/hicks-road-masterplan-june-2012.pdf?Status=Master&amp;sfvrsn=0">http://www.dacorum.gov.uk/docs/default-source/planning-development/hicks-road-masterplan-june-2012.pdf?Status=Master&amp;sfvrsn=0</a></p> <p>Adjoining land is being brought forward for 75 homes, employment and community</p>

		facilities.
H/21	Garden Scene Nursery, Chapel Croft, Chipperfield	Early discussions (via pre-application process) have taken place regarding bringing forward the site.
LA1	Marchmont Farm	Subject to draft master plan (Examination Document LA8). Viability tested via CIL Strategic Sites work (Examination Document ID4). Site owned / optioned by Gleasons Homes, HCA and DBC.
LA2	Old Town	Subject to draft master plan (Examination Document LA19). Viability tested via CIL Strategic Sites work (Examination Document ID4). DBC owned site.
LA3	West Hemel Hempstead	Subject to draft master plan (Examination Document LA25). Viability tested via CIL Strategic Sites work (Examination Document ID4). Early pre-application discussions commenced. Site owned / optioned by Taylor Wimpey and Barratt Homes.
LA4	Hanburys	Subject to draft master plan (Examination Document LA39). Viability tested via CIL Strategic Sites work (Examination Document ID4).
LA5	West of Tring	Subject to draft master plan (Examination Document LA47). Viability tested via CIL Strategic Sites work (Examination Document ID4). Site owned / optioned by Cala Homes.
LA6	Chesham Road	Subject to draft master plan (Examination Document LA55). Viability tested via CIL Strategic Sites work (Examination Document ID4). Site owned by Ministry of Justice, but likely to be offered to market by HCA.

**Table 1.2: Supply of housing (sites of 50 or more dwellings)**

<b>Location</b>	<b>Gross Capacity</b>	<b>Outstanding Capacity (as at 1.4.15)</b>	<b>Status</b>	<b>Comments</b>
<b>Berkhamsted:</b>				
New Lodge, Bank Mill Lane	54	36	U/C	
Land at Durrants Lane / Shootersway	92	92	P/P	U/C post 1.4.15.
MU/6 Land at Durrants / Lane	150	60	Allocation	P/P on southern half of the site.
<i>Total</i>	<i>296</i>	<i>188</i>		
<b>Hemel Hempstead:</b>				
Swan Court, Waterhouse Street	65	65	P/P	U/C post 1.4.15.
Business Park, Corner Hall	70	38	P/P	
Land at Manor Estate	325	200	U/C	
Sappi Site, Lower Road	450	253	U/C	
Land at NE Hemel Hempstead (Spencers Park Phase 1)	357	357	P/P	U/C post 1.4.15.
Former Royal Mail Sorting Office, Park Lane	86	86	U/C	Complete as at 1.4.16.
Viking House, Swallowdale Lane	64	64	P/P	Revised scheme sought for 87 apartments. No decision as at 1.4.16.
Land at Maylands Court / Wood Lane End	130	130	P/P	Part of Heart of Maylands scheme. U/C post 1.4.15.
Symbio House, London Road	208	208	s.106	P/P post 1.4.15. Revised application

				submitted for 277 units.
Spencers Park (Phase 2)	550	550	-	Master planning work being progressed post 1.4.15. Application due autumn 2016.
MU/1 Marlowes / QueenswayCombe Street /	600	600	Allocation	P/P post 1.4.15 for 207 flats.
MU/2 HH Hospital Site	200	200	Allocation	Feasibility work undertaken.
MU/3 Paradise / Wood Lane	75	75	Allocation	Active current interest on part of the site post 1.4.15.
MU/4 HH Station Gateway	200	200	Allocation	Active current interest on part of the site post 1.4.15.
H/2 National Grid site, London Road	160	160	Allocation	Active current interest in bringing site forward as a higher density scheme.
H/2 Martindale School, Boxted Road	50	50	Allocation	P/P post 1.4.15 for 43 units. Current interest in bringing site forward as a higher density scheme.
H/13 Frogmore Road	150	150	Allocation	Recent interest in bringing northern section of site forward.
LA1 Marchmont Farm	350	350	Allocation	Site subject to master plan.
LA2 Old Town	80	80	Allocation	Site subject to master plan.
LA3 West Hemel	900	900	Allocation	Site subject to

Hempstead				master plan.
Heart of Maylands (remainder)	270	270	-	Part of site subject to planning permission (82 units) and current approval (75 units) post 1.4.15.
Grovehill Local Centre	200	200	-	Capacity subject to further detailed work on Grovehill Neighbourhood Plan area.
Swan Court, Waterhouse Street	-	-		P/P and U/C post 1.4.15 for 74 units.
Bryanston Court, Selden Hill	-	-		P/P post 1.4.15 for 60 units.
<i>Total</i>	<i>5,540</i>	<i>5,186</i>		
<b>Tring:</b>				
LA5 Icknield Way, west of Tring	200	200	Allocation	Site subject to master plan.
<i>Total</i>	<i>200</i>	<i>200</i>		
<b>Markyate:</b>				
Land at Hicks Road	75	40	U/C	
<i>Total</i>	<i>75</i>	<i>40</i>		
<b>Bovingdon:</b>				
LA6 Chesham Road / Molyneaux Avenue	60	60	Allocation	Site subject to master plan.
<i>Total</i>	<i>60</i>	<i>60</i>		
<b>Grand Total</b>	<b>6,171</b>	<b>5,674</b>		

**Abbreviations:**

P/P – planning permission

U/C – under construction

s.106 – s.106 legal agreement

## Appendix 2

### Adjusted 5 year housing supply calculations

**Table 2.1: 5 year housing supply calculations (5% buffer)**

25 year Core Strategy requirement 1 April 2006 – 31 March 2031	<b>10,750</b>
Completions 1 April 2006 – 31 March 2015	<b>3,377</b>
Projected completions (current year) 2015/16	<b>629</b>
Total projected completions 2006-2016 (3,377+ 629)	<b>4006</b>
Remaining Core Strategy requirement 2016 – 2031 (10,750 – 4,006)	<b>6,744</b>
Requirement for 2006 - 2016 (430 x10)	<b>4,300</b>
Shortfall 2006 – 2016 (4,300 – 4,006)	<b>294</b>
5 year requirement for 2016 – 2021 Core Strategy unadjusted housing target (430 x 5) = 2,150 <u>Plus</u> Shortfall = 294 <u>Plus</u> 5% buffer brought forward from later in plan period (5% of 2,150 + 294) = 122	<b>2,566</b>
Annual adjusted 5 year requirement (2,566 / 5)	<b>513</b>
Projected supply 2016/17 - 2020/21	<b>2,995</b>
No. of years supply (2,995 / 513)	<b>5.8 years</b>

**Table 2.2: 5 year housing supply calculations (20% buffer)**

25 year Core Strategy requirement 1 April 2006 – 31 March 2031	<b>10,750</b>
Completions 1 April 2006 – 31 March 2015	<b>3,377</b>
Projected completions (current year) 2015/16	<b>629</b>
Total projected completions 2006-2016 (3,377+ 629)	<b>4006</b>
Remaining Core Strategy requirement 2016 – 2031 (10,750 – 4,006)	<b>6,744</b>
Requirement for 2006 - 2016 (430 x10)	<b>4,300</b>
Shortfall 2006 – 2016 (4,300 – 4,006)	<b>294</b>
5 year requirement for 2016 – 2021 Core Strategy unadjusted housing target (430 x 5) = 2,150 <u>Plus</u> Shortfall = 294 <u>Plus</u> 20% buffer brought forward from later in plan period (20% of 2,150 + 294) = 489	<b>2,933</b>
Annual adjusted 5 year requirement (2,933 / 5)	<b>587</b>
Projected supply 2016/17 - 2020/21	<b>2,995</b>
No. of years supply (2,995 / 587)	<b>5.1 years</b>

Windfalls

Table 3.1: Windfall data for small sites and conversions 2006/07-2012/13

Settlement	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	Total	Total per annum
Hemel-Hempstead	65	54	70	47	34	59	50	379	54
Berkhamsted	32	19	22	4	8	10	7	102	15
Northchurch	1	5	1	6	1	10	1	25	4
Tring	12	9	30	3	8	4	15	81	12
Bovingdon	1	0	3	2	0	0	0	6	1
Kings Langley	0	2	2	1	7	3	2	17	2
Markyate	3	4	4	4	6	2	6	29	4
<b>Total</b>	<b>114</b>	<b>93</b>	<b>132</b>	<b>67</b>	<b>64</b>	<b>88</b>	<b>81</b>	<b>639</b>	<b>91</b>

Source: County Council monitoring

Table 3.2: Small completions on garden land 2001-12

Small garden land completions 2001-12	Total
2001/02	24
2002/03	17
2003/04	30
2004/05	37
2005/06	46
2006/07	73
2007/08	58
2008/09	60
2009/10	32
2010/11	40
2011/12	16
Total	433
Average per annum	40

Source: County Council monitoring

## Appendix 4

### Summary of housing commitments (as at 1<sup>st</sup> April 2015)

<b>Commitments:</b>	<b>No. of homes (net)</b>
Large Sites	1,778
Small Sites	203
Conversion / changes of use	378
<b>Total</b>	<b>2,359</b>
Sites awaiting completion of s.106 agreement	210*
<b>Total</b>	<b>210</b>
<b>Grand total</b>	<b>2,569</b>

*Source: Residential Land Position Statement No. 42 (1<sup>st</sup> April 2015)*

#### Note:

- \* The legal agreements total has been adjusted to remove double counting with an existing planning permission.

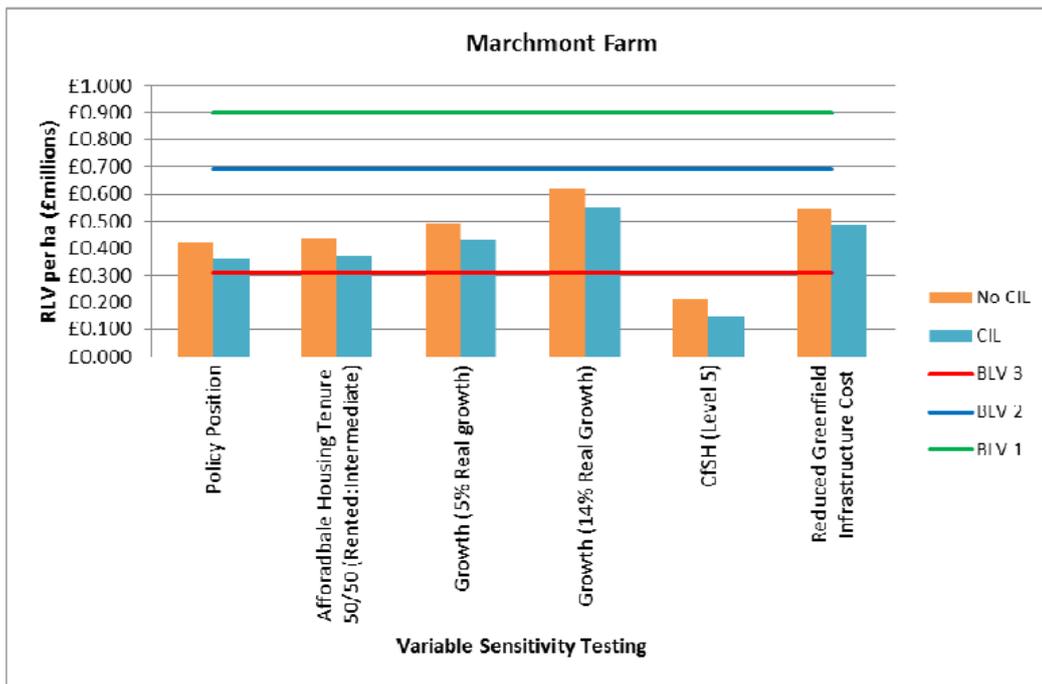
**Summary of changes to capacity of allocations**

<b>Location</b>	<b>Existing Capacity</b>	<b>Amended Capacity</b>	<b>Change</b>	<b>Comments</b>
<b>Part 1</b>				
<b>(a): Housing Allocations</b>				
H/2 National Grid site, London Road, Hemel Hempstead	160	350	+190	On-going discussions with landowner and policy support for increasing densities in the Two Waters Master Plan Study area.
H/5 Former Hewden Hire site, Two Waters Road, Hemel Hempstead	15	36	+21	Planning permission to be approved under 4/3344/15 for 36 flats subject to completion of s.106.
H/9 Apsley Paper Trail, London Road, Hemel Hempstead	25-35	31	-4	Planning permission approved under 4/3344/15 for 31 flats.
H/12 Martindale School, Boxted Road, Hemel Hempstead	50	66	+16	Site purchased by Council. Revised application being sought for increased capacity over existing planning permission of 43 units (4/0925/14).
H/14 c/o High Street / Swing Gate Lane, Berkhamsted	15	11	-4	Planning permission approved under 4/1895/15 for 11 homes.
<b>Total</b>	<b>275</b>	<b>494</b>	<b>+219</b>	
<b>(b) Mixed Use Allocations</b>				
MU/2 HH Hospital Site, Hemel Hempstead	200	400	+200	Emerging feasibility study points to potential to deliver increased capacity.
MU/8 Former Police Station, c/o High Street / Kings Road, Berkhamsted	14	23	+9	Planning permission approved under 4/3286/14 for 23 retirement apartments.
<b>Total</b>	<b>214</b>	<b>423</b>	<b>+209</b>	
<b>Grand Total ((a) + (b))</b>	<b>489</b>	<b>917</b>	<b>+428</b>	

**Extracts from 2013 and 2016 BNP Paribas Estate viability studies**

2013 Viability Result:

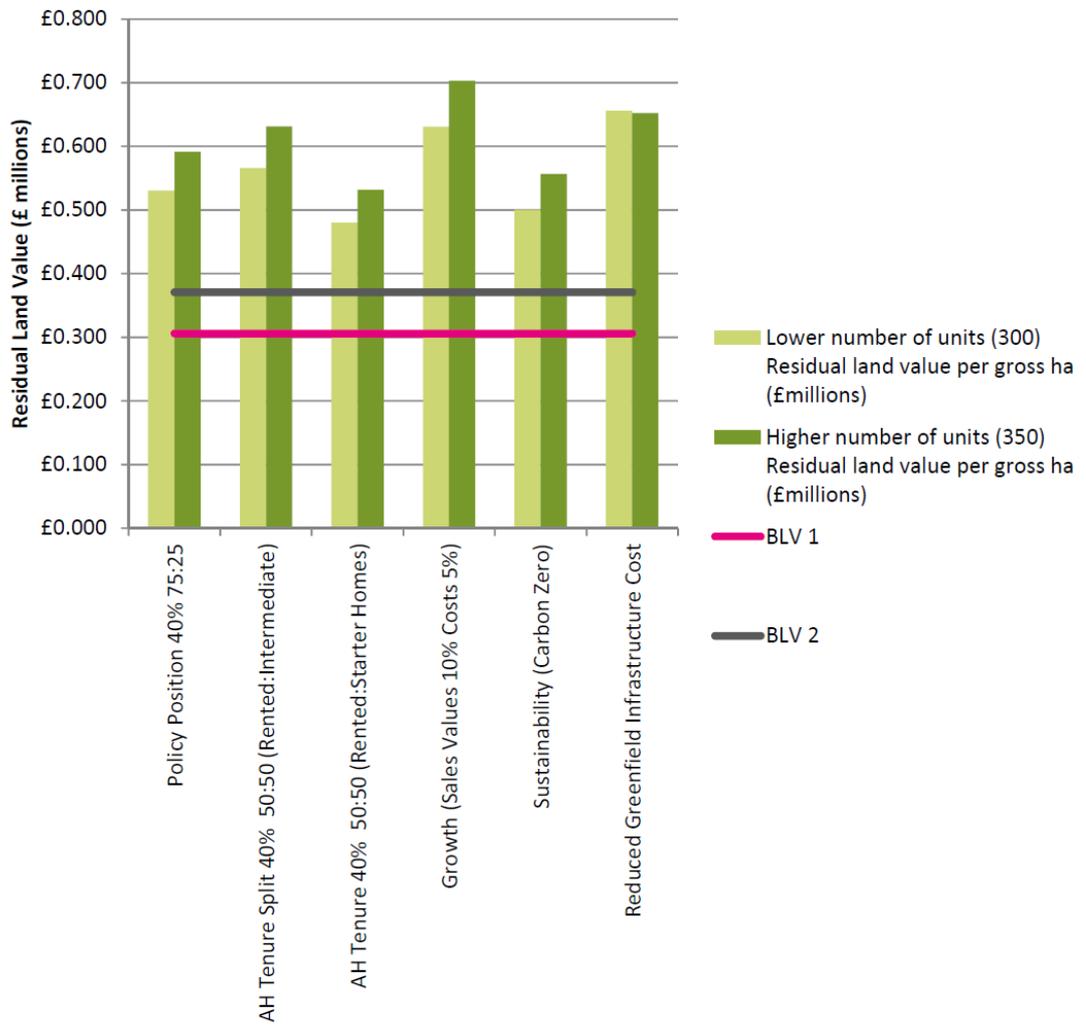
**Figure 4.1.1: Residual land values per hectare compared to benchmark land values (Marchmont Farm – LA1)**



Source: Examination Document ID4

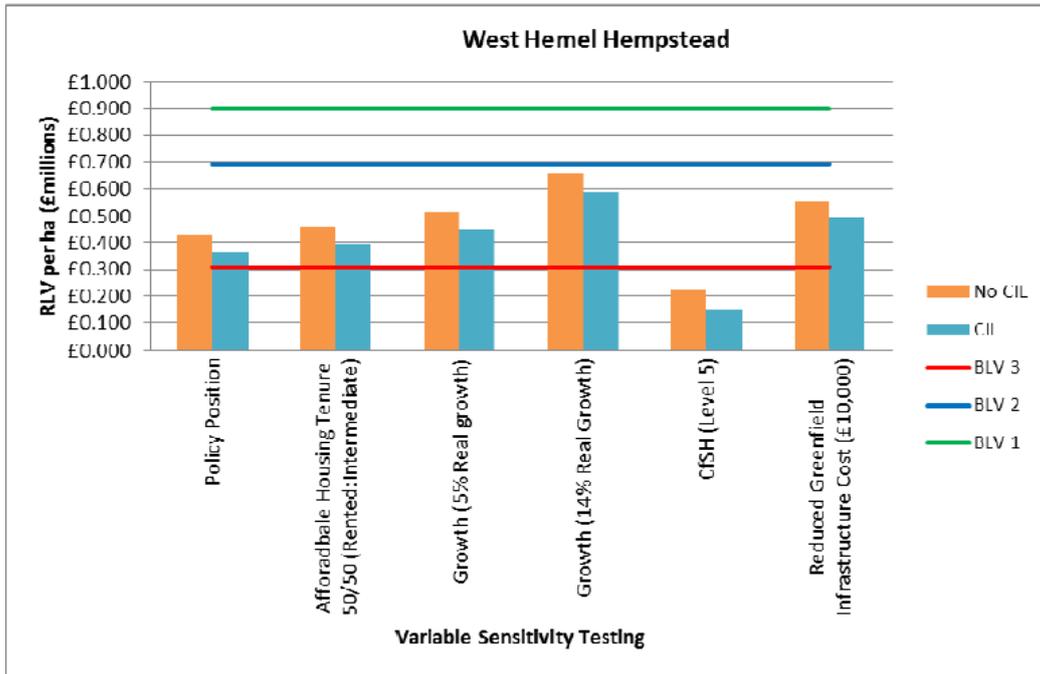
2016 Viability Result:

Figure 4.2.1: LA1 Marchmont Farm Residual land values per hectare compared to benchmark land values – Sensitivity testing scenarios



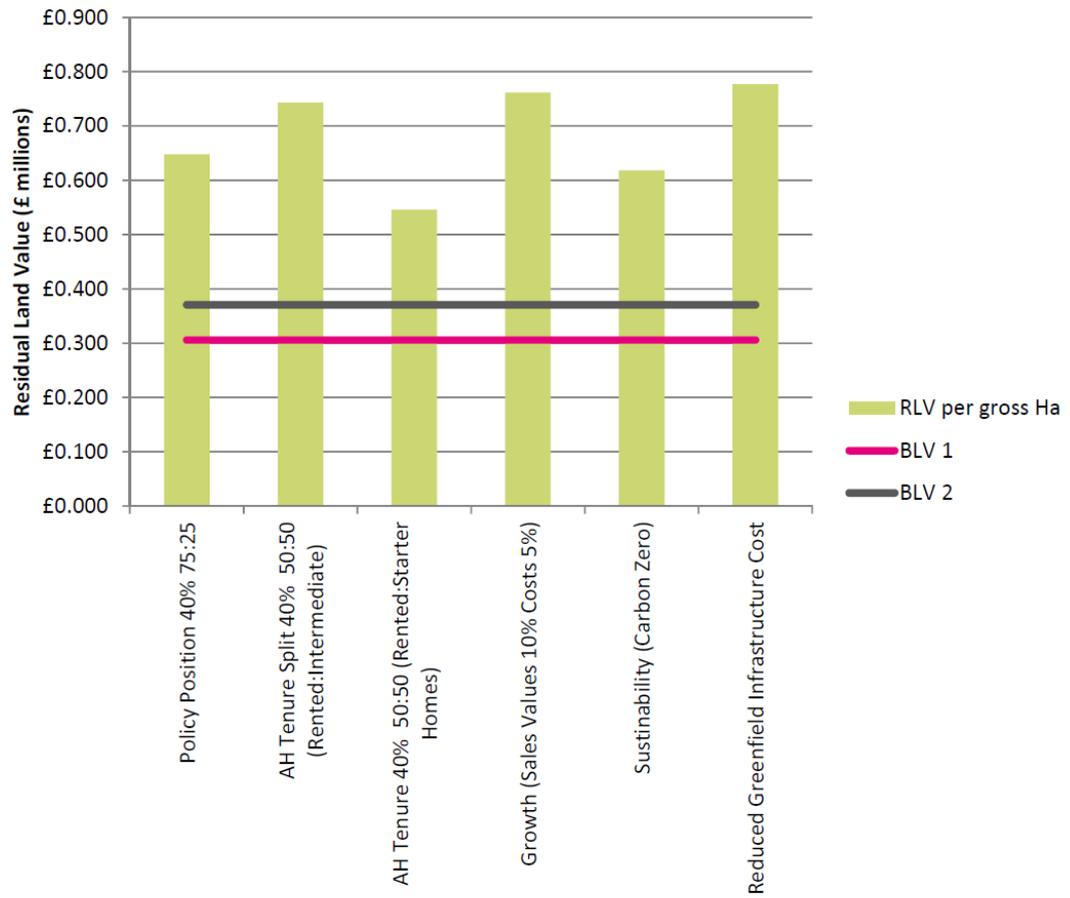
Source: Examination Document HG19

**Figure 4.1.3: Residual land values per hectare compared to benchmark land values (West Hemel Hempstead – LA3)**



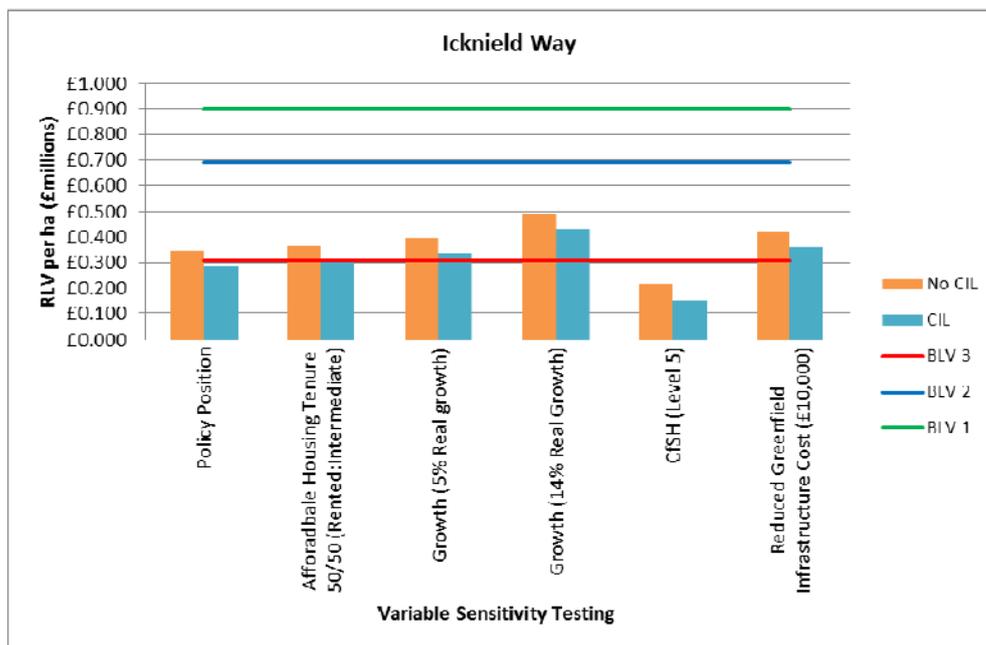
Source: Examination Document ID4

Figure 4.2.2: LA3 West Hemel Hempstead Residual land values per hectare compared to benchmark land values – Sensitivity testing scenarios



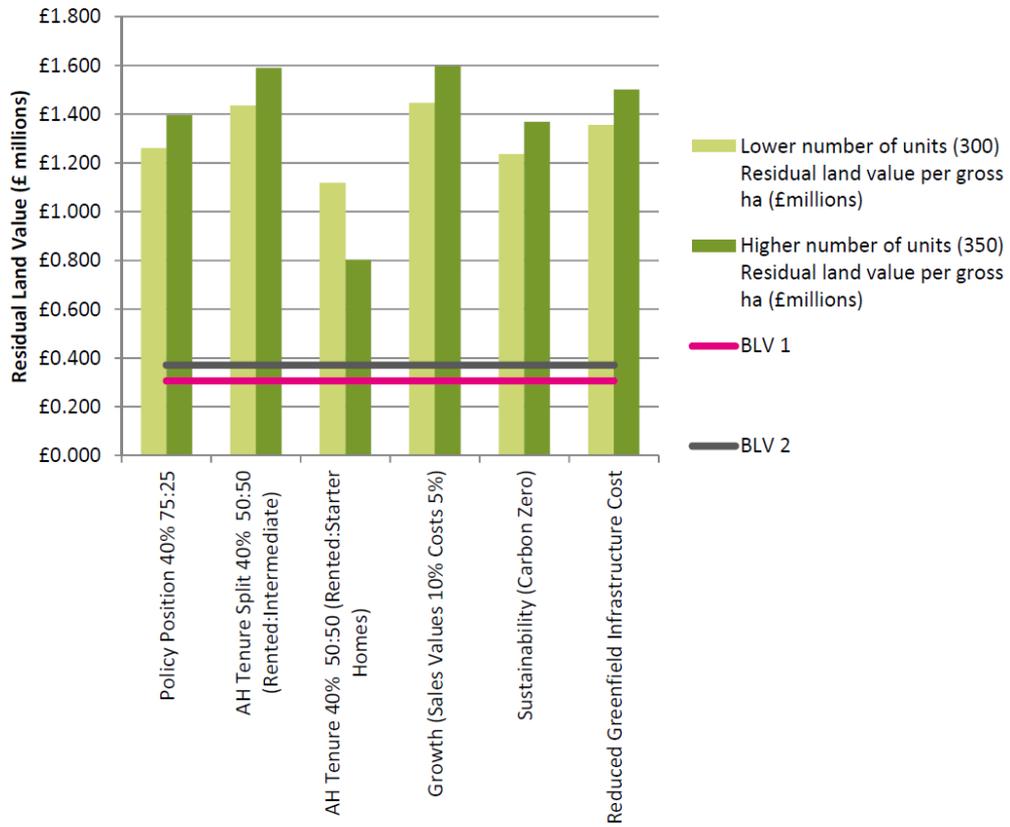
Source: Examination Document HG19

**Figure 4.1.5: Residual land values per hectare compared to benchmark land values (Icknield Way – LA5)**



Source: Examination Document ID4

Figure 4.2.3: LA5 Icknield Way Residual land values per hectare compared to benchmark land values – Sensitivity testing scenarios



Source: Examination Document HG19

**Housing Allocations – assumed affordable housing contributions**

<b>Location</b>	<b>Gross Capacity</b>	<b>Affordable Housing (@ 35%)</b>	<b>Comments</b>
<b>1. Part 1</b>			
<b>(a) Housing Allocations</b>			
H/1 Land r/o 186-202 Belswains Lane, HH	10	0	Below national threshold for the contribution of affordable housing on small sites.
H/2 National Grid site, London Road	160	56	Capacity to increase, but contribution dependent on site viability.
H/3 Land at Westwick Farm, Pancake Lane, HH	24	8	
H/4 Ebbens Road, HH	30	10	
H/5 Former Hewden Hire site, Two Waters Road, HH	15	5	Permission for 36 flats subject to completion of s106. Contribution dependent on site viability.
H/6 Leverstock Green Tennis Club, Grasmere Close, HH	25	8	
H/7 Land at Turners Hill, HH	43	15	
H/8 233 London Road, HH	10	0	Below national threshold for the contribution of affordable housing on small sites.
H/9 Apsley Paper Trail, London Road, Hemel Hempstead	35	31	DBC owned land. Assume to be developed for 100% affordable homes.
H/10 The Point, Two Waters Road, HH	25	25	Assume to be developed by DBC for 100% affordable homes.
H/11 Land r/o St Margaret's Way / Datchworth Turn, HH	32	32	DBC owned land. Assume to be developed for 100% affordable homes.
H/12 Martindale School, Boxted Road, HH	50	18	Scheme for higher capacity (+60) to be pursued.
H/13 Frogmore Road, HH	150	53	
H/14 c/o High Street / Swing Gate Lane, Berkhamsted	15	11	Figure reflects permission granted for 11 affordable homes.
H/15 Miswell Lane, Tring	24	8	

H/16 Western Road, Tring	25	0	Contribution dependent on whether a scheme exceeds the national threshold for the contribution of affordable housing on small sites.
H/17 Depot land, Langdon Street, Tring	10	0	Below national threshold for the contribution of affordable housing on small sites.
H/18 Land adj. to Coniston Road, Kings Langley	12	12	DBC owned land. Assume to be developed for 100% affordable homes.
H/19 c/o Hicks Road / High Street, Markyate	15	0	Dependent on scale, potentially below national threshold for the contribution of affordable housing on small sites.
H/20 Watling Street, Markyate	10	0	Below national threshold for the contribution of affordable housing on small sites.
H/21 Garden Scene, Chapel Croft, Chipperfield	12	4	Dependent on scale, potentially below national threshold for the contribution of affordable housing on small sites.
<b>Total</b>	<b>732</b>	<b>296</b>	
<b>(b) Mixed Use Allocations:</b>			
MU/1 Marlowes / QueenswayCombe Street /	600	210	P/P post 1.4.15 for 207 flats.
MU/2 HH Hospital Site	200	70	Contribution would increase if capacity increases.
MU/3 Paradise / Wood Lane	75	26	Dependent on scale of schemes coming forward, potentially below national threshold for the contribution of affordable housing on small sites.
MU/4 HH Station Gateway	200	70	
MU/6 Land at Durrants / Lane, Berkhamsted	150	21	Financial contribution only secured on southern half of the site. Figure assumes 35% contribution from remaining 60 units.
MU/7 Gossoms End / Billet Lane, Berkhamsted	30	11	Figure reflects that in approved scheme (4/1317/14).
MU/8 Former Police Station, c/o High Street / Kings Road, Berkhamsted	14	0	Affordable housing contribution secured under linked Proposal H/14.
MU/9 Berkhamsted Civic Centre, High Street	16	16	DBC owned land. Assume to be developed for 100% affordable homes.

<b>Total</b>	<b>1,285</b>	<b>424</b>	
<b>(c) Local Allocations</b>			
LA5 Icknield Way, west of Tring	200	80	At 40% assuming maximum capacity.
<b>Total</b>	<b>200</b>	<b>80</b>	
<b>Part 2</b>			
<b>(a) Local Allocations</b>			
LA1 Marchmont Farm	350	140	At 40% assuming maximum capacity.
LA2 Old Town	80	80	DBC owned land. Assume to be developed for 100% affordable homes.
LA3 West Hemel Hempstead	900	360	At 40% assuming maximum capacity.
LA4 Land at Hanburys, Shootersway, Berkhmasted	40	16	At 40% assuming maximum capacity.
LA6 Chesham Road / Molyneaux Avenue	60	24	At 40% assuming maximum capacity.
<b>Total</b>	<b>1,430</b>	<b>620</b>	
<b>Grand Total</b>	<b>3,647</b>	<b>1,420</b>	

## Appendix 8

### Extract from 2014/15 AMR – affordable housing completions

**Table 7.9 Gross Affordable Housing Provision 2001 – 2015 relative to Total (net) Housing**

Period	Total Housing	Affordable Housing Number	Proportion
<b>2006/7</b>	<b>400</b>	<b>137</b>	<b>34.3%</b>
<b>2007/8</b>	<b>384</b>	<b>126</b>	<b>32.8%</b>
<b>2008/9</b>	<b>418</b>	<b>148</b>	<b>35.4%</b>
<b>2009/10</b>	<b>237</b>	<b>96</b>	<b>35.2%</b>
<b>2010/11</b>	<b>603</b>	<b>60</b>	<b>10%</b>
<b>2011/12</b>	<b>447</b>	<b>117</b>	<b>26.2%</b>
<b>2012/13</b>	<b>290</b>	<b>92</b>	<b>31.7%</b>
<b>2013/14</b>	<b>219</b>	<b>27</b>	<b>12.3%</b>
2014/15	379	128	33.8
Total	3,377	931	27.6%
<b>Annual rate of provision 2006/07 – 2014/15</b>	<b>375</b>	<b>103</b>	<b>27.5%</b>

*Source: DBC Monitoring 2006/15*

**Table 7.10 Total supply of Affordable housing by type**

	Social Rented homes provided	Intermediate Homes/Shared Ownership	Affordable Rented	First Buy / Home Buy	Total
2006/07	59	78	-	-	137
2007/08	53	73	-	-	126
2008/09	92	56	-	-	148
2009/10	35	61	-	-	96
2010/11	53	7	-	-	60
2011/12	90	5	22	32	149
2012/13	43	24	25	58	150
2013/14	7	11	9	96	123
<b>2014/15</b>	<b>41*</b>	<b>20</b>	<b>67</b>	<b>126</b>	<b>254</b>
<b>Total 2006-15</b>	<b>473</b>	<b>335</b>	<b>123</b>	<b>312</b>	<b>1,243</b>

*Source: DBC monitoring*

Note:

Intermediate homes include shared equity and key worker housing.

\* Includes a contribution of 41 social rented units from a hostel development (The Elms) in Hemel Hempstead.