



Shaping
growth in
Dacorum



Housing: Policy Background Topic Paper

Dacorum Local Plan (2020-2038)
Emerging Strategy for Growth
November 2020

Background Topic Papers

Introduction

A series of background topic papers have been prepared to support the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth consultation. These are as follows:

- **Climate Change and Sustainability**
- **The Development Strategy**
- **Housing**
- **Site Selection**
- **The Green Belt & Rural Area**
- **Employment**
- **Retail and Town Centres**
- **Transport and Connectivity**
- **Open Space, Sport and Leisure**
- **Chilterns Beechwoods SAC**

These papers form part of the evidence base and are intended to make it easier to understand how the Council's emerging approach has evolved.

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A. Housing supply and delivery

1. Introduction

1.1 The Borough of Dacorum is facing challenging pressures for new development over the next 15 years which it must tackle through the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints. Thus the Plan must demonstrate how it is meeting its development needs taking into account the many constraints and opportunities of the Borough.

1.2 This background topic paper provides a summary to date of how the Council's approach to its planning requirement for housing, and housing supply and delivery in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth has emerged. It explains what the draft Local Plan took into account in developing the approach and how it has narrowed down reasonable policy options, identified Plan allocations, and highlighted changes to the Policies Map in terms of its:

- evidence base;
- feedback from the Issues and Options consultation;
- ongoing engagement with key stakeholders and meeting its obligations under the Duty to Cooperate; and
- testing of options through the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment and Habitats Regulations Assessment.

1.3 This background topic paper is divided into three main sections covering:

- accommodating the assessed local housing need (LHN) and the delivery of new homes (Part A);
- meeting housing need and housing mix (Part B); and
- accommodating the needs of the travelling communities (Part C).

1.4 You should note that there is significant overlap across these three sections of the document and with other topic papers that are linked to housing. This document will provide cross-referencing, where appropriate, to these relevant topic papers such as the development strategy, site selection and the Green Belt, etc.

1.5 This background topic paper is published alongside the Plan for consultation. It should be read in conjunction with a series of related and complementary topic papers that explain the Plan's emerging overall policies, visions and objectives.

2. Policy Context

- 2.1 The preparation of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth, particularly in developing its housing programme, has been influenced by a broad national, strategic and local policy context.

National Planning Policy Framework

- 2.2 National advice on housing is provided through the National Planning Policy Framework (NPPF), with further guidance through the National Planning Practice Guidance (NPPG). There are many elements of the NPPF that influence planning for a sufficient supply and type of housing and these are summarised below.

- 2.3 At the heart of the NPPF is the presumption in favour of sustainable development. For plan-making this means that:

“a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- I. The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole” (paragraph 11)*

- 2.4 Chapter 3 of the NPPF solely relates to plan making. This section of the NPPF refers to a range of strategic priorities that local plans should address. The following key points are important for understanding the context for housing supply and delivery:

- Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities (paragraph 15);
- Plans should be prepared positively, in a way that is aspirational but deliverable (paragraph 16);
- Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees (paragraph 16 (c));
- The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area (paragraph 17).

- Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development (paragraph 20).
- Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure (paragraph 22)
- Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies) (paragraph 23).

2.5 The NPPF states that all policies: “*should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals*” (paragraph 31).

2.6 The NPPF highlights the importance for plans and spatial development strategies to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements, including how it has addressed relevant economic, social and environmental objectives (paragraph 32).

2.7 With this, the NPPF is clear that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where this is unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

2.8 When the Plan Local plans are examined they must have been prepared in accordance with legal and procedural requirements, and satisfy the tests of “soundness” (paragraph 35). Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters than have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 2.9 Chapter 5 of the NPPF sets the framework for housing delivery, including the Government's objective to significantly boost the supply of homes (paragraph 59). The Government is committed to ensuring that: *"a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*.
- 2.10 Strategic policies should be informed by a local housing needs assessment, using the standard method in national planning guidance (paragraph 60).
- 2.11 Paragraphs 61-64 provide guidance on meeting a mix of size, type and tenure of housing. This is covered in detail in Part B of this topic paper.
- 2.12 Paragraph 65 sets out the expectation that strategic policies will need to establish a housing requirement figure for their whole area (taking into account as appropriate any unmet need from neighbouring areas) and how this is met. This also includes a housing requirement for designated neighbourhood areas.
- 2.13 The NPPF (paragraphs 67 - 69) emphasises the importance of understanding and delivering a sufficient supply and mix of housing, particularly in respect of:
- a) specific, deliverable sites for years one to five of the plan period; and
 - b) specific, developable sites or broad locations for growth, for years 6-10 and ,where possible, for years 11-15 of the plan.
- 2.14 In order to maintain supply and deliver, the NPPF expects (paragraphs 73 – 75):
- strategic policies should include a housing trajectory and the anticipated rate of development for specific sites.
 - an annual update of 5-year supply of specific deliverable sites (including an appropriate buffer moved forward from later in the plan period); and
 - local planning authorities should monitor progress in building out sites which have permission.
- 2.15 Chapter 11 seeks to make effective use of land. It states that policies should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains (paragraph 118). Plan should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (paragraph 119).
- 2.16 Where there is no reasonable prospect of land coming forward for the use allocated in the existing plan, these should be reallocated for a more deliverable use that can help to address identified needs, or if appropriate, deallocate a site which is undeveloped (paragraph 120).

Planning Practice Guidance

2.17 Further national advice is provided through the National Planning Practice Guidance (NPPG)¹. The NPPG contains a wide range of sections that are relevant to the matters concerning the housing need figure, supply and delivery and relate closely to and expand upon areas of the NPPF summarised above. While not repeated in detail here, these include:

- Effective use of land;
- Flood risk and coastal change;
- Green Belt;
- Housing and economic needs assessment;
- Housing supply and delivery; and
- Plan-making.

2.18 The Housing and Economic Needs Assessment section of the PPG sets out guidance on the standard method for assessing local housing need (LHN). In particular, it explains:

- that assessing housing need is the first step in the process of deciding how many homes need to be planned for (paragraph 001).
- that the standard method uses a formula to identify the minimum annual housing need figure to be planned for, but it does not produce a housing requirement figure (paragraph 002).
- how a minimum local housing need figure is calculated using the standard method (paragraph 004).
- whether to take account of past under-delivery of new homes in preparing plans (paragraph 011).
- that the standard method provides authorities with a number, based on a 10 year base line, which can be applied to the whole plan period (paragraph 012).

2.19 The PPG on Housing Supply and Delivery does not provide guidance on plan-making or setting the local housing need figure. Its main focus is providing advice on how a local authority can calculate whether it has a five year housing land supply and how it should measure its performance against the Housing Delivery Test.

The Government's response to the Technical Consultation on Updates to National Planning Policy and Guidance

2.20 The consultation paper was published in October 2018 and set out proposals to update planning practice guidance on housing need assessment to be consistent with the Government's ambitions for increasing housing supply.

¹ <https://www.gov.uk/government/collections/planning-practice-guidance>

2.21 The Government set out its response to the technical consultation in February 2019:² In particular, it concluded that the 2014-based projections should be used as the demographic baseline for the standard method for a time limited period. And that it would be revised within 18 months of the publication of the response document i.e. by August 2020. It also recognised that Local authorities may not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.

Planning for the Future

2.22 In August 2020, the Government published its Planning White Paper on 'Planning for the future'³. It heralds a number of potentially significant reforms to the planning system and, in particular, the plan-making process.

2.23 The White Paper continues to place a strong emphasis on home ownership, increasing the supply of housing and supporting the regeneration of settlements, speeding up the delivery of new homes, securing a range of types and tenures of housing, and supporting small to medium sized house builders and self-builders. Pillar One - Planning for development in the White Paper identifies a number of proposals including:

- defining a standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst; and
- preparing masterplans and design codes for substantial development so that they include a variety of development types by different builders.

2.24 The Government is committed to the delivery of beautiful and well-designed homes and places under Pillar Two - Planning for beautiful and sustainable places. It will seek to "fast-track" such schemes through the planning system where they accord with locally prepared site masterplans and design codes. Where these are drawn up for substantial development they should include a variety of housing types from different builders. Pillar Three - Planning for infrastructure and connected places seeks to reform the system of developer contributions, with a number of aims, to secure more on-site affordable housing provision.

Changes to the Current Planning System

2.25 The Government has also consulted on "Changes to the current Planning System"⁴ in parallel with the White Paper. This includes:

- details of how the revised standard methodology for assessing local housing need might operate;

² <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

³ <https://www.gov.uk/government/consultations/planning-for-the-future>

⁴ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

- how the Government might deliver, operate and fund its First Homes scheme; and
- extending the threshold for securing affordable homes for a temporary period to sites of up to 40-50 homes in order to support small to medium sized house builders.

Joint Strategic Plan (JSP)

2.23 Dacorum has joined the other four authorities in South West Hertfordshire (St Albans City and District, Three Rivers, Hertsmere and Watford) and Hertfordshire County Council to respond to longer term growth challenges by preparing a place, growth and development Plan (Joint Strategic Plan (JSP)) to cover the period 2036-2050. This includes a signed Memorandum of Understanding between the partners. They have also secured planning delivery funding from the Ministry of Housing, Communities and Local Government (MHCLG) to deliver the JSP.

2.24 The South West Herts Joint Strategic Plan will be a 'boundary - off' strategic plan that will set out the vision and map the context for the Local Plans to 2050. It will focus on:

- A Spatial Strategy including any Strategic Areas of Opportunity;
- Strategic housing need and provision;
- Strategic employment need and provision;
- Strategic infrastructure need and provision; and
- Strategic approach to the Green Belt and the Chilterns AONB.

2.25 The five districts and HCC are currently carrying out high- level visioning work. Two major and complementary projects are underway: a strategic growth location study and a multi modal transport study.

2.26 The Joint Strategic Plan will be prepared over the next couple of years and it is anticipated that it will come into force across all the five authorities by the end of 2023 to address longer term development needs.

2.27 Given the time horizon of the JSP, it has not influenced how the Council prepared the development strategy in the draft Local Plan.

Local Plan Context

2.28 The following Plan documents will be replaced by the new Local Plan:

- Dacorum Borough Local Plan 1991-2011 (adopted April 2004) (saved policies);
- Dacorum Core Strategy (adopted September 2013); and
- Dacorum Site Allocations Development Plan Document (DPD) (adopted July 2017).

- 2.29 There is only one “made” Neighbourhood Plan (covering the neighbourhood of Grovehill in Hemel Hempstead). Two other plans are being prepared for Bovington and Kings Langley.
- 2.30 Key existing policies relating to local housing need, supply and delivery are summarised below.
- 2.31 Policy NP1 in the Core Strategy sets out the NPPF national presumption in favour of sustainable development and positive approach to development.
- 2.32 Policies CS1, C2 and C3 relate to the distribution, selection and management of development sites.
- 2.33 Policy CS17 deals with housing supply. It identified a housing requirement of 430 homes per annum between 2006 and 2031 (a total of 10,750 homes over this period). Table 8 in the Core Strategy demonstrated that the Council could identify a much larger housing supply (11,320 homes) to 2031 if all sources were fully taken into account.
- 2.34 Paragraphs 29.7 - 29.10 committed the Council to an early partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs) and the mechanisms to achieve this. The purpose of the review was to reconsider housing need and investigate ways of meeting that need more fully.
- 2.35 The Site Allocations SPD identified the distribution, timing and scale of key housing proposals in order to meet the planned requirement for housing set out under Policy CS17.

Draft (Issues and Options) Local Plan to 2036

- 2.36 The draft (Issues and Options) Local Plan to 2036 (Reg. 18 Plan)⁵ was published for consultation during November - December 2017. This presented a number of potential future housing growth scenarios and their implications on the Borough's settlements, the environment, transport, and local infrastructure. These are discussed in further details in chapter 4 of the topic paper.
- 2.37 The Reg.18 Plan was accompanied by a Schedule of Site Appraisals – October 2017⁶. This document undertook a simple appraisal of a number of greenfield housing sites that had been promoted to the Council leading up to the consultation. It did not make any formal decisions on their suitability to be taken forward. The consultation on the Reg. 18 Plan also included a Call for Sites exercise which provided a further opportunity for landowners to promote their sites for housing and other development.

⁵ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

⁶ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/schedule-of-site-appraisals-draft--october-2017.pdf?sfvrsn=85af339e_8

2.38 Both the Reg. 18 Plan and the Schedule of Site Appraisals were subject to separate Sustainability Appraisals^{7 8}.

South West Hertfordshire Strategic Housing Market Assessment

2.39 Dacorum, Hertsmere, Three Rivers and Watford jointly commissioned GL Hearn and Justin Gardner Consulting to prepare the South West Herts Strategic Housing Market Assessment (February 2016)⁹ (SHMA). It assessed future development needs for both market and affordable housing across the relevant housing market area (HMA) which included St Albans City and District.

2.40 The SHMA provided an important and robust starting point for the setting of the housing target over the period 2013-31 for the commissioning authorities. It followed a standard approach of using the (then) latest official population and household projections (2012-based CLG Household Projections) for assessing housing need. It then considered whether this needs to be adjusted to take account of market signals, evidence of affordable housing need or to support expected growth in the economy and employment. This is used to define the objectively-assessed need (OAN) for housing.

2.41 It concluded that there was not a robust evidential basis for seeking to adjust assessed housing need for individual authorities within the HMA to take account of economic factors. However, the SHMA did determine that a modest upwards adjustments (of 95 homes per annum) to the assessed housing need was justified to improve affordability. This resulted in an objectively-assessed need for 3,151 homes per annum across the South West Hertfordshire HMA over the period 2013-36. For Dacorum, this equated to 756 homes per annum (the highest across the HMA authorities) (Table 2.1).

Table 2.1 Objectively assessed needs across the SW Herts HMA

Authority	OAN pa 2013-36	Total homes 2013-36
Dacorum	756	17,388
Hertsmere	599	13,777
St Albans	705	16,215
Three Rivers	514	11,822
Watford	577	13,271
Total	3,151	72,473

2.42 The study helped inform early work on housing options at the Issues and Options stage of the draft Local Plan. The Issues and Options paper identified this as one of three growth options discussed (it was termed as the “locally assessed need”

⁷ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-issues-and-options-sa-working-note---october-2017.pdf?sfvrsn=66ad339e_4

⁸ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-schedule-of-site-appraisals-sa-working-note---october-2017.pdf?sfvrsn=2ad339e_4

⁹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

option) growth scenario. This sat between a lower growth option of 602 homes per annum and a higher option of 1,000-1,100 homes per annum.

Other Local Strategies

(i) Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050 (G&IS)

2.43 The Sustainable Community Strategy (“Destination Dacorum”) was published in 2012 and set out visions for the Borough to 2031. It helped develop the visions in the Core Strategy. This visioning is now provided by the “Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050” (G&IS)¹⁰. The Strategy has informed the early stages of developing the spatial objectives for the new Local Plan. It outlines the long term visions for the Borough to 2050, guides how the Council can meet the challenges and opportunities of future growth, and cover six over-arching themes:

- Building Dacorum’s future homes for everyone.
- Generating a vibrant economy with opportunities for all.
- A happier, healthier and safer Dacorum.
- Creating a clean, green and attractive Dacorum.
- On-track for a better transport network.
- Harnessing the opportunity of technology and digital connectivity

2.44 The G&IS sets out key challenges, proposals and related visions under each theme. It also explains how the Council will work with the local community and key partner organisations to deliver the proposals and visions.

2.45 The strategy is clear that the main driver of change is the accelerated delivery of new housing and that this will be a central component in the strategy for Dacorum’s future. The G&IS notes that housing growth will be significant compared to historic rates. It takes a positive view to the benefits growth can bring to the borough. Key proposals include:

- Progressing the draft Local Plan and policies in support of delivering new homes, maximising the use of brownfield land and urban densities, and delivering genuinely affordable homes.
- Supporting regeneration of the Hemel Hempstead Town Centre and Two Waters Area.
- Working to deliver the Joint Strategic Plan.
- Working with St Albans City and District and the Crown Estate to develop a master plan (of 11,000 homes) for Hemel Garden Communities.
- Preparing an Infrastructure Delivery Plan needed to support growth and improved transport.
- Delivering a major programme of new council housing and working closely with Housing Associations to meet the housing needs of the Borough

¹⁰ <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

(ii) Hemel Garden Communities (HGC)

2.46 The Council is working closely with St Albans City and District Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and The Crown Estate to deliver a mixed-use residential and commercial development for Hemel Hempstead (Hemel Garden Communities (HGC)).

2.47 HGC is a proposed major urban extension of Hemel Hempstead, providing both new residential and employment space for the area. Hemel Garden Communities' proposed sites are to the east and the north of Hemel Hempstead and could deliver around 11,000 homes and 10,000 jobs for the area.

2.48 The partners have been successful in securing funding from the Ministry of Housing, Communities and Local Government (MHCLG) to move the project forward. The HGC is now accepted on to the Garden Communities programme, alongside being awarded £750,000 from the MHCLG to help accelerate delivery of the scheme. The funding will help initiate infrastructure studies and support resources to help bring the project forward.

2.49 The HGC Partnership will use the funding to help accelerate the delivery of:

- High quality designed, mixed-use residential development providing around 11,000 new homes for the area.
- A significant boost to the local economy through the delivery of 10,000 new jobs, including a new Enviro-Tech based Enterprise Zone to the east, called the Hertfordshire Innovation Quarter.
- Major improvements to existing infrastructure alongside new sustainable infrastructure delivery.
- A Transformational Plan for Hemel Hempstead, looking at social, economic and environmental improvements that can be delivered to the existing settlement as a result of new growth.

2.50 We discuss further the HGC programme and its implications for growth and change in the Development Strategy topic paper.

(iii) Dacorum Corporate Plan 2020-2025

2.51 The Corporate Plan¹¹ outlines the Council's vision and priorities for a five year period, and provides a focus for service delivery and performance, aiding strategic decisions.

2.52 The document sets out a delivery plan for the Council's and identifies five key priorities:

- A clean, safe and enjoyable environment
- Building strong and vibrant communities
- Ensuring economic growth and prosperity
- Providing good quality affordable homes, in particular for those most in need

¹¹ <http://www.dacorum.gov.uk/docs/default-source/recruitment/corporate-plan-2020-2025.pdf>

- Ensuring efficient, effective and modern service delivery

2.53 Key housing delivery-related actions for the Council are:

- Partnership working to enable the delivery of Hemel Garden Communities and to deliver new homes and jobs there;
- A commitment to build over 400 new Council homes;
- Continuing to provide support to Housing Associations where viable; and
- Support for the broader development of over 5,000 new affordable homes.

(iii) Accelerated Housing Delivery Programme

2.54 The County Council is leading on a project that is seeking support from Government to deliver an ambitious target of 100,000 homes to 2031 under the Hertfordshire Proposition (Growth Deal). Through its Hertfordshire Growth Board it has set up an Accelerated Housing Delivery Task Team that continues to meet with each of the Hertfordshire local authorities. The initial work has focussed on identifying for each local authority a focused set of target sites with potential for acceleration, alongside a series of issues/barriers to delivery and potential solutions.

2.55 MHCLG has confirmed (March 2020) that Hertfordshire should continue its work to develop its growth deal. The Government sees this linked to wider post-Covid-19 economic recovery measures. MHCLG has confirmed that Government intends to proceed with a spending review in the autumn and wants to have place based economic recovery programmes to invest in later in the year.

2.56 The immediate priority of the Accelerated Housing Delivery Programme is to develop the housing numbers and identify the quantum of investment required (alongside any freedoms/flexibilities required to be able to be able to deliver the Growth Deal) for inclusion in a Scoping Document. The end goal is to secure with the Government an agreed outline proposal, delivery plan and full business case for the total quantum of investment required and the resultant outputs (housing numbers) secured as a result over 2020/21.

2.57 Following the meetings with the districts, the County Council has identified a number of suggested sites for potential acceleration. In the case of Dacorum, this has focussed chiefly on key sites in Hemel Hempstead, many of these owned by the Council. In particular, the HGC scheme was seen as having the potential to significantly benefit from transport investment in order to bring forward later phases of development earlier.

(iv) Climate Change Emergency

2.58 The Council, along with many other local authorities in the UK, has declared that there is a climate change emergency that requires urgent planning and action. This will include a number of actions:

- That we work towards ensuring that the full range of council activities are net carbon neutral by 2030.

- That an action plan will be developed as soon as possible.
- That we ensure all services make the maximum possible impact in challenging the extent and causes of climate change. The developing new Local Plan will incorporate the maximum possible sustainability requirements that the system will allow, and encourage developers to go beyond this in order to future proof homes and buildings.
- It will act to improve social housing energy efficiency through direct action and take full advantage of Government and energy provider funding to improve the energy efficiency of private homes.
- Engage with all sectors of our residents, communities and businesses to publicise the climate emergency declaration and work together to reduce the possible impact.

2.59 The Council is developing a Climate Change Strategy and Action Plan to explain how it will achieve a net carbon neutral position across its services by 2030. This includes data collection/baselining data, developing its carbon offsetting approach, identifying priorities and programmes for services, working with partner organisations to develop a consistent approach to climate change, and community outreach/persuasion. The Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth is seen as a key vehicle to focus on the climate change mitigation requirements of new development and in taking responsibility for biodiversity, green energy and environmental requirements.

2.60 This climate emergency has placed an even greater emphasis on the Plan delivering growth in a sustainable way.

3. Evidence Base

3.1 The approach to local housing need, supply and delivery has been developed in the light of a number of key evidence base work and studies which are summarised below.

a) The South West Hertfordshire Local Housing Needs Assessment 2020

3.2 The South West Hertfordshire authorities (Dacorum, Hertsmere, St. Albans, Three Rivers, and Watford) jointly commissioned GL Hearn and Justin Gardner Consulting to prepare a Local Housing Needs Assessment (LHNA). The South West Herts Local Housing Needs Assessment 2020 (LHNA) was finalised in August 2020¹².

3.3 The role of the LHNA is to assess future development needs for housing types and mix to meet the housing needs of different groups across South West Hertfordshire over the period 2020-2036. It has helped inform a variety of approaches to housing policies including:

- providing detailed conclusions on the required mix of market and affordable housing need by house type and size for this Local Plan period. These conclusions take into account projected changes in the population and estimates future demand.
- setting out evidence on the need for accessible and adaptable housing in Dacorum.
- assessing the local need for specialist housing for older people.

3.4 The report defines the whole of these councils' areas as forming the South West Hertfordshire Housing Market Area (HMA).

3.5 Chapter 1 in the LHNA summarises the relevant Government guidance in the NPPF and the PPGs, in particular the PPG on Housing and Economic Needs Assessment. Paragraph 1.19 in the draft LHNA refers to the PPG in concluding that:

“Given that there is a clear direction that the calculation should use the current year as a starting point (paragraph 4) and that the calculation takes into account historic under-delivery (Paragraph 5 and 11) those local authorities whose plan period starts before 2020 can use completions as their housing need for the years earlier than 2020 and use the standard method as their housing need for any period thereafter.”

3.6 The LHNA (paragraph 1.22) states that it may be necessary to undertake a targeted update to the report when the revised guidance on the standard methodology is published for those authorities who have not submitted their plans by that time.

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3.7 Chapter 2 in the LHNA sets out how the three step process in paragraph 004 of the PPG on Housing and Economic Needs Assessment is applied to South West Hertfordshire and its constituent districts. The figures in the report cover the 16 year period from 2020 to 2036, but are based on the 2020-2030 period. It states that:

“In all the local authorities within the SW Herts HMA, the Local Plan is older than 5 years and the increase in Step 2 is greater than 40%. The cap is therefore applied at 40% above the higher of the projected household growth (step 1) or the average annual housing requirement figure set out in each of the adopted local plans (the most recently adopted strategic policies).

As set out in Table 4 in every authority the projected household growth set out in step 1 is also higher than the adopted local plan housing requirement. The 40% cap is therefore applied to the figure in Step 1.”

3.8 Table 3.1 summarise the results of the calculations for South West Hertfordshire and Dacorum.

Table 3.1: Summary of standard methodology calculations

Standard method calculation	Dwellings per annum	
	South West Herts	Dacorum
Step 1. Setting the baseline	2,888	731
Step 2. An adjustment to take account of affordability – this increases the figures to:	4,674	1,108
Step 3. Capping the level of any increase	4,043	1,023

3.9 In accordance with paragraph 010 in the PPG, chapter 2 of the LHNA also considers whether it would be appropriate for the South West Hertfordshire authorities to plan for a higher housing need figure than the standard method indicates. The LHNA makes the following points:

- The South West Hertfordshire Authorities are currently developing a Joint Strategic Plan which may result in a growth strategy, but it is too early to know whether this will be the case.
- The only major strategic infrastructure improvement that could drive the need for homes locally is the Thameslink Programme, but this is largely complete and would only impact Hertsmere and St. Albans if at all.
- Some neighbouring authorities including those in London and within the Housing Market Area itself are likely to have unmet need. However, the scale of any unmet need is not yet known. It will be up to authorities with an unmet need to approach the South West Hertfordshire authorities.

- In such circumstances, each local authority should consider the extent of the identified unmet need it could meet, taking into account various factors including local capacity (e.g. infrastructure and land capacity) and sustainability. This should be done through the local plan process.

3.10 Chapters 3 - 5 in the draft LHNA give further consideration to the case for planning for a higher level of housing than indicated by the standard method.

3.11 Chapter 3 considers whether the housing need identified through the standard method is enough to meet the planned economic growth from South West Hertfordshire. This chapter takes account of the South West Hertfordshire Economic Study Update (September 2019) produced by consultants Hatch Regeneris¹³. The draft LHNA concludes that the standard method would help support considerably higher job growth than set out in the Economic Study. There is, therefore, no requirement to plan for a higher level of housing than indicated by the standard method to support economic growth.

3.12 Chapter 4 updates some of the information from the South West Hertfordshire Strategic Housing Market Assessment (2016) on market signals. It is concluded that there are some severe affordability issues in South West Hertfordshire. However, these are addressed through the standard method, specifically the 40% uplift within steps 2 and 3. There is no requirement to make any further uplift in response to market signals.

3.13 Chapter 5 shows that there is a very high need for affordable housing in South West Hertfordshire. Therefore, the LHNA recommends that as much affordable housing should be sought as viability allows. Despite this, the following conclusion is drawn:

“As per the PPG local authorities should consider an increase in housing requirements where it could help deliver the required number of affordable homes. However based on information set out herein it would be reasonable to conclude that after consideration it was not necessary to increase housing delivery.”

3.14 Chapters 6-8 deal with specialist forms of housing, their adaptability and accessibility and housing mix. These matters together with affordable housing, are dealt with in further detail in Part B of the topic paper.

b) Urban Capacity Study (incl. windfall assessment) Strategic Housing Land Availability Assessment (November 2020)

3.15 The Council has undertaken an in-house Strategic Housing Land Availability Assessment, or “Urban SHLAA”, to assess land availability for potential development within the district over the lifetime of the Local Plan. The study takes

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forward earlier work on the 2016 SHLAA¹⁴ and also incorporates inputs from the Call for Sites exercises and the Brownfield Register¹⁵.

3.16 It forms part of the initial process alongside the Greenfield Site Assessment work (see below for details) that informs the selection of sites for inclusion in the Local Plan. This study together with other monitoring work on urban sites has helped in guiding the Council's decisions on the level of Green Belt releases it will have to consider in meeting its LHN and in understanding its ability to satisfy a 5-year housing land supply.

3.17 The Urban SHLAA provides information on a wide range of sites within the built-up area of the six main settlements in Dacorum and assesses them for their suitability, availability and achievability, in accordance with the most up-to-date national guidance¹⁶. It also considers in detail historic completions rates for windfall sites in order to assess their future contribution to housing supply.

c) Greenfield Site Assessment

3.18 The Council commissioned AECOM and viability specialists HDH to prepare an assessment of greenfield sites being promoted to it for housing and other development under the emerging draft Local Plan (Site Assessment Study for Dacorum Borough Council (January 2020)). This "Rural SHLAA" complemented the Urban SHLAA (see above) and its understanding of land availability.

3.19 The Rural SHLAA focussed on land outside of the main urban areas. Most of this land was in the countryside and subject to a number of other important designations, including the Green Belt, Rural Area and the Chilterns Area of Outstanding Natural Beauty (AONB). While the bulk of sites were greenfield, there were a few brownfield sites.

3.20 The study assessed a total of 144 sites for residential or employment development on its suitability, availability and achievability (Volumes. These were determined by being tested against standard criteria derived from and measured against national policy, having regard to the local characteristics of the borough. This allowed sites to be categorised into three main groupings:

- 'potentially suitable for allocation with minor constraints'
- 'potentially suitable for allocation with major constraints'
- 'not suitable for allocation'

3.21 The sites were then subject to two main phases of filtering ultimately resulting in 46 sites that were considered potentially suitable, of which 34 had major constraints and 12 had minor constraints. Based on a number of design case

¹⁴ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

¹⁵ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/brownfield-land-register>

¹⁶ Planning Practice Guidance – Section on "*Housing and economic land availability assessment*" (Published 6 March 2014, Last updated 22 July 2019). Available from <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

studies and other assumptions, the sites collectively had potential for 15,192 new dwellings (and 6,000 square metres of new employment space). Table 3.2 breaks down the housing numbers by settlement.

Table 3.2: Summary of dwelling potential by settlement

Settlement	Land potentially suitable for allocation with minor constraints (dwellings)	Land potentially suitable for allocation with major constraints (dwellings)	Total
Hemel Hempstead	12	7,460	7472
Berkhamsted	760	2,111	2,871
Tring	367	2,420	2,787
Bovingdon	333	146	479
Kings Langley	698	522	1,220
Markyate	0	170	170
Long Marston	12	0	12
Wilstone	57	46	103
Great Gaddesden	0	21	21
Total	2,239	12,896	15,135

3.22 Table 3.2 demonstrates that there is significant theoretical capacity arising from greenfield sites. The vast majority of this is associated with sites with ‘major constraints’ adjacent to the towns in the borough.

3.23 The sites were also tested for their viability and deliverability. The case studies undertaken concluded that the greenfield sites were viable and had capacity for substantial developer contributions over and above CIL for both site-specific and Borough-wide infrastructure. However, the assessment also identified that the viability of brownfield sites was less certain, particularly in the lower value areas and urged a more cautious approach to them.

d) 2017 Schedule of Site Appraisals

3.24 The Council has undertaken an early and high-level constraints-based approach to appraising a number of potential allocations, chiefly greenfield locations, through the Schedule of Site Appraisals at the draft (Issues and Options) Plan stage. The list of sites followed meetings in March and April 2017 with the respective landowners.

3.25 30 sites were assessed around the main settlements of the borough (Table 3.3).

Table 3.3: Summary of sites appraised through the Schedule of Site Appraisals

Settlement	No. of sites appraised
Hemel Hempstead	5
Berkhamsted	8

Tring	6
Bovingdon	4
Kings Langley	3
Markyate	2
Other (countryside)	2
Total	30

3.26 These sites were appraised on their contribution to sustainability and on the basis of their effect on key environmental designations including:

- Chilterns Area of Outstanding Natural Beauty (AONB)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve (LNR)
- Semi-Natural Ancient Woodland
- Historic Park and Garden
- Scheduled Ancient Monument (SAM)
- Floodplain (only in relation to greenfield sites)

3.27 This work has provided an opportunity to systematically appraise sites against a range of broad land use and sustainability considerations. It identified a range of constraints and opportunities with each location.

3.28 While a useful early tool for assessing sites, the work did not make any formal decisions on them in terms of any site selection process given the very high-level nature of the appraisal and the difficulties of making robust decisions at the early stages of preparing the evidence base for the Plan. However, the Council has relied on the more detailed site assessment work undertaken through the Site Selection topic paper and complementary evidence base studies for taking these and other sites forward as preferred allocations.

e) Sustainability Appraisals

3.29 How the Sustainability Appraisal process has influenced the broad scale and location of development is set out in more detail in the Development Strategy topic paper. However, it is worth noting that the SA is a decision aiding tool rather than a decision making one. It is part of a number of strands of evidence to help inform the Council's approach to levels and distributions of growth.

3.30 The preparation of the consultation draft Local Plan involved the reviewing and testing of a range of growth options and scenarios. Alternative options were developed and presented early in the preparation stage of the Plan, and have been developed and refined over time as evidence emerged. It was also subject to further testing and targeted engagement to develop the growth strategy contained in the consultation document.

3.31 The consultation draft Local Plan has also been informed by a number of iterations of the Sustainability Appraisal to assess emerging proposals against a number of economic, social and environmental objectives and to identify what

measures could be included to offset adverse impacts. A series of Working Notes have been prepared at each key stage.

f) Habitat Regulations Assessment

3.32 The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan and its policies, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects. It must determine whether they would adversely affect the integrity of those sites.

3.33 The HRA is a separate process from the SA/SEA, although there are links between the two assessments and one will inform the other. The Plan is being subjected to an Appropriate Assessment (AA) under the Conservation of Habitats and Species Regulations 2017 (as amended) which considers (amongst other things) the impact of the Plan on the Chilterns Beechwoods Special Area of Conservation (SAC) taking into account any further mitigation that may be required in the Plan. This work is ongoing. Further details of the assessment process can be found in the Development Strategy topic paper.

g) Green Belt Review

3.34 The commissioning of a comprehensive Green Belt assessment for Dacorum was a specific requirement of the Core Strategy Examination Inspector and one that is reflected in the Core Strategy (Section 20). The assessment is technical work only and is not formal policy of the Council, although it forms an important part of its emerging evidence base.

3.35 Developers and landowners have continued to promote land on the edge of settlements and in the wider countryside for housing, particularly Green Belt land. Therefore, the allocation of new housing sites needs to be seen in the context of the role of the Green Belt. However, the use of such land for housing has proved unpopular with the public and other organisations (e.g. CPRE), as reflected in the responses to the Issues and Options stage of the Plan.

3.36 The Council acknowledges national priorities to boost overall housing supply and to deliver sustainable housing development. Equally, it is a national priority to maintain, as far as is possible, established Green Belts.

3.37 The draft Plan has been subject to a series of Green Belt reviews:

- Green Belt Review Purposes Assessment – Final Report (November 2013)
- Stage 2 Green Belt Review and Landscape Appraisal Report January 2016 (Published December 2016)
- Stage 3 Green Belt Review – Final Report (August 2020)

3.38 The studies can be accessed using the following link to the Council's website: <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

- 3.39 Each review represented an increasingly finer grained focus on Green Belt boundaries and landscape constraints. Neither Stage 1 nor 2 of these studies made any recommendations for specific development opportunities. Alternatively, the Stage 3 process was much more site-led. All of the reviews have helped the Council's understanding of the constraints and opportunities for development, and its implications for the wider Green Belt purposes and detailed boundaries. This work, in conjunction with other evidence base studies, has guided the Council's decisions over the most appropriate locations for planned growth in the Borough.
- 3.40 The Stage 1 study was commissioned jointly by Dacorum, St Albans and Welwyn and Hatfield authorities and was prepared by Sinclair Knight Merz. The consultants undertook an assessment of the Green Belt in each authority to identify how it met the purposes of the Green Belt set out in national guidance. The study concluded that, on the whole, all strategic parcels in the Green Belt, at least in part, clearly performed a key role in terms of the Green Belt function nationally and locally. It was clear that most of the Green Belt performed important functions that relate to checking sprawl, preventing merging, safeguarding the countryside, preserving setting and maintaining the local settlement pattern.
- 3.41 However, it did identify a small number of strategic sub-areas that were seen as contributing least to Green Belt purposes and should be subject to further assessment:
- D-S1 – Land enclosed by B488, A41 and west of Tring (GB03).
 - D-S2 – Land enclosed by A41 and southeast Berkhamsted (GB11).
 - D-S3 – Land south of Hemel Hempstead enclosed by the A41 and railway line, and in the vicinity of Rucklers Lane (GB14B).
- 3.42 Furthermore, it identified two smaller sub areas that were similarly seen as contributing least to such purposes:
- D-SS1 – Land west of Hemel Hempstead (GB10)
 - D-SS2 – Land at southeast edge of Bovingdon (GB13)
- 3.43 In the case of Dacorum, the study did not make any suggestions for boundary adjustments that could be made that would not compromise the achievement of the overall purposes of the Green Belt.
- 3.44 The Council commissioned a Stage 2 Green Belt review which was undertaken by Arup. This study also included a landscape appraisal. The review assessed in more detail those strategic and small-scale sub-areas of the Green Belt in the previous review that were considered as “contributing least” to national Green Belt purposes, alongside additional sub-areas at the edges of the towns and large villages. The work continued to note that all of the sub-areas examined were adjudged to meet one or more of the NPPF purposes, though the degree to which different parts of the Green Belt contributed to the individual purposes varied significantly.

3.45 The study made clear that it did not aim to determine future amendments to the Green Belt boundaries in Dacorum. It identified a series of further refined Green Belt sub-areas around the key settlements which, on the basis of their strength against the NPPF Green Belt purposes, level of environmental and heritage constraint, and landscape sensitivity, should be considered further as part of the Council's future site selection process.

3.46 The further refined Green Belt sub-areas were divided into less constrained and more constrained groups as follows:

Degree of constraint	Settlement	No. of sub areas
Less constrained	Berkhamsted	6
	Bovingdon	3
	Hemel Hempstead	3
	Kings Langley	2
	Markyate	1
	Tring	2
More constrained	Berkhamsted	2
	Hemel Hempstead	3
	Kings Langley	1
	Tring	2

3.47 The Stage 2 Review also suggested, as part of the Rural Area assessment, an addition of two sub-area to the Green Belt to the north of Markyate and recommended an amendment to correct an anomaly to the south of Berkhamsted to create a stronger defensible boundary with the A41.

3.48 The Stage 3 review differed from the previous two stages in that it was more site-informed. Arup was also appointed by the Council to prepare a Stage 3 Green Belt review. This summarised the results of a review of the Green Belt boundaries informed by the Council's on-going work on preferred site allocations. The study had three main components:

- To assess preferred housing and employment sites, their boundaries and potential mitigation measures;
- To advise on new Green Belt boundaries around the six key settlement following consideration of these sites; and
- To assess the landscape and visual impact of the potential housing and employment sites.

3.49 The study did not fundamentally alter the broad conclusions of the earlier Stage 2 review. The majority of sites reviewed were found to have strong existing Green Belt boundaries, which would be considered to meet the NPPF requirements of being clearly defined, readily recognisable and likely to be permanent. Six sites were considered to have relatively weak boundary edges and so they recommended strengthening if the opportunity arose.

3.50 The review also considered the strength of the resulting Green Belt boundaries if a site was released from the Green Belt. In summary, it concluded that:

- Four sites would result in new Green Belt boundaries that would be considered readily recognisable and likely to be permanent.
- Thirty sites would result in weak new Green Belt boundaries, where boundary strengthening would be required.
- Sixteen sites were found to lead to anomalies, unless the area of land released from the Green Belt was enlarged.

3.51 Each review represented an increasingly finer grained focus on Green Belt boundaries and landscape constraints. Neither Stage 1 nor 2 of these studies made any recommendations as to potential growth scenarios. They have helped guide the Council's decisions about the most appropriate locations for planned growth in the Borough by better understanding constraints and opportunities for development, and its implications for the wider Green Belt and detailed boundaries.

3.52 These reviews and their implications are discussed in more detail in the Green Belt and Development Strategy topic papers.

h) Settlement Hierarchy Study

3.53 Policy CS1 and Table 1 in the Core Strategy set out the Council's approach for guiding the distribution and scale of development in Dacorum to 2031. This focussed a hierarchy of growth on the towns and large villages as sustainable locations. The aim of the Settlement Hierarchy Study (October 2017)¹⁷ (SHS) was to review the information that sat behind the existing settlement hierarchy and to consider whether it should change in the future to guide development planned through the draft Local Plan.

3.54 The SHS was supported by a Settlement Profile (October 2017)¹⁸. The settlement profiles used a range of key local statistics and concentrated on the towns and villages in the Borough with a minimum population of 300 residents, and where the information was most readily available:

- Hemel Hempstead
- Berkhamsted (including Northchurch)
- Tring
- Bovingdon
- Kings Langley
- Markyate
- Chipperfield Flamstead
- Potten End

¹⁷ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/settlement-hierarchy-study-main-report-october-2017.pdf?sfvrsn=deac339e_4

¹⁸ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/settlement-profiles-paper.pdf?sfvrsn=7ac5339e_4

- Wigginton
- Aldbury
- Long Marston
- Wilstone
- Bourne End
- Great Gaddesden
- Little Gaddesden

3.55 The SHS assessed each settlement based on its population size, the presence and range of services and facilities available, and its accessibility. It concluded that the Council's current approach to the settlement hierarchy was sound, and should not change as a result of planned development up to 2031. In terms of the draft Local Plan, the SHS recommended that, based on growth levels highlighted in the Issues and Options (Reg.18) consultation, no change to the settlement hierarchy would be needed, but that decision should be confirmed once it was known.

3.56 The Council sent a questionnaire to all the Town and Parish Councils to understand their views about local infrastructure, services and facilities. The Council received a response from the majority of parishes, although the level of detail varied in each case.

i) Draft Dacorum Infrastructure Delivery Plan

3.57 The Draft Infrastructure Delivery Plan (IDP) provides an assessment of the infrastructure required to support the existing and planned levels of housing and employment development within the borough, as detailed in the new Local Plan.

3.58 The IDP is accompanied by an Infrastructure Delivery Schedule which sets out the schemes which are currently proposed to take place and an Infrastructure Business Plan that identifies funding mechanisms and priorities for delivering the proposed infrastructure set out in the IDP including those covered by CIL and S106. These documents can be viewed on the Council's website.

3.59 The Council recognises that it must ensure that the strategy is underpinned by a clear understanding of infrastructure needs. The scale and distribution of any growth must be capable of facilitating the timely delivery of necessary infrastructure to ensure, as fully as possible, its impacts can be mitigated.

3.60 The Council has undertaken a range of engagements with key organisations on an iterative basis that has helped both inform and refine the developing strategy for growth. This engagement process will continue beyond the current consultation stage of the Local Plan. We also continue to work closely with infrastructure providers and relevant bodies under the Duty to Cooperate process, including Hertfordshire County Council and Highways England.

3.61 The draft IDP is our key evolving evidence base on infrastructure. It provides an assessment of the infrastructure required to support the existing and planned levels of development within the borough up to 2038. The preparation of the IDP is an iterative process as it has been continually updated through discussions

with relevant stakeholders and other technical inputs as emerging growth scenarios were developed and refined.

- 3.62 The Council has carried out a series of stakeholder engagements in September 2019, and May and August 2020 with utility providers and other stakeholders under the South West Hertfordshire Infrastructure Providers meetings. The responses have been informed by and have helped refine our emerging scenarios, as well as forming a key input into the IDP work.
- 3.61 The County Council are an important body that we are engaging with jointly under the Duty to Co-operate requirements and Strategic Infrastructure Providers meetings. The County Council's Growth and Infrastructure Unit has acted as our liaison across the many county services.
- 3.63 The Council has carried out a series of more detailed stakeholder engagements in September 2019, and May and August 2020 with utility providers and other stakeholders under the Strategic Infrastructure Providers meetings. The responses have been informed by and have helped refine our emerging scenarios, as well as forming a key input into the IDP work. More detail can be found in the latter document.
- 3.64 Work on the Hemel Garden Communities programme to deliver substantial growth to the north and east of the town has also helped inform our knowledge of infrastructure requirements there, some of it being large-scale and having town-wide implications.
- 3.65 The draft IDP provides us with an understanding of infrastructure requirements, priorities, timing and funding. Our work to date on infrastructure has not identified any fundamental "showstoppers" to the level of growth proposed, although there are continuing issues that will need addressing, some of which are discussed below.
- 3.66 We continue to work closely with relevant landowners, developers, and other related infrastructure bodies, to minimise/resolve matters, and acknowledge the on-going need to rigorously test viability on a Plan-wide and site-specific basis to ensure development and infrastructure can be delivered.

4. Current supply and delivery

a) Introduction

- 4.1 This section of the topic paper explains the Council's current position on housing supply and delivery as a baseline against which to consider future supply.
- 4.2 The Council has a well-developed monitoring system which the County Council helps support. This allows us to carry out regular monitoring of land development in the borough and to publish an annual series of land position statements and borough wide monitoring reports¹⁹. Furthermore, the work provides us with robust time-series data in support of national monitoring requirements (e.g. the Housing Delivery Test and 5-year housing land supply position), and for monitoring our own corporate indicators.
- 4.3 We publish an annual land position statement for both housing and employment. We prepare these for each financial year using a base date of 1st April. They provide a simple "snap shot" of the supply of planning permissions for development and their progress to date. The latest published residential position statement is for 1st April 2019 and covers the period 1st April 2018 – 31st March 2019.
- 4.4 The Council also prepares on an annual basis its Authority Monitoring Reports (AMR). The AMRs use information from the land position statements and other sources to provide a more detailed overview of the success of Local Plan policies and the progress of new development. Due to the need to progress the draft Local Plan in recent years, the latest published AMR covers the period 2016/17.

b) Housing completions 2006-2019

- 4.5 We are on-track to deliver on our existing housing target in the Core Strategy of 430 homes per annum (see Table 4.1). Since the start date of the Core Strategy, the Borough has delivered an average of 449 (net) completions over this 13 year period (albeit annual completions have varied enormously from a low of 219 homes to a peak of 723 homes). Matters have improved more recently with an average of 569 (net) homes per annum being achieved over the last 5 years, reflecting a steadily improving local housing market since the national recession of 2008.

Table 4.1: Summary of (net) housing completions 2006-19

Period	No of completions (net)
April 2006 - March 2007	400
April 2007 - March 2008	384
April 2008 - March 2009	418
April 2009 - March 2010	237

¹⁹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

April 2010 - March 2011	603
April 2011 - March 2012	447
April 2012 - March 2013	290
April 2013 - March 2014	219
April 2014 - March 2015	379
April 2015 - March 2016	659
April 2016 - March 2017	723
April 2017 - March 2018	586
April 2018 - March 2019	493
Total	5,838
<i>Average (2006-19)</i>	<i>449</i>
<i>Average (2014-19)</i>	<i>569</i>

Source: DBC monitoring

- 4.7 The bulk of completions over this Plan period have been centred on Hemel Hempstead (71.1%) (Table 4.2 below).

Table 4.2: Summary of (net) housing completions by settlement 2006-19

Settlement	Total housing stock in Borough (as at 2019)*	% of total housing stock in Borough	No. of (net) homes)	% of total housing programme
Hemel Hempstead	39,350	61.0	4,150	71.1
Berkhamsted (inc. Northchurch)	9,430	14.6	805	13.8
Tring	5,320	8.3	286	4.9
Bovingdon	2,250	3.5	35	0.6
Kings Langley	2,190	3.4	68	1.2
Markyate	1,400	2.2	159	2.7
Rest of Dacorum	4,530	7.0	335	5.7
Total	64,570	100	5,838	100

Source: DBC monitoring

* VOA 2019 housing stock data

c) Housing commitments

- 3.87 This marked improvement in levels of annual completions has been matched by increasing levels of commitments (i.e. those sites with planning permission or subject to the completion of a legal agreement). As at 1st April 2019 this stood at 3,222 (net) homes (see Table 4.3 below).

Table 4.3: Summary of (net) housing commitments as at 1st April 2019

Source	No of homes (net)
Large sites	1,598
Small sites	260
Conversions / changes of use	695
Legal agreements	669
Total	3,222

Source: DBC monitoring

3.87 The levels of commitments have been helped by an uplift in the housing market and also a continuing relaxation of the planning system to support and bring forward housing supply. As with completions, commitments are overwhelmingly focussed on Hemel Hempstead (see Table 4.4).

Table 4.4: Summary of housing commitments by settlement as at 1st April 2019

Settlement	No. of (net) homes	% of total
Hemel Hempstead	2,493	77.4
Berkhamsted (inc. Northchurch)	95	3.0
Tring	325	10.1
Bovingdon	32	1.0
Kings Langley	6	0.2
Markyate	9	0.30
Rest of Dacorum	259	8.0
Total	3,222	100

Source: DBC monitoring

d) Existing Plan allocations

3.88 Excellent progress continues to be made with the Plan allocations. Our monitoring demonstrates that, on the whole, allocations are moving forward through the development management process with over half subject to either an application or have planning permission. A number of the larger sites are proving more difficult to bring forward given their complexities in terms of negotiating infrastructure delivery (e.g. new schools) and finalising legal agreements. Despite this, what is particularly noteworthy is that schemes are being progressed and implemented on the basis of much higher capacities than indicated in the Site Allocations DPD.

3.89 A summary of the position with existing Plan allocations can be found in Table 4.5 and Appendix 1.

Table 4.5: Summary of housing allocations as at 1st April 2019

	Total No. of schemes	Application submitted	Awaiting completion of legal agreement	With planning	Implemented	Completed
Local Allocations	6	1	1		1	-
Mixed Use Schemes	8	-	-	4	2	2 (part)
Housing Allocations	21	-	-	2	4	2 (part)
Total	35	1	1	6	7	4

Source: DBC monitoring

Note: Some allocations involve multiple parcels of land.

5. Consultation and Engagement

5.1 This section of the Topic Paper explains:

- what consultation and engagement the Council has undertaken in preparing the draft Local Plan; and
- the responses it has received at each stage.

(a) Draft Local Plan (Issues and Options) Consultation 2017

5.2 The Council undertook an Issues and Options consultation on its initial draft of the Plan²⁰ during November-December 2017. In order to secure more meaningful responses this version of the Plan presented a full and detailed set of policy options, particularly in respect of housing growth and distribution. This has helped inform and develop the Local Plan. This stage also involved a Call for Sites exercise for new development.

5.3 This section of the document provides a brief summary of the main issues arising from that stage, and the responses to these. The Council received a total of 22,708 responses to 46 questions from 2,376 individuals and organisations. A full summary of the consultation material and the responses are available from the Council's website²¹.

5.4 The Issues and Options Local Plan gave extensive coverage to housing growth matters followed by a series of related questions. This involved discussions over:

- how new development could be distributed. (Question 8)
- the future role of the Green Belt in meeting housing need. (Question 9)
- selecting development sites. (Question 11)
- the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment. (Question 15)
- calculating housing need. (Question 16)
- the proposed approach to the timing of site delivery. (Question 19)
- what appropriate levels of housing growth should be considered. (Question 33-35)
- identifying suitable locational principles. (Question 36)
- how future growth should be distributed. (Question 37-38)
- potential growth options. (Question 39-45)
- suitability of sites (Question 46)

5.5 The draft Local Plan sought feedback on three potential and successively increasing options to use as a starting point for setting the housing target in the draft Local Plan:

²⁰ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan---issues-and-options--consultation-final---13-november-2017.pdf?sfvrsn=841e329e_21

²¹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

Option	No. of homes pa	Comments
Option 1: lower draft Government figure	602	The Government's draft figure based on the standard methodology for a plan less than 5 years old.
Option 2: Locally assessed need	756	Based on the conclusions of the 2016 South West Herts Strategic Housing Market Assessment
Option 3: upper draft Government figure	1,000-1,100	The Government's draft figure based on the standard methodology for a plan more than 5 years old.

5.6 The Plan explained the implications of each of these options and also rejected other options above and below these figures (see Appendix B to the Reg.18 Local Plan for a detailed discussion on this). It then applied the options to 7 different spatial scenarios explored under Questions 39-45.

(b) Responses to the draft (Issues and Options) Local Plan (Reg. 18) Consultation

5.7 From the substantial number of responses received the summary of responses document identified a number of housing-related themes:

- The Council had not fully assessed urban capacity and made decisions about underused spaces throughout its towns, including Hemel Hempstead.
- The approach to development in the Green Belt and the steps to be taken to assess future development sites. It was felt that a further assessment would be required on Green Belt sites before identifying preferred options
- The extent to which infrastructure assessments have fed into the Plan. Of particular importance was the need for schools and healthcare facilities.
- The impact that development would have on the Chilterns Beechwoods from growth in Dacorum and in adjoining authorities.
- Water availability (including wastewater, drainage and other utility provision) and the capacity required to meet the needs arising from new development.
- The need for environmental standards in all housing (new build and existing) to be set at the highest level to minimise environmental impacts and reduce/minimise carbon emissions.
- Developer contributions should be secured to support development either through Section 106 agreements or through CIL. It was identified that there are existing infrastructure deficits across the Borough that should be address

5.8 By far the largest number of responses received were concerned with housing growth and associated matters. As a consequence, comments were often cross-cutting across the Issues and Options Plan. The public and residential action groups strongly objected to a variety of levels of housing growth and its implications on a number of grounds. However, public and private organisations adopted a more mixed view to such matters, and there was a degree of support expressed for taking proactive steps to accommodate growth. Unsurprisingly, the

development industry tended to be by far the most positive over growth, often linked to their promotion of individual sites.

- 5.9 A brief summary of the main issues arising from each question or group of related questions that had a bearing on housing delivery and distribution is set out below.
- 5.10 There was broad consensus for focussing development in the towns and larger villages (Question 8) as sustainable locations, particularly where this was infrastructure-led and subject to its impact on character in each case. However, there was some limited support for growth in the rural areas and smaller settlements.
- 5.11 There was significant support from key stakeholders, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development in response to Question 9. They raised a number of concerns over the suitability and what they regarded as harmful impacts of releasing land from the Green Belt. Some respondents took a more pragmatic view stating that if Green Belt development had to come forward then this should be used as a way to ensure greater levels (in the order of 50%) of affordable housing. However, many developers and land owners agreed that land that performs poorly in relation to the five NPPF principles should be removed from the Green Belt.
- 5.12 Central Beds recognised that higher than anticipated growth levels would mean that further Green Belt release would be needed across the Borough. St Albans were concerned that the Council had not done enough to encourage urban regeneration and development beyond the Green Belt. Hertfordshire County Council took the view that Green Belt releases would need to take into account how accessible and sustainable such locations were, and they were supportive of using Green Belt for multiple uses.
- 5.13 A variety of responses were made to the Councils approach to selecting sites (Question 11). These overlapped earlier concerns about growth in general and its impact (individually and cumulatively) on the settlements, the Green Belt/Rural Area, and the need for (or lack of) infrastructure. There was considerable support for making effective use of urban/previously developed land, including smaller and windfall sites. The Chilterns Conservation Board (CCB) stressed that the AONB should be a very important factor in assessing where development should be located.
- 5.14 A number of landowners have made representations in support of the release of their land from the Green Belt for a variety of reasons, including their overall suitability and contribution to meeting growth. Where there was support for this from individuals it was on the basis of schemes being properly planned for, and that they were away from sensitive areas and in sustainable/accessible locations.
- 5.15 Question 15 on defining the Housing Market Area (HMA) did not generate large volumes of comments. Most responses were concerned with what precise area this should cover and the implications of this in terms of where and how need (and unmet need) is met. Some supported the HMA extending into

Buckinghamshire and Bedfordshire. A few felt that the HMA would allow other South West Herts councils to meet some of their housing need in Dacorum and highlighted the adverse effects of this.

- 5.16 Question 16 was concerned with which of three growth level would be the most appropriate. Residents, Town and Parish Councils and local action groups were generally supportive of the lower growth level (602 homes per annum). However, some were still concerned that this was not reflective of local circumstances.
- 5.17 Many developers/ planning consultants, Markyate Parish Council and Chilterns and South Bucks District Council felt that a growth level of 756 homes per annum is an appropriate starting point based on evidence needs (the (then) SHMA). However, the former group also argued that the plan and housing land supply should have enough flexibility to meet a higher growth level if circumstances justified. Not all agreed that this was an appropriate figure citing that Dacorum would not be able to accommodate the growth proposed.
- 5.18 Alternatively, there was support for the highest of the growth options (1,000-1,100 homes per annum) put forward in the Issues and Options Local Plan. Respondents felt this was the most appropriate scenario as it complied with the Government's standardised methodology approach and that it would more accurately meets housing need of the Borough. However, some respondents did caveat their support. Some argued that there needed to be consideration of the amount of development each settlement could take based on these housing numbers. While others stressed that there needed to be cooperation with other authorities in determining how housing number are met.
- 5.19 Question 16 did allow flexibility for respondents to explore other growth levels. Many of those who commented sought lower figures as this was felt to lessen the impact on the Green Belt, settlement character, local infrastructure, etc. Some thought the Council had underestimated the contribution from urban capacity. Others considered that the housing figures should be based on local needs rather than Government set values and should not have to take further growth levels from London. A number of developers believed that the higher value should be sought, as this will be required by the Government standard methodology when the plan was adopted.
- 5.20 A number of neighbouring local authorities also responded to this element of Question 16. The responses mainly focussed on the issue of meeting the need within the HMA and how any unmet need was to be tackled.
- 5.21 Question 19 focussed on the timing of site delivery. There was strong support for prioritising previously developed land over greenfield sites (e.g. Northchurch PC, Chiltern Conference board, the Chiltern Society). Infrastructure was also seen as being closely linked to delivery. Respondents were supportive of the earlier delivery of infrastructure (often in advance of the housing). Developers tended to favour the early release of large sites as they were seen as securing infrastructure and the delivery of housing.

- 5.22 Questions 33-35 asked further questions regarding growth levels. Question 33 enquired whether the three growth levels proposed were the most reasonable to consider. Many of the responses mirrored those to Question 16. A number of organisations were seeking lower housing figures than 602 homes per annum (Northchurch PC, Berkhamsted TC). Many residents felt that the Council had not actively explored alternatives to growth. Others urged caution (e.g. Tring TC) because of the need to take into account the constraints of the Borough, the capacity of settlements and heritage impacts (Historic England).
- 5.23 Not unsurprisingly, many developers argued that the Council will need to reflect the Governments standard methodology approach, or risk being found unsound.
- 5.24 Question 34 asked whether respondents agreed with rejecting the following growth levels:
- Continuing the current housing target (430 homes a year);
 - ‘Urban Capacity’ option (476 homes a year); and
 - Significantly above the upper Government figure (1,100+ homes a year).
- 5.25 Berkhamsted TC and Northchurch PC took the view that the current housing target of 430 homes per year should be maintained given that the infrastructure across Dacorum is at capacity. A small number of organisations supported the urban capacity option (The Chilterns Conservation Board, local residents groups). Central Bedfordshire Council suggested that the Council should plan to meet the upper Government growth figure (option 3) until a final housing figure is identified.
- 5.26 Question 35 enquired as to whether the Council had considered all reasonable alternative levels of growth. Again there was a repetition of responses to those under previous linked questions. The parishes, residential and civic groups sought lower growth levels. Developers sought growth at higher levels and were satisfied that that lower levels of growth had been properly discounted through the process. Central Bedfordshire Council was also supportive of higher growth levels. Historic England did not have a preference on growth options pending further analysis on heritage impacts. The Chiltern Conservation Board suggested that the capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number of homes.
- 5.27 Question 36 sought views on the proposed location principles set out in the Issues and Options Plan. A variety of organisations expressed their broad conditional support for these principles. Hertfordshire County Council suggested that sites should be chosen based on their sustainability performance and their ability to provide infrastructure provisions to support development. Other respondents argued that the locational principles need to take into account the specific constraints of each settlement or be reviewed on a site-by-site basis.
- 5.28 The Chiltern Conservation Board and Chiltern Society objected to the principles as they omitted consideration of the CAONB and/or its setting. Numerous respondents disagreed with the principles for high density building as they felt there was a greater need for family homes and outdoor space in developments.

In addition, some rejected the principle requiring securing a 5 year housing supply. On the whole, developers believed that the locational principles restricted the deliverability of development, as it did not consider the availability of brownfield sites and the importance of urban regeneration.

5.29 Question 37 asked whether respondents agreed with rejecting the following growth distributions:

- New settlement (town or village);
- Rural growth;
- Export growth to another Council area;
- Use greenfield land before brownfield land; and
- Significant expansion of a large village(s)

5.30 There was some broad support for rejecting these options and Historic England continued to express no specific view pending further analysis on heritage impacts. However, the views of nearby local authorities was much more varied. In particular, many felt the Council should pursue a new settlement further. Hertsmere was more supportive of exploring the benefits of this and Aylesbury Vale also noted why this was being rejected as an option. Welwyn and Hatfield considered that a smaller village of 1000 new dwellings could be a sustainable alternative. Hertfordshire County Council supported rejecting the majority of the growth options but felt that new settlements can actually provide the opportunity to plan for sustainable modes from the outset and, if large enough, would have critical mass for services.

5.31 Of the local authorities who responded, St Albans City and District (SADC) considered that these were reasonable alternatives and should not have been rejected. They did not accept our case for rejecting new settlements, large village expansions and rural growth. SADC urged the Council to explore options that lie beyond the Green Belt (and AONB), particularly the area north west of Tring. The area could provide for 15-20,000 homes based on their high level estimate. SADC also felt the Council should consider expanding Markyate.

5.32 Question 38 then sought comments on whether the Council had considered all reasonable alternatives for distributing growth. This only generated very few new options. Some respondents referred to opportunities at Bovingdon Airfield and another suggested a hybrid of the options could be pursued. Most comments were focussed on arguments for and against how growth could be distributed across the three towns and what form this could take.

5.33 Questions 39-45 were concerned about respondent's preferences for seven spatial growth options put forward in the Issues and Options Plan. These options were based on a combination of the three growth levels (602 (option 1), 756 (option 2) and 1,000 – 1,000 (option 3) homes per annum) and whether they were distributed across the three towns (option A), focussed more on Hemel Hempstead (option B), or spread more evenly across the borough (option C). The differences between individual scenarios reduced with the higher growth levels that needed to be accommodated such that there was only one spatial distribution under the option 3 growth level.

- 5.34 Given the number of options and the amount and varied nature of the comments they generated, it was difficult for the Council to understand whether there was any clear preference for a spatial distribution. Respondents in theory could object and support to all options.
- 5.35 Most of the responses were linked to earlier comments over individual's support for particular levels of growth and how this was to be accommodated. Again residents tended to favour distributions associated with lower growth levels (many could not even support this) that were seen as having less impacts on the Green Belt and the character and capacity of settlements, and the development industry were more likely to support the opposite approach. Organisations based outside of Hemel Hempstead tended to favour concentrating development there, especially where it could support urban regeneration along with affordable housing in areas where employment was available.
- 5.36 Those who supported lower growth levels repeated arguments for minimising Green Belt releases, avoiding the merger of settlements, focusing on urban capacity, infrastructure shortfalls, meeting needs outside the Borough, etc. The CCB preferred the lower of the options that focussed growth at Hemel Hempstead (i.e. Option 1B). It was seen as having the least adverse impact on the Chilterns AONB and its setting. Chiltern and South Bucks tended to raise greater concerns over higher growth levels where focussed outside of Hemel Hempstead.
- 5.37 Many who preferred higher growth felt that Option 2A better met assessed need and they favoured concentrating this at the three towns. These settlements were seen as being able to accommodate growth and deliver infrastructure. Some developers argued that option 3 would be more appropriate due to changes in the Government standard methodology.
- 5.38 A small number of respondents argued that there should be opportunities for the more rural settlements to provide some housing growth to ensure they remain vibrant/ viable. Hertfordshire County Council expressed no strong preference (from a transport perspective) but supported proposals to focus on the three main towns, and some development in the smaller settlements to help support rural bus services. Interestingly, Luton Airport was against proposals for development in Markyate as they have a duty to limit the number of people living in areas affected by aircraft noise.
- 5.39 The issues of growth and distribution are dealt with in more detail in the Development Strategy topic paper.
- 5.40 Question 46 sought feedback on the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanied the Issues and Options Local Plan. The former generated a large number of comments from local residents and a number of organisations, often in objection to them. These matters are explored further in the Site Selection topic paper.

(c) Call for Sites

- 5.41 The Council ran a Call for Sites exercise in parallel with the draft (Issues and Options) Local Plan consultation and in conjunction with the Schedule of Site Appraisals. The Call for Sites sought to understand what land landowners were promoting for a range of new development. In reality, the Council accepted submissions beyond this period in order to ensure it was able to capture as complete a picture of potential site availability as possible. However, it did set November 2018 as an informal “cut-off” date to allow the AECOM greenfield site assessment work to proceed (under the “rural” arm of the SHLAA).
- 5.42 The Council received a large number of submissions, mainly for greenfield sites being promoted for housing, although there were a few for employment sites. These are discussed in more detail in the Site Selection and Economic Development topic papers

(d) Internal Workshops

- 5.43 The Strategic Planning team undertook a series of internal workshops across a range of Council development management, housing and property teams. This provided an opportunity to test evolving approaches to policy. The work has helped to shape and refine the emerging plan. It has delivered a range of revisions that take into account recommendations and address concerns and issues raised.

(e) Task and Finish Group Meetings

- 5.44 Officers have been working closely with the Local Plan Task and Finish Group. This is a cross party panel of Members that has provided both high level guidance and detailed scrutiny of the emerging plan, its policies and proposals. As with the internal workshops discussed above, the feedback helped the Council refine the scope of, and broad approaches to and wording of key policies.

(f) Duty to Cooperate/Cross Boundary Matters

- 5.45 The Duty to Cooperate (DtC) is an ongoing process, and we will need to demonstrate that this has been satisfied as a legal requirements by the time the Local Plan is submitted for Examination.
- 5.46 The Council has been working with nearby authorities and other organisations under the requirements of the DtC. These discussions have focussed on strategic matters that affect more than one authority and include unmet housing, as well as employment and infrastructure needs across the South West Herts authorities grouping (Dacorum, St. Albans, Watford, Three Rivers and Hertsmere). Engagement is continuing, but substantial alignment has been reached with many organisations on a range of issues. Consequentially, we have started to prepare Statements of Common Ground / Memoranda of Understanding with these organisations, which have in turn informed the consultation document.

5.47 We have also contacted nearby authorities outlining the scale of growth that needs to be accommodated and seeking assistance to meet needs. These authorities have advised us that they too are facing substantial growth challenges, and are thus unlikely to be able to assist us, particularly in the case of housing.

5.48 We will continue these collaborative and positive discussions alongside the preparation of the Local Plan and the conclusions reached will be incorporated into the final Local Plan, where appropriate.

(f) Other engagement with key stakeholders

5.49 As with the DtC process, the Council continues to engage with a number of specialist bodies across a range of subject matters including utility, transport and educational infrastructure, the Chilterns Special Area of Conservation, Chilterns AONB, heritage, etc. These have directly and indirectly influenced our approach to the scale, timing, and location of the housing supply and associated infrastructure.

5.50 Further information can be found in the relevant topic papers.

6. Assessment of requirements

a) Introduction

- 6.1 This section explores the role of the Local Housing Needs Assessment (LHNA) and its conclusions on what the local housing need should be for Dacorum. It then goes on to explore the implications of recent consultation on changes to the planning system and, in particular the standard method used to calculate this, in terms of setting a housing requirement figure in the Local Plan.
- 6.2 Government guidance on assessing local housing need can be found in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) on 'housing and economic needs assessments'. The NPPF provides that each planning authority should have strategic delivery policies informed by their local housing need assessment which itself follows the standard method.
- 6.3 Our local evidence and recommendations on local housing need are set out in the South West Hertfordshire Local Housing Need Assessment (LHNA). The draft LHNA defines a South West Hertfordshire Housing Market Area (HMA), which covers the whole of the study area.

b) Assessing the local housing need

- 6.4 The NPPF (paragraph 60) provides the following guidance:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 6.5 The PPG on housing and economic needs assessments (paragraph 004) provides guidance on how a minimum annual local housing need figure is calculated using the standard method. The method involves use of a formula to identify the minimum number of homes expected to be planned for, as summarised below:

Step 1 - Setting the baseline	The baseline is set using the 2014-based national household growth projections for the local authority's area over a 10 year period, with the current year being used as the starting point from which to calculate growth over that period.
Step 2 - An adjustment to take account of affordability	Affordability pressures are based on 2018 house price and earnings affordability ratios.

Step 3 - Capping the level of any increase	Where the relevant strategic policies for housing were adopted more than five years ago, the local housing need figure is capped at 40% above whichever is the higher of: a. the projected household growth for the area over the 10-year period identified in step 1; or b. The average annual requirement figure set out in the most recently adopted strategic policies.
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6.6 Paragraph 011 in the PPG explains that:

“The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.”

6.7 Paragraph 012 states that:

“The method provides authorities with an annual number, based on a 10-year base line, which can be applied to the whole plan period.”

6.8 The PPG (paragraphs 003 and 015) allows for alternative approaches to the standard method, but only in exceptional circumstances. Alternatives to the standard method are considered in the draft LHNA (paragraphs 2.37-2.44). This has been done by examining two alternative sources of population estimates from the 2014-based sub-national population projections. The draft report concludes that the evidence is inconclusive.

c) What is the local housing need in Dacorum and South West Hertfordshire based on the standard method?

6.9 Chapter 2 in the LHNA applies the standard method following the steps explained above to the South West Hertfordshire authorities.

Step 1 – Setting the baseline

6.10 The results for South West Hertfordshire are shown below, using the current year as the starting point:

	Dacorum	Herts- mere	St Albans	Three Rivers	Watford	SW Herts
Households 2020	66,908	43,788	61,720	38,857	42,416	253,689
Households 2030	74,213	48,906	68,097	43,314	48,037	282,567
Change 2020-2030	7,305	5,118	6,377	4,457	5,621	28,878
Average Annual Change (Step 1)	731	512	638	446	562	2,888

Step 2 - An adjustment to take account of affordability

6.11 House prices in South West Hertfordshire are high, so step 2 results in a substantial increase in the local housing need:

	Dacorum	Herts- mere	St Albans	Three Rivers	Watford	SW Herts
Average Annual Change (Step 1)	731	512	638	446	562	2,888
Affordability Ratio 2018	12.3	14.3	16.8	13.7	12.5	-
Adjustment Factor	1.52	1.64	1.80	1.60	1.53	-
Adjusted LHN (Step 2)	1,108	841	1,148	715	862	4,674

Step 3 - Capping the level of any increase

6.12 All the South West Hertfordshire Local Plans were adopted more than five years ago, so the cap is applied at 40% above the higher of the projected household growth (step 1) or the current annual housing target in the most recently adopted strategic policies. In every South West Hertfordshire authority, the projected household growth in step 1 is higher than the adopted local plan housing requirement. The 40% cap is therefore applied to the step 1 figure.

6.13 Applying the cap means the minimum annual local housing need figure based on the standard method is 1,025 homes per annum in Dacorum and 4,048 a year in South West Hertfordshire:

	Dacorum	Herts- mere	St Albans	Three Rivers	Watford	SW Herts
Adjusted LHN (Step 2)	1,108	841	1,148	715	862	4,674
Current Adopted Target	430	266	480	180	260	1,736
Adoption Date	Sep-13	Jan-13	Nov-94	Oct-11	Jan-13	-
Higher of Current Target or Step 1	731	512	638	446	562	2,888
Cap Applied	40%	40%	40%	40%	40%	
Step 3 - LHN	1,023	717	893	624	787	4,043

6.14 Therefore, the minimum annual local housing need figure based on the standard method is 1,023 homes per annum in Dacorum and 4,043 a year in South West Hertfordshire.

d) Should the draft Local Plan reflect a higher level of housing growth than the standard method indicates?

6.15 It is necessary to examine this issue because:

- NPPF paragraph 60 advises that strategic policy-making authorities should consider whether they should meet unmet need from neighbouring areas in addition to accommodating their own local housing need.
- Paragraph 010 in the PPG on housing and economic needs assessments provides guidance on when it might be appropriate to plan for a higher housing need figure than the standard method indicates.

6.16 The PPG states that circumstances where a higher figure may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

6.17 This issue is in part linked to the wider matter of South West Hertfordshire accommodating unmet need from elsewhere. Paragraphs 2.20-2.26 in the LHNA deal with this possibility concluding that:

“At this stage it is not possible to gauge the scale of unmet need from neighbouring areas including London. It will be up to those local authorities with an unmet need to approach the SW Hertfordshire authorities in the first instance.”

6.18 Chapter 3 in the LHNA considers whether the housing need identified through the standard method is enough to meet the planned economic growth from South West Hertfordshire. This chapter takes account of the South West Hertfordshire Economic Study Update (September 2019)²². The broad conclusion in chapter 3 of the draft LHNA is that the standard method would help support a considerably higher level of job growth than set out in the Economic Study. There is, therefore, no requirement to plan for a higher level of housing than indicated by the standard method to support economic growth.

6.19 Chapter 4 in the LHNA updates some of the information from the South West Hertfordshire Strategic Housing Market Assessment (2016) on market signals. It concludes that there are some severe affordability issues in South West Hertfordshire. However, these are addressed through the standard method, specifically the 40% uplift within steps 2 and 3. There is no requirement to make any further uplift in response to market signals.

6.20 The LHNA does not consider whether there are any proposed strategic infrastructure improvements that are likely to drive an increase in the homes needed locally. However, the Council’s view is that there are no such proposals which would justify housing growth above the level indicated by the standard method.

6.21 We would conclude that there is no need for South West Hertfordshire as a whole to plan for a higher level of housing growth than the standard method indicates. However, the NPPF (paragraph 60) and the PPG on housing and economic needs assessments (paragraph 010) go on to consider whether local planning

²² http://www.dacorum.gov.uk/docs/default-source/strategic-planning/south-west-herts-economic-study-update---september-2019.pdf?sfvrsn=3594099e_6

authorities should plan for a higher level of housing growth than the standard method indicates.

6.22 Paragraphs 2.16 and 2.19 in the draft LHNA refer to the possibility that the overall local housing need for South West Hertfordshire might be distributed in a different way than indicated by the standard method. In particular, paragraph 2.17 advises that:

“Any redistribution will need to take into account a wide range of factors including local capacity (linked to infrastructure, land availability, environmental and other constraints) and strategic aspiration. It is not the role of this LHNA to distribute the identified level of growth.”

e) The Planning White Paper and Changes to the Planning System

6.23 The Government has announced a number of potential changes to the standard method for calculating housing need in its recent consultations on the Planning Reform White Paper and related changes to the planning system.

6.24 The Government’s new method is explained in the ‘Changes to the Current System’ consultation paper. The paper introduces a new element into the calculation to take account of existing housing stock of an area. A baseline will be set that will consider the higher of either 0.5% of the local authority’s housing stock or the average annual household projections over a 10 year period with the aim of boosting numbers in locations with lower projections.

6.25 The revised standard method also places a greater emphasis on the uplift for affordability and removes the cap which exists under the current approach. Compared to 270,000 homes a year nationally under the current approach, these changes mean that the Government would be able to achieve its 300,000 homes a year ambition.

6.26 If we apply the new revised standard method using the formula in the paper (paragraph 30) we get a local housing need of 922 homes pa (i.e. 16,596 homes over the period 2020-38). The calculation is as follows:

$$\begin{aligned} \text{Adjustment Factor} &= \left[\left(\left(\frac{\text{Local affordability ratio}_{t=0} - 4}{4} \right) \times 0.25 \right) \right. \\ &\quad \left. + \left((\text{Local affordability ratio}_{t=0} - \text{Local affordability ratio}_{t=-10}) \times 0.25 \right) \right] \\ &\quad + 1 \end{aligned}$$

Where $t = 0$ is current year and $t = -10$ is 10 years back

$$[(((12.21 - 4) / 4) \times 0.25) + ((12.21 - 7.88) \times 0.25)] + 1$$

This can be simplified as $(0.513125 + 1.0825 + 1)$, and gives us an adjustment factor of 2.595625

Annual Housing Requirement:

If the proposed approach is followed, it would result in an annual requirement of $355.4 \times 2.595625 = \underline{\underline{922 \text{ dwellings per annum}}}$

- 6.27 Moreover, the Government's wishes to replace the standard method with a nationally-prescribed approach for setting "binding" local housing requirements in Local Plans. This will take into account both housing need in an area (under what the standard method currently provides for) and relative constraints (or lack of).
- 6.28 The 'Changes to the current planning system' consultation document explains (paragraph 5) that further details of these adjustments are set out in the White Paper (paragraphs 2.25-2.29). The latter identifies the following factors that will form part of these adjustments under Proposal 4 to Pillar One – Planning for development:
- the size of existing urban settlements;
 - the relative affordability of places;
 - the extent of land constraints in an area, including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk;
 - the opportunities to better use existing brownfield land for housing, including through greater densification;
 - the need to make an allowance for land required for other (non-residential) development; and
 - inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions and allow for sufficient choice to the market.
- 6.29 We have taken the decision to progress the draft Plan on the basis of the revised local housing need calculation (of 922 homes pa) rather than the current standard method (of 1,023 homes pa). We acknowledge the uncertainties over using this provisional housing figure pending the potential introduction of a national approach to the housing target, a better understanding of the further constraints and other matters that may need to be factored in, and confirmation of how the transitional arrangements will be implemented.
- 6.30 We will keep the local housing need under review as we progress to the next stage of the Plan, revise the figure upwards or downwards when we know more, and make any necessary adjustments to the housing programme as a consequence.

7. Housing supply and delivery

7.1 This section of the topic paper considers the future supply and delivery as set out in the draft Local Plan's housing programme. It considers its performance against the local housing need (LHN) (see chapter 6) and explores other related housing matters.

a) How does the local housing need respond to unmet need?

7.2 Dacorum is intending to satisfy its housing need in full and this is currently reflected in the draft Local Plan. However, as part of the Duty to Cooperate process we have approached authorities within and outside of the housing market area (HMA) during May 2020 regarding meeting some of our needs. These authorities include the following and the template letter can be found in Appendix 2:

- Hertsmere;
- St Albans
- Three Rivers;
- Watford;
- Central Beds;
- Luton
- Buckinghamshire Council; and
- Barnet.

This is a reasonable step to take given how heavily constrained the Borough is and in also justifying our case under exceptional circumstances for releasing Green Belt land.

7.3 Similarly, we have been approached by a number of these same authorities concerning their unmet housing needs including:

- Hertsmere;
- Three Rivers;
- Watford; and
- Barnet.

7.4 The Council has actively engaged with these authorities on the issue of unmet housing needs, and can adequately demonstrate positive ongoing outcomes from these discussions. We will refine our position on this matter as the Plan is being progressed.

b) Is there sufficient urban land to meet our housing requirement?

7.7 The NPPF requires that we fully assess the potential to make effective use of urban land (paragraphs 118 and 137), especially before considering the exceptional circumstances needed for meriting Green Belt releases for housing and other purposes. Traditionally, the Council has found this a difficult source to identify given the constrained nature of the borough, generally limited

opportunities arising and the difficulties of balancing out competing uses for urban land.

7.8 Nevertheless, we have thoroughly reviewed the scope for meeting our housing needs from urban land, particularly that from our main settlements, including:

- accounting for future commitments based on the most recently available monitoring data (as at 1st April 2020);
- bringing forward earlier and identifying new Plan (strategic and non-strategic) growth areas in the existing urban areas;
- identifying development opportunities from sites in the Urban Capacity Study;
- exploring housing opportunities from former employment land;
- fully reviewing opportunities to increase delivery on allocated sites;
- making an allowance across the Plan period of 200 homes pa for windfalls (i.e. small to large sites not currently identified in the Plan but based on an analysis of historic rates); and
- identifying contributions from Neighbourhood Plans.

7.9 The details of this work can be found in the Urban Capacity Study and Site Selection topic papers. Table 7.1 sets out their conclusions on urban housing supply and what we are confident can be delivered over the Plan period.

Table 7.1: Urban Housing Programme 2020 – 2038

Source	No. of homes (net)*
Number of homes required to be built (922 x 18 years)	16,596
Commitments as at 1st April 2020	2,708
Urban Growth Areas	5,638
Grovehill Neighbourhood Plan	200
Windfall allowance	2,408
Total Housing Supply	10,954
Deficit over housing need figure (16,596-10,954)	-5,642

7.10 Table 7.1 clearly identifies that urban land can make a substantial contribution (c.11,000 homes) towards our housing requirement i.e. two thirds of this comprises of such a source. In terms of settlements, the supply of urban land is dominated by Hemel Hempstead with decreasing contributions from the other towns and smaller settlements (see Table 7.2).

Table 7.2: Contribution from urban land by settlement 2020-38

Settlement	No. of homes)	% of total
Hemel Hempstead	9,138	83.4
Berkhamsted (inc. Northchurch)	486	4.4

Tring	531	4.9
Bovingdon	91	0.8
Kings Langley	129	1.2
Markyate	65	0.6
Rest of Dacorum	514	4.7
Total	10,954	100

7.11 However, a significant gap in supply exists in order to achieve an initial 922 homes pa over the Plan period. While the policies in the draft Local Plan will be framed positively to support national priorities towards urban housing and opportunities on previously developed land, these are not sufficient to reduce such a substantial shortfall. Therefore, if we are to meet the local housing need, then there will have to be land released from the Green Belt to bridge this deficit.

c) What is the contribution to the housing programme from Green Belt land?

7.12 Given that we have been unable to identify sufficient urban capacity to fully meet the local housing need, we have sought to meet the shortfall from Green Belt releases. The wider arguments for this are explained in the Green Belt topic paper and the process of selecting suitable and sustainably located preferred allocations (Growth Areas) are set out in the Site Selection topic paper.

7.13 The draft Local Plan identifies 5,945 homes (about a third of the full housing requirement based on the initial housing figure of 922 homes pa) coming from the Green Belt. This is a substantial scale of release (c.500 hectares in total assuming all of the site area is released in each case) reflecting the current challenges of meeting a much higher level of housing need. As a comparison, it is over three times the number of homes released for housing (1,630 homes) under the adopted Core Strategy (i.e. the Local Allocations LA1-LA6). For information, a full list of the preferred Green Belt sites can be found in Appendix 3.

7.14 Such releases vary in location, size, and density. Table 7.3 summarises the distribution of Green Belt releases by settlement. Obviously, all the main towns and large villages now include varying levels of releases broadly related to their size and sustainability characteristics. Tring will contribute the most homes from Green Belt releases over the Plan period, although Hemel Hempstead also includes a significant area of safeguarded land for development post 2038 (see below) and carries forward three of the former planned releases under Policies LA1, LA2 and LA3 of the Site Allocations DPD²³ (a total of 1,330 homes).

Table 7.3: Contribution from Green Belt land by settlement 2020-38

Settlement	No. sites	No. of homes)	% of total
Hemel Hempstead	1	1,550	26.1

²³ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-site-allocations-statement-june-2017.pdf?sfvrsn=d63a3c9e_10

Berkhamsted (inc. Northchurch)	9	1,750	29.4
Tring	3	2,200	37.0
Bovingdon	1	150	2.5
Kings Langley	1	145	2.5
Markyate	1	150	2.5
Rest of Dacorum	-	-	-
Total	16	5,945	100

7.15 The distribution by settlement is more complex in the case of the towns in that site sizes vary considerably from under 100 to close to 1,600 homes (see Table 7.4). In relation to Berkhamsted, the contribution from Green Belt land comprises of a much greater mix of small, medium and large sites compared to the other towns, although it has none in the upper capacity range.

Table 7.4: Number of Green Belt releases by capacity by settlement 2020-38

Settlement	Capacity			
	0-100 homes	101-500 homes	501-1,000 homes	1,001-1,600 homes
Hemel Hempstead	-	-	-	1
Berkhamsted (inc. Northchurch)	5	3	1	-
Tring	-	2	-	1
Bovingdon	-	1	-	-
Kings Langley	-	1	-	-
Markyate	-	1	-	-
Rest of Dacorum	-	-	-	-
Total	5	8	1	2

7.16 Not only do these Green Belt releases differ in size, but they contrast greatly in terms of gross densities from just under 10 dwellings per hectares (dpa) to nearly 30dpa (see Table 7.5). Generally, densities tend to fall with the larger the site. This is because such sites will often have to take into account the need to deliver a variety of commercial, community and leisure uses as well as other infrastructure, reducing the land actually available for housing. Furthermore, their development footprint still needs to be refined in many instances. Therefore, in reality net densities are likely to be much higher in these cases and the Plan and master planning work will ultimately seek to ensure effective use is made of all of these sites.

Table 7.5: Number of Green Belt releases by gross densities 2020-38

Settlement	Gross Density (dpa)			
	5-10 dpa	11-20 dpa	21-30 dpa	Total
Hemel Hempstead	1	-	-	1

Berkhamsted (inc. Northchurch)	1	3	5	9
Tring	1	1	1	3
Bovingdon	-	1	-	1
Kings Langley	-	1	-	1
Markyate	-	-	1	1
Rest of Dacorum	-	-	-	-
Total	3	6	7	2

7.17 The level of Green Belt release is further complicated by the need to identify further long-term safeguarded land at north Hemel Hempstead (c.160ha) (to ensure continuity of supply beyond 2038 (see point g) below).

d) What is the draft Local Plan’s position on housing supply?

7.18 The Council is committed to meeting its local housing need, but it is very evident that the draft Plan will have to herald a major uplift in delivery compared to historic rates of growth (see the discussion under chapter 4). On this point, the Growth and Infrastructure Strategy recognises the scale of the challenge:

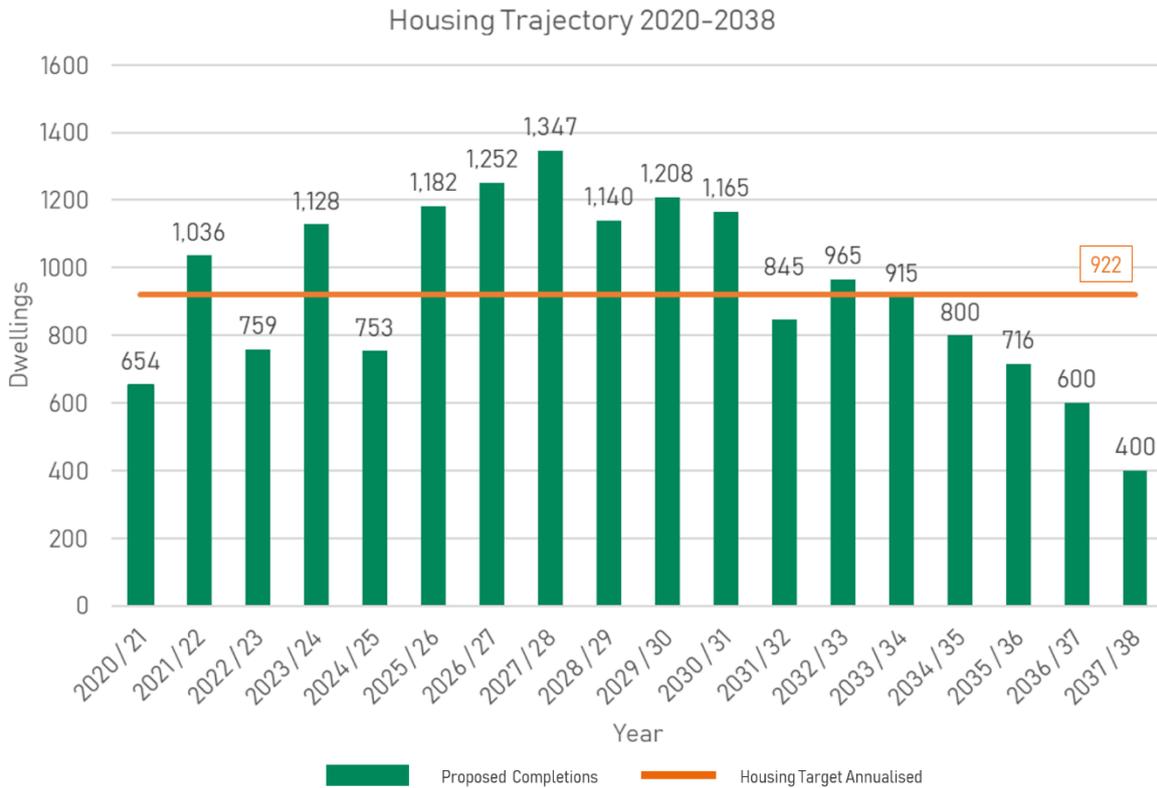
“Whilst our new Local Plan will determine the appropriate level of growth, the evidence points towards a considerable step-change in the amount of development, which ranges from between a doubling to a trebling of what the Borough has been used to over the past 20 years or so.”

7.19 The greenfield and urban site selection topic paper²⁴ deals with the detailed aspects of housing supply. It identifies the updated assumptions behind each of the components of housing land supply, critically tests them, and then draws conclusions over the potential supply coming from both urban capacity and greenfield sites.

7.20 Graph 7.1 summarises the housing trajectory position over the Plan period. It shows that projected completion vary widely from a minimum of 400 homes pa to a maximum of 1,377 homes pa. This is to be expected given the diverse mix of housing sources that make up the supply and does mean that annual delivery will vary above and below 922 homes pa. Broadly, the near to medium term is dominated by commitments and previous Plan allocations carried forward into the Plan (essentially the urban capacity). During the mid to longer-term the projected supply gives way to predominantly Green Belt releases, although this source does tend to gradually fall towards the end of the Plan period. These two sources combine to create the peak of forecast delivery around the mid-term (2025-31).

24

Graph 7.1: Housing trajectory 2020-38



7.21 The full housing programme can be found under Appendix 4. It is clear that when all sources of allocations and other contributions are taken into account the housing target can be met and modestly exceeded by c.300 homes (see Table 7.6). It is also worth noting that the housing programme is dominated by planned and committed sites, with the windfall allowance forming only c.14% of the total future supply of all housing.

Table 7.6: Housing Programme summary 2020 – 2038

Source	No. of homes (net)*
Number of homes required to be built	16,596
Commitments as at 1st April 2020	2,708
Urban Growth Areas	5,638
Grovehill Neighbourhood Plan	200
Windfall allowance	2,408
Strategic greenfield Growth Areas	5,945
Total Housing Supply Total	16,899
Surplus over housing need figure (16,899 - 16,596)	+303

7.22 Table 7.7 summarises the housing programme by settlement. Hemel Hempstead continues to make the largest contribution overall to the housing supply over the Plan period (63.2%), followed by the market towns (29.4%) and then the larger villages (4.3%). On this basis, the three town will be the dominant locations for future housing (over 90% of the supply) over the Plan period.

Table 7.7: Summary of housing programme by settlement 2020-38

Settlement	No. of homes	% of total	
Hemel Hempstead	10,688	63.2%	92.6
Berkhamsted (inc. Northchurch)	2,236	13.2%	
Tring	2,731	16.2%	
Bovingdon	241	1.4%	4.3
Kings Langley	274	1.6%	
Markyate	215	1.3%	
Rest of Dacorum	514	3.1%	3.1
Total	16,899	100	100

7.23 Table 7.8 summarises the housing programme by main source of supply and then by settlement.

Table 7.8: Summary of housing programme by source and by settlement 2020-38

Settlement	Commitments (as at 1st April 2020)	Allocations	Windfall	Total
Hemel Hempstead	1,873	7,105	1,710	10,688
Berkhamsted (inc. Northchurch)	143	1,876	217	2,236
Tring	313	2,274	144	2,731
Bovingdon	27	190	24	241
Kings Langley	71	155	48	274
Markyate	8	183	24	215
Rest of Dacorum	273	-	241	514
Total	2,708	11,783	2,408	16,899

e) Does the draft Local Plan deliver a 5-year supply?

7.24 The NPPF (paragraphs 67, 73 and 74) expects that local plans will be able to identify a sufficient amount of land with an appropriate buffer to demonstrate a five year supply of housing land. We have adopted a Sedgefield approach to the calculation as this is generally preferred and is a more robust test to supply.

7.25 As at 1st April 2020, the draft Local Plan does not achieve a 5-year supply even taking into account applying a minimum buffer of 5% (see Table 7.9). The position would only be worsened when measured against either a 10% or 20%

buffer. This is broadly to be anticipated given new allocations and policy approaches and other measures will not have yet registered with the supply.

Table 7.9: 5-year housing supply as at 1st April 2020 (5% buffer)

5 year requirement for 2020 – 2024 unadjusted housing target (922 x 5) = 4,610 Plus 5% buffer brought forward from later in plan period (5% of 4,610) = 231	4,841
Annual adjusted 5 year requirement (4,841 / 5)	968
Projected supply 2020/21 - 2023/24	4,340
No. of years supply (4,340 / 968)	4.5 years

7.26 However, Tables 7.10 – 7.12 set out the position of the draft Local Plan assuming adoption in the 2022/23 period and using the closest full year's supply in that year (i.e. from 1st April 2022). The housing programme is able to demonstrate a 5-year supply but only with the smallest of a buffer, although the 10% and 20% buffers are not markedly short of achieving this.

Table 7.10: 5-year housing supply as at 1st April 2022 (5% buffer)

Shortfall 2020-22: (2 years x 922) – projected completions 2020/2022 1,844 - 1,690	154
5 year requirement for 2022 – 2026: unadjusted housing target (922 x 5) + shortfall (154) = 4,610 + 154 = <u>4,764</u> Plus 5% buffer brought forward from later in plan period (5% of 4,610) = <u>231</u>	4,995
Annual adjusted 5 year requirement (4,995 / 5)	999
Projected supply 2022/23 - 2025/26	5,078
No. of years supply (5,078 / 999)	5.1 years

Table 7.11: 5-year housing supply as at 1st April 2022 (10% buffer)

Shortfall 2020-22: (2 years x 922) – projected completions 2020/2022 1,844 - 1,690	154
5 year requirement for 2022 – 2026: unadjusted housing target (922 x 5) + shortfall (154) = 4,610 + 154 = <u>4,764</u> Plus 10% buffer brought forward from later in plan period (10% of 4,610) = <u>461</u>	5,225

Annual adjusted 5 year requirement (5,225 / 5)	1,045
Projected supply 2022/23 - 2025/26	5,078
No. of years supply (5,078 / 1,045)	4.9 years

Table 7.12: 5-year housing supply as at 1st April 2022 (20% buffer)

Shortfall 2020-22: (2 years x 922) – projected completions 2020/2022 1,844 - 1,690	154
5 year requirement for 2022 – 2026: unadjusted housing target (922 x 5) + shortfall (154) = 4,610 + 154 = <u>4,764</u> Plus 20% buffer brought forward from later in plan period (10% of 4,610) = <u>922</u>	5,686
Annual adjusted 5 year requirement (5,686 / 5)	1,137
Projected supply 2022/23 - 2025/26	5,078
No. of years supply (5,078 / 1,137)	4.5 years

7.27 Clearly, the 5-year housing supply will prove to be a challenge to the housing programme.

f) What is the draft Local Plan’s approach to phasing?

7.28 The Core Strategy only sought to phase the six greenfield housing allocations (Local Allocations LA1-6) under Policy CS3, although there was flexibility over their delivery to allow the release date of the local allocation to be brought forward if necessary to maintain a five year housing land supply. Whilst no specific delivery date was set, this was to have followed the formal release of these sites from the Green Belt i.e. after adoption of the Site Allocations DPD.

7.29 As a consequence, the Site Allocations DPD only aimed to control the delivery of the local allocations up to 2021 and not introduce any specific phasing for the 2021 – 2031 period. In reality, it meant that the three larger allocations (LA1, LA3 and LA5) could come forward at any time and the small ones (LA2, LA4 and LA6) would be delivered from 2021 onwards. Otherwise, all other allocations were un-phased (i.e. they could come forward at any time).

7.30 However, we are faced with a significant housing supply challenge and we do not consider that a strict phasing of sites is justified in the circumstances. In reality, the Council will need to maintain an effective supply of housing from a range of sources, rather than to have to artificially regulate their release. Full capacity must be maintained in order to meet the housing target, to achieve a 5-year supply and to secure a reasonable land supply buffer to build in a degree of resilience.

- 7.31 The approach of the draft Local Plan is principally to ensure a steady release of housing land over the plan period, to encourage earlier opportunities for homes on previously developed land within the settlements, to boost supply over the latter half of the housing programme (where identified urban sites decline), and to maintain housing activity for the development industry and wider local economy.
- 7.32 That is not to say that some form of phasing will not naturally occur. The allocations vary significantly in size, character, and location, and these factors will naturally regulate their release over time. Obviously, the larger sites will need a longer lead in period in order to allow for practical delivery, and this is reflected in the trajectory to the housing programme (albeit we would wish to narrow this period down as far as is practicable). The major urban extension to the north of Hemel Hempstead (c.5,500 homes) is an example of where the significant scale of development does justify some form of phasing (and safeguarding), and we discussed this in the section below.
- 7.33 The delivery of necessary infrastructure with new development is a key priority of the Council. Therefore, in a limited number of cases some broad form of phasing will need to take place in order for development to secure the delivery of and keep pace with infrastructure. This is particularly the case with the larger development which by their nature are going to place the greatest pressure on infrastructure capacity. The draft Infrastructure Delivery Plan has identified the key infrastructure requirements being chiefly transport and education. This needs to be tempered by the following as the towns and villages are different in their requirements and capacity:
- (a) The availability of infrastructure in the settlement;
 - (b) The relative need for the development at that settlement; and
 - (c) The benefits it would bring to that settlement.

g) Should part of the Hemel North land be safeguarded beyond 2038?

- 7.34 It is important that land released from the Green Belt is safeguarded to necessitate the longer-term comprehensive planning and delivery of housing to the north and east of Hemel Hempstead under the Hemel Garden Communities (HGC) programme. The NPPF makes clear (paragraph 139) that local plans can identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs beyond the plan period and on the basis that such land is not allocated for development at the present time.
- 7.35 The HGC is central to the development strategy for the Borough, both for this current plan period to 2038 and indeed longer-term. It represents a major urban expansion of the town. The Council is confident that a first phase of around 1,500 homes can be delivered over the Plan period, but that land needs to be reserved beyond 2038 to allow a second and larger phase of c.4,500 homes and necessary infrastructure to be delivered.
- 7.36 Together with the proposals for land to the east of Hemel Hempstead falling within St. Albans district area, HGC requires a strategic approach towards

delivering high quality garden town development and major supporting infrastructure. MHCLG has designated Hemel Hempstead as a Garden Town and this is dependent on delivery of the whole programme in the long term. The basis for this designation is to not only deliver new high quality garden communities on the land identified, but to use this as a catalyst to transform and improve the rest of the town.

- 7.37 To provide certainty to the market, to give confidence for investment and to help with infrastructure planning (which has very long lead in times), it is essential to designate the whole area (as it affects Dacorum) in the draft Local Plan.
- 7.38 A critical element of this is a new road link through the HGC area which will play an important part in managing traffic flows through Hemel Hempstead. To plan effectively for this, and to put the local authorities in a good position to seek Government or other funding to help with its timely provision, the draft Local Plan needs to be clear that the land will come forward – albeit accepting that the latter phases will be developed after the plan period (beyond 2038).
- 7.39 Overall, work is now under way between the partner organisations, governed by the HGC Board, to prepare necessary master planning work, infrastructure delivery plan and other supporting studies. The area needs to be considered as a whole, and omitting to identify a key and major extent of the land involved would undermine this process.

h) Does the Plan ensure a sufficient contribution from small and medium sized sites?

- 7.40 The NPPF (paragraph 68) states that small and medium sized sites can make an important contribution to meeting the housing requirement of the area. To promote development of a good mix of sites, local planning authorities should *identify* through Local Plans land to accommodate 10% of their total housing requirement on sites no larger than one hectare, unless there are strong reasons why the target cannot be achieved.
- 7.41 Looking at our local context, our total housing requirement is 16,596 homes. To be NPPF compliant, the Local Plan needs to identify sufficient small sites to accommodate 1,660 homes (i.e. 10% of 16,596). Based on an assessment of the housing programme and a breakdown of these sites by the net number of dwellings that each will deliver, we can summarise the position as follows:

Preferred allocations	1,003
Sites with planning permission (major development)	1,008
Sites with planning permission (small sites)	721
Total dwellings	2,732
% of housing requirement	16.5%

- 7.42 Thus our evidence demonstrates that there are sufficient “smaller” sites which are meeting (and exceeding) 10% of the total housing requirement. It should be

noted that in order to be NPPF compliant, the draft Local Plan need only 'identify' land, not specifically 'allocate' it.

i) Is the draft Plan sufficiently flexible to deal with contingencies?

7.43 The Council acknowledges both near-term concerns on the housing trajectory (e.g. Brexit and Covid-19 pandemic) and the need to ensure some flexibility in supply over the lifetime of the draft Local Plan. Historically, the Council has always delivered on its Plan housing target and the borough has remained an attractive and area of high housing demand. The projected excess over the housing need figure (i.e. 303 units) allows for a modest degree of flexibility. Furthermore, we will work proactively to ensure we can achieve the housing target to 2038 by:

- Using corporate measures to assist strategic developments to come forward in a timely manner;
- Actively bringing forward development on our own landholdings and securing new sites from the open market for housing;
- Continuing to work closely with developers and other bodies to understand a site's latest position.
- Progressing related policy documents to ensure sites are delivered;
- Detailed project management of Hemel Gardens Communities and a stronger public/private relationship to bring it forward;
- Securing infrastructure funding to unlock the delivery of housing sites; and
- Accelerating and supporting schemes through the development management pipeline e.g. early use of Planning Performance Agreements.

7.44 Government continues to widen opportunities for housing in relaxing the planning system, adding to the supply of future housing. The Plan itself is positively framed to support the housing trajectory:

- It provides for a mix of urban and greenfield opportunities in varied locations and type and sizes in housing allocations. This provides for a diversity of offering and flexibility in the housing market.
- Sites will not normally be phased allowing opportunities, where they arise, to bring forward preferred allocations.
- The policies support increasing opportunities for densification, including identifying locations for increasing densities, tall and taller buildings and flexible parking standards.

7.45 All these above factors provide some flexibility to adapt to rapid change and the unexpected non-delivery of sites. Such an overall approach will ensure a robust supply of sustainably located sites and support a plan-led approach to housing land supply.

j) How does the draft Plan account for the impact of Covid-19?

7.46 As with other authorities, the Council is faced with great uncertainties regarding the impact the on-going health crisis will have on the housing market and

consequent effects on supply, demand and the timing of new homes. Undoubtedly, confidence and investment will be adversely affected over the near to medium term.

- 7.47 In the first instance, we will have to see what interventions the Government may wish to put in place to stimulate the wider economy and housing market. There are early anecdotal signs that the latter is slowly improving²⁵, perhaps as a consequence of pent up demand, alongside a steady upturn in the construction industry (led by growth in housing construction)²⁶.
- 7.48 However, there are a number of steps the Council can take locally. We have revisited the housing programme to consider what changes should be made to it to reflect this situation. We do not believe that we can readily apply any discounting to supply as we are not aware of any fair and credible basis for this, locally and nationally. Even if we were to incorporate such discounting, it is unclear what form this would take and over what period it would apply to. This is probably more a near-term issue to do with the slippage and non-implementation of commitments on small to medium sized sites rather than one affecting the medium-long term strategic sites that will inevitably have a lengthier lead-in time.
- 7.49 Irrespective, the Council has looked at potential start dates of sites and adjusted these for potential slippage where justified. This has had a slight impact in terms of reducing the available supply that forms part of the 5-year housing supply calculation. Our discussions with those landowners and developers that form part of the preferred allocations reveals that they are still keen to take sites forward rather than stalling them. Dacorum has historically been a buoyant local economy and house builders will need to cope with significant pent up demand, once the market begins to recover and confidence returns.
- 7.50 Despite these uncertainties, the Council believes it is even more important to be proactive over delivery. Many of these steps it will take are explained in the sub-section i) on contingencies above. The Council will support any specific measures brought forward by the Government following the pandemic, to boost the supply and delivery of new homes. As the draft Plan progresses through the plan-making stages, we will adjust the housing programme, as appropriate, to ensure it remains as robust as possible.
- 7.51 We are pushing forward with adoption of the draft Local Plan that will provide greater confidence to the market, secure growth and allow for well-planned development to come forward in a co-ordinated manner. Indeed, the Council would argue that the Plan is very permissive in nature and supportive of high quality and sustainable forms of development. Corporately, it is further refining its approach, wherever possible, across the plan-making and the development management processes to speed up decision-making and delivery.

²⁵ <https://www.theguardian.com/money/2020/jun/10/property-sales-recover-to-pre-lockdown-levels-across-england-says-zoopla>

²⁶

<https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/bulletins/constructionoutputingreatbritain/august2020>

- 7.52 The Council will place increased emphasis on a collaborative, partnership working across the public and private sectors in order to maintain and boost housing supply and economic development, particularly with key organisations including Hertfordshire County Council, the South West Hertfordshire authorities and, as appropriate, other adjoining districts, the Hertfordshire LEP, Homes England, and the Crown Estate.
- 7.53 However, it will be incumbent of the Council to closely monitor the supply and delivery situation from 2020/21 onwards as this will be much more heavily impacted. The Council can then better gauge its effect on the housing programme and 5-year supply position.

8. Conclusions

- 8.1 This topic paper seeks to demonstrate that the Council has followed the requirements of Government planning policy in assessing housing supply and delivery in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. It has taken into account the outcome of its evidence base and consultation to date in developing its housing strategy. The LHNA has tested and confirmed what the local housing need (LHN) is for the borough, although this approach has been updated to reflect the proposed revised standard method.
- 8.2 While projected supply varies across the Plan period, the topic paper explains that there is sufficient land availability to meet the initial 922 homes pa local housing need and to satisfy a five-year land supply position (albeit at the lower end of any potential buffer) while avoiding the need for a stepped housing trajectory.
- 8.3 The Council is confident that there is sufficient flexibility in the housing programme to allow for variations in the supply. We do not consider that any phasing of sites is warranted based upon the significant level of housing that needs to be delivered over the lifetime of the draft Local Plan. However, there are arguments for a role for safeguarded land to ensure continuity of supply post 2038.
- 8.4 Given the above, the Council considers that the policy approach it has adopted in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth to identifying and delivering housing supply is in accordance with the requirements of the NPPF and PPG. However, as the Plan is progressed we are mindful of the need to keep under review further changes as to how housing need is calculated and its impact on the housing programme.

B. Affordable Housing, other Housing Needs and Housing Mix

9. Introduction

9.1 This section of the background topic paper provides a summary of how the Council's approach to meeting housing need and mix in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth has developed. It explains what has influenced its approach in respect of:

- the evidence base to the draft Local Plan;
- feedback from the Issues and Options consultation; and
- where relevant, ongoing engagement with key stakeholders and meeting its obligations under the Duty to Cooperate.

9.2 The background topic paper makes clear the Council's commitment to identifying and meeting the diverse housing needs of the community through future growth signalled in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. In particular, it describes how the South West Herts Local Housing Needs Assessment 2020 has been a key document for informing much of the draft Local Plan's policy approach to housing need and mix.

10. Policy Context

10.1 Government guidance on assessing local housing need can be found in the National Planning Policy Framework (NPPF) published in February 2019 and the Planning Practice Guidance (PPG) on 'housing and economic needs assessments' (July 2019). The Council also has a number of local strategies in place that influence the provision of affordable homes.

National Planning Policy Framework

10.2 The NPPF states (paragraph 8) that in order to support a strong, vibrant and healthy communities, sufficient number and range of homes should be provided to meet the needs of present and future generations in achieving one of the aims of the social objective of sustainable development.

10.3 Chapter 3 of the NPPF solely relates to plan making. It states that all policies: *"should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals"* (paragraph 31).

10.4 Chapter 5 of the NPPF sets the framework for housing delivery, including the Government's objective to significantly boost the supply of homes (paragraph 59). The Government is committed to ensuring that: *"a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*.

10.5 Paragraphs 61-64 provide guidance on meeting a mix of size, type and tenure of housing. Paragraph 61 of the National Planning Policy Framework (NPPF) states that:

"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes".

10.6 NPPF paragraph 62 states where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. Footnote 27 in the NPPF indicates that this should be done by applying the definition of affordable housing in Annex 2 to the framework (see Issue 6 above).

10.7 Annex 2 differentiates between the following types of affordable housing:

- a) Affordable housing for rent (social rent or affordable rent)
- b) Starter homes
- c) Discounted market sales housing

d) Other affordable routes to home ownership

10.8 Paragraph 63 in the NPPF provides the following guidance on national site thresholds for seeking affordable housing:

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”

10.9 Annex 2 to the NPPF contains definitions of the terms ‘major development’ and ‘designated rural areas’:

- **“Major development.** *For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more...*
- **Designated rural areas:** *National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.”*

10.10 NPPF paragraph 64 states that, subject to certain provisos:

“Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership...”

10.11 Footnote 29 in the NPPF adds that this should form part of the overall affordable housing contribution from the site.

10.12 The NPPF supports the development of rural entry-level exception sites, suitable for first time buyers (or those looking to rent their first home). These are subject to the need for such homes already being met within the authority’s area. These sites should be on land which is not already allocated for housing and should:

- “a) comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and
- b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards.”

10.13 Footnote 33 to point b) sets a size limit of no larger than one hectare in size or exceed 5% of the size of the existing settlement. Footnote 34 restricts entry-level exception sites in National Parks (or within the Broads Authority), Areas of Outstanding Natural Beauty or land designated as Green Belt.

10.14 Paragraph 77 in the NPPF advises that:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local

needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

10.15 Chapter 12 of the NPPF deals with achieving good design. Footnote 47 to paragraph 127 refers to the use of optional national standards for accessible and adaptable housing in planning policies. It also mentions the use of internal space standards, where the need is justified.

10.16 Annex 2 in the NPPF defines people with disabilities as follows:

“People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.”

10.17 Annex 2 to the NPPF also defines self-build and custom-build housing as follows:

“Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.”

Planning Practice Guidance

10.18 More detailed Government guidance is contained in the following Planning Practice Guidance notes (PPGs):

- Housing and economic needs assessments (includes guidance on affordable housing)
- Housing needs of different groups (includes guidance on the private rented sector, self-build and custom housebuilding, student housing, affordable housing and rural housing)
- Housing for the elderly and people with disabilities
- Self-build and custom housebuilding

10.19 Further guidance on how to assess affordable housing need appears in paragraphs 18-24 of the PPG on ‘housing and economic needs assessments’. Paragraph 018 cross refers to the definition of affordable housing set out in Annex 2 of the NPPF. It also states that all households whose needs are not met by the market can be considered to be in affordable housing need.

10.20 Paragraph 009 in the PPG on ‘housing needs of different groups’ advises that strategic policies will need to be informed by an understanding of local housing needs and opportunities. This is especially so where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.

10.21 Paragraph 009 in the PPG on ‘housing needs of different groups’ deals with rural housing. This paragraph advises that strategic policies will need to be informed by an understanding of local housing needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.

10.22 The messages in the NPPF and the PPG on ‘housing needs of different groups’ are reinforced by paragraph 023 in the PPG on ‘planning obligations’.

10.23 Paragraphs 001-003 in the PPG ‘housing for older and disabled people’ provide an introduction and paragraph 001 gives the following explanation of why it is important to plan for the housing needs of older people:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”

10.24 Paragraph 002 is also particularly relevant:

“Why is it important to plan for the housing needs of disabled people?”

The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. Unsuitable or unadapted housing can have a negative impact on disabled people and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. Without accessible and adaptable housing, disabled people risk facing discrimination and disadvantage in housing. An ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime.”

10.25 Paragraphs 004-007 in the PPG advises on how to identify the housing requirements of older and disabled people. In particular, paragraph 006 states that:

“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”

10.26 Paragraphs 010-016A in the PPG deal with specialist housing for older people. Some key aspects of these paragraphs are highlighted below:

10.27 Paragraph 010 states that:

“There are different types of specialist housing designed to meet the diverse needs of older people, which can include:

Age-restricted general market housing: *This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.*

Retirement living or sheltered housing: *This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.*

Extra care housing or housing-with-care: *This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.*

Residential care homes and nursing homes: *These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.*

There is a significant amount of variability in the types of specialist housing for older people. The list above provides an indication of the different types of housing available, but is not definitive. Any single development may contain a range of different types of specialist housing.”

10.28 Paragraph 012 states that Plans need to provide for specialist housing for older people where a need exists. Paragraph 013 then gives the following guidance:

“Do plans need to allocate sites for specialist housing for older people?”

It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.”

10.29 The PPG advises in paragraph 014 that:

“When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

10.30 Finally, paragraph 016A reads as follows:

“How should plan-making authorities count specialist housing for older people against their housing requirement?”

Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.”

10.31 Paragraphs 8 and 9 give more detailed guidance on accessible and adaptable housing. The benefits of such housing are described in paragraph 8 and paragraph 009 gives the following guidance:

“Should plan-making bodies set minimum requirements for accessible housing?”

Where an identified need exists, plans are expected to make use of the [optional technical housing standards](#) (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.”

10.32 More detailed Government guidance on self-build and custom housebuilding is contained in the PPG on ‘Self-build and custom housebuilding’. The PPG stresses that in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout.

10.33 Local authorities are required to keep and have regard to a self-build and custom housebuilding register. The PPG contains guidance on these registers.

10.34 The PPG also explains the self-build and custom housebuilding land duties, namely, the ‘duty to grant planning permission etc’ and the ‘duty as regards

registers'. In relation to the latter duty, the following extract from paragraph 028 is particularly worth noting:

“Relevant authorities with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated documents.”

10.35 The PPG on 'Housing: optional technical standards' reflects some of the steps Government has undertaken in order to streamline housing standards. This PPG introduces a number of optional housing technical standards covering:

- Accessibility and wheelchair housing standards
- Water efficiency standards
- Internal space standards

10.36 Paragraph 001 of the PPG makes clear that local planning authorities (LPAs) will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. The PPG advises LPAs to consider the impact of using these standards as part of their Local Plan viability assessment.

10.37 Paragraph 006 explains the type of evidence LPAs should use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

Much of this can be sourced from their housing needs assessment and other available datasets.

10.38 Paragraph 018 stresses that the optional internal space standards should only be introduced through the local plan. Paragraph 19 explains that the detailed standards can be found in the “Technical housing standards – nationally described space standard (March 2015)²⁷. Paragraph 20 sets out the justifications for such policies:

- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.

10.39 These standards are discussed in further details in chapter 15.

Planning for the future

10.40 The ‘Planning for the future’ White Paper has wide ranging implications for housing. With respects to housing affordability and housing mix it continues to emphasise home ownership, increasing the supply of housing, speeding up the delivery of new homes, securing a range of types and tenures of housing, and supporting self-builders.

10.41 Pillar One - Planning for development in the White Paper identifies a number of proposals including defining a standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst.

10.42 The Government is committed to the delivery of beautiful and well-designed homes and places under Pillar Two - Planning for beautiful and sustainable places. It suggests that when site masterplans and design codes are drawn up for substantial development they should include a variety of housing types from different builders.

10.43 Pillar Three - Planning for infrastructure and connected places seeks to reform the system of developer contributions, with among a number of aims, to secure more on-site affordable housing provision.

Changes to the current planning system

10.44 The Government has also consulted on "Changes to the current Planning System" in tandem with the White Paper. In terms of affordable housing and housing mix, this includes how the Government might deliver, operate and fund its new First Homes scheme and extending the threshold for securing affordable homes for a temporary period to sites of up to 40-50 homes in order to support small to medium sized house builders.

10.45 First Homes are homes that will be sold with a discount of at least 30% and will be prioritised for first-time buyers, serving members and veterans of the Armed Forces, and key workers. The discount will be passed on to future buyers so that these homes will always be sold below market price.

10.46 The Government are effectively seeking to prioritise First Homes over previous forms of home ownership as currently defined in the NPPF. They do not rule out the latter but are anticipating that a minimum of 25% of the negotiated affordable housing will be First Homes. However, the Government have not yet confirmed how the remaining 75% mix of affordable homes will be calculated. They also wish to see such homes replacing the entry-level exception homes approach in the NPPF (paragraph 71).

Raising accessibility standards for new homes (September 2020)

10.47 The Government has recently consulted²⁸ on whether it should mandate a higher accessible and adaptable standard for homes and the wheelchair user standard or reconsider the way they are currently used.

10.48 The paper puts forward a number of policy options affecting what minimum and maximum standards would apply and whether these would be mandatory or optional. However, in all cases, these standards would only affect new homes and not the refurbishment of existing homes.

10.49 Given the timing and nature of the consultation, such discussions are at too early a stage to affect the current approach taken in the draft Local Plan. The Council will need to await future outcomes of the consultation process and consider whether it needs to revise its approach accordingly to accessibility standards.

Local Plan Context

10.50 The following Plan documents provide current advice on affordable housing and housing mix:

- Dacorum Borough Local Plan 1991-2011 (adopted April 2004) (saved policies);
- Dacorum Core Strategy (adopted September 2013); and
- Dacorum Site Allocations DPD (adopted July 2017).

Key relevant policies are summarised below.

10.51 Policy CS18: Mix of Housing seeks to ensure new development provides for a choice of homes in terms of type, size and tenure. While the policy does not provide any specific breakdowns, decisions on this are to be guided by the latest borough-wide and site-specific information.

10.52 Policy CS19: Affordable Housing states that a minimum of 75% of the affordable housing units provided should be for rent. The policy goes on to say that judgements about the level, mix and tenure of affordable homes will have regard to points (a)-(d) in the policy. Policy CS19 sets out specific thresholds for eligible sites, their detailed requirements, and mix of affordable homes. Most eligible sites should achieve 35% of the total new homes as affordable housing.

²⁸ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes>

Further, detailed guidance is also provided in the Affordable Housing Supplementary Planning Document (paragraph 10.48 below).

- 10.53 Policies CS20: Rural Sites for Affordable Homes explains the Council's approach to the location of and criteria for small-scale affordable housing schemes in the countryside.
- 10.54 The Site Allocations SPD identified the distribution, timing and scale of key housing proposals. It sets out key planning requirements for sites, including specific levels of affordable homes.
- 10.55 The above policies have been supplemented by advice contained in the Affordable Housing SPD (September 2013)²⁹ and the Affordable Housing SPD – Clarification Note (August 2019)³⁰. The SPD has provided more guidance regarding the implementation of Policy CS19 and other relevant policies in the adopted Core Strategy; and the assessment of commuted sums. However, national advice on affordable housing has constantly evolved since adoption of the Core Strategy. A series of Clarification Note have been issued which have helped regarding how the Council will apply policy changes signalled by Ministerial Statements and the NPPF.

South West Hertfordshire Strategic Housing Market Assessment

- 10.56 The South West Herts Strategic Housing Market Assessment (February 2016)³¹ (SHMA) assessed future development needs for both market and affordable housing across the relevant housing market area (HMA). It considered the need for different sizes of homes and the housing needs of different groups within local communities across the joint commissioning authorities over the period 2013-2036.
- 10.57 The study helped inform early work on affordable housing and housing mix at the Issues and Options stage of the draft Local Plan. The report suggested that an appropriate mix of new affordable homes in South West Hertfordshire as a whole would be 20% intermediate housing and 80% social or affordable rented homes. However, they advised due to the high number of social rented homes in Dacorum, that the Council could increase the intermediate housing proportion up to 30%.
- 10.58 The SHMA forecast an increasing ageing population to 2036 and the need for suitable accommodation to meet their needs. It estimated a need to make provision for an average of 72 homes per year for specialist accommodation for older people, as part of our overall housing need.

²⁹ http://www.dacorum.gov.uk/docs/default-source/planning-development/affordable-housing-spd-2013-nbsp-.pdf?sfvrsn=5b39f89f_0

³⁰ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/affordable-housing-spd---clarification-note---update-aug-2019.pdf?sfvrsn=37ab099e_8

³¹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

10.59 The SHMA also separately estimated the need for residential and nursing care provision. It concluded that there was an annual need for an additional 30 residential and nursing care bed spaces each year.

10.60 The SHMA has now been mainly updated by the Local Housing Need Assessment.

Draft (Issues and Options) Local Plan to 2036

10.61 Chapter 6 of the draft (Issues and Options) Local Plan to 2036 (Reg. 18 Plan)³² dealt with housing size and type, and affordable housing and mix. It explained that the Borough was subject to affordability issues, and set out the importance of ensuring that new development provided for a range of housing types.

10.62 This draft Plan suggested that it should continue to require 35% of all new homes to be affordable, subject to viability considerations, on sites of 11 or more dwellings, with a general emphasis on properties for rent. However, it considered that the Council's current approach to securing higher levels (40%) of affordable housing on large greenfield housing sites should continue

10.63 The Issues and Options Local Plan supported housing schemes on rural sites that could deliver a very high proportion (ideally 100%) of affordable homes due to high house prices in villages and the supply of affordable homes here being generally more restricted.

10.64 Based on the work of the SHMA, the Issues and Options Local Plan recognised that there was a need to plan for specialist accommodation for the elderly and those needing care. It also identified a modest role in the housing supply for self-build properties within larger development.

Other Local Strategies

(i) Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050 (G&IS)

10.65 The Sustainable Community Strategy ("Destination Dacorum") was published in 2012 and set out visions for the Borough to 2031. It helped develop the visions in the Core Strategy.

10.66 This visioning is now provided by the "Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050" (G&IS)³³. The Strategy has informed the early stages of developing the spatial objectives for the new Local Plan. It outlines the long term visions for the Borough to 2050, guides how the Council can meet the challenges and opportunities of future growth, and cover six over-arching themes.

³² <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

³³ <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

10.67 The G&IS sets out key challenges, proposals and related visions under each theme. It also explains how the Council will work with the local community and key partner organisations to deliver the proposals and visions.

10.68 The key theme affecting affordable housing and other forms of specialist housing is “Building Dacorum’s future homes for everyone”. The GI&S explains that a key element of growth will be to deliver the right type and number of houses to meet need. The Council has invested £15 million in grant funding to Housing Associations since 2012 and it has an ongoing programme to deliver more affordable homes over the next couple of years.

10.69 Chief challenges include pressure to increase the supply of homes across all tenures, and meeting the needs of an ageing population and also those with disabilities or mental health issues. A number of key priorities include:

- Delivering new and genuinely affordable homes.
- Facilitating the delivery of high quality new housing developments meeting all needs.
- Delivering a major programme of new council housing and working closely with Housing Associations to meet the housing needs of the Borough.
- Drafting a new housing strategy to help accelerate the supply of homes across all tenures and types.

(iii) Dacorum Corporate Plan 2020-2025

10.70 The Dacorum Corporate Plan³⁴ (DCP) outlines the Council’s vision and priorities for a five year period, and provides a focus for service delivery and performance, aiding strategic decisions. There is much overlap with

10.71 The document sets out a delivery plan for the Council’s five key priorities. Affordable housing is covered by the “Providing good quality affordable homes, in particular for those most in need” priority. The DCP points out that the Council owns and manages 10,150 homes. It explains that the Council is committed to investing in new Council homes and its existing housing stock. It also highlights a number of Council achievements:

- Completion of 698 new affordable homes, including 216 new Council homes, which are let at social rent.
- £96m investment in maintaining and improving the Council housing stock.
- Completion of a rooftop development to provide six new homes and the upgrading of the thermal efficiency of the whole block.
- Built, or converted properties, to provide 84 units of temporary accommodation.

10.72 Key affordable housing delivery-related actions for the Council are:

- Partnership working to enable the delivery of Hemel Garden Communities and to deliver new homes and jobs there;

³⁴ <http://www.dacorum.gov.uk/docs/default-source/recruitment/corporate-plan-2020-2025.pdf>

- A commitment to build over 400 new Council homes;
- Continuing to provide support to Housing Associations where viable;
- Support for the broader development of over 5,000 new affordable homes;
- Investing £88m in its housing stock through its capital investment programme; and
- Providing further improvements to sheltered accommodation to ensure it meets the ongoing demand.

(iv) Homes for the Future Housing Strategy 2019-21

10.73 The Council's Housing service team has published their three year housing strategy³⁵. It sets out a vision for housing, explaining what the long-term objectives, targets and policies are. The strategy identifies four outcome-based service commitments. In terms of the delivery of housing, under "Commitment 1: We work in partnership to meet the demand for quality, affordable housing in Dacorum" the Council seeks to:

- Write and start to implement a new Housing Development Strategy which will set out our plans for providing new homes in Dacorum.
- Identify and utilise underused garage sites to build new homes for local people at social rent
- Work more closely with our planning department colleagues, offering advice on the affordable housing elements of section 106 agreements

(v) Housing Allocations Policy 2019

10.74 The Council's Housing service team has published an updated housing allocation policy³⁶. The policy is important as it affects how the Council prioritises applications for council and housing association homes based on personal circumstances and level of housing need. It ensures that such homes go to people in greatest housing need.

(vi) Building for the future – Dacorum Borough Council's strategy for new council homes 2013-20

10.75 The strategy was approved in November 2013³⁷. While published a number of years ago, it has established the Council's commitment to an ambitious approach to directly delivering new-build council homes for the period 2013-2020. It committed the Council to build at least 300 more affordable homes in the borough by 2020. The strategy took forward commitments in the Housing Strategy 2013 – 2018, particularly identifying social homes for rent as the priority for the new-build programme over other tenures.

³⁵ http://www.dacorum.gov.uk/docs/default-source/housing/housing-strategy-2019-2021.pdf?sfvrsn=e9f6089e_4

³⁶ http://www.dacorum.gov.uk/docs/default-source/housing/housing-allocations-policy---2019.pdf?sfvrsn=8dcd0a9e_12

³⁷ http://www.dacorum.gov.uk/docs/default-source/housing/building-for-the-future.pdf?sfvrsn=4d2df59f_0

10.76 The strategy has strongly influenced the nature and scale of the Council's new-build programme over the last few years outlined in the above Council policy documents and summarised below.

(vii) New Build Housing Programme

10.77 Since 2013 the Council has embarked on a development programme, which up until the end of 2019 had delivered 188 new Council homes (Table 10.1). Additionally, the Council has needed to respond to an increasing pressure from Homeless applicants and has completed a 41 bed homeless hostel, The Elms in 2015.

Table 10.1 Summary of Council homes delivered under the new build housing programme 2013-19 (as at 1st April 2019)

Scheme	Tenure	No. of units	Year of Completion
Longlands, Hemel Hempstead	Social rent	6	2015
Farm Place, Berkhamsted	Social rent	26	2015
St Peters, Hemel Hempstead	Social rent	9	2015
Aspen Court, Hemel Hempstead	Social rent	36	2016
Queen Street, Tring	Social rent	6	2016
Able House, Figtree Hill, Hemel Hempstead	Social rent	14	2017
Kylna Court, Wood Lane End, Hemel Hempstead	Social rent	79	2019
Corn Mill Court, Hemel Hempstead	Social rent	12	2019
Total		188	

(vii) Council Garage Disposal Programme

10.78 The Council owns 7,611 garages across 771 blocks throughout the borough that provides an important rental stream. However, since September 2014 they have also represented a valuable source of supply of affordable homes when the Council approved:

- a) the disposal of 97 sites following a detailed review of stock; and
- b) a strategy to select a development partner (or partners) to take forward the proposed planning, construction and housing sales for the sites selected for disposal.

10.79 To date 17 sites have been sold, the majority having been bought by Housing Associations. The remainder have been sold to private developers.

11. Evidence Base

11.1 The approach to the level and type of affordable housing and mix of housing and other forms of specialist accommodation has been developed in the light of a number of key evidence base work and studies which are summarised below.

11.2 The Local Housing Needs Assessment (LHNA) has been a key driver in informing the approach to housing policy in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth.

a) The South West Herts Local Housing Needs Assessment 2020

11.3 The South West Herts authorities (Dacorum, Hertsmere, St. Albans City, Three Rivers, and Watford) jointly commissioned GL Hearn and Justin Gardner Consulting to prepare a LHNA. The South West Herts Local Housing Needs Assessment 2020 was finalised in May 2020³⁸. Importantly, the LHNA takes into account the changed definition of affordable housing in the NPPF (Annex 2).

11.4 The role of the LHNA is to assess future development needs for housing types and mix to meet the housing needs of different groups across South West Hertfordshire over the period 2020-2036, although it did not deal with the need for Gypsies and Travellers.. It has helped inform a variety of approaches to housing policies including:

- providing detailed conclusions on the required mix of market and affordable housing need by house type and size for this Local Plan period. These conclusions take into account projected changes in the population and estimates future demand.
- setting out evidence on the need for accessible and adaptable housing in Dacorum.
- assessing the local need for specialist housing for older people.

However, the LHNA did not provide an affordable housing target but merely identified the scale of the need.

11.5 In terms of affordable homes and mix, Chapter 4 updates some of the information from the South West Hertfordshire Strategic Housing Market Assessment (2016) on market signals. It is concluded that there are some severe affordability issues in South West Hertfordshire. However, these are addressed through the standard method, specifically the 40% uplift within steps 2 and 11. There is no requirement to make any further uplift in response to market signals.

11.6 Chapter 5 shows that there is a very high need for affordable housing in South West Hertfordshire. Therefore, the LHNA recommends that as much affordable housing should be sought as viability allows. Despite this, the following conclusion is drawn:

38

“As per the PPG local authorities should consider an increase in housing requirements where it could help deliver the required number of affordable homes. However based on information set out herein it would be reasonable to conclude that after consideration it was not necessary to increase housing delivery.”

- 11.7 The LHNA identifies a net combined estimated annual need over the period 2020-36 for affordable rent/social rent and affordable home ownership of 3,188 affordable homes per annum across the SW Herts area. Dacorum’s estimated need is 611 homes per annum, sitting mid-way in respect of the other authorities (Table 11.1).

Table 11.1 Estimated net housing need in SW Hertfordshire 2020-36

Type of housing	Dacorum	Hertsmere	St Albans	Three Rivers	SW Herts
Aff. Rent / Social Rent	363	356	443	350	1,994
Aff. Home ownership	248	147	385	162	1,194
Total	611	503	828	512	3,188

Source: Tables 37 and 41, LHNA

- 11.8 In terms of affordable housing to rent, the LHNA stresses that it does not provide an affordable housing target but merely identifies the scale of the need. However, given the scale of affordable housing need the authorities should seek to deliver as much affordable housing as viability allows.
- 11.9 With respect to affordable home ownership, the LHNA considers that the estimates should be seen as indicating the potential demand for such accommodation, as all of the households identified will be able to afford a private rented sector home without subsidy. It concludes that the Council could consider seeking at least 10% of all housing (on larger sites) to be affordable home ownership (as set out in the NPPF2). The LHNA considered that Shared Ownership and Discount Market Sale are the most appropriate of the low cost home ownership products as these will reach the widest and lowest-earning population base.
- 11.10 The LHNA also identified the costs of different types of affordable housing in order for them to be genuinely affordable. It recommends that the Council should implement policies which restrict affordable rents to Local Housing Allowance (Housing Benefits). Any rents set in excess of LHA would mean households having to top up their rent from other income sources.
- 11.11 The LHNA recommends that it is not necessary to plan for starter homes given that no starter homes have been built since 2014 when the concept was launched due to the required secondary legislation not being enacted.
- 11.12 Chapter 6 provides a detailed analysis of the mix of housing required across different tenures based on a profiling of current and future households. The

LHNA recommends the following suggested size and tenure mix across the SW Hertfordshire Housing Market Area (HMA) and at a local level:

Size	Market	Affordable Homes to Buy	Affordable Homes to Rent
1-bedroom	5%	25%	35%
2-bedrooms	25%	40%	30%
3-bedrooms	45%	25%	30%
4+-bedrooms	25%	10%	5%

11.13 This reflects differing needs across the tenures, particularly the need for smaller affordable homes and larger market (family) properties. However, the LHNA warns against using these figures too prescriptively, rather they should be used as a guide to ensure future delivery is not unbalanced taking into account local circumstances.

11.14 Chapter 7 covers the housing needs of older and disabled persons. The LHNA recognises a substantially ageing population profile in the HMA area. It makes a distinction between housing with support (i.e. retirement/sheltered housing) and that with care (i.e. extra-care housing). It identifies a dwelling requirement for both forms of housing across tenures in the HMA. However, in the case of Dacorum, there already is a current and forecast surplus of rented housing with support (Table 11.2)

Table 11.2 Older Persons' Dwelling Requirements 2020 to 2036 – Dacorum

		Housing demand per 1,000 75+	Current supply	2020 demand	Current shortfall / surplus	Additional demand to 2036	Shortfall/ surplus by 2036
Housing with support	Rented	70	1,579	904	-675	526	-149
	Leasehold	53	363	688	325	401	726
Housing with care	Rented	18	0	231	231	135	366
	Leasehold	12	0	157	157	91	248

Source: Table 90, LHNA

11.15 The report then goes on to assess the bed space requirements for nursing and residential care beds (i.e. accommodation covered by the C2 use class). The LHNA highlights a notable future need in both the HMA and locally (Table 11.3).

Table 11.3 Older Persons’ care bed requirements 2020 to 2036 - Dacorum

	No. of care beds
Housing demand per 1,000 population aged 75+	95
Current supply	921
2020 demand	1,226
Current shortfall/surplus	305
Additional demand to 2036	714
Shortfall/ surplus by 2036	1,019

Source: Table 96, LHNA

- 11.16 While the report did secure the County Council’s assessment of need it did not take this into account as it was assessed in a different way and over a different period. However, both reports identified a considerable need for specialist housing for older and disabled people.
- 11.17 Chapter 7 also considers the potential requirements for accessible and adaptable dwellings. The report recognises that an ageing population would mean that the number of people requiring specialist accommodation and/or with disabilities is likely to increase substantially in the future. It does provide evidence for the need for housing built to various accessibility and wheelchair standards (respectively M4(2) and M4(3) technical standards). However, the LHNA acknowledges that there may be difficulties of securing such adaptable and accessible compliant homes due to the nature of some sites and issues around viability.
- 11.18 Chapter 8 focuses on the housing requirements for self-build and custom build, student accommodation, and the private rental sector. The LHNA does not recommend that the SW Hertfordshire authorities plan for any of these forms of accommodation except in the case of the former. As a result, the LHNA recommends encouraging self-build and custom build on smaller sites (+10 units). However, such housing should be actively sought on larger sites, subject to a number of site-specific, supply and viability considerations.
- 11.19 Chapter 9 deals with housing delivery and the requirement to stimulate the acceleration of housing supply. The report concludes that the SW Hertfordshire authorities should explore a number of actions and interventions to ensure as much as the identified housing need is met as soon as possible.

b) Greenfield Site Assessment -Viability Assessment

- 11.20 The greenfield site assessment (“rural SHLAA”) (see paragraphs 3.18 - 3.23) of potential employment and housing sites included a supporting viability study. This viability study was undertaken by HDH Planning & Development Ltd on behalf of AECOM. It provided an early high-level appraisal of mainly greenfield sites with a small number of rural brownfield sites. Importantly, the study made clear that its purpose was to establish whether different types of sites in different

areas were viable rather than to accurately assess the viability of the development of specific sites.

- 11.21 The study modelled a range of sizes and types of sites (i.e. greenfield, mixed use and brownfield sites) against a number of existing Local Plan requirements and their ability to contribute towards the costs of infrastructure under the CIL/s106 regime. This included affordable housing requirements at 35% and 40% (based on a split of 75% Affordable rent and 25% Intermediate Housing in both cases). The smaller sites were assessed through modelling typologies.
- 11.22 The modelling suggested that greenfield sites across the borough were viable at both 35% and 40% affordable housing requirements and could meet a variety of developer contributions. However, the analysis indicated that the brownfield sites were not viable and had less capacity to meet developer contributions.

c) Demand assessment for custom and self-build

- 11.7 The Council commissioned consultants, Three Dragons, to prepare a demand assessment for custom and self-build (CSB) housing. The “Custom and Self Build Demand Assessment (January 2020)”³⁹ provides information to assist the Council in planning for custom and self-build housing, and to better understand local demand.
- 11.8 The report concluded that potential demand for CSB development was greater than the CSB register implied. It identified that current rates of supply fell below the potential demand indicated by the demand modelling. The report estimated an annual demand for 68 CSB plots per year (years 1-5) against an average supply of 30 plots per year.
- 11.9 The demand assessment recommended that the Council take positive action to enable faster rates of CSB development in the area. Only limited CSB development was occurring, measured through CIL exemptions and the development of single plots. Taking into account the plots already supplied, it suggested the following guideline levels of provision for CSB to be facilitated through the local plan:

Plan Years	CSB potential annual demand for plots
0-5	68*
6-10	74
11-17	78

Note: * This includes an average of 30 plots per annum that are likely to come forward through the planning process, recorded as CIL exemptions

- 11.10 The report urged that the above figures should not be viewed as maximum, as there may be particular circumstances that could support provision of a greater number of CSB plots than the figures suggested.

- 11.11 The demand assessment anticipated that approximately half of the supply would be expected to come forward as self-build housing and half as custom build developments. Only a small number of the former were considered to come forward as single plots delivered through traditional planning routes.
- 11.12 The following was put forward as a guide to the mix of plot types likely to be required to meet need:
- 20% - low cost/small plots/terrace style developments (say at about 100-120 sqm per plot);
 - 40% - suitable for 3 bed semi/detached homes (say at about 300 sq m per plot);
 - 40% - suitable for 4 or 5 bed detached homes (say at over 300 sq m per plot)
- 11.13 The report did identify a role for affordable housing, suggesting that around 10% of future CSB development could be delivered in this way, mainly focussed on low cost home ownership products. Suitable Affordable Rented schemes could also be appropriate. It suggested that 75% of the affordable CSB plots should be geared towards smaller households and 25% for larger families. The affordable element of CSB housing could be delivered by affordable housing providers, custom build developers or enablers, as well as community groups.
- 11.14 However, the study urged the need for the Council to carefully monitor demand and delivery of CSB in line with the Government's Planning Practice Guidance.

12. Current supply and delivery of affordable homes

- 12.1 As explained in paragraphs 4.2 - 4.4, the Council has a well-developed monitoring system which the County Council helps support. This allows us to carry out regular monitoring of land development in the borough and to publish an annual series of land position statements and borough wide monitoring reports⁴⁰. These provide a key source of time-series information throughout the topic paper in support of policy formulation.
- 12.2 The Council produces an annual land position statement for both housing. The latest published residential position statement is for 1st April 2019 and covers the period 1st April 2018 – 31st March 2019. The Authority Monitoring Reports (AMR) expand upon the position statement. Unfortunately, due to the need to progress the draft Local Plan in recent years, the latest published AMR covers the period 2016/17.
- 12.3 Property prices remain high in Dacorum with the average house price in March 2019 being £394,266⁴¹. This compares to an equivalent house price of £243,128 for England as a whole. House price affordability has also worsened in the borough since the start of the Plan period in 2006 with the median housing affordability ratio (i.e. the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers) rising from 8.4 to 12.3⁴².
- 12.4 While house prices are on average high across the borough they do differ significantly across the towns and larger villages (Table 12.1). Historically, Berkhamsted has been the most expensive of the towns and Hemel Hempstead the least expensive. Hemel Hempstead is also significantly below the house price for Hertfordshire as a whole, whereas the other settlements are either broadly equivalent to or markedly exceed it. Irrespective, all house prices are higher than that for England.

Table 12.1 Settlement house prices Q.4 2018

Settlement	Price
Hemel Hempstead	£370,300
Berkhamsted	£643,200
Tring	£461,600
Kings Langley	£585,500
Hertfordshire	£467,300
England	£311,100

Source: Herts Insight

⁴⁰ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

⁴¹ <https://www.gov.uk/government/publications/uk-house-price-index-england-march-2019/uk-house-price-index-england-march-2019>

⁴²

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>

- 12.5 The Council owned and managed 10,158 homes as at 1st April 2019. A breakdown of Council housing stock is shown in Table 12.2. Only 115 of these homes were vacant (c.1% of the total stock). There were 6,500 households on the Council's housing register at that same period of time.

Table 12.2 Breakdown of Council housing stock

No. of bedrooms	No. of homes
Bedsits	248
1-bed	2854
2-bed	2734
3-bed	3885
4-bed	427
5-bed	7
6 or more beds	3
Total	10,158

MHCLG LAHS returns 2018-19

- 12.6 The Council's monitoring reveals that during the period 2018-19, 117 affordable homes were completed. This represented nearly a quarter of total supply in that period (Table 12.3). Over the current 13 year plan period of the Core Strategy, 1,618 affordable homes were built (nearly 28% of all homes built) at an annual rate of 124 homes per annum.

Table 12.3 Gross Affordable Housing Provision 2006 – 2019 relative to Total (net) Housing

Period	Total Housing	Affordable Housing Provision	
		Number	Proportion
2006/7	400	137	34.3%
2007/8	384	126	32.8%
2008/9	418	148	35.4%
2009/10	237	96	35.2%
2010/11	603	60	10%
2011/12	447	117	26.2%
2012/13	290	92	31.7%
2013/14	219	27	12.3%
2014/15	379	128	33.8
2015/16	659	203	30.8%
2016/17	723	135	18.7%
2017/18	586	232	39.5%
2018/19	493	117	23.7%
Total	5,838	1,618	27.7%
Annual rate of provision 2006/07 – 2018/19	449	124	27.6%

Source: HCC/DBC Monitoring 2006/19

12.7 Table 12.4 provides a breakdown of affordable housing by type (including First Buy / Home Buy). By far the largest number of affordable homes completed over the period 2006-19 are social rented, followed by shared ownership and then affordable rent. Cumulatively, the affordable housing for rent sector has dominated delivery over shared ownership homes (resp. 74% to 26%).

Table 12.4 Total supply of Affordable housing by type 2006-19

Year	Social Rented	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
2014/15	41*	20	67	126	254
2015/16	126	26	51	n/a	203
2016/17	104	8	23	n/a	135
2017/18	98	53	81	n/a	232
2018/19	93	4	20	n/a	117
Total 2006-19	894	426	307	312	1,939

Source: HCC/DBC Monitoring 2006/19

12.8 Table 12.5 provides a summary of current supply of affordable homes with planning permission or subject to a legal agreement. The table makes clear that affordable rent is the most dominant form of affordable housing whereas shared ownership experienced the least take up.

Table 12.5 Affordable housing commitments (as at 1st April 2019)

	Social Rent	Affordable Rent	Shared Ownership	Total
With planning permission	150	300	29	479
Subject to legal agreement	1	161	28	190
Total	151	461	57	669

Source: HCC/DBC Monitoring 2006/19

12.9 Table 12.6 sub divides all commitments by settlement. Affordable rent is the most dominant form of affordable housing and shared ownership is the least

available. Currently, opportunities for affordable homes are very unevenly spread across the Borough being disproportionately concentrated in Hemel Hempstead and the market towns (96% of the supply in total). This is not surprising as the likelihood of qualifying sites coming forward is greater there. However, this also means that the smaller settlements and countryside provide very little scope to secure affordable homes.

Table 12.6 Affordable housing commitments by settlement (as at 1st April 2019)

Settlement		Social Rent	Affordable Rent	Shared Ownership	Total
Hemel Hempstead	With planning permission	140	263	15	418
	Subject to legal agreement	0	84	28	112
Sub total		140	347	43	530
Berkhamsted	With planning permission	0	20	3	23
	Subject to legal agreement				
Tring	With planning permission	10	0	0	10
	Subject to legal agreement	1	77	0	78
Sub total		11	77	0	88
Bovingdon	With planning permission	0	0	0	0
Kings Langley	With planning permission	0	5	0	5
Markyate	With planning permission	0	0	0	0
Rest of Dacorum	With planning permission	0	12	11	23
Total		151	461	57	669

Source: HCC/DBC Monitoring 2006/19

12.10 Tables 12.7 and 12.8 set out the mix of completions for all sectors of housing by type and size of property. Flats form the largest type of new homes built since 2006, although more recently houses have been growing in importance as larger numbers of greenfield sites come forward. Completions tend to be dominated by smaller 1 and 2-bed properties, mainly reflecting the dominance of flats in the completions.

Table 12.7 Completions (gross) by type of property 2006-2019

	Houses	Flats	Total
2018/19	298	266	564
2017/18	352	266	618
2016/17	311	453	764
2015/16	243	440	683
2014/15	212	199	411
2013/14	184	70	254
2012/13	190	174	364
2011/12	206	270	476
2010/11	92	544	636
2009/10	92	167	259
2008/09	177	282	459
2007/08	182	290	472
2006/07	174	306	480
	2,713	3,727	6,440

Source: HCC/DBC Monitoring 2006/19

Table 12.8 Completions (gross) by nos. of bedrooms 2006-2019

	1-bed	2-bed	3-bed	4-bed	5-bed	6-bed or more	Not known	Total
2018/19	171	174	115	92	8	2	2	564
2017/18	144	184	160	86	38	5	11	628
2016/17	154	349	130	96	30	5	0	764
2016/17	154	349	130	96	30	5	0	764
2015/16	161	325	111	56	30	0	17	700
2014/15	93	144	75	70	26	3	0	411
2013/14	37	73	77	40	23	4	0	254
2012/13	90	141	78	31	22	2	0	364
2011/12	141	162	97	66	4	5	0	475
2010/11	218	335	44	22	16	1	0	636
2009/10	66	114	21	40	14	4	0	259
2008/09	94	218	77	41	26	3	0	459
2007/08	94	252	71	28	23	4	0	472
2006/07	95	258	63	17	36	11	0	480
Total	1,558	2,729	1,119	685	296	49	30	6,466

Source: HCC/DBC Monitoring 2006/19

12.11 The Council has been proactive in delivering affordable homes in terms of its own landownership and buying land from the market. In particular, it has helped

boost the local supply of affordable rented housing, especially homes for social rent.

- 12.12 There is a strong pipeline of new schemes programmed (Table 12.9) under its New Build housing programme. The lifting of the borrowing cap on the HRA has presented an opportunity to accelerate delivery and enable a sustainable ongoing development programme. The programme has also been instrumental in bringing forward a number of current housing allocations in the Site Allocations DPD.

Table 12.9 Summary of Council homes under construction or in the pipeline

Scheme	Tenure	No. of units	Status
<i>New-build homes</i>			
a) Current housing allocations:			
LA1 Marchmont Farm, Hemel Hempstead	Social rent	35	Feasibility / Design
LA2 Cherry Bounce, Hemel Hempstead	Social rent	90	Feasibility / Design
H/7 Land at Turners Hill, Hemel Hempstead	Social rent	50	Feasibility / Design
H/9 Apsley Paper Trail (Stationers Place), London Road, Hemel Hempstead	Social rent	29	u/c
H/11 St Margaret's Way, Hemel Hempstead	Social rent	50	Feasibility / Design
H/12 Former Martindale School, Boxted Road, Hemel Hempstead	Social rent / Market	44 21	u/c
H/14 Swing Gate Lane, Berkhamsted	Social rent	12	u/c(1)
H/18 Coniston Road / Barnes Lane, Kings Langley	Social rent	10	n/s
b) Non-allocations:			
Eastwick Row, Hemel Hempstead	Social rent	36	n/s
Bulbourne Road, Tring	Social rent	10	
West Dene, Gaddesden Row	Affordable rent	3	n/s
Tring Road, Wilstone	Social rent	6	n/s
Magenta Court	Social Rent	29	u/c
Paradise Depot, Wood Lane, Hemel Hempstead	Social rent	50	Feasibility / Design
Randalls Ride, Hemel Hempstead	Social rent	20	Feasibility / Design
Total		474	
<i>Temporary Accommodation</i>			
Northend Garage Site	Temporary accommodation	6	Feasibility / Design
Westerdale Garage Site	Temporary accommodation	6	Feasibility / Design

	Total	20	
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Note:

(1) Complete autumn 2019.

12.13 The disposal of its garage sites has also provided a valuable source of affordable homes. The next phase of the disposal programme is underway and Heads of Terms have been agreed in principle with a potential purchaser for the disposal of a further 7 sites. They are expected to deliver between 30-50 homes. All sites are sold unconditionally – i.e. without planning. It is understood that the proposed purchaser intends to build low density affordable homes.

13. Consultation and Engagement

13.1 This section of the Topic Paper explains:

- what consultation and engagement the Council has undertaken in preparing the draft Local Plan; and
- the responses it has received at each stage.

(a) Local Plan Issues and Options Consultation 2017

13.2 The Council undertook an Issues and Options consultation on its initial draft of the Plan⁴³ during November-December 2017. In order to secure more meaningful responses this version of the Plan presented, wherever possible, a full and detailed set of policy options. However it was not possible to set out specific approaches to affordable housing or housing mix at this early stage of the Plan and preparation of the evidence base.

13.3 This section of the document provides a brief summary of the main issues arising from that stage, and the responses to these. A full summary of the consultation material and the responses are available from the Council's website⁴⁴.

13.4 Affordable housing and housing mix were covered under "Issue 10 – What type of homes do we need to plan for?" in the Issues and Options Plan. This section of the plan covered:

- housing size and type;
- affordable housing need and mix;
- specialist accommodation for older persons; and
- other types of accommodation.

(b) Responses to the draft (Issues and Options) Local Plan (Reg. 18) Consultation

13.5 Two separate questions were asked about the approach to affordable housing (Question 17) and planning for specific types of housing (Question 18). In terms of Question 17 there was a broad even split between those supporting and objecting to the approach. In reality, there was general support for the provision of affordable housing, most of the concerns being centred on the mechanism for its delivery, location and type. The main issues raised were:

- the loss of affordable housing to the open market;
- support for the Council's new-build housing programme (and some asking for the Council to be more active in order to ensure an appropriate mix, type and tenure);
- ensuring rural housing is allocated to local residents only;

⁴³ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan---issues-and-options--consultation-final---13-november-2017.pdf?sfvrsn=841e329e_21

⁴⁴ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

- the need for a stronger emphasis on starter homes and 1 and 2 bedroom houses;
- identifying the appropriate levels of affordable homes contributions based on type of location, and the role of viability in tempering this; and
- broadening out the eligibility for affordable housing.

13.6 There were a small number of comment from key stakeholders as follows:

- Chilterns Conservation Board (CCB) requested the Council to consider aligning its affordable housing policy with South Oxfordshire District Council's affordable housing policy of 40% affordable housing on 11 sites or more.
- Central Bedfordshire Council recommended the Council should produce a SHMA that provides for a range of housing types and tenure.
- Hertfordshire County Council (Public Health Service) stated that the quality and affordability of housing can determine the health status of residents.
- Aylesbury Vale District Council questioned how the threshold of 35-40% affordable housing fits with the definition of affordable housing outlined in the 2016 Housing White Paper and the Housing and Planning Act 2016. They considered that we should consider including starter homes in the definition of affordable housing.

13.7 Similarly, there was a broad even split between those supporting and objecting to Question 18. Most respondents were supportive of the principle for providing for elderly persons accommodation. The main issues raised were:

- the need for one-person elderly accommodation in Berkhamsted;
- the need to avoid isolated locations for elderly persons accommodation that lack local facilities;
- the need for a specific policy on accommodation for older people in the Local Plan;
- a greater emphasis on housing for young people and families rather than for older people; and
- a requirement for accommodation for elderly people who wish to downsize from their larger family homes.

13.8 St Albans City and District Council suggested that the provision of two and three bedroom housing units is favourable as it meets the assessed need and increases the affordability of housing in Dacorum. Moreover, they considered that housing size and tenure was an important factor in planning for cross-boundary development in East Hemel Hempstead.

(c) Internal Workshops

13.9 The Strategic Planning team undertook a series of internal workshops with the Council's housing service and strategic housing teams on affordable housing matters. This provided an opportunity to test evolving approaches to policy. This work has helped to shape and refine the emerging plan.

(d) Task and Finish Group Meetings

13.10 Officers have been working closely with the Local Plan Task and Finish Group which is a cross party panel of Members that has provided both high level guidance and detailed scrutiny of the emerging plan, its policies and proposals. As with the internal workshops discussed above, the feedback helped the Council refine the scope of, and broad approaches to and wording of key policies. Members were particularly supportive of an approach that would optimise genuinely affordable housing over other forms of affordable housing.

14. Affordable Housing Need

14.1 Annex 2 of the NPPF sets out the definition of affordable housing and this is what is followed in the draft Local Plan. Furthermore, paragraph 018 in the PPG on 'housing and economic needs assessments' cross refers to the above definition. It also states that all households whose needs are not met by the market can be considered to be in affordable housing need.

14.2 The Local Housing Needs Assessment (LHNA) (paragraph 5.5) comments that the guidance in the PPG is largely the same as in the previous PPG and does not really address the additional definition concerning affordable home ownership. Therefore, paragraph 5.6 of the LHNA states that the analysis in the report looks both at the previous NPPF definition of affordable need and also the additional elements of the revised NPPF definition.

14.3 The need for affordable housing using the previous NPPF definition is assessed in chapter 5 of the LHNA. Table 37 in the LHNA shows the estimated annual level of affordable/social rented housing need over the period 2020-36, excluding supply from sites with planning permission. The relevant figures for Dacorum are as follows:

Current need	70
Newly forming households	5708
Existing households falling into need	353
Total Gross Need	993
Supply	630
Net Need	363

14.4 In respect of the expanded NPPF definition, paragraphs 5.62-5.65 in the LHNA read as follows:

“5.127 Using the previously established method to look at affordable need, it was estimated that there is a need for 1,994 units per annum – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy). It would be expected that this housing would be delivered primarily as social/affordable rented housing.

5.128 The revised NPPF introduces a new category of household in affordable housing need and widens the definition of affordable housing (as found in the NPPF – Annex 2). This includes starter homes, discounted market sales housing and other affordable routes to home ownership.

5.129 In reality, the Councils will need to consider any specific offers of different tenures against local housing costs and affordability. This would include considering the cost to buy, whether or not a discount is sufficient as well as the overall likely outgoings of a household (for rent, mortgage and service charges) to judge whether shared ownership is affordable or not.”

14.5 The LHNA (paragraph 5.131) considers that households falling into the expanded NPPF definition would be suitable for starter homes or discounted

market sales housing. However, other forms of affordable home ownership such as shared ownership might also be appropriate.

14.6 Paragraphs 5.133 and 5.134 in the LHNA state that there is no Government guidance on measuring the need for affordable home ownership. Therefore, the methodology used in the report draws on the previous method.

14.7 Conclusions on the estimated annual need for affordable home ownership over the period 2020-36 appear in Table 42 of the LHNA. The relevant information for Dacorum is shown below:

Current need	25
Newly forming households	4109
Existing households falling into need	76
Total Gross Need	511
Supply	263
Net Need	248

14.8 Paragraph 5.142 in the report states that the table should be seen as indicating the potential demand for such accommodation, as all the households covered in the analysis will be able to afford market housing in the private rented sector without subsidy.

14.9 The LHNA shows an estimated combined annual need for 611 affordable homes in Dacorum, based on the previous and new NPPF definitions. This would represent a substantial proportion of total annual housing target in the draft Local Plan for all forms of housing.

15. Policy Approach

15.1 This part of the topic paper considers the Council's developing approach to affordable housing and housing mix and standards. It acknowledges that further technical work is still required in a number of instances to refine the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth's approach, and the need to keep under review the policies in light of emerging changes to national guidance. The latter includes the intended introduction of First Homes and the funding of affordable homes.

a) What is an appropriate overall percentage of affordable housing?

15.2 There is no guidance on affordable housing percentages in the National Planning Policy Framework (NPPF), the Planning Policy Guidance (PPG) or the draft Local Housing Need Assessment (LHNA). The current approach to affordable housing contribution is set out under Policy CS19 in the Dacorum Core Strategy which would require:

"35% of the new dwellings should be affordable homes. Higher levels may be sought on sites which are specified by the Council in a development plan document, provided development would be viable and need is evident. On rural housing sites 100% of all new homes will normally be affordable (Policy CS20)."

15.3 The Dacorum development plan proposes a slightly higher level of 40% on the six greenfield 'local allocations' in the Core Strategy which was carried forward into the Dacorum Site Allocations Development Plan Document (July 2017).

15.4 Chapter 14 of the topic paper explains that the LHNA shows a combined estimated annual need for 611 affordable homes in Dacorum, based on the previous and new NPPF definitions:

Previous NPPF definition (primarily affordable /social rented housing need)	363
Expanded NPPF Definition (affordable home ownership)	248
Total	611

This is clearly substantial and constitutes approximately two thirds of all future housing in the draft Local Plan as measured against 922 homes a year.

15.5 However, the LHNA makes clear in the summary to chapter 5 that it does not seek to set a target but merely identifies the scale of the need. In terms of rented affordable housing it concludes:

"Such is the scale of affordable housing need that the local authorities should seek to deliver as much affordable housing to rent as viability allows."

15.6 With respect to affordable home ownership, the LHNA accepts that the identified need for affordable home ownership properties similarly equates to a large proportion (around 30%) of the overall housing need across the Strategic

Housing Market Area (SHMA) (4,043 per annum) and concludes at the end of chapter 5:

“However, the need for rented affordable housing is about 50% of all dwellings and this involves households who cannot afford anything in the market without subsidy. Therefore, there is no basis to increase the provision of affordable home ownership above the NPPF’s 10% figure, as to exceed this would reduce the supply of affordable social rental homes.”

15.7 Given the above, it would neither be realistic nor viable for the draft Local Plan to propose an affordable housing percentage anything like as high as 66% to meet theoretical need. We consider that carrying forward the previous approach from the Core Strategy is a reasonable starting point for testing percentage thresholds given it has proved viable and deliverable in the past and broadly differentiates between locations and, in the case of Hemel Hempstead, types of greenfield and urban schemes.

15.8 However, it will still be necessary to take account of decisions on affordable housing types, cost, thresholds and size as part of ongoing viability work as we progress to the next stage of the Plan.

b) Will the draft Plan ensure sufficient levels of Affordable Housing?

15.9 As explained above, there is a very substantial identified need in Dacorum for both affordable housing for rent and affordable home ownership, albeit the LHNA tempers this by stressing that it seeks to identify the scale of the need rather than to provide an affordable housing target. The reality is it would form such a large proportion of the housing supply that it would be difficult to achieve. Thus the draft Local Plan needs to strike a balance between optimising the deliverability of affordable homes, securing a reasonable mix of affordable and open market housing, and ensuring overall viability of schemes.

15.10 Calculating the future supply is complicated for a number of reasons. The Government has taken certain steps to limit what affordable homes local planning authorities can ask for through the prior approval process for certain types of development, by discounting affordable homes against the floorspace of vacant buildings, and by setting national qualifying threshold. Much of this is centred on improving the viability of schemes, boosting housing supply and in supporting Small and Medium Enterprise (SME) house builders. This process continues with the Government recently consulting on increasing the qualifying threshold to up to 40-50 homes, albeit on a temporary basis, and how affordable homes will be funded in the future. This does bring with it uncertainties in terms of estimating (and ultimately bringing forward) future supply, but the Council will strive to optimise delivery as far as it reasonably can.

15.11 Making a number of assumptions about the delivery of affordable homes, Table 15.1 indicates that the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth can secure 6,420 affordable homes from committed, planned and windfall sites. This would not meet full identified need, which is not practical to do so, but does form a reasonable proportion (38%) of the total housing supply.

Table 15.1 Estimated supply of affordable homes 2020-38

Source	Number of homes
Commitments (as at 1 st April 2020)	717
Preferred Allocations	5,036
Windfalls	667
Total	6,420
% of total supply (16,899 homes)	38.0%

c) What should the affordable housing tenure split be in the draft Local Plan?

15.12 Policy CS19 (affordable housing) in the Dacorum Core Strategy states that a minimum of 75% of the affordable housing units provided should be for rent subject to points (a)-(d) in the policy. Also, further, detailed guidance is provided in the Affordable Housing Supplementary Planning Document.

15.13 However, Policy CS19 does not relate to all the types of affordable housing included within the Government’s revised definition of affordable. In particular, this policy predates the introduction of the affordable rent category (previously all rented affordable housing was social rent) and the Government’s policy of encouraging affordable home ownership.

15.14 Moreover, the Government’s intention to introduce its First Homes programme will effectively supersede much of the guidance in paragraph 62 and 64 in the NPPF and, in particular, potentially the types of affordable homeownership and the expectation that at least 10% of the homes to be available for affordable home ownership in major developments. Initial indications are that 25% of the overall affordable housing contribution from qualifying sites should be in the form of First Homes. The Government is expecting that such homes will be discounted by a minimum of 30%. Furthermore, it is unclear the future role, if any, for other forms of low-cost homeownership such as shared ownership and discount market sales.

15.15 The LHNA predates the consultation on First Homes, but demonstrates that there is a very substantial need in Dacorum for both affordable housing for rent and for affordable home ownership (see point a) above). We consider that a policy in the draft Local Plan should state that 25% of housing on major sites should be for affordable home ownership to reflect the future role for First Homes, although no more than this as explained below. The rest of the affordable housing should predominantly be rented accommodation.

15.16 However, the LHNA cautions against increasing the proportion of affordable homeownership with regards to the current 10% requirement under the NPPF. It should be noted that the LHNA assumes that:

- Households that cannot afford to rent privately are in need of rented affordable housing.

- Households that can afford to rent privately on the open market, but cannot afford to buy, are in need of affordable home ownership.

15.17 The LHNA assesses the need for affordable home ownership in paragraphs 5.127-5.149. In particular, paragraph 5.134 explains that

“...in looking at affordability, an estimate of the number of households in the ‘gap’ between buying and renting is used. To study current need, an estimate of the number of households living in the private rented sector (PRS) has been established, along with the same (rent/buy gap) affordability test.”

The report stresses the high level of need for affordable and social rented housing and the difficulties such households have accessing housing. The report warns that any increase above the 10% figure would only further reduce the supply of affordable social rental homes. Thus, on a similar basis the Council would not want to support any more First Homes in excess of the proposed 25% requirement.

15.18 Given the above points on affordable home ownership, the main challenge will be around deciding the split between affordable and social rented housing on the remaining contribution. The LHNA emphasises the substantial need for these types of housing and that they should form the bulk of the affordable housing contributions to be sought. This should be the priority for the draft Local Plan. The report also advises that a very high proportion of the affordable housing for rent should be provided as social rent, but allowing for some flexibility:

“..the local authorities will be free to choose an alternative split to reflect local viability or local priorities.

15.18 The analysis in the LHNA also identifies the costs of different types of affordable housing for them to be genuinely affordable. It suggests that we should consider the rent levels for affordable rents and as measured against the Local Housing Allowance (Housing Benefit). This is with the possibility that rents could be reduced further to ensure a greater number of low-income working families can access these products. This will have implications for the viability of schemes as affordable homes to rent generally result in lower viability. However, delivering fewer of such homes but ensuring that they are genuinely affordable will better make provision for those that are most in need.

15.19 The Council will continue to explore the linked issues of tenure mix, affordability, and deliverability in the light of potential national changes to the planning system, including the introduction of First Homes, and in preparing the Affordable Housing SPD. It will be necessary to consider the evidence on affordable housing percentages, types, cost, site thresholds and size of homes and viability testing results in the round, before finalising the content of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth affordable housing policy.

d) What sites should provide an element of affordable housing?

15.20 We are seeking to align thresholds in the draft Local Plan with those set out nationally in the NPPF and PPG. In this particular instance, the LHNA does not deal with thresholds for affordable housing.

15.21 The NPPF (paragraph 63) refers to the following on national site thresholds for seeking affordable housing:

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”

15.22 The NPPF (Annex 2) defines the following:

- **“Major development.** For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more...
- **Designated rural areas:** National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.”

15.23 The ‘housing needs of different groups’ PPG (paragraph 009) advises that strategic policies will need to be informed by an understanding of local housing needs and opportunities. This is especially so where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.

15.24 While the Core Strategy Policy CS19 provides initial guidance on thresholds this has been updated through the ‘Affordable Housing Clarification Note’ (August 2019)⁴⁵ in the light of changing Government guidance. This brings the thresholds for affordable housing into line with the revised NPPF and PPGs and is summarised below:

Location	No. of units		
	1-5	6-9	10+
Within ‘rural area’	No contribution	Commuted sum	On-site contribution
Outside ‘rural area’	No contribution		On-site contribution

15.25 For Dacorum the ‘rural area’ covers all land within the Chilterns AONB and includes all or part of a number of rural parishes (see Figure 1 in the clarification note).

⁴⁵ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/affordable-housing-spd---clarification-note---update-aug-2019.pdf?sfvrsn=37ab099e_8

e) What is the Plan's approach to rural exception sites?

- 15.26 Policy CS20 of the Dacorum Core Strategy has been supportive of the principle of rural exception sites where supported by robust evidence of local need such as through a housing needs survey. The Council wishes to continue with this broad approach in the draft Local Plan as the policy provides an appropriate framework for encouraging and assessing such proposals in the selected small villages in the Green Belt and Rural Area. The policy is justified given the overall level of housing need and the specific difficulties of delivering rural housing. The affordable housing problem is more acute in the countryside given generally higher house prices, greater planning constraints, and, as a consequence, the lack of housing supply (both market and affordable homes).
- 15.27 However, restricting limited infilling in the selected small villages in the Green Belt under Policy CS6 (Point (b)) to affordable housing is non-compliant with the NPPF, so should no longer be taken forward as an approach.
- 15.28 The supply of affordable homes from this source has been very limited, despite the active promotion of this process to the Parish Councils by a local rural housing enabler (Community Development Action Hertfordshire (CDA Herts)). In reality, not all Parish Councils' had the capacity or were willing to pursue this process.
- 15.29 To date the only scheme that has actually been delivered was through the redevelopment of a Council-owned garage block in Johnson Court, Great Gaddesden for 4 social rented homes (application 4/3282/16/FUL) in 2017/18. The scheme is being managed by Hastoe Wyvern Housing Association and the application was supported by a housing needs survey prepared by CDA Herts.
- 15.30 Nevertheless, there is a scheme for 3 affordable rented homes in the pipeline in West Dene, Jockey End as part of the Council's New Build Housing Programme (application 4/1327/19). Furthermore, CDA Herts continue to pursue rural housing opportunities with other Parish Councils and this could also be explored through future neighbourhood plans, albeit few are currently being taken forward at the moment in the Borough.
- 15.31 The NPPF (paragraph 71) does allow for entry-level exception sites, suitable for first time buyers or renters and subject to a small number of locational and size constraints. While this approach is new to the Council and remains locally relatively untested in policy terms, it should also be taken forward in policy in the draft Local Plan with these caveats. Such an approach would be limited to the villages of Wilstone and Long Marston.
- 15.32 However, the Government has recently consulted on replacing the existing entry-level exception sites policy with a First Homes exception sites policy. It is intended to operate on a similar basis to the original exception policy. We will have to keep this matter under review to see whether we need to amend our approach in the draft Local Plan.

f) What should the overall mix of housing by size and tenure be?

15.33 The draft Local Plan’s policy on housing mix should contain clearer guidance than currently provided by Policy CS18, but should not be over-prescriptive. The aim should be to achieve a housing mix broadly in line with the recommendations in the LHNA, or any alternative figures that may be decided by the Council as being more appropriate for Dacorum.

15.34 The NPPF (paragraph 61) states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes families with children. The PPG does not provide any guidance about this topic.

15.35 Chapter 6 in the LHNA is concerned with housing mix. This chapter looks at a range of statistics in relation to families (generally described as households with dependent children), before considering future projections over the period 2020 - 2036. The analysis finishes by looking at the mix of housing required, covering all household groups and tenures.

15.36 Table 65 in the LHNA shows the number of bedrooms by tenure across South West Hertfordshire in 2011. The information from this table relating to Dacorum is shown below:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Owner occupied	4%	19%	44%	32%
Social rented	30%	30%	35%	5%
Private rented	26%	42%	24%	9%

15.37 Tables 74-76 in the LHNA show the sizes of homes estimated to be required between 2020 and 2036 in each of the three broad tenures by local authority area. The estimates for Dacorum are set out below:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market (owner occupied and private rented)	3%	26%	46%	25%
Affordable home ownership	41%	42%	15%	2%
Affordable housing (rented)	63%	20%	16%	1%

15.38 Paragraphs 6.70-6.98 in the LHNA give advice on modelled estimates of the proportion of homes of different sizes that are needed by tenure, whilst its conclusions can be found in paragraphs 6.99-6.103. The suggested mix across South West Hertfordshire by size and tenure is shown in the following table:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5%	25%	45%	25%
Affordable home ownership	25%	40%	25%	10%
Affordable housing (rented)	30%	35%	25%	10%

15.39 However, the LHNA cautions that the above figures should not be treated as prescriptive requirements that should necessarily be included in Local Plans,

but can be used as a monitoring tool to ensure that future delivery is in balance with demographic change.

15.40 In addition, the report says that whilst the output of the modelling provides estimates of the proportion of homes of different sizes that are needed, other factors should also be taken into account in setting policies for provision. The report emphasises that the Councils can make adjustments to the recommended mix to reflect any local issue and/or political aspirations as they see fit.

15.41 The report states that it is unlikely that all needs in the affordable sector will be met, so priority should be given to households with the most acute needs (e.g. households with children).

15.42 For affordable rented housing, relevant factors include:

- One bedroom homes provide limited flexibility for households (e.g. a couple starting a family) and can have high levels of turnover and management issues.
- The limited existing stock of four bedroom affordable homes, which tend to have a very low turnover.
- The number of households and length of time they are in temporary accommodation or on the waiting list (e.g. if there is an acute immediate need for larger family homes).
- The role which larger family homes can play in releasing a supply of smaller properties for other households.

15.43 For affordable home ownership, the draft LHNA considers that provision should be focused mainly on delivering smaller family homes for younger households.

15.44 For the open market sector, the report suggests that:

- Worsening affordability may mean that some households will seek smaller homes than they might traditionally have been expected to do.
- If high quality units are provided for older persons, this might encourage an increased level of downsizing and thus release additional larger homes into the market. This could reduce the need for larger homes.

15.45 Achieving a greater housing mix will be easier on larger rather than smaller developments. Any policy should be flexible enough to recognise the potential practical difficulties of delivering housing mix given a number of site-specific and locational factors.

15.46 However, the suggested split put forward by the LHNA for rented affordable housing does raise some local issues. While it does reflect a much fuller measure of need, the report points out (paragraph 6.36 and Table 66) the high demand for 1-bed homes as evidenced in the Housing Register for Dacorum:

“What is clear is that for most authorities, especially Dacorum, the need for smaller dwellings (1 and 2-bedrooms) are most prominent.”

Therefore, the Council will need to test this modelled mix to ensure it meets local priorities and optimises any split for rented affordable housing. This approach should be reflected in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth with a general weighting towards 1 and 2-bed homes, and explored further through the Affordable Housing SPD.

g) How will the draft Plan meet the accommodation needs of the elderly and other forms of housing?

15.46 The NPPF (paragraph 61) is clear over the importance of meeting the housing needs of the community, including older people and those with disabilities. The main Government guidance appears in the ‘Housing for older and disabled people’ PPG.

15.47 Policy CS18 in the Core Strategy (housing mix) states that new housing development will provide a choice of homes, including housing for those with special needs. However, the elderly and those with disabilities are not the subject of more detailed policies.

15.48 Paragraphs 004-007 in the PPG advises on how to identify the housing requirements of older and disabled people. In particular, paragraph 006 states that:

“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”

15.49 Paragraph 010 sets out the type and broad definition of a number of forms of specialist accommodation for the elderly including:

- Age-restricted general market housing.
- Retirement living or sheltered housing.
- Extra care housing or housing-with-care.
- Residential care homes and nursing homes.

15.50 Paragraph 012 states that Plans need to provide for specialist housing for older people where a need exists and Paragraph 013 provides guidance on allocating such sites.

15.51 Chapter 7 in the LHNA considers the housing needs for specific groups. It is helpful to explain the equivalent definitions used in the LHNA against that used in the PPG:

PPG definition:	LHNA definition:
retirement living or sheltered housing	• retirement housing

	<ul style="list-style-type: none"> • housing with support
extra care housing or housing-with-care	<ul style="list-style-type: none"> • extra care housing • housing with care

15.52 Table 90 in the LHNA forecasts Dacorum’s 2020-2036 requirement for older persons’ housing with support and care:

		Housing demand per 1,000 75+	Current supply	2020 demand	Current shortfall/surplus	Additional demand to 2036	Shortfall/surplus by 2036
Housing with support	Rented	70	1,579	904	-675	526	-149
	Leasehold	53	363	688	325	401	726
Housing with care	Rented	18	0	231	231	135	366
	Leasehold	12	0	157	157	91	248

15.53 The analysis shows a surplus of retirement housing in the affordable sector (a large surplus in both 2020 and by 2036). This reflects the fact that the Council owns and manages a large number of sheltered accommodation and retirement bungalows. However, in respect of leasehold properties, there was a 2020 shortfall of around 300 units and this is forecast to increase to over 700 units by 2036. In terms of extra care housing, there was a 2020 shortfall which reflected the lack of any existing supply. By 2036 a shortfall of around 370 rented units and 250 leasehold units is predicted.

15.54 Given the evidence in the LHNA and the PPG guidance, the draft Local Plan should contain a policy encouraging the provision of leasehold retirement homes and rented and leasehold extra care housing. This represents a total future supply of 1,340 homes or 84 homes per annum. These should be referred to in the draft Local Plan as ‘indicative figures’, to accord with paragraph 006 in the PPG on housing for older and disabled people. The scale of need is large enough to justify allocating some sites for retirement housing in the new Local Plan, bearing in mind the advice in paragraphs 012 and 013 of the PPG.

15.55 This predicted need for retirement housing is significant, but a large proportion of this could be met through and outside of the draft Plan by a combination of:

- Well-located larger allocations in the draft Local Plan.
- Existing commitments.
- On sites not specifically allocated for such housing in the new Local Plan.

Table 15.2 highlights recent interest in and supply of elderly person’s accommodation and care homes in the borough. Interest continues to emerge in such accommodation in both towns and larger villages, apart from in Hemel Hempstead.

Table 15.2 Applications for retirement, sheltered and care homes in Dacorum

Application No.	Address	No. of units / bed spaces	Status
20/2021/MFA	Land at Hanburys, Shootersway, Berkhamsted	103 units	Not determined
20/2159/OUT	3 London Road, Markyate	73 bed spaces	Not determined
20/2052/MFA	Berkhamsted Golf Driving Range, Spring Garden Lane, Northchurch	70 bed spaces	Refused
4/2204/18/MFA	Old Silk Mill, Brook Street, Tring	41 units	Not determined
4/1845/17/MFA	27-33 Hempstead, Road Kings Langley	40 units	Refused / Dismissed at Appeal
4/3473/16/MFA	Former Royal Mail, 32 High Street, Kings Langley	61 bed spaces	Completed 2019/20
4/3283/16/MFA	Junction of Brook Street and Mortimer Hill, Tring	31 units	Refused / Dismissed at Appeal
4/3698/15/MFA	Hardings Garage, Hempstead Road, Bovingdon	34 units	Completed 2018/19
4/3286/14/MFA	Former Berkhamsted Police Station, High Street, Berkhamsted	23 units	Completed 2018/19
4/0994/13/MFA	380 - 392, High Street, Berkhamsted	48 units	Completed 2015/16

Source: DBC/HCC monitoring

15.56 On the above basis, it would seem appropriate to plan for an element of retirement housing in large urban extensions proposed in the draft Local Plan, as long as they are supported by local amenities such as a new local centre and good bus services.

15.57 Table 96 in the LHNA concludes as follows on the need for bedspaces in residential care homes and nursing homes, including dementia care, between 2020 and 2036:

Housing demand per 1,000 75+	Current supply	2020 demand	Current shortfall/surplus	Additional demand to 2036	Shortfall/surplus by 2036
95	921	1,226	305	714	1,019

It should be noted that the forecasts do not differentiate between the need for bedspaces in residential care homes and nursing homes. Neither do they distinguish between different tenures. Overall, there is an estimated shortfall of 305 bedspaces in 2020 and that the shortfall is predicted to rise to 1,019 bedspaces by 2036 (or the equivalent 64 bedspaces per annum).

15.58 As with retirement housing, there is an indicative demand for bedspaces that will be challenging to meet in full. Some of this demand can be met within larger draft Local Plan housing sites and through existing and future commitments. However, we consider it less critical to locate care homes in highly accessible locations compared to retirement housing, as care home residents are unable to leave their homes on their own. Therefore, it would seem appropriate to include a care home as part of the package of proposals for any large urban extensions proposed in the draft Local Plan.

h) What should the approach be to Self-Build and Custom-Build?

15.59 This is a newer form of housing requirement which is not currently covered by existing Plan policy. However, it is important that the draft Local Plan reflects the need for such accommodation as the NPPF (paragraph 61) states that:

“...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to... people wishing to commission or build their own homes).

Annex 2 to the NPPF provides a definition of what self-build and custom-build housing is. However, the NPPF does not set out any thresholds or percentages for this type of housing.

15.60 More detailed Government guidance is contained in the PPG on ‘Self-build and custom housebuilding’. The PPG stresses that in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout. It also explains that local authorities are required to keep and have regard to a self-build and custom housebuilding register. The PPG contains guidance on these registers.

15.61 The PPG also explains the self-build and custom housebuilding land duties, namely, the ‘duty to grant planning permission etc’ and the ‘duty as regards registers’. In relation to the latter duty, paragraph 028 is worth noting:

“Relevant authorities with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated documents.”

15.62 Our monitoring on self-build and custom-build reveals the following:

Table 15.2: Number of registrations on the self-build and custom-build register

Base Period	For Period Ending	No. of Registrations	Cumulative total
1*	30 October 2016	16	16

2	30 October 2017	40	56
3	30 October 2018	20	76
4 ^{\$}	30 October 2019	26	102

Note:

i) Please also note that the numbers stated are for each base period running from 31 October to 30 October of the following year.

ii) * Covers the period commencing 31 March 2016 when the Register was established. Excludes one individual who subsequently requested removal from the register.

iii) \$ Excludes one individual who subsequently requested removal from the register.

15.63 The number of registrations in Table 15.2 would imply relatively modest annual and cumulative interest in Dacorum for self-build and custom build plots. We do not keep a record of direct correlation between applicants on the register and grant of planning permissions to those applicants. Table 15.3 below illustrates Community Infrastructure Levy (CIL) exemptions recorded as granted for the relevant period, as a broad equivalent for this.

Table 15.3: CIL Exemptions granted per base period

Period	CIL Exemptions*
1 April to 30 October 2016	11
31 October to 30 October 2017	21
31 October 2017 to 30 October 2018	53
31 October 2018 to 30 October 2019	43

Note:

* The figures given are for full or partial CIL exemptions recorded as granted in each base period. One or more exemptions may apply to a single or more units from multiple applications for CIL exemption in respect of that unit or units.

15.64 The LHNA (paragraphs 8.1-8.34) considers the need for such housing, highlights the demand in terms of registrations was highest in Dacorum, recognises that there might be a number of policy responses to such housing, and makes the following recommendation:

“The local authorities should seek to adopt a general “encourage” policy for self-build and custom-build housing on smaller sites (+10 units) but also implement a further policy on strategic sites, where justified. The exact level should be determined in reference to the number and capacity of strategic sites and the overall local need. This should also take into account the committed supply and viability considerations.”

15.65 However, the Council decided that a more detailed study should be prepared. Three Dragons consultants were appointed to produce the ‘Dacorum Custom and Self-build Housing Study’ and a summary of the results can be found in paragraphs 11.7 – 11.14 in the topic paper. The key conclusion was that the

potential modelled demand was greater than the register implied. It estimated an annual demand for 68 plots per year (years 1-5) against an average supply of 30 plots per year. However, it is also worth noting that the report points out that:

“CSB housing is not, of itself, Affordable Housing as set out in the National Planning Policy Framework (NPPF) (February 2019) although CSB housing can produce cost savings compared to market housing.” (paragraph 2.7)

- 15.66 Given that our technical work demonstrates that there is a clear need in excess of that indicated by the register alone and when compared to the annual supply coming forward from single unit developments, a policy of general encouragement is not considered suitable in this case. Therefore, we believe that a local approach that secures a modest proportion of custom and self-build homes on larger sites is more appropriate in actually boosting the supply of such housing.
- 15.67 We are suggesting that such a requirement could provisionally be set at 5% on larger sites of 40 or more homes, although noting that a considerable proportion of the demand for such housing will continue to be met on small sites below this site threshold. However, we acknowledge that this approach would need to be fully tested against the number and capacity of strategic sites, the overall need, the committed supply and viability consideration.

i) Is there a justified need for applying Optional Internal Technical Space Standards?

- 15.68 The Council considers that these national space standards have an important role to play in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. We support a consistent and high internal space standard within all new homes and we will seek this through Plan policy. This will help ensure a high quality of development and living environment for future occupiers. Indeed, the Government is intending that all new homes delivered through Permitted Development Rights such as the prior approval process will have to satisfy national space standards⁴⁶.
- 15.69 The ‘Optional Internal Technical Space Standards’ document applies to internal space within new dwellings across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home. The supporting text to the document explain that these space standard form part of the planning system and is not a building regulation.
- 15.70 We recognise that we need to undertake further work to justify this approach based on evidenced need and where the viability of development is not compromised (as detailed in paragraph 20 of the PPG on ‘Housing: optional technical standards’). We note that the requirement to evidence need is reinforced in footnote 46 to the NPPF.

⁴⁶ <https://www.gov.uk/government/news/permitted-development-homes-to-meet-space-standards>

j) Is there a justified need for accessible and adaptable homes standards?

15.71 The Council believes that there is an equally important role for the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth to improve the accessibility and adaptability of homes alongside raising internal space standards. New housing schemes should be suitable to accommodate the needs of older people and those with disabilities to allow them to live independently. In addition, such housing should be flexible enough to adapt to the changing life-stage needs of occupants. The LHNA clearly points to an ageing population and increasing levels of disabilities over the Plan period.

15.72 The PPG on 'housing for older and disabled people (Paragraphs 008 and 009) give more detailed guidance on accessible and adaptable housing. The benefits of such housing are described in paragraph 8 and paragraph 009 gives the following guidance:

“Should plan-making bodies set minimum requirements for accessible housing?”

Where an identified need exists, plans are expected to make use of the [optional technical housing standards](#) (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.”

15.73 The LHNA (paragraph 7.68) points out that it does not examine the need for M4(1) visitable dwellings as this is a mandatory standard for all new dwellings as set out in Buildings Regulations.

15.74 The analysis in the LHNA identifies growing levels of future disabilities. It concludes that this justifies, as a starting point, that all dwellings should be M4(2) compliant. However the report recognises that this may not be achievable in all schemes due to a variety of site constraints and noting potential viability issues. Furthermore, it usefully highlights that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

15.75 The LHNA acknowledges (paragraph 7.81) that information about the need for housing for wheelchair users is difficult to obtain (particularly at a local level). Despite this and taking into account the backlog alongside population

projections, the report concludes (Table 104) on the following estimated need for wheelchair accessible homes in Dacorum over the period 2020-36:

Current need	Projected need (2020-36)	Total
230	481	712

- 15.76 The M4(3) category can be further divided between: M4(3)(a) which is designed to require only simple adaptation and M4(3)(b) that is ready for wheelchair use on completion. However, the "Housing: Optional technical standards" PPG states that a policy requiring wheelchair accessible (M4(3)) homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.
- 15.77 The LHNA recommends that the Council's should consider having separate policies for up to 5% of market properties as M4(3)(a) standard and up to 10% affordable dwellings at M4(3)(b) standard where this type of property is viable and suitable. This recognises that not all developments will be able to meet these standards but also the higher occurrence of wheelchair users in affordable housing tenures.
- 15.78 The Council acknowledges in the report that there are wider constraints such as viability and other site specific factors that may mean that this is not possible as a broad policy approach in the draft Local Plan. The LHNA explains that the levels of need within the recommendation reflects the fact that not all developments will be able to contribute.
- 15.79 Finally, the Government is currently consulting (see paragraphs 10.47-10.49) on options to raise the accessibility and adaptability of new homes across the planning and Building Regulations systems. This should serve to only strengthen the use of such standards by local authorities. The Council will have to await to see how this may affect the approach taken to the application of these standards in the Local Plan.

16. Conclusions

- 16.1 This topic paper seeks to demonstrate that the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth has followed the requirements of Government planning policy in meeting the diverse housing needs of the Borough. It has taken into account the outcome of its evidence base and consultation to date in developing its approach to affordable housing need and mix. The draft Local Plan also seeks to raise the standard for internal space and the accessibility and adaptability of homes.
- 16.2 The topic paper acknowledges throughout the need for further testing of this overall approach to housing, mix, type and tenure and technical standards to ensure the draft Local Plan does not undermine deliverability.
- 16.3 The Dacorum Local Plan (2020-2038) Emerging Strategy for Growth's policy approach has been strongly evidence-led. The LHNA has identified what the affordable housing need is and has made recommendations over other forms of specialist accommodations. It has also drawn conclusions over the accessibility and adaptability of homes. Furthermore, the Council has commissioned a study to better understand the demand for custom and self-build.
- 16.4 The evidence base has helped support the draft Local Plan's emerging policy approach to ensuring that new development delivers a mix of new homes, that appropriate thresholds are in place, and that they meet identified need as far as is practicable.
- 16.5 However, it will be necessary to continue to consider the evidence on affordable housing percentages, types, cost, site thresholds and size of homes in the round, before final conclusions can be reached on the content of the Plan's affordable housing policy. Decisions on these matters will be informed by the viability testing results. This will also need to take into account a potentially rapidly evolving national policy approach to affordable homes and their funding, and national standards for new development.

C. Travelling Communities

17. Introduction

17.1 Dacorum hosts three main travelling communities that live in and visit the borough:

- Gypsies and Travellers;
- Travelling showpeople; and
- People living in boats on the Grand Union Canal.

In reality, they represent a very small proportion of all households.

17.2 With respect to Gypsies and Travellers there are two existing travellers sites in the borough both of which Hertfordshire County Council own and manage (Table 17.1).

Table 17.1: Existing Authorised Gypsy and Traveller Sites in Dacorum

Site	Number of authorised pitches
Three Cherry Trees Lane, Hemel Hempstead	30
Cheddington Lane, Long Marston	6
Total	36

17.3 These two public sites respectively accommodate travellers from the Irish Travellers and Romany Gypsy communities. The Three Cherry Trees site is currently suffering from overcrowding of pitches.

17.4 However, a number of the travelling community live in conventional housing. These have proved historically difficult to identify through accommodation assessments and the fact that the Council does not monitor this through its housing register.

17.5 There are only three showperson yards in the Borough (Table 17.2).

Table 17.2: Existing Travelling Showperson yards in Dacorum

Site	Number of plots
Adj Timber Yard (Temporary)	1
Hogpits Bottom (Tolerated)	5
Timber Yard	5
Total	11

17.6 There are also other forms of caravan dwellers, albeit of a more settled nature. The Borough provides home to four main caravan parks that are mostly sited in rural locations (Table 17.3). These support a large number of pitches in total.

Table 17.3: Existing Caravan Parks in Dacorum

Site	Number of pitches
Beech Park, Wiggington	117
The Limit Mobile Home Park, Northchurch	56
Flaunden Mobile Home Park, Flaunden	40
Scatterdell Caravan Park, Chipperfield	30
Total	243

17.7 The Grand Union Canal accommodates a smaller number of marinas in Dacorum that are principally located in countryside locations (Table 17.4). These marinas provide in total for over 200 residential and leisure moorings.

Table 17.4: Existing Marinas in Dacorum

Site	Number of moorings
Cow Roast Marina, Tring	110
Apsley Marina, Hemel Hempstead	65
Winkwell Marina, Hemel Hempstead	30
Total	205

18. Policy Context

18.1 The national, strategic and local policy context and strategies have strongly influenced the preparation of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth, particularly in developing its approach to the travelling communities.

National Planning Policy Framework

18.2 The National Planning Policy Framework (NPPF) together with further guidance in the Planning Practice Guidance (PPG), provide national advice on housing matters. The NPPF is limited in its guidance on the travelling communities. It explains (paragraph 4) that it should be read in conjunction with the Government's Planning Policy for Traveller Sites.

18.3 Paragraph 26 of the NPPF stresses the importance of assessing the housing need of different groups in the community, including those of travellers, and that planning policies should reflect such needs.

18.4 Paragraph 73 refers to the need for local planning authorities to identify sufficient deliverable sites to meet their 5-year housing requirement. Footnote 36 explains that this also covers a five-year supply of deliverable sites for travellers, which local planning authorities (LPA) should assess separately in line with the policy in Planning Policy for Traveller Site.

Planning Policy for Traveller Sites

18.5 The national policy for Gypsies and Travellers is set out in the Planning Policy for Traveller Sites (August 2015) (PPTS), which accompanies the NPPF. This guidance encourages fair and equal treatment for travellers, and urges local planning authorities to identify need and plan for future provision in appropriate locations. It recognises the sensitivity of new sites in rural areas, particularly the Green Belt, and seeks to limit the number and scale of new traveller site development in open countryside.

18.6 Key requirement in the PPTS are:

- Paragraph 9: LPAs should set pitch targets for gypsies and travellers that address the likely need for such accommodation.
- Paragraph 10: In producing their Local Plan, LPAs should, identify sites to meet their locally set targets. This includes the requirement to be able to demonstrate a 5-year supply of deliverable sites.
- Paragraph 17: LPAs should only alter Green Belt boundaries in exceptional circumstances. If a LPA wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If the LPA remove land from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

- Paragraph 27: a lack of pitches for Gypsies and Travellers is not a reason to grant planning permission for sites in the Green Belt and other protected areas. This requirement is in the section relating to determining applications (i.e. Development Management decisions), not the section on plan-making.
- Annex 1: sets out the definition of 'Gypsies and Travellers' and travelling showpeople as follows:

Annex 1: Glossary

1. For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

3. For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

18.8 It is worth noting that under the Equalities Act 2010, the courts have determined that Romany Gypsies and Irish Travellers are protected against race discrimination as ethnic groups. There may be a cultural preference (and need) to live in a caravan for some households, regardless of whether they still intend to lead a nomadic habit of life.

Other national strategies

18.9 The Housing and Planning Act (2016) includes a duty (under Section 8 of the 1985 Housing Act) that covers the periodical requirement for local authorities to consider the needs of people residing in or resorting to their district with respect to caravans and where houseboats can be moored.

18.10 For the purposes of assessing the housing requirement under The Housing Delivery Test Measurement Rule Book (MHCLG – July 2018)⁴⁷, the rule book confirms (footnote 11) that the assessed needs for Travellers that meet the planning definition are not included in the overall Local Housing Need. Where applicable, LPAs will add their housing requirement (calculated separately as set out under the Planning Policy for Traveller Sites (PPTS)) to the housing requirement.

Local Plan Context

18.11 Policies CS21 and CS22 in the Dacorum Core Strategy (adopted September 2013) are relevant to the travelling communities. However, neither policy takes on board the new definition of a traveller under the latest PPTS. This will need to be addressed in the draft Local Plan.

18.12 Policy CS21 seeks to retain existing accommodation for the travelling communities unless developers can provide a satisfactory replacement or there is no further need for the facility. The Council considers that this provides a fundamental cornerstone for protecting suitable accommodation. Thus, the Council should retain this approach in the draft Local Plan. Indeed, there is considerable difficulties in identifying sites in the first place and securing additional provision, given most sites lie in areas of heavy constraints.

18.13 Policy CS22 explains the Council's approach to new accommodation for Gypsies and Travellers. It sets out key criteria against which the Council can assess new sites and transit pitches. We can broadly carry forward the broad principles of the policy into the draft Local Plan with some minor adjustments to take into account the split between travellers and non-travellers.

⁴⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf

19. Evidence Base

- 19.1 The key document that has informed the Council's policy approach to the travelling community has been the Dacorum Gypsy and Traveller Accommodation Assessment (March 2019)⁴⁸ (GTAA). This study was jointly commissioned with Watford Borough Council and was completed by consultants ORS. Importantly, it takes into account the changes to national guidance following the update of the PPTS in 2015, which included the new definitions of a "gypsy", "traveller" and "travelling showperson".
- 19.2 The GTAA updated an earlier study of 2013 (Dacorum Borough Council and Three Rivers District Council Traveller Needs Assessment (January 2013))⁴⁹. This chiefly informed the levels of need for pitches within the Site Allocations DPD over the period 2012-31. It identified the need for 17 pitches on public sites over this timescale.
- 19.3 The GTAA was broader than just the Gypsy and Travellers communities as it also assessed the needs of the travelling showpeople, and caravan and boat dwellers (to be found in Appendix D of the GTAA).
- 19.4 The full details of the methodology, outcomes and conclusions are set out in the GTAA. However, the topic paper includes a summary of key findings on need below by each of these sub-groups. Paragraphs 20.16 - 20.18 summarise the engagement ORS undertook.
- 19.5 The assessment found no clear evidence for either levels of in or out-migration from the study area. Local interviews with traveller households, discussions with key stakeholders, and the outcomes from other nearby local authorities' studies did not point to any households wishing to move into or away from Dacorum. Therefore, the GTAA has assumed a nil net migration of households.
- 19.6 The assessment also provided an overview of different policy approaches to meeting the broad needs and site requirements of travellers, non-travellers and transit provision. The topic paper discusses these matters in chapter 22 below.

(a) Gypsies and Travellers

19.7 The topic paper summarises the GTAA by four main sub-categories:

- Gypsies and Travellers
- Gypsies and Travellers (unknown households)
- Gypsies and Travellers (non-travellers)
- Transit provision

19.8 ORS undertook 39 interviews in total (Figure 6 in the GTAA). Table 19.1 summarises the planning status of these households and Table 19.2

⁴⁸ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/gypsy-and-traveller-accommodation-assessment-2019.pdf?sfvrsn=89c00a9e_4

⁴⁹ <http://www.dacorum.gov.uk/docs/default-source/planning-development/trdc-and-dacorum-travellers-needs-assessment-website.pdf?Status=Master&sfvrsn=0>

summarises their ethnicity. It is clear from these tables that the bulk of households do not meet the definition of a traveller, and that Irish Travellers are the largest ethnic group.

Table 19.1: Planning status of households in Dacorum

Status	Meets Planning Definition	Unknown	Not Meeting Planning Definition
	4	12	36

Table 19.2: Ethnicity of households in Dacorum

Status	Irish Travellers	Romany Gypsies	English Travellers	New Travellers
	31	6	1	1

19.9 The GTAA assessed the needs of those travellers that met the definition and those that did not, and it also made an assumption for those unknown households who may subsequently demonstrate that they meet the definition. The position is set out below.

(i) Gypsies and Travellers

19.10 The GTAA identified only four households that met the definition. Thus, the resultant future needs generated from this were likely to be modest. The assessment identified an overall need for seven additional pitches across the Plan period to 2036 (Figure 8 of the GTAA) derived from:

- 3 concealed or doubled-up households of single adults;
- 2 for teenage children living on sites who will be in need of a pitch of their own in the next 5 years; and
- 2 from new household formation (based on the demographics of the households).

19.11 The GTAA split the additional pitch requirements across five-year periods as set out in Table 19.3.

Table 19.3: Additional need for Gypsy and Traveller households meeting the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-19	Total
	2017-22	2022-27	2027-32	2032-36	
	5	0	0	2	7

19.12 ORS highlighted that, given that this additional need all comes from households living on public sites, it is likely that the Council will need to address this through the provision of additional public pitches.

(i) Gypsies and Travellers (unknown households)

- 19.13 The GTAA considered the needs for additional pitches from unknown households who might meet the definition of a traveller. ORS were unable to determine the planning status of 12 households.
- 19.14 From their experience, ORS did not consider it robust to make assumptions on the status of households based on the outcomes of households in that local authority where an interview was completed.
- 19.15 However, from their cumulative experience since the changes to PPTS in 2015, ORS were aware that nationally approximately 25% of households that they have interviewed meet the planning definition. While the Council recognises that this is not an official national statistic as such, it consider it robust enough to be used with confidence. This would imply that only a smaller proportion of the potential need identified from these unknown households would necessarily meet the definition of a traveller.
- 19.16 ORS suggest that these 12 households could give rise to an additional need of 4 pitches from new household formation (Appendix B in the GTAA). Applying the ORS national average of 25% would result in only one additional pitch. However, ORS caution over whether these figures could be higher or lower. In reality, the actual proportion of households in Dacorum that met the planning definition was lower (at 10%), and the need to take into account any concealed adult households or 5-year need arising from teenagers living in these households (if all 12 unknown pitches are deemed to meet the planning definition).

(ii) Gypsies and Travellers (non-travellers)

- 19.17 The GTAA initially identified that 36 households were non-travellers (Figure 7 in the GTAA). In calculating future need, it concluded that 69 additional pitches would be required for these households. The additional pitches comprise of a number of components (Appendix C to the GTAA):
- 18 concealed or doubled-up households of single adults;
 - 1 movement from bricks and mortar;
 - 12 for teenage children living on sites who will be in need of a pitch of their own in the next 5 years;
 - 5 for teenage children living in the bricks and mortar household who will be in need of a pitch of their own in the next 5 years;
 - 33 from new household formation using a rate of 2.20% derived from the household demographics of the households that were interviewed; and
 - 3 arising from a proportion (75%) of need from unknown households.
- 19.18 The GTAA distributes this additional need in 5-year bands across the Plan period (Table 19.4).

Table 19.4: Additional need for Gypsy and Traveller households that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-19	Total
	2017-22	2022-27	2027-32	2032-36	
	43	9	9	8	69

(iii) Transit provision

19.19 The GTAA did not identify any significant issues from unauthorised encampments in the Borough. It notes that there is a public transit site in Hertsmere (South Mimms) with 15 pitches that could be used to move any unauthorised encampments from Dacorum. Whilst this is currently part occupied on a permanent basis, 6 transit pitches remain available. On this basis, the GTAA does not recommend that there is a need for any additional transit provision in Dacorum at this time.

19.20 However, the GTAA does point to the need for the Council to closely monitor the position in terms of unauthorised encampments, especially following the changes to PPTS in 2015. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable (such as negotiated stopping). In such a case, work will need to be undertaken on a county-wide basis to identify suitable locations to meet the provision.

(b) Travelling Showpeople

19.21 There are only three existing yards in the Borough amounting to 11 plots (Table 1.2). ORS identified that non-travellers occupied all the yards. Therefore, they concluded that this did not generate any current or future need for additional plots for Travelling Showpeople households.

(c) Caravan and boat dwellers

19.22 Appendix D of the GTAA covers in detail the potential requirement for addressing need arising from caravan and boat dwellers.

19.23 The GTAA points out those caravan dwellers are a diverse group comprising of the need for additional pitches:

- on traditional mobile home or park home sites;
- to accommodate workers (often migrant workers and often found living on sites conditioned for Gypsy or Traveller households); and
- as an alternative type of affordable housing.

19.24 As this overall group does not form part of the requirements for travellers under the PPTS 2015, their needs form a smaller part of the local need for conventional housing and is not additional to it. The only evidenced need is for Gypsies and Travellers who do not meet the planning definition of a Traveller.

In addition, the GTAA identified a small potential need for up to four additional pitches from households where it was not possible to complete an interview.

- 19.25 The GTAA does not consider that there is a direct need for any additional residential caravan pitches that is driven by a local demand for additional pitches, but instead that more pitches could help to address the wider housing needs of the area e.g. as a cheaper form of accommodation. There is no evidence to suggest any specific need should be met, rather such pitches should be seen as an alternative means of meeting a small proportion of general housing need. Put simply, more residential caravan pitches (such as a new caravan park) would generate a greater demand for them.
- 19.26 The GTAA notes that guidance on assessing the needs of people residing in or resorting to moorings for houseboats is very limited. Furthermore, primary data on those households living in boats as their main place of residence is also difficult to obtain. As with Gypsies and Travellers who do not meet the planning definition of Travellers and wider Caravan Dwellers, houseboat dwellers also form part of the OAN because they are included in the overall population and household projections.
- 19.27 Similarly, the GTAA did not conclude that there was any evidence to suggest any specific need for additional permanent moorings driven by a local demand. Instead, the GTAA sees moorings as an alternative means of meeting a small proportion of general housing need. Additional residential moorings are likely to lead to a demand for them. Thus, households may choose to live on houseboats as they provide a cheaper option to live on than bricks and mortar housing. Such a demand is likely to be a very small figure that would form part of the existing OAN and not be additional to it.

20. Consultation and Engagement

20.1 This section of the Topic Paper explains:

- what consultation and engagement the Council has undertaken; and
- the responses it has received at each stage.

(a) draft (Issues and Options) Local Plan (Reg. 18) Consultation

20.2 The Council undertook a Reg.18 consultation during November-December 2017 that has helped inform and develop the Local Plan. This stage also involved a Call for Sites exercise for new development.

20.3 This section of the document provides a brief summary of the main issues arising from that stage, and the responses to these. The Council received 22,708 responses to 46 questions from 2,376 individuals and organisations. A full summary of the consultation material and the responses are available from the Council's website⁵⁰.

(b) Responses to Issues and Options Consultation

20.4 The main question that had a bearing on the travelling communities was Question 18 (see Appendix 6 to the main responses document). This question related to the proposed approach to planning for specific types of housing, including travellers. The Council received only six responses that specifically involved the travelling communities, and these were all focussed on Gypsies and Travellers. The main issues arising were:

- Support for traveller provision.
- Criticism over perceived preferential treatment of this group.
- The need for up to date demand forecast.
- Objection to the existing policy approach under Policy CS22 being taken forward.
- The potential to meet need from an adjoining authority.
- Support for new transit provision and future discussions on the county transit site.

20.5 The responses did include comments from two nearby authorities. Chiltern and South Bucks District Council wanted to be kept informed of the outcome of further work on traveller needs, particularly in order to explore whether there were opportunities to meet needs arising from their authority in Dacorum.

20.6 Welwyn and Hatfield were urging Dacorum to make allowance, through the updated accommodation assessment, for one pitch to address a need for accommodation arising from the county transit site at South Mimms (Hertsmere). They have chosen to follow such an approach in their emerging Local Plan. It would be in recognition of the countywide function of the transit site. Furthermore,

⁵⁰ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

they would also welcome an ongoing dialogue (on a countywide basis) on the approach to transit provision to help facilitate travelling within the community on authorised sites.

20.7 In the case of Gypsies and Travellers and showpeople, the GTAA also involved specific engagement with a number of organisations, particularly neighbouring authorities in Hertfordshire, Buckinghamshire and Bedfordshire (see para. 20.16 – 20.18 below).

(c) Call for Sites

20.8 The Council undertook a Call for Sites exercise in parallel with the draft (Issues and Options) Local Plan consultation. In reality, the Council accepted submissions beyond this period in order to ensure it was able to capture as complete a picture of potential sites as possible. The Call for Sites sought to understand what landowners were promoting their land for a range of new development.

20.9 The Council received no responses in relation to potential gypsies and traveller sites or showpeople yards. However, the Council it did receive a submission from a landowner promoting a residential-led proposal at Cow Roast abutting the Grand Union Canal, Tring that included a new layby for canal boats.

(d) Internal Workshops

20.10 The Strategic Planning team undertook a series of internal workshops across a range of Council development management, housing and property teams. This provided an opportunity to test evolving approaches to policy. This work has helped to shape and refine the emerging plan. It has delivered a range of revisions that take into account recommendations and address concerns and issues raised.

(e) Task and Finish Group Meetings

20.11 Officers have been working closely with the Local Plan Task and Finish Group which is a cross party panel of Members that has provided both high level guidance and detailed scrutiny of the emerging plan, its policies and proposals. As with the internal workshops discussed above, the feedback helped the Council refine the scope of, and broad approaches to and wording of key policies.

(f) Duty to Cooperate/Cross Boundary Matters

20.12 The Council is trying to resolve with the adjoining authority, St Albans City and District (SADC), its objection to the St Albans and City and District Local Plan 2020-2036 (Publication Draft) 2018⁵¹ regarding what it considers to be an over-

⁵¹ https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/CD%20002%20St%20Albans%20City%20%26%20District%20Local%20Plan%20Publication%202020-2036_tcm15-67020.pdf

concentration of traveller sites to the north and east of Hemel Hempstead. The SADC's Plan is proposing two traveller sites as part of major housing development (Broad Locations) on the eastern side of the town. These form part of a larger urban extension under the Hemel Garden Communities project.

20.13 The Council is of the opinion that the proposed sites, in conjunction with nearby existing and potential new provision in Dacorum, will cumulatively lead to a local over-concentration of traveller accommodation. The Council is urging SADC to adopt a more dispersed approach to traveller sites in SADC.

20.14 It is unclear how the two authorities will deal with the objection through the examination/hearing process given uncertainties over the future progress of the SADC's Plan⁵². Nonetheless, the Council is preparing a Statement of Common Ground with SADC to resolve wider issues with their Local Plan.

20.15 Under the Duty to Co-operate process the Council has engaged with the Canal and River Trust (CaRT) to seek their views on canal-related matters. CaRT wishes to encourage greater usage of the canal network through improved accessibility. They were keen for the draft Local Plan to incorporate a standalone canal policy as their interest goes beyond transport and heritage. CaRT highlighted pressure for residential moorings and the importance of s106 and CIL funding to secure improvements to the canal environment.

(f) Other engagement with key stakeholders

20.16 As part of work on the GTAA, ORS undertook a focussed stakeholder engagement consultation with a number of organisations:

- Internal officers at Dacorum;
- Showman's Guild of Great Britain;
- St Albans City and District;
- Three Rivers District Council;
- Watford Borough Council;
- Aylesbury Vale District Council;
- South Buckinghamshire and Chiltern District Councils
- Central Beds; and
- Luton Borough Council.

20.17 The Showman's Guild of Great Britain did not raise any matters specific to Dacorum, but stressed that yards were generally suffering from overcrowding and the difficulties of securing suitable and affordable land for new sites.

20.18 Most of the above districts had a GTAA in place. They were exploring how they could accommodate future needs. None raised any fundamental cross-boundary matters, although SADC referred to the need to resolve with Dacorum

⁵²

<https://www.stalbans.gov.uk/sites/default/files/attachments/ED38%2027.1.20%20Inspectors%E2%80%99%20Post%20Hearings%20Letter%20to%20St%20Albans%20City%20%26%20District%20Council.pdf>

issues around their proposed traveller site provision as part of major development on the eastern side of Hemel Hempstead.

21. Identification of sites

21.1 The GTAA has confirmed that there is only an identified need for future additional pitches over the Plan period. However, the GTTA's role is solely to establish levels of accommodation need and not to make any recommendation over the location for such provision. Therefore, this section explores the current supply and other opportunities to meet that specific need.

21.2 In Dacorum, site opportunities are complicated by the fact that much of the borough is constrained by the Green Belt and the high quality landscape of the Chilterns Area of Outstanding Beauty. The PPTS (paragraph 16) is clear that Traveller sites (temporary or permanent) in the Green Belt are inappropriate development and that there are few situations that would outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.

21.3 The PPTS goes on to say:

“Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan.” (para. 25)

The PPTS thus severely limits the scope for investigating site options for meeting identified needs.

21.4 In addition, the Council has not undertaken any standalone site assessment of potential sites that might provide a supply of specific deliverable or developable sites/broad locations to meet the needs of this community. However, it has considered the following potential sources:

- Sites granted permanent or temporary planning permission.
- Existing allocations for traveller sites.
- The expansion or intensification of existing authorised sites.
- Any unauthorised sites of which the Council was aware of.
- Sites promoted through the Call for Sites process for gypsy and travellers.
- Other opportunities for sites such as brownfield sites, securing pitches.
- alongside traditional housing provision on large urban extensions and in.
- new settlements, or sites released from employment for housing.

(a) Commitments

21.5 As at 1st April 2019, no new traveller sites benefited from planning permission. However, there are two schemes that are being progressed through the planning application system (see section (b) below), although neither has secured a formal decision.

21.6 In addition, there have only been a small number of applications submitted for gypsy and traveller sites all of which were either refused or dismissed at appeal (see Table 21.1). These were refused and/or dismissed on a variety of Green Belt/Rural Area, needs, amenity, flood risk and access grounds.

Table 21.1: Applications refused or dismissed for traveller sites

Planning ref.	Location	Proposal	Decision
4/1709/19	Land at Featherbed Lane, Hemel Hempstead	Change of use of land to provide 2 gypsy/traveller pitches comprising of 2 mobile homes	Refused 11.09.19
4/2187/15	Land west of The Bobsleigh Hotel, Hempstead Road, Bovington	Change of use of land to a residential caravan site for 8 gypsy families - each with two caravans with construction of a utility building and associated hard standing.	Refused 15.12.15 Appeal dismissed 10.04.17
4/2324/13			Amended scheme refused 27.03.14
4/1342/13			Refused 15.10.13
4/1070/07	Old Tree Place, Lower Icknield Way, Wilstone Green, Tring	Change of use for three residential caravans and three touring caravans for occupation by single traveller families	Refused 05.09.07 Appeal dismissed 05.01.09

Source: DBC monitoring

(b) Allocations

21.7 The Site Allocations DPD identifies two housing allocations that currently incorporate new pitches (Table 21.2).

Table 21.2: Existing Plan allocations for traveller sites

Site	No. of pitches
LA1 Marchmont Farm, Hemel Hempstead	5
LA3 West of Hemel	7
Total	12

These sites imply that there is a strong focus on Hemel Hempstead for meeting short-medium term additional need.

21.8 The two allocations formed part of the supply of (then) accommodation needs to be met under the previous 2013 GTAA. This was to be delivered

comprehensively as part of planned new greenfield developments. The Site Allocations DPD Inspector in her final report to the Council (paragraphs 33 – 35)⁵³ supported the Council’s approach to additional pitches.

21.9 The GTAA did not take these proposal into account in assessing need as neither of these strategic allocations had planning permission at the time of preparing the study. However, the assessment did urge the Council to continue to monitor these allocations in terms of meeting need as they were expected to be delivered within the first 5 years of the GTAA period.

21.10 In reality, matters are being moved forward in both cases. These allocations are being progressed as planning applications, although proposal LA3 is at a more advanced stage (Table 21.3).

Table 21.3: Current progress taking forward Plan allocations with traveller provision

Site	Proposal	Progress
LA1 Marchmont Farm, Hemel Hempstead	Outline planning for up to 350 dwellings, land for 5 gypsy & traveller pitches. Vehicular access from A4147, public open space including extension to Margaret Lloyd Park and associated landscaping, infrastructure and drainage. Detailed approval for access arrangements only with all other matters reserved (Revised scheme).	Initial outline application 4/00045/19/MOA withdrawn in November 2019. Revised outline application 19/02749/MOA submitted in October 2019 and awaiting determination.
LA3 West of Hemel	Hybrid planning application for mixed use proposed development to provide for up to 1100 dwellings (with up to 40% affordable housing), primary school, community centre, traveller site, and open space.	Application 4/03266/18/MFA approved subject to the completion of s.106 agreement.

⁵³ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-allocations-inspector's-final-report.pdf?sfvrsn=b904389e_4

21.11 It is worth noting that the Council did consider and reject the potential for provision being made in other smaller greenfield allocations (Local Allocations) in preparing both the Core Strategy and Site Allocations DPD. Table 21.4 summarises these reasons. The Council considers these reasons continue to be valid in rejecting these allocations as suitable locations.

Table 21.4: Summary of Reasons for Discounting Pitch Provision on Local Allocations LA2, LA4 and LA6

Site	Reasons
LA2: Old Town, Hemel Hempstead	<ul style="list-style-type: none"> • Relatively small size of site makes integration with new and existing settled community more difficult. • Topography (i.e. relatively steep slope) • The need for the architecture of the new development to appropriately respect the historic character of the Old Town Conservation Area.
LA4: Hanburys and the Old Orchard, Berkhamsted	<ul style="list-style-type: none"> • Relatively small scale of site makes integration with new and existing settled community more difficult. • Good access to A41, but actual site access onto Shootersway relatively constrained.
LA6: Chesham Road, Bovington	<ul style="list-style-type: none"> • Relatively small scale of site makes integration with new and existing settled community more difficult. • Relatively 'tight' nature of the site due to constraint of balancing pond.

(c) Expansion/intensification of existing sites

21.12 The Council previously discussed under the Core Strategy and Site Allocations DPD the potential to extend the two existing Gypsy sites within the Borough with the Gypsy and Traveller Unit at Hertfordshire County Council, who own and manage both sites.

21.13 They advised at the time that the Three Cherry Trees Lane site in Hemel Hempstead is already larger than the ideal site size and should not be extended. The situation has worsened as the GTAA has identified that the site is suffering from over-crowding. Therefore, the Council sees no merit in pursuing this option through the draft Local Plan.

21.14 Similarly, the County Council raised concerns over the scope to expand the Long Marston site. They considered that it was not ideally located in terms of access to services and facilities and was already of the maximum size suitable for its rural location on the edge of a village. In addition, the potential for expansion is severely limited due to land ownership (a local farmer had bought an area of land that may have been appropriate for expansion with the express intent of preventing this from occurring).

21.15 There is also a written undertaking between the County Council and local Parish Council that there will be no further site expansion. Whilst this is not legally binding, it is a further constraint to expansion. Officers at the time had

subsequently written to the owners of land adjacent to the Long Marston site, who have confirmed that they would not support the use of their land for any future expansion of the site (see Appendix 7 and 8).

(d) Call for Sites

21.16 As mentioned in paragraph 20.8, the Council undertook a Call for Sites exercise alongside the draft (Issues and Options) Local Plan consultation. While the process formally closed at the end of this consultation it was left open for any submissions beyond this timeframe. The process did not identify any new Gypsies and Travellers sites.

21.17 While disappointing in terms of allowing the Council to fully explore site options, we have normally found that the Call for Sites exercise rarely highlight any suitable sites with willing landowners or locations to pursue.

22. Policy Approach

22.1 This section of the topic paper sets out how the policy approach to and any site allocations for the travelling communities in the draft Local Plan has evolved taking into account national and local guidance, the evidence base and on-going consultation and engagement to date.

(a) What is the Draft Plan's broad approach to the travelling communities?

22.2 The Council intends to carry forward the existing Core Strategy Policy CS21 into the draft Local Plan. Policy should seek to protect existing accommodation for the travelling communities wherever possible, albeit allowing some flexibility for its loss where fully justified. This fundamental approach recognises that there are considerable difficulties in identifying suitable sites in the first place and securing additional provision, given most sites lie in areas of heavy constraints.

22.3 The GTAA has allowed the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth to take into account the new definition of a traveller under the PPTS and to thus decide on how to plan for the future households needs of those who do and do not meet the definition. Furthermore, the GTAA has identified that there is no formal need for caravan or houseboats that the draft Local Plan should expressly accommodate.

(b) How is the Plan meeting the needs of travellers?

22.4 The GTAA, undertaken by ORS, sets out that only the need from those households who meet the planning definition and those from unknown households who subsequently demonstrate that they meet the definition should be considered as need arising from the assessment. The total in both cases is 8 pitches (respectively 7 and 1 pitch(es)).

22.5 The Council will base its approach to new provision around mainstreaming pitch provision with bricks and mortar housing. The draft Local Plan can best meet their needs by retaining existing accommodation and providing new sites.

22.6 The existing pitch allocations at LA1 Marchmont Farm and LA3 West Hemel Hempstead provide sufficient opportunities to meet and modestly exceed future household growth, ensure a small degree of flexibility/buffer over the requirement and across the Plan period, and are appropriate locations for pitches (sub-section (f) below). Furthermore, these sites are being actively progressed through the planning system (Table 21.3 above).

22.7 Therefore, the Council is rightfully giving the priority for identifying sites to those who meet the legal definition or who could subsequently. We are being positive and proactive through the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth in satisfying such household growth on planned sites.

(c) What is the Plan’s approach to meeting the needs of non-travellers?

- 22.8 The PPTS does not make clear whether pitches should be provided to those who no longer have a travelling lifestyle or indeed whether they could be accommodated in “bricks and mortar” accommodation.
- 22.9 The GTAA states that under provisions set out in the Housing and Planning Act (2016) the need from these Gypsy and Traveller households that do not meet the planning definition will form a subset of the wider need arising from households residing in caravans. Overall, this is likely to be only a very small proportion of the total potential objectively assessed need in Dacorum (and Watford). However, it does represent a potentially important need because Romany, Irish and Scottish Travellers may claim a right to be provided with culturally appropriate housing (caravans) based on their protected ethnic status in the Equality Act (2010). It should also be noted that a separate 5- year land supply for this group is not required as the needs under the Equalities Act are those of a housing requirement rather than a planning requirement under the PPTS.
- 22.10 The GTAA suggests that we could consider the use of a criteria-based policy for any unknown households that do provide evidence that they meet the planning definition. In the case of Dacorum, most of this need arises from significant levels of over-crowding that were found at the public site at Three Cherry Trees Lane.
- 22.11 The Council has taken the broad position that we should respect the cultural traditions of travellers who do not travel permanently. As the future household requirement for those who meet the definition is very small, most of this could be met on the West of Hemel Hempstead allocation. This leaves some modest capacity on the Marchmont Farm allocation to accommodate either those who do or do not meet the legal definition of a traveller, as appropriate.
- 22.12 Outside of those pitches to be formally housed through the consultation draft Local Plan, we also consider it appropriate to provide a criteria-based approach to accommodate on unallocated sites the remaining future needs of those who do not travel. This will provide clear guidance on location and standards of design for such sites.

(d) Why is the Council concerned about the traveller provision in East Hemel Hempstead?

- 22.13 At the time of writing, the Council had raised objections to the preferred location of two new traveller sites in the East Hemel Hempstead Central and South Broad Locations identified to the east of Hemel Hempstead in St Albans City

and District (SADC). These Broad Locations form part of strategic allocations in their Local Plan (SADC Local Plan 2020-2036 Publication Draft 2018)⁵⁴.

- 22.14 The Council supports SADC's commitment to making direct provision for meeting its identified needs for new Gypsy and Traveller provision in their administrative area. Indeed, identified need should generally be planned for where it arises otherwise this places pressure on adjoining authorities to accommodate any unmet need.
- 22.15 The Council is chiefly concerned that SADC has not taken into account the cumulative effects of new pitches in the north eastern side of Hemel Hempstead. There are currently already four established public and private sites (a total of 56 pitches) either within the town or within a radius of less than 4km from the edge of Hemel Hempstead, including at Three Cherry Trees Lane and within the Redbourn area. The proposed traveller sites would substantially increase provision in this area by another 30 pitches. The Council's preference is for SADC to adopt a more dispersed approach to provision.
- 22.16 The examination process has stalled on their Local Plan. This was due to the Inspectors raising a number of fundamental Duty to Cooperate and soundness matters in their post hearing letter of 14th April 2020 to SADC⁵⁵. Therefore, the Inspectors have been unable to reach a conclusion on this specific issue and it remains unresolved.
- 22.17 However, this has not prevented the two authorities from continuing with constructive dialogue on this (and other) cross-boundary matters through their ongoing Duty to Cooperate arrangements, the governance structure for the Hemel Garden Communities, and through discussions on and in preparing, a Statement of Common Ground between them. The authorities remain committed through this process to reach mutually acceptable solutions, wherever possible.

(e) How is the Plan dealing with transit provision?

- 22.18 Transit sites serve a specific function of meeting the needs of Gypsies and Traveller households who are visiting an area or who are passing through on the way to somewhere else. They do not have a function in meeting local need, which must be addressed through permanent (residential) sites.
- 22.19 There is currently no specific transit provision within Dacorum. The closest provision is at South Mimms, in Hertsmere. This site has 15 pitches and capacity for 30 caravans.

⁵⁴ https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/CD%20002%20St%20Albans%20City%20%26%20District%20Local%20Plan%20Publication%202020-2036_tcm15-67020.pdf

⁵⁵ <https://www.stalbans.gov.uk/sites/default/files/attachments/ED40%20%20Inspectors%20Post%20Hearings%20Letter%2014.4.20.pdf>

22.20 The GTAA undertaken in 2013 identified little evidence that there are any major travelling routes through Dacorum or any indication of a need for transit accommodation to be provided. Indeed unauthorised sites are low in the borough based on recent enforcement action (Table 22.1).

Table 22.1: No. of enforcement actions in terms of unauthorised traveller sites 2015-19

Year	2015	2016	2017	2018	2019	Total
No. of enforcements	0	0	1	0	1	2

22.21 The latest needs assessment continues to identify low levels of unauthorised caravans on land not owned by travellers in recent years and no need identified through stakeholder interviews. It did recognise the possibility that the PPTS could result in increased levels of travelling but it did not recommend a need for transit provision at this time.

22.22 The GTAA considered that, while in reality the South Mimms transit site was in part permanently occupied, there was still capacity available for 6 transit pitches that could be used to move any unauthorised encampments from Dacorum. However, it did stress for the Council to carefully monitor and review the situation, particularly following the post PPTS changes to the definition of travellers.

(e) What is a suitable size of traveller site?

22.23 The Council’s favoured approach is for meeting needs on smaller rather than larger sites. This is supported by previous advice from the County Council’s Gypsy Liaison Officer and is based on his extensive experience across Hertfordshire. It also reflects former Government good practice guidance and feedback from the Gypsy and Traveller community themselves. Face to face consultation with the Gypsy and Traveller community by specialist consultants found that:

“All respondents without exception would like to see the provision of smaller sites in the future. Those interviewees living on larger sites felt that a site of around fifteen pitches would be a reasonable size. Whereas those living on smaller sites or who had lived on smaller sites of around six pitches felt that a site of fifteen pitches would be far too large and that sites should ideally accommodate between six to eight pitches.”

22.24 The provision of smaller sites would generally result in fewer difficulties within the Gypsy and Traveller community themselves. It will allow for easier site management and integration with the settled community. Furthermore, we are aware that travellers have a cultural preference for living in small family groups, or with families they have a close relationship.

(f) Where should new traveller sites be located?

- 22.25 Government guidance states that the number of pitches should be related to the circumstances of the specific size and location of the site and the surrounding population's size and density. It will also help ensure that no undue pressure is placed on local infrastructure and services and help promote peaceful and integrated co-existence between the occupants of the site and the local community.
- 22.26 Adopting a dispersed pattern of distribution is supported by previous feedback from the traveller community. Whether there are any other Gypsy and Traveller sites in the vicinity can be a key issue for some when considering future site provision. There was also recognition that sites too close to each other would make it harder for integration with the settled community.
- 22.27 Existing Plan policy has been to avoid new sites in the open countryside / Green Belt, but to accommodate these within planned urban extensions. This was part based on earlier advice on the location of new provision for Gypsies and Travellers in the 2013 Accommodation Needs for Travelling Communities study:

- ^{8.9} Planning Policy for Traveller Sites contains clear advice on the location for new sites, such as that they typically should not be in the Green Belt or remote rural locations where access to services is limited. However, an issue of debate across the country is how to successfully develop new sites which integrate with the surrounding area. It is common for existing communities to object to new sites being located near to them because of concerns about the impact the site will have on them.
- ^{8.10} A number of authorities across the country such as those in Worcestershire are considering incorporating sites into new housing developments and urban extensions. The aim of this is to ensure the site fully integrates with the local community from the outset and does not run into conflict with the existing population before it is developed. For an area such as Dacorum where large new housing developments are being considered this may represent a practical and effective means of delivering sustainable new Gypsy and Traveller sites.

- 22.28 We continue to consider that the previous Local Allocations LA1 and LA3 provide the best mechanism to secure the provision of new Gypsy and Traveller pitches and to ensure these are:
- Deliverable and are beginning to be brought forward through the planning system;
 - Located to meet the bulk of need where it arises and is the most critical;
 - Well connected to local services and facilities;
 - Have good links to the local transport network; and
 - Have the ability to be well integrated with the settled community.
- 22.29 Certainly, the two preferred sites in Hemel Hempstead are best placed to meet the needs of the Irish Travellers who are currently focussed in the east of the Borough, around Hemel Hempstead.

(g) How does the Plan deal with Travelling Showpeople?

22.30 The latest GTAA notes that there is no demand for pitches within Dacorum. Thus the Council is not recommending that additional provision is made for this group within the consultation draft of the Local Plan. However, existing pitches will continue to need to be protected.

(h) How does the Plan deal with Residential Moorings?

22.31 Residential moorings along the Grand Union Canal (GUC) have offered an opportunity for relatively low cost accommodation in the borough. The approach has been to accommodate demand through planned sites in order to safeguard the canal environment and to help reduce problems of unauthorised moorings.

22.32 The GTAA did not conclude that there is a direct need for any additional permanent residential moorings in Dacorum that is driven by a local demand for additional moorings, but instead that more moorings could help to address the wider housing needs of the area. It saw the role of additional moorings in meeting current housing needs in Dacorum is likely to be very small and this figure would form part of the existing objectively assessed need rather than being additional to it.

22.33 Given these points, we do not believe that new moorings should be formally accommodated in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. However, a criteria-based approach would provide flexibility should schemes come forward and would ensure that they are directed to appropriate locations that do not lead to harm to the quality of the countryside.

23. Conclusions

- 23.1 The starting point in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth has been to safeguard those existing sites used by the travelling communities in the borough. These sites are valuable and vital to these communities and are difficult to replace. Thus they should be protected from alternative uses.
- 23.2 In terms of future households, the Council considers that it has taken reasonable and positive steps in its duty to identify and meet the future household growth of the travelling communities in the borough. It has done this in a balanced and proportionate way as it has in addressing the needs of the settled community. Indeed, the Council has not sought to meet its needs on a cross-boundary basis.
- 23.3 The evidence base points to their only being identified need for Gypsies and Travellers. The Council has sought to address this as best it can, especially given the constraints of the Green Belt and CAONB, and the lack of urban opportunities. This has limited our choice in terms of realistic and deliverable spatial options.
- 23.4 Our immediate planning priority is to meet the needs of those that satisfy the definition for travellers. The Council will achieve this through new households as part of planned site provision on larger housing allocations. As this need is small, the draft Local Plan can adequately meet this through existing allocations in Hemel Hempstead.
- 23.5 There is no formal planning requirement to meet the household needs of those non-travellers as they form part of the wider general housing need. However, the Council believes that this can be part addressed in the draft Local Plan in combination with the remaining capacity on existing housing allocations and using a criteria-based approach for the assessment of applications for new proposals.
- 23.6 Given the above, the Council considers the policy approach it has adopted in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth to meet the needs of the travelling community in the borough is in accordance with the requirements of the NPPF and PPTS.

Appendices

Appendix 1 - Capacity changes on Local Plan allocations carried forward into the draft Local Plan

Allocation	Existing capacity	Draft Plan capacity	+/- change	Comments
LA1 - Marchmont Farm	350	380	+35	Current application for 350 homes omits site owned by DBC. Land is available for an additional 35 homes.
LA2 - Old Town	80	90	+10	
LA3 - West Hemel Hempstead	900	1,150	+250	Planning permission for 1,100 homes.
LA4 - Land at and to the r/o Hanburys, Shootersway	40	40	-	
Icknield Way (previously LA5 employment land)	-	50	+50	Employment proposal E/1 is now available to come forward for housing.
LA6 - Chesham Road / Molyneaux Avenue	60	40	-20	Capacity adjusted downwards to take account of site constraints.
MU/1 - West Herts College site and Civic Zone (Civic Zone site)	200	200	-	
MU/2 - Hemel Hempstead Hospital Site, Hillfield Road	400	450	+50	
MU/3 - Paradise / Wood Lane End	75	350	+275	Location can support higher densities and taller buildings.
MU/4 - Hemel Hempstead Station Gateway, London Road	200	350	+150	Location can support higher densities and taller buildings.
MU/9 - Berkhamsted Civic Centre and land to the r/o High Street	16	16	-	
H/2 - National Grid Land, London Road	350	400	+50	Location can support higher densities and taller buildings.
H/4 - Ebbens Road	30	30	-	
H/7 - Land at Turners Hill	43	60	+17	DBC New Build Housing programme.
H/8 - 233 London Road	10	10	-	

H/11 - Land to r/o St. Margaret's Way / Datchworth Turn	32	50	+18	DBC New Build Housing programme.
H/13 - Frogmore Road	-	170	+170	Original capacity was 100-150. Planning permission approved for north eastern section of site only. Remaining undeveloped land has capacity for a similar amount.
H/15 - Miswell Lane	24	24	-	
H/18 - Coniston Road	12	10	-2	DBC New Build Housing programme.
H/19 - Hicks Road / High Street	15	13	-2	
H/20 - Watling Street (r/o Hicks Road and High Street)	10	20	+10	
L1 - Market Square and Bus Station, Marlowes	-	130	+130	Early feasibility work suggests scope for up to 130 homes on the site.
Total	2,847	4,038	+1,191	

Appendix 2: Template letter sent to adjoining authorities regarding unmet need

Date: XX March 2020

Your Ref:

Contact: 01442 228000

Email:

XXXX

Head of Planning...

...Council

The Forum

Marlowes

Hemel Hempstead
Hertfordshire

HP1 1DN

Dear

Dacorum borough Council – Request for Support in meeting Housing and Industrial/Warehousing Need

Dacorum Borough Council is currently progressing work on its Local Plan which will cover the period from 2018 to 2036.

Through the duty to cooperate process, we have been actively engaging with all of our neighbouring councils, Hertfordshire County Council and other key stakeholders to consider how Dacorum will meet its identified housing and employment needs. The standard methodology for assessing housing need has identified a minimum annual requirement of 1025 homes per annum; a total of 18,450 homes over the plan period. By comparison, our current Core Strategy which was adopted 2013, has an annual housing requirement of 430.

We recognise that there is agreement in principle to progress a Joint Strategic Plan (JSP) for the South West Hertfordshire and note the recent boost to its development and delivery through significant Government Funding. The JSP will cover both housing and employment options and opportunities to 2050. This plan will not be in place in time to inform our new Local Plan, which is being prepared in accordance with the timetable set out in our Local Development Scheme.

The South West Hertfordshire Economic Study Update (2019) indicates that Dacorum needs to provide the following floor space requirements during the next plan period:

68,292m² of office floor space

120,131m² of industrial floor space

Dacorum Borough Council is assessing both housing and economic land availability through a comprehensive Greenfield Site Assessment study and Urban Capacity Study. Whilst we are still finalising the evidence it is clear that we will not have sufficient land available to meet the identified housing and employment needs without having to look to take land out of our Green Belt.

In reaching this conclusion we have thoroughly explored the following options and opportunities:

- 1) Reviewing the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development.
- 2) Looking at opportunities to increase the density and resultant capacity of sites allocated in the adopted Core Strategy and adopted site Allocation Development Plan Document that have not yet been delivered either in whole or in part.
- 3) Review the achievability and deliverability of Dacorum's own land assets.
- 4) Assessing the quantum of housing development that can be expected from windfall sites based on a detailed analysis of past trends and patterns.

The emerging evidence demonstrates that there is a very significant gap between the potential housing capacity of Dacorum's previously developed land (including additional potential from allocated but undeveloped sites) and the level of identified housing need. Furthermore there is also a very significant shortfall of land to meet employment needs over the plan period.

As an authority with almost all of its area, outside existing settlements, designated as Green Belt or falling within the Chilterns Area of Outstanding Natural Beauty, given these constraints opportunities to identify further land for development are extremely limited. We are therefore asking you whether your authority is able to accommodate some, or all, of the growth shortfall within Dacorum. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA and FEMA.

PARA IN ITALICS FOR SADC ONLY

We have been working closely with Hertfordshire County Council to identify the needs for new education infrastructure to support the proposed housing development. This work has highlighted the potential need to provide a new secondary school in the south of Hemel Hempstead. We have not yet been able to identify a suitable site for a secondary school and would like to work with you to continue dialogue through DtC discussions around opportunities to locate the secondary school capacity as part of the development proposed as part of Hemel Garden Community contiguous with the boundary between our Council areas.

We would be pleased to receive your written response to this request at the earliest opportunity. We will also continue to hold DtC meetings with you and other SW Herts Councils including sharing more detail of our evidence as work progresses towards a conclusion.

If you have any queries relating to the above request, please do not hesitate to get in touch. In the current circumstances please could any response communication by e-mail or telephone?

Yours sincerely,

James Doe
Assistant Director Planning, Development & Regeneration

Appendix 3 – Housing programme 2020-38 (preferred Green Belt releases)

Settlement	Address	No. of homes	Site Area	Density (gross)
Hemel Hempstead	North Hemel (Phase 1)	1550	212.2	7.3
Berkhamsted	South Berkhamsted	850	33.5	25.4
	British Film Institute, Kingshill Way	90	3.2	28.1
	Haslam Playing Fields, Shootersway	150	6.6	22.7
	Land Between Hanburys and the A41	70	4.7	14.9
	Land adj. Blegberry Gardens	80	3.5	22.9
	East of Darr's Lane	200	22.7	8.8
	Lockfield, Northchurch	60	2.2	27.3
	Rossway Farm, Shootersway	200	12.3	16.3
	Bank Mill Lane	50	3.9	12.8
	Tring	Dunsley Farm	400	37.3
New Mill		400	14.7	27.2
East of Tring		1400	119.1	11.8
Kings Langley	Land at Rectory Farm	145	8.4	17.3
Bovingdon	Grange Farm	150	10.1	14.9
Markyate	South of London Road	150	6.3	23.8
	Total	5945	500.7	11.9

Appendix 4 – Dacorum Local Plan (2020-2038) Emerging Strategy for Growth housing programme 2020-38

Settlement	Site Reference	Location	2020 / 21	2021 / 22	2022 / 23	2023 / 24	2024 / 25	2025 / 26	2026 / 27	2027 / 28	2028 / 29	2029 / 30	2030 / 31	2031 / 32	2032 / 33	2033 / 34	2034 / 35	2035 / 36	2036 / 37	2037 / 38	Total	
Hemel Hempstead	Growth Area HH22	Marchmont Farm		30	80	80	80	80													350	
	Growth Area HH22	Marchmont Farm (DBC land)				35															35	
	Growth Area HH23	Old Town			45	45															90	
	Growth Area HH21	West Hemel Hempstead		25	105	110	110	120	120	120	160	130	100				25	25			1,150	
	Growth Area HH06	West Herts College site and Civic Zone			50	80	70														200	
	Growth Area HH03	Hemel Hempstead Hospital Site, Hillfield Road							80	80	80	80	80	50							450	
	Growth Area HH04	Paradise / Wood Lane End						30	40	40	40	40	40	40	40						350	
	Growth Area HH08	Hemel Hempstead Station Gateway, London Road				50	50	50	50	50	50	50	50								350	
	Growth Area HH09	National Grid Land, London Road			25	50	100	100	100	25											400	
	Growth Area HH15	Ebbens Road								30											30	
	Growth Area HH24	Land at Turners Hill			60																60	
	Growth Area HH14	233 London Road								10											10	
	Growth Area HH25	Land to r/o St. Margaret's Way / Datchworth Turn		25	25																50	
	Growth Area HH13	Frogmore Road								80	90										170	
		Grovehill Neighbourhood Plan Allocation														100	100				200	
	Growth Area HH17	Cupid Green Depot, Redbourn Road														60	100	100	100		360	
	Growth Area HH11	Two Waters North (The Plough)													50	50	100	100	50		350	
	Growth Area HH05	Market Square and Bus Station, Marlowes									130										130	
	Growth Area HH12	Two Waters / London Road Junction											60								60	
	Growth Area HH18	Kier Park (Plots 2/3)					100	100	50												250	
Growth Area HH07	NCP Car Park																		100	100		
Growth Area HH10	Symbio Place, Whiteleaf Road							180												180		
Growth Area HH19	Wood Lane End				150															150		
Growth Area HH26	Site south of Green Lane												25	30	25					80		
Growth Area HH01	North Hemel Hempstead (major urban extension)										50	100	150	150	200	200	200	200	200	100	1,550	
Berkhamsted	Growth Area Bk10	Land at and to the r/o Hanburys, Shootersway				20	20														40	
	Growth Area Bk12	Berkhamsted Civic Centre and land to the r/o High Street																			16	
	Growth Area Bk01	South of Berkhamsted						50	100	125	125	150	150	100	50						850	
	Growth Area Bk03	Haslam Playing Fields						25	50	50	25										150	
	Growth Area Bk005	Blegberry Gardens						25	30	25											80	
	Growth Area Bk08	Rossway Farm							25	40	40	40	40	15							200	
	Growth Area Bk06	Land east of Darrs Lane									50	50	50	50							200	
	Growth Area Bk11	Jewson Site (Former Durrants Furniture), Billet Lane														40					40	
	Growth Area Bk09	Bank Mill Lane						25	25												50	
	Growth Area Bk04	Other Land between Hanburys and the A41									20	50									70	
Growth Area Bk02	British Film Institute											30	60							90		
Growth Area Bk07	Lock Field, Northchurch							30	30											60		
Tring	Growth Area Tr05	Miswell Lane								12	12										24	
	Growth Area Tr04	Icknield Way (previously LA5 employment land)					24	26													50	
	Growth Area Tr03	East of Tring								50	100	125	150	150	150	175	175	125	100	100	1,400	
	Growth Area Tr02	New Mill						50	50	50	50	50	50	50							400	
Growth Area Tr01	Dunsley Farm						40	70	70	70	70	70	10							400		
Bovingdon	Growth Area Bov02	Chesham Road / Molyneux Avenue				40															40	
	Growth Area Bov01	Grange Farm						25	50	50	25										150	
Kings Langley	Growth Area KL01	Coniston Road		10																	10	
	Growth Area KL02	Rectory Farm						20	50	50	25										145	
Markyate	Growth Area Mk03	Watling Street (r/o Hicks Road and High Street)										20									20	
	Growth Area Mk02	Hicks Road / High Street										13									13	
	Growth Area Mk01	South of London Road						50	50	50											150	
		Commitments (from 01/04/2020)	654	946	379	368	99	67	85	64	64	12									2,738	
		Windfall Allowance (200 dpa max)					100	133	115	136	136	188	200	200	200	200	200	200	200	200	200	2,408
			654	1,036	769	1,128	753	1,176	1,252	1,377	1,140	1,208	1,165	845	965	915	800	716	600	400	16,899	

Appendix 5 - Affordable housing commitments as at 1st April 2019

a) With planning permission

Applic. No.	Address	Type of tenure			Total
		Social Rented	Affordable Rent	Shared Ownership	
4/00635/18/MFA	ZOFFANY HOUSE,, 74-78 WOOD LANE END, HEMEL HEMPSTEAD, HP2 4RF	0	19	0	19
4/01121/18/MFA	PARADISE INDUSTRIAL ESTATE, WOOD LANE, HEMEL HEMPSTEAD, HP2 4TP	0	44	0	44
4/01198/18/MFA	LAND AT APSLEY MILLS, ADJ. THE COTTAGE, LONDON ROAD, APSLEY	29	0	0	29
4/01331/18/MFA	FROGMORE ROAD INDUSTRIAL ESTATE, FROGMORE ROAD, HEMEL HEMPSTEAD, HP3 9RW	11	48	0	59
4/01459/18/RES	LAND ADJACENT TO THE, FORUM AND DACORUM WAY, HEMEL HEMPSTEAD, HP1 1HL	0	40	13	53
4/01491/17/FUL	LYNDHURST,, 32 HARDY ROAD, HEMEL HEMPSTEAD, HP2 5EG	2	0	0	2
4/01519/17/MFA	WESTWICK FARM, WESTWICK ROW, LEVERSTOCK GREEN, HP2 4UD	0	9	0	9
4/01630/17/MFA	MARTINDALE JMI SCHOOL, BOXTED ROAD, HEMEL HEMPSTEAD, HP1 2QS	26	0	0	26
4/02014/18/FUL	KINGS LANGLEY SCHOOL, LOVE LANE, KINGS LANGLEY, WD4 9HN	0	5	0	5
4/02061/18/MFA	BUTTON HOUSE, PIX FARM LANE, HEMEL HEMPSTEAD, HP1 2RY	0	12	11	23

4/02269/17/MFA	LAND NORTH EAST OF 25, GOLDCROFT,, HEMEL HEMPSTEAD, HP3 8ET	11	0	0	11
4/02419/04/FUL	LAND ADJ. THE MANOR ESTATE, APSLEY, HEMEL HEMPSTEAD	47	0	0	47
4/02449/18/FUL	GARAGE SITE, PULLEYS LANE, HEMEL HEMPSTEAD	2	0	0	2
4/02607/17/ROC	LIDL - LAND FORMERLY ROY CHAPMAN LTD AND DAVIS AND SAMSON, GOSSOMS END, BERKHAMSTED, HP4 3LP	0	11	0	11
4/02647/17/FUL	GARAGES, ADJ STORNOWAY, NORTHEND, HEMEL HEMPSTEAD	6	0	0	6
4/02649/17/FUL	GARAGE SITE ON CORNER OF, TEESDALE AND, WESTERDALE, HEMEL HEMPSTEAD	6	0	0	6
4/02772/15/MFA	VIKING HOUSE,, SWALLOWDALE LANE, HEMEL HEMPSTEAD, HP2 7EA	0	87	0	87
4/03007/18/NMA	BRYANSTON COURT, SELDEN HILL, HEMEL HEMPSTEAD, HP2 4TN	0	6	0	6
4/03019/18/FUL	25 - 31, WEYMOUTH STREET, HEMEL HEMPSTEAD, HP3 9SL	0	4	0	4
4/03105/17/MFA	GARAGES AT SPRING LANE, HEMEL HEMPSTEAD, HP1 3QZ	0	5	2	7
4/03167/17/MFA	CONVENT OF ST FRANCIS DE SALES PREPARATORY SCHOOL, AYLESBURY ROAD, TRING, HP23 4DL	10	0	0	10
4/03325/17/MFA	9-11 & 13, HIGH STREET, BERKHAMSTED, HP4 2BX	0	9	3	12
4/03686/15/FUL	R/O, 43 MARLOWES, HEMEL HEMPSTEAD, HP1 1LD	0	1	0	1
		150	300	29	479

b) Subject to legal agreement

Applic. No.	Address	Type of tenure			Total
		Social Rented	Affordable Rent	Shared Ownership	
4/02539/16	LAND BETWEEN THREE CHERRY TREES LANE AND CHERRY TREES LANE, HEMEL HEMPSTEAD	0	84	28	112
958/18	LA5 LAND AT ICKNIELD WAY	0	77	0	77
1735/18	CONVENT OF ST FRANCIS DE SALES PREPARATORY SCHOOL, AYLESBURY ROAD	1	0	0	1
		1	161	28	190

Appendix 6: Estimated supply of affordable housing 2020-38

Settlement	Site Reference	Location	% affordable	No. of homes
Hemel Hempstead	Growth Area HH22	Marchmont Farm	40	140
	Growth Area HH22	Marchmont Farm (DBC land)	100	35
	Growth Area HH23	Old Town	100	90
	Growth Area HH21	West Hemel Hempstead	40	460
	Growth Area HH06	West Herts College site and Civic Zone	100	200
	Growth Area HH03	Hemel Hempstead Hospital Site, Hillfield Road	40	180
	Growth Area HH04	Paradise / Wood Lane End	35	123
	Growth Area HH08	Hemel Hempstead Station Gateway, London Road	35	123
	Growth Area HH09	National Grid Land, London Road	35	140
	Growth Area HH15	Ebbens Road	35	11
	Growth Area HH24	Land at Turners Hill	100	60
	Growth Area HH14	233 London Road	35	4
	Growth Area HH25	Land to r/o St. Margaret's Way / Datchworth Turn	100	50
	Growth Area HH13	Frogmore Road	35	60
		Grovehill Neighbourhood Plan Allocation	35	70
	Growth Area HH17	Cupid Green Depot, Redbourn Road	40	144
	Growth Area HH11	Two Waters North (The Plough)	40	140
	Growth Area HH05	Market Square and Bus Station, Marlowes	100	130
	Growth Area HH12	Two Waters / London Road Junction	40	24
	Growth Area HH18	Kier Park (Plots 2/3)	35	88
	Growth Area HH07	NCP Car Park	35	35
	Growth Area HH10	Symbio Place, Whiteleaf Road	35	63
	Growth Area HH19	Wood Lane End	100	150
	Growth Area HH26	Site south of Green Lane	40	32
Growth Area HH01	North Hemel Hempstead (major urban extension)	40	620	
Berkhamsted	Growth Area Bk10	Land at and to the r/o Hanburys, Shootersway	40	16
	Growth Area Bk12	Berkhamsted Civic Centre and land to the r/o High Street	100	16
	Growth Area Bk01	South of Berkhamsted	40	340
	Growth Area Bk03	Haslam Playing Fields	40	60
	Growth Area Bk005	Blegberry Gardens	40	32
	Growth Area Bk08	Rossway Farm	40	80
	Growth Area Bk06	Land east of Darrs Lane	40	80
	Growth Area Bk11	Jewson Site (Former Durrants Furniture), Billet Lane	35	14
	Growth Area Bk09	Bank Mill Lane	40	20
	Growth Area Bk04	Other Land between Hanburys and the A41	40	28
	Growth Area Bk02	British Film Institute	40	36
	Growth Area Bk07	Lock Field, Northchurch	40	24
	Tring	Growth Area Tr05	Miswell Lane	35
Growth Area Tr04		Icknield Way (previously LA5 employment land)	35	18
Growth Area Tr03		East of Tring	40	560
Growth Area Tr02		New Mill	40	160
Growth Area Tr01		Dunsley Farm	40	160
Bovingdon	Growth Area Bov02	Chesham Road / Molyneaux Avenue	40	16
	Growth Area Bov01	Grange Farm	40	60
Kings Langley	Growth Area KL01	Coniston Road	100	10
	Growth Area KL02	Rectory Farm	40	58
Markyate	Growth Area Mk03	Watling Street (r/o Hicks Road and High Street)	35	7
	Growth Area Mk02	Hicks Road / High Street	35	5
	Growth Area Mk01	South of London Road	40	60
		Commitments (from 01/04/2020)	n/a	717
		Windfall Allowance (200 dpa max)	n/a	667
				6420

Appendix 7: Council letter of 27th April 2015 to the adjoining landowner to the Long Marston traveller site

Date: 27th April 2015
Your Ref:
Our Ref:
Contact: Mr F Whittaker
Email: francis.whittaker@dacorum.gov.uk
Directline: 01442 228383
Fax:

Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1HH

Dear

Long Marston Gypsy and Traveller site

I am writing on behalf of the planning department at Dacorum Borough Council to explore your views on the potential to expand the above traveller site into adjoining land, which I understand is within your ownership.

By way of background, the Government requires local authorities to similarly plan for the future accommodation needs of the traveller community as that of the settled community. To this end, the Council commissioned consultants to undertake such technical work which was completed in January 2013. The study identified the need for at least 17 additional pitches* up to 2031 to meet the needs stemming from existing travellers in the borough, including that arising in the Tring area from the Long Marston site. We are therefore legally obliged to demonstrate how we can plan to meet this need.

We have been exploring how we can actually accommodate this identified need through a planning strategy document called the 'Site Allocations'. This document is not yet in its final form, but the current version identifies a range of different sites to meet the future development needs of the borough, including potential locations for traveller sites.

The Council's preferred approach is to provide new traveller sites as part of large, new housing development. We are proposing that these new sites should only accommodate a modest number of pitches as general advice and best practice suggests that it is easier to accommodate and manage smaller sites.

The Site Allocations document is proposing that these new pitches are provided as part of three new greenfield housing sites, termed 'Local Allocations', located on the edges of Hemel Hempstead and Tring.

In the case of Tring, we are proposing a site comprising 5 pitches adjacent to Local Allocation LA5 located to the west of Tring on land that is currently in the Green Belt and Chilterns Area of Outstanding Natural Beauty. LA5 will provide for 180-200 new homes alongside the traveller site, a new cemetery and extension of the Icknield Way industrial estate.

The Council consulted on the Site Allocations document, and this approach to meeting traveller accommodation at LA5, during the Autumn of last year, which you may already be aware of. This consultation resulted in a significant level of local objections to the traveller site from residents and the developer who controls the LA5 site, Cala Homes. The Council will need to consider how it deals with such comments (and others to proposal LA5) and whether changes should be made to its approach as a result of concerns raised.

Some of those who objected to the LA5 site suggested that we should instead consider the option of expanding the existing Long Marston site. The Council therefore feels it is prudent to explore this option further.

Other alternative sites in the Tring area and beyond have proved difficult to identify in light of their general suitability to accommodate new pitches, continuing local objections and the uncertainty of securing the support of land owners. On this basis, the option to expand the existing Long Marston site to accommodate up to 5 additional pitches is a potential alternative. In order to achieve this expansion, we would need to purchase land in your ownership. We recognise that any extension would be a sensitive local issue given that the existing traveller site has remained unchanged for many years and that it has integrated itself relatively well with nearby residents.

The Council is also aware that there was an undertaking from the (then) County Secretary, in planning for the original site, not to increase its current size. Whilst such an undertaking is not legally binding, it is something which we will need to take account of.

We would therefore welcome your initial views on the possibility of expanding the Long Marston site and whether this is something we can explore further with you both. It is important that the Council understands your views as the landowners. We would stress that no decision has yet been made to take forward this option.

Please let me know if you require any additional information. We would of course be happy to meet with you to discuss this matter further.

If you would like to arrange to come to speak to us, or to discuss things further over the phone, please contact me on 01442 228383, or alternatively email francis.whittaker@dacorum.gov.uk.

Yours sincerely

Francis Whittaker
Strategic Planning Officer
Strategic Planning

Appendix 8: Response from the adjoining landowners to the Long Marston traveller site

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8/5/15

Dacorum Borough Council
 Civic Centre
 Marlowes
 Hemel Hempstead
 HERTS.
 HP1 1HH

Dear Mr Whittaker,

With reference to your letter regarding the potential to expand the Long Marston Gypsy and Traveller site. This is something, we would strongly oppose because of all the problems we have experienced over the last 40 years.

Part of the reason this site has integrated itself better than many others is due to its small size, which we were assured would not be expanded.

Yours sincerely

[REDACTED]