



Dacorum Borough Council

Housing Delivery Test

Action Plan

(December 2021)



Content

1. Introduction	1
2. Policy Context	2
3. How have we performed against the Housing Delivery Test?	9
4. What has our past housing delivery been like?	12
5. What are our supply and delivery challenges?	16
6. How can we improve delivery?	26
7. What are we doing next?	39

Appendices:

Appendix 1: Larger new-build (+100 homes) sites in Dacorum	46
Appendix 2: Office to residential prior approvals as at 1 st April 2021	47

Front cover photo: New council homes at Magenta Court, London Road, Hemel Hempstead

1. Introduction

- 1.1 The Housing Delivery Test (HDT) Result for Dacorum Borough Council was published by the Government in January 2021. The Council has underperformed against the test. As a result, it now needs to prepare a Housing Delivery Test Action Plan (Action Plan) to show how it is positively responding to the government's requirement to boost the supply and delivery of new homes in future years. This consequence will apply until subsequent HDT results demonstrates that our delivery exceeds the required rate in the following year.
- 1.2 This document sets out the steps we are taking in partnership with other organisations, landowners and the development industry to ensure that more homes are built within the borough at an accelerated rate. Indeed, the Council has and continues to take every reasonable opportunity through its systems and processes to increase the supply of new homes and recognises this as a corporate priority.
- 1.3 The Action Plan needs to be considered within the current and evolving context of the Coronavirus pandemic and associated economic recovery. This has given rise to a period of uncertainty and disruption in terms of the housing market and the delivery of new homes. The Action Plan also explains the reasons for the under-delivery and the wider challenges the Council faces in uplifting housing completions.
- 1.4 We have also prepared the Action Plan in line with the 'Housing supply and delivery' Planning Practice Guidance (PPG)¹ and also taking into account advice from the Planning Advisory Service².
- 1.5 While the Council has a key role in housing delivery locally, we are strongly dependent on the activities of the private sector to deliver the majority of new homes in Dacorum. However, we also see the Action Plan as part of a positive approach to plan ahead, understand and manage potential risks to future housing supply.
- 1.6 The Action Plan will focus on major developments as it is these that will have the greatest impact locally on delivery and the pipeline supply of housing.

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery>

²

https://www.local.gov.uk/sites/default/files/documents/Housing%20Delivery%20Test%20Preparing%20an%20Effective%20Action%20Plan%20June%202020_0.pdf

2. Policy Context

a) National Context

2.1 The shortage of delivery of new homes across the country has been a national issue for many years which has led to increased prices, worsening affordability, and a generation who are unable to access or to purchase a property. Thus the Government has committed to:

- planning for the delivery of 300,000 new homes a year by the mid-2020s;
- focussing on achieving a more appropriate distribution of homes; and
- targeting more homes into areas where there are affordability challenges.

2.2 In support of the objective to significantly boost the supply of new homes and making the local authority more accountable for delivery in their area, the Government published a number of documents:

- a revised National Planning Policy Framework (NPPF)³;
- updated Planning Practice Guidance (PPG) advice;
- the Housing Delivery Test Measurement Rule Book (July 2018); and
- the Housing Delivery Test: 2018 Measurement Technical note (February 2019).

2.3 With regards to the Housing Delivery Test, the NPPF (July 2021) makes clear that:

“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.” (paragraph 76)

2.4 The ‘Housing Delivery and Supply’ PPG provides further guidance on the preparation, nature, content and aims of the HDT Action Plans (Paragraphs 047-054). In particular, the PPG (Paragraph 051) identifies a number of actions local authorities can take to boost delivery including:

- revisiting their Strategic Housing Land Availability Assessment (SHLAA) / Housing and Employment Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land;
- working with developers on the phasing of sites, including whether sites can be subdivided;
- offering more pre-application discussions to ensure issues are addressed early;

³ The latest version of this is the revised NPPF of July 2021.

- considering the use of Planning Performance Agreements;
- carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites;
- revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies;
- reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;
- establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed;
- ensuring evidence on a particular site is informed by an understanding of viability;
- considering compulsory purchase powers to unlock suitable housing sites;
- using Brownfield Registers to grant permission in principle to previously developed land; and
- encouraging the development of small and medium-sized sites.

b) Joint Strategic Plan

- 2.5 The South West Herts Authorities (Dacorum Borough Council, St. Albans City and District, Watford Borough Council, Hertsmere Borough Council and Three Rivers District Council, with the support of Hertfordshire County Council) have agreed to work together to produce the South West Hertfordshire Joint Strategic Plan (JSP). This will provide a South West Hertfordshire integrated strategic planning framework and supporting evidence base to support sustainable growth to 2050. They have also secured planning delivery funding from the Ministry of Housing, Communities and Local Government (MHCLG) to deliver the JSP.
- 2.6 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 be a statutory planning document. The JSP will identify the overall quantum of housing and economic growth within South West Hertfordshire to be planned for between 2036 and 2050 and its broad distribution across the area. The plan will identify strategic allocations and priorities, as well as the strategic infrastructure necessary to deliver the spatial strategy.
- 2.7 The JSP will focus on climate change, infrastructure delivery, strategic housing and employment, and Green Belt/AONB and will create a framework for investor confidence in SW Herts. The five districts and HCC are currently carrying out high-level visioning work which is heading to stage 2 workshops over the autumn. A final report is due the end of year and this will inform an early consultation draft of the JSP next spring / early summer (see paragraph 2.9 below). The visioning work will also feed into two major and complementary projects on a strategic growth location study and a multi modal transport study before they are finalised.

⁴ [SW Herts Joint Strategic plan \(swhertsplan.com\)](http://swhertsplan.com)

2.8 The benefits of a JSP include:

- Increased potential for unlocking infrastructure investment from Government;
- Creating a bigger canvas to make decisions about future growth;
- Allowing an infrastructure-led approach; not ‘planning by numbers’; and
- Enabling a coordinated approach to investment and delivery of infrastructure giving priority to strategic solutions.

2.9 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 2024 to address longer term development needs. Key milestones are set out below:

- Autumn 2021 – preparation of Statement of Common Ground / agree and finalise JSP Statement of Community Involvement
- Early 2022 – Draft ‘Issues and Options’ JSP (Regulation 18) consultation
- Early 2023 – publication of Draft ‘Spatial Options’ JSP for consultation
- Early 2024 – Final draft version of JSP published for Regulation 19 Consultation
- Mid-2024 – JSP submitted for Examination
- End 2024 Adoption of JSP

2.10 All five Local Planning Authorities (LPAs) will retain ‘sovereignty’ over the JSP process, with the plan following essentially the same process as individual Local Plans and therefore needing approval from each of the partner authorities at each key stage of its preparation and final adoption. Furthermore, the JSP looks at the period beyond the timescale being followed for the five Boroughs’ and Districts’ emerging Local Plans.

2.11 The ongoing work on the JSP does not, and will not, affect current work on the new Local Plan. For now, the JSP sits apart from our Local Plan progress and will take a longer term look at development needs, pressures, infrastructure and strategic development proposals up to 2050.

c) Local Planning Policy

2.12 Work continues with preparing a new Local Plan to replace the following Plan documents:

- 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).

2.13 The Council published a draft (Regulation 18) Local Plan for consultation – the Emerging Strategy for Growth - during November 2020 - February 2021⁵. This Plan presented a potential future strategic growth scenario based on 922 homes per annum and considered its implications on the Borough's settlements, the environment, transport, and local infrastructure.

d) Relationship to other plans/strategies and council activities

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

2.14 The G&IS⁶ sets out the vision for Dacorum to 2050 and has informed the early stages of developing the spatial objectives for the new Local Plan. It outlines the long term visions for the Borough, guides how the Council can meet the challenges and opportunities of future growth, and covers 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

2.15 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.

2.16 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, thus aligning with the aims of the Action Plan. 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 for a major urban extension (of 11,000 homes) to east and north of Hemel Hempstead, as part of the wider Hemel Garden Communities programme.

⁵ <https://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/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

- 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

(ii) Hemel Garden Communities (HGC)

2.17 The HGC Team is working closely with partners including 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))⁷. However, the Council recognises that the programme still needs to be formally tested by Independent Planning Inspectors through both our own and St Albans City and District Local Plan processes.

2.18 HGC includes 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.

2.19 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.

2.20 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.

(iii) Dacorum Corporate Plan 2020-2025

2.21 The Corporate Plan⁸ outlines the Council's vision and priorities for a five year period, and provides a focus for service delivery and performance, aiding strategic decisions.

⁷ <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/hemel-garden-communities>

⁸ <http://www.dacorum.gov.uk/docs/default-source/recruitment/corporate-plan-2020-2025.pdf>

2.22 The document sets out a delivery plan for the Council's and identifies five key priorities with the two most relevant to housing delivery being:

- Ensuring economic growth and prosperity
- Providing good quality affordable homes, in particular for those most in need.

2.23 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;
- Support for the broader development of over 5,000 new affordable homes.
- Continuing to provide support to Housing Associations where viable; and
- Investing £88m in its housing stock through its capital investment programme.

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

2.24 The Council's Housing service team has published their three year housing strategy⁹. 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) New Build Housing Programme

2.25 Since 2013 the Council has embarked on a sustained development programme using its own property portfolio and in buying land, which up until the beginning 2021 had delivered nearly 300 new Council homes (see Table 4.2 below). This has involved both direct management schemes and transfer of sites to Registered Providers. 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.

(vi) Council Garage Disposal Programme

2.26 The Council owns 7,611 garages across 771 blocks throughout the borough that provides an important rental stream. However, since September 2014 they

⁹ http://www.dacorum.gov.uk/docs/default-source/housing/housing-strategy-2019-2021.pdf?sfvrsn=e9f6089e_4

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.

2.27 To date the majority of sites have been bought by Housing Associations. The remainder have been sold to private developers.

(vii) Monitoring of housing supply and delivery

2.28 The Council undertakes regular monitoring of the housing supply and delivery. This Action Plan is underpinned by the Authority Monitoring Report (AMR) and Residential Land Position Statement, both of which report on the yearly housing delivery and future commitments in the borough.

3. How have we performed against the Housing Delivery Test?

3.1 The Housing Delivery Test (HDT) is a measurement of housing delivery in a local planning authority’s area as assessed against their latest Local Plan’s housing requirement (or in the absence of an up-to-date Local Plan, the minimum annual local housing need figure/annual average household growth) over a rolling three year period. The measurements commenced in the financial year 2016/17. LPAs are expected to achieve at least 95% of their cumulative requirement with escalating sanctions applied based on the scale of any shortfall:

Thresholds	Penalties
All results equal to or above 95%	Subject to no action.
If a Council falls below 95% in its rate of housing delivery	The Council is required to produce and publish a Housing Delivery Action Plan in order to explain and justify how it will increase its housing delivery rate over the coming years.
Where delivery falls below 85% of the required amount / adopted housing requirement	A 20% buffer is added to the local authority’s five-year housing land supply (this would require the Council to find additional sites for an additional 20% of the housing requirement)
If housing delivery falls below 45% of the adopted housing requirement	The ‘presumption in favour of sustainable development’ in the National Planning Policy Framework would apply automatically.

3.2 The method for calculating the Housing Delivery Test measurement is set out in the Government’s Housing Delivery Test measurement rule book¹⁰. The rule book should be read in conjunction with the ‘Housing Supply and Delivery’ Planning Practice Guidance (which was last published on the 22nd July 2019). The formula for the HDT calculation is as follows:

$$HDT (\%) = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

Housing Delivery in Dacorum

3.3 The results of the HDT measurements are published by the government annually at the beginning of each year. The latest 2020 measurement results were published in January 2021 (Housing Delivery Test: 2020 measurement¹¹). This covers the three year period 2017/18, 2018/19 and 2019/20.

¹⁰ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>

¹¹ <https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>

- 3.4 Table 3.1 sets out our performance against the 2020 HDT in terms of comparing the net homes delivered over the three years to the homes that should have been built over the same period.

Table 3.1 HDT - Housing Projections and Delivery 2020

Year	No. of homes required	Homes delivered	Percentage delivered
2017/18	430	587	-
2018/19	519	576	-
2019/20	938	522	-
Total	1,887	1,685	89%

- 3.5 The Council has delivered only 89% of its housing requirements over the past three years i.e. 1,685 homes out of an assessed requirement of 1,887 homes. This means that we have failed the first component of the HDT. The Government now expects us to prepare an Action Plan to demonstrate the steps we are taking to boost delivery and meet its housing requirements.
- 3.6 Our performance has been good in 2018 and 2019 where we comfortably exceeded the target (respectively 153% and 138%). It only fell short by 11% in 2020 when our requirement in that year effectively doubled and during which the Covid-19 Pandemic began (see Table 3.2).

Table 3.2 Housing Delivery Test results for 2018, 2019 and 2020

a) 2018 Test Results

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018	Housing Delivery Test: 2018
	2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
Dacorum	431	431	431	1,293	654	737	587	1,978	153%	None

b) 2019 Test Results

Area name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence
	2016-17	2017-18	2018-19		2016-17	2017-18	2018-19			
Dacorum	430	430	519	1,379	737	587	576	1,900	138%	None

c) 2020 Test Results

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
	2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
Dacorum	430	519	938	1,887	587	576	522	1,685	89%	Action plan

4. What has our past housing delivery been like?

- 4.1 This section of the Action Plan reviews past performance and provides a useful context as to why Dacorum has not met its housing requirement over the last three years.
- 4.2 The Council regularly monitors housing supply implementation, and delivery through publication of its Residential Land Position Statements and Annual Authority Monitoring Reports¹². This provides us with a good overview of housing activity against which we can measure the success of our Local Plan housing strategy and our performance in terms of the five year housing land supply.

a) Local housing delivery performance

- 4.3 Since the beginning of the Plan period in 2006, Dacorum has delivered 7,078 (net) new homes to 2021 (see Table 4.1). While levels of completions do vary in individual years, if we take into account long-term development/economic cycles, this represents an average of 472 homes per annum.
- 4.4 Dacorum has also seen a marked increase of delivery in the last 5 years with an average of 608 homes built each year over that period of time. Much of this is as a result of larger schemes coming on-stream and as a consequence of the relaxation of the planning system and prior approvals regime, particularly in respect of the conversion of offices to residential.

Table 4.1 Net Housing Completions 2006-2021

Period	Net completions
2006/07	400
2007/08	384
2008/09	418
2009/10	237
2010/11	603
2011/12	447
2012/13	290
2013/14	219
2014/15	379
2015/16	659
2016/17	723
2017/18	586
2018/19	493
2019/20	489
2020/21	751
Total	7,078

¹² <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

15 year average	472
5 year average	608

Source DBC/HCC monitoring

- 4.5 It is worth noting that the latest completion figure is the highest in 30 years, and does point, in part, to a still buoyant housing market and strong market recovery and confidence despite the Covid-19 pandemic.

b) Council Housing Completions

- 4.6 The Council is one of the more active authorities in Hertfordshire in directly bringing forward council homes, both in terms of its own land ownership and land it has bought on the open market. This has helped support housing completions generally in the borough. It has a proactive housing delivery team which has delivered nearly 300 homes¹³ over the period 2013-21 (see Table 4.2).

Table 4.2 Summary of Council homes delivered under the new build housing programme 2013-21 (as at 1st April 2021)

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, Berkhamsted	Social rent	12	2019
School End Crescent and Old School House, Boxted Road, Hemel Hempstead	Social rent / market	65	2021
Magenta Court, Hemel Hempstead	Social rent	29	2021
Westdene, Bingham Mews, Gaddesden Row	Social rent	3	2021
Total		285	

- 4.7 We have also sold a number of under-used garage blocks for affordable and market homes under our Garage Disposal Programme since September 2014 when Cabinet gave approval for the disposal of 97 of these sites. We have continued to review sites to establish their suitability for development.

¹³ <http://www.dacorum.gov.uk/home/housing/new-council-homes>

c) Five Year Housing Supply

- 4.8 Now that the Plan is older than five years, we have reverted to the national standard methodology for calculating our local housing need (LHN). This has meant that the Council has faced a substantial increase of homes (from 430 to (at the time of the HDT calculation) 1,023 homes per annum) it needs to find deliverable sites for.
- 4.9 Since 2019 and in advance of preparing the new Local Plan, we have accepted that we have been unable to demonstrate a minimum of five years' worth of housing with either a 5% or 20% buffer. The latest published position as at 1st April 2020 is set out in Tables 4.3 and 4.4. The evidence makes clear that under the best circumstances of the 5% buffer, we can only deliver a maximum of 3.2 years' worth of housing supply.
- 4.10 It is unlikely that the Council will be able to demonstrate a 5-year housing supply until the new Local Plan is adopted as the existing spatial strategy cannot fully support delivery against the LHN figure.

Table 4.3: 5-year housing land supply calculations (1st April 2020 to 31st March 2025) - 5% Buffer

Requirement 2019/20	1,025
Completions 2019/20	489
Shortfall over 2019/20 requirement (1,025-489)	536
5 year requirement for 2020 – 2025:	
Unadjusted housing target (1,023 x 5)	5,115
Shortfall 2019/20	536
Plus 5% buffer brought forward from later in plan period and on shortfall (5% of (5,115+536))	283
<u>Total</u>	5,934
Annual adjusted 5 year requirement (5,934/5)	1,187
Projected supply 2020/21 - 2024/25	3,823
No. of years supply (3,823/1,187)	3.2

Table 4.4: 5-year housing land supply calculations (1st April 2020 to 31st March 2025) - 20% Buffer

Requirement 2019/20	1,025
Completions 2019/20	489
Shortfall over 2019/20 requirement (1,025-489)	536
5 year requirement for 2020 – 2025:	
Unadjusted housing target (1,023 x 5)	5,115
Shortfall 2019/20	536
<u>Plus</u> 20% buffer brought forward from later in plan period and on shortfall (20% of (5,115+536))	1,130
<u>Total</u>	6,781
Annual adjusted 5 year requirement (6,781/5)	1,356
Projected supply 2020/21 - 2024/25	3,823
No. of years supply (3,823/1,356)	2.8

5. What are our supply and delivery challenges?

- 5.1 This section of the Action Plan considers the many reasons for our under-performance against the HDT. In reality, the borough is complex and diverse and there are many planning and environmental constraints affecting opportunities for development.
- 5.2 The national pressure to deliver more homes and the need to revert to the standard methodology for calculating our local housing need figure now that our Local Plan is more than five years old, means that Dacorum has to plan for substantially higher housing requirement than ever before.
- 5.3 Furthermore, the building of new homes can be complicated and there are many factors affecting why schemes are delayed, delivery is slowed or why they do not ultimately get built. These may be outside of the scope of planning and the control of this Council. For example, developers are currently experiencing skills and material shortages and supply chain difficulties which are hindering delivery.

a) Local Housing Need

- 5.4 The introduction of the national standard method to assess the local housing need since adoption of the Core Strategy has meant that Dacorum (and other authorities) are having to meet the difficulties of accommodating dramatically increased housing numbers. In our case, this has risen from 430 homes per annum in the Core Strategy to 1,023 homes per annum through the standard method (an uplift of over 230%).
- 5.5 Therefore, the Council is having to face a fundamental challenge as to how it meets this need which it cannot deliver under the existing spatial strategy. We are finding it extremely difficult to plan for this step-change in growth, especially taking into account the high demand for new homes and a constrained land supply.
- 5.6 While there has been a period of transition in terms of the HDT measurement for the standard method to take effect, this will prove increasingly difficult to achieve in the future. It is also negatively impacting on the 5-year housing supply calculations (Tables 4.3 and 4.4).

b) Cross-boundary and Strategic Issues

- 5.7 The delivery of market and affordable homes has implications beyond the borough boundary. It affects our neighbouring authorities, especially those within the South West Hertfordshire housing market area. Moreover, London is having an increasingly stronger and expanding influence on the housing markets locally. The Council is thus having to work with many partner bodies on such matters. However, such discussions are unlikely to influence near-term supply difficulties.
- 5.8 The Council is working hard under its Duty to Co-operate obligations to engage with neighbouring authorities and our many other partners to address strategic matters, including housing need and infrastructure. Indeed, we share many

housing and land supply characteristics with our neighbours and across the Housing Market Area with our partner authorities in South West of Hertfordshire. This is reflected in joint evidence base and Joint Strategic Plan (JSP) working, and in preparing a number of Memorandum of Understanding and Statements of Common Ground with neighbouring authorities.

c) Progressing the Local Plan

5.9 The Council is preparing a new Local Plan to address the dramatic uplift in the identified housing need. It consulted on an emerging (Regulation 18) Plan towards the end of 2020/early 2021 (paragraph 2.11 above). While we recognise that its preparation and adoption is a corporate priority, the Plan is proving considerably complex to progress in the face of:

- uncertainties around the introduction of the proposed planning reforms;
- the need to satisfactorily accommodate this level of growth within existing settlements;
- reconciling potential Green Belt releases to meet the need in full;
- ensuring infrastructure is properly funded and in place to support growth; and
- the importance of taking into account the impact of growth on the Chilterns Beechwoods Special Area of Conservation (SAC).

5.10 The current focus of the Plan programme is taking forward this critical supporting technical work. This evidence gathering will revolve around the following key areas:

- Habitat Regulation Assessment;
- Urban Capacity;
- Infrastructure Delivery Plan;
- Transport Modelling; and
- employment/economic and retailing needs assessments.

5.11 We would point out that the recent Local Plan consultation proposed 922 homes per annum (16,596 homes between 2020 and 2038) under the (then) revised Standard Method and not the more recent confirmed figure.

d) Progressing Local Plan allocations/larger housing schemes

5.12 The Council is not wholly dependent on the delivery of existing Local Plan allocations, given that the majority of commitments come forward as windfall sites. However, a substantial number of homes are tied up with a small number of these larger (100+ homes) allocations.

5.13 The Council is having marked success in supporting them through to delivery (see Table 5.1 below). However, despite the actions of the Council, some are taking longer than envisaged to secure planning permission and to be implemented. Where sites are not yet coming forward or are being delayed at the planning application stage they are characterised by a combination of the following points:

- their size and complexity;
- multiple landownerships;
- the need to deliver key infrastructure, including new primary schools and traveller pitches;
- the requirement to deal with contaminants and existing utilities;
- the involvement of outside organisations; and
- processes outside of the planning system / control of the Council.

Table 5.1 Progress with larger (100+ homes) Local Plan allocations

Local Plan Reference	Location	No of homes o/standing	Progress
MU/1	West Herts College site and Civic Zone, Queensway / Marlowes / Combe Street (north) / Leighton Buzzard Road	200	Two phases of development are now effectively complete in 2021/22 period (resp. 110 and 150 homes). Remaining Council owned land is proving more complicated to deliver because of on-site constraints.
MU/2	Hemel Hempstead Hospital Site, Hillfield Road	400	Progress is tied up with the review of the future of hospital services in South West Hertfordshire. ¹⁴
MU/4	Hemel Hempstead Station Gateway, London Road	140-200	On-going discussions with landowners over design feasibility. Site complicated by multiple land ownerships, phasing of land parcels, and the need to improve the operation of the train station. Likely to deliver a much higher density scheme (400-500 homes).

¹⁴ <https://www.westhertshospitals.nhs.uk/about/redevelopment/yourcareyourviews.asp>

MU/6	Land at Durrants Lane / Shootersway, Berkhamsted	-	Site has come forward in two phases. The first phase is complete (90 homes) and the second phase is significantly advanced (13 of 84 homes are complete in the 2020/21 period).
LA1	Marchmont Farm, Hemel Hempstead	350	Hybrid application for 350 homes submitted and awaiting determination (19/02749/MOA).
LA3	West Hemel Hempstead	900	Hybrid application for 1,100 homes awaiting completion of a legal agreement (4/03266/18/MFA).
LA5	Icknield Way, West of Tring	-	Planning permission approved for 225 homes and commencement and partial completions (43 homes) on site (4/00958/18/MFA).
H/2	National Grid land 339-353 London Road	350	Application submitted in late 2021 for 441 homes (21/03855/MFA). Not determined.
H/13	Frogmore Road	170	North eastern part of allocation has already secured approval for 170 homes (4/01331/18/MFA) and is effectively built-out in 2021/22 period. No progress on remaining commercial land.

5.14 On the positive side, allocation are generally tending to come forward at the planning application stage in excess of minimum housing capacities identified in planning requirements. This has helped and will continue to boost the housing numbers. For example, while LA3 West of Hemel allocation is still awaiting the completion of its legal agreement, it will deliver 200 more homes than anticipated by the Local Plan (1,100 as opposed to 900 homes).

5.15 Moreover, where an allocation is generally straightforward to deliver and/or issues can be resolved with speed, then there is no practical reason why development cannot be progressed promptly. For example, the hybrid application for allocation LA5 West of Tring was granted planning permission on 4th October 2019 with starts monitored on-site within less than six months (25th February 2020), and the first tranche of completions finished in just over a year (2nd December 2020).

5.16 While the above focusses on the larger allocations, the Council is engaging with landowners and other relevant parties to move forward the remaining Plan allocations.

e) Environmental and planning constraints

5.17 While the Council continues to be proactive when it comes to the supply and delivery of new homes, opportunities for development continue to be heavily restricted by the Borough’s varied environmental and planning constraints. These limit practical choices for developers with regards to the scale and location of new development.

5.18 The Borough is subject to a range of key constraints including:

- the Green Belt
- the Rural Area beyond the Green Belt
- Chilterns AONB
- Chiltern Beechwoods Special Area of Conservation (SAC)/SSSI
- Areas of flood risk

The main designations are set out in Table 5.2 and Figures 5.1, 5.2 and 5.3 below.

Table 5.2 Extent of constraints in Dacorum

PROTECTED AREAS	Area (Ha)
GREEN BELT	10,634.08
CHILTERN AONB	9,053.72
Sites of Special Scientific Interest	611.87
Special Areas of Conservation	455.63
Conservation Area	548.03
Scheduled Monuments	89.08
Flood Zone 2	466.78
Flood Zone 3	393.78

Total (taking account of overlapping constraints)	16,916.51
<i>Versus total area of Dacorum</i>	<i>21,247.97</i>
<i>As a percentage of Dacorum's total area</i>	<i>79.6%</i>

Figure 5.1 Key constraints in Dacorum

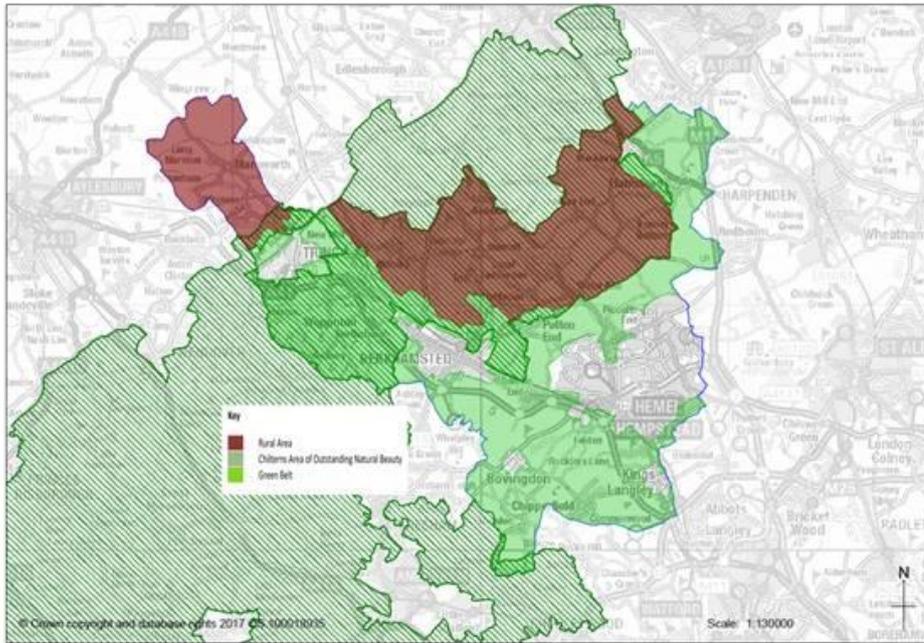


Figure 5.2 Map of the Chilterns Beechwoods SAC in Dacorum

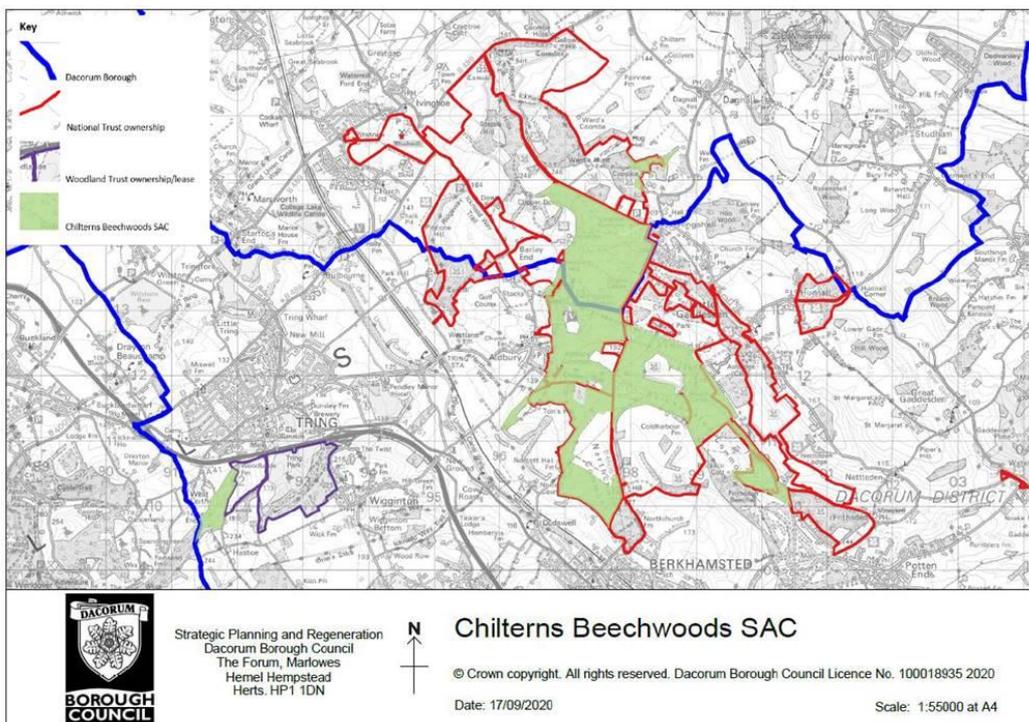
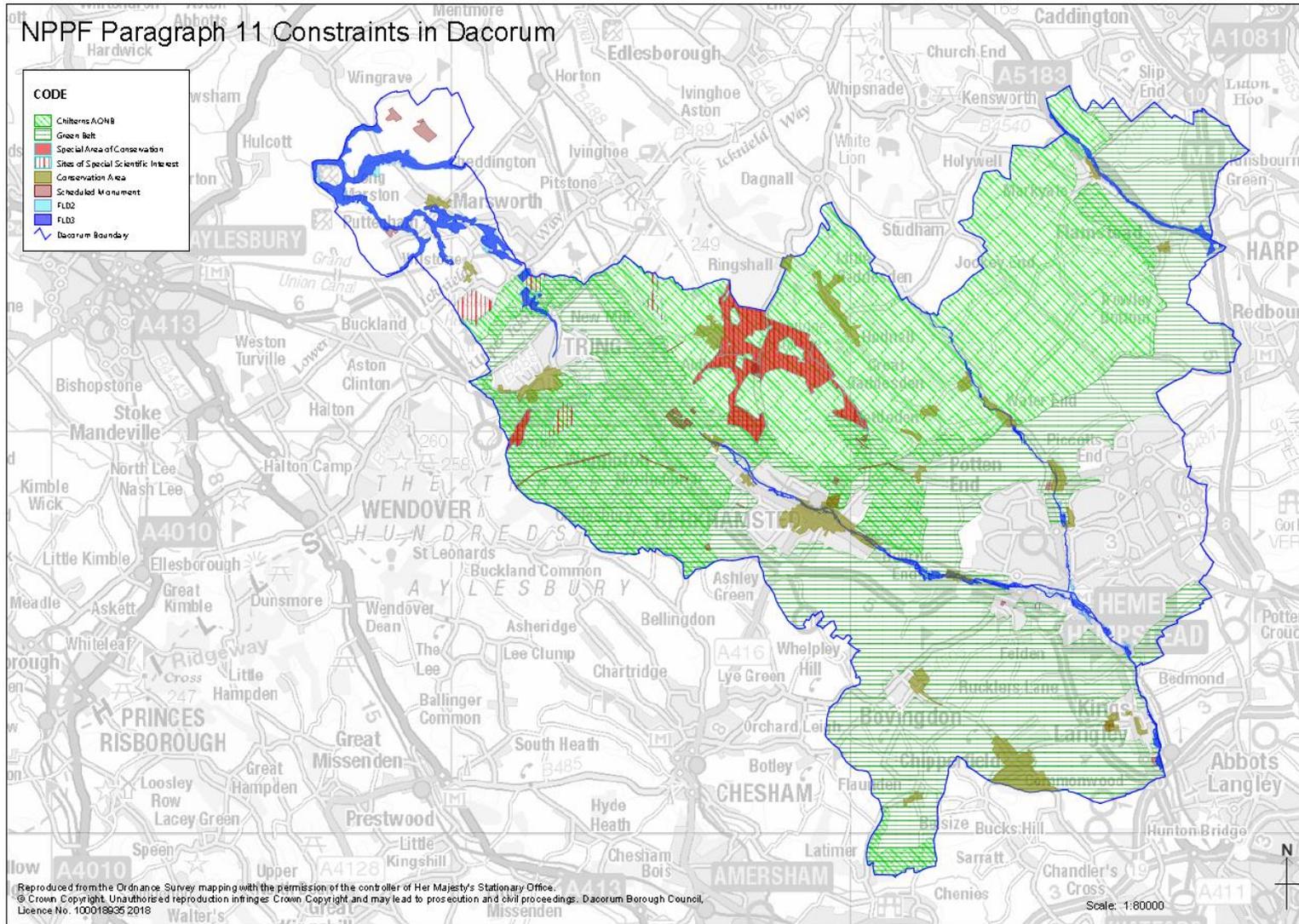


Figure 5.3 NPPF Paragraph 11 Constraints in Dacorum

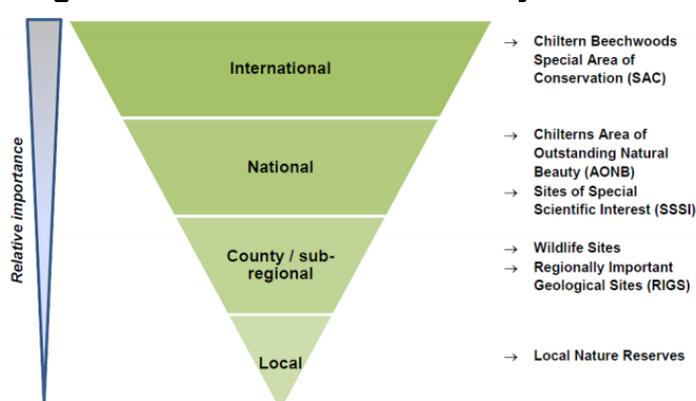


5.19 Table 5.2 and Figures 5.1, 5.2 and 5.3 demonstrate just how extensive, varied and overlapping these constraints are in Dacorum. For example, the Green Belt covers over half of the Borough with the Chilterns AONB overlapping and extending beyond it. Therefore, most of the land outside of the key settlements is identified as areas of development restraint.

5.20 The Chilterns AONB is nationally recognised landscape of very high quality that overlays both the Green Belt and Rural Area designations. The Council not only needs to avoid major development within the AONB, but it needs to consider the impact of development on its (often extensive) setting. Furthermore, the recent Glover Review on landscapes only serves to underline the growing importance of managing and resourcing the Chilterns landscape and highlight the potential move towards a National Park status.¹⁵

5.21 The Borough’s countryside is of high nature conservation value and is also affected by an overlapping hierarchy of environmental designations (see Figure 3). These include the Chiltern Beechwoods Special Areas of Conservation¹⁶, SSSIs (8 in total), Regionally Important Geological Sites (2 in total), Local Nature Reserves (6 in total), Local Wildlife Sites (over 230), etc. It also includes the rivers Gade, Bulbourne and Ver and their flood plains. New development should not lead to the loss, harm, and fragmentation of these sensitive environmental assets.

Figure 3 Environmental hierarchy



5.22 Government expects Local Planning Authorities to have particular regards to a number of these constraints as they are recognised as NPPF paragraph 11 “Footnote 6” constraints¹⁷. Paragraph 11b) of the NPPF also makes clear that weight should be given to these areas or assets in considering the scale and location of planned growth:

¹⁵ Landscapes Review (September 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

¹⁶ The designation extends to two areas in the Borough: a larger area covering the Ashridge Estate and a smaller area at Tring Park.

¹⁷ In Dacorum these cover SACs, SSSIs; the Green Belt, an Area of Outstanding Natural Beauty, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding.

“i. the application of policies in this 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;”

- 5.23 Designated Special Area for Conservation (SAC) are of international importance for ecology. These SACs and other sites of similar importance are collectively known as “European Sites”. Within the Borough there is one such European Site, the Chilterns Beechwoods. It is a composite of 9 sites each being a SSSI (and 8 of which are in the Chilterns AONB). In Dacorum there are 2 ‘units’ at Ashridge (Ashridge Commons and Woods SSI) and south-west of Tring (Tring Woodlands SSSI). The Council has a dedicated webpage where you can find further details about the SAC and associated work on the HRA.¹⁸
- 5.24 A considerable part of the borough is of high heritage and conservation value. There are over 2,000 listed buildings within Dacorum and 25 conservation areas in both urban and rural settings. The borough is also home to a variety of other locally important built heritage and below ground archaeology. The latter includes 28 Scheduled Ancient Monuments and 61 Areas of Archaeological Significance.
- 5.25 This combination of high quality, distinctive and often sensitive landscape and heritage assets reduces opportunities for both development generally and, in particular, limits the scope for delivering large scale housing schemes.

f) The Local Housing Market / Viability

- 5.26 Dacorum’s housing market is generally buoyant. This is due to its location close to London and being well served by mainline railway stations, the existing local job opportunities and low rates of unemployment, its varied housing stock, and high overall environmental quality. Consequently, the borough is an affluent area, and residents enjoy an excellent standard of living and high levels of average earnings.
- 5.27 When we look at median house price paid for all house types over the period October 2019 – September 2020, the price paid for a property was £390,000, the fifth highest in the county. This was comparable to the county median, but substantially above that for the region (by 57%) and nationally (by 34%) (Table 5.3). Buyers would also be having to pay an additional £18,000 from the equivalent figure for the year ending September 2019 (£372,000).

Table 5.3 Median price paid for all house types (Oct 2019 – Sep 2020)

Area	Price Paid
Dacorum	£390,000
Hertfordshire	£400,000
England	£249,000
East of England	£292,000

Source: Herts Insight

¹⁸ [Chilterns Beechwoods Special Area of Conservation \(dacorum.gov.uk\)](https://www.dacorum.gov.uk/chilterns-beechwoods-special-area-of-conservation)

- 5.28 Therefore, on the basis of high house prices and a strong local economy the housing market is not a barrier to delivery, especially in attracting large scale developments. However, high house prices across all house types and an expensive rental market means that affordability remains a major issue locally.
- 5.29 High land values and property prices together with local viability evidence, suggests that viability is not a major issue impacting on the delivery of new homes in the borough. While viability may affect the nature and scale of contributions secured through the application process, the Council will take a flexible approach, where appropriate and evidenced, to ensure schemes can come forward.

g) Covid-19

- 5.30 It is difficult to predict the impact of the Covid-19 pandemic and economic downturn (and to a degree the consequences of leaving the EU) on the local and national housing market. Much of its effects is often out of the immediate control of the Council and planning may not necessarily be the main barrier to supply and delivery of housing. Certainly, issues around skill shortages, building supplies/delivery/distribution and cost of materials will impact significantly on the ability of house builders to build-out schemes in a timely manner.
- 5.31 Equally, structural changes in terms of the need and use of buildings and a different pattern in the way we work and access services and facilities (combined with a more relaxed planning controls) as a result of Covid-19, means that additional properties and land will likely become available in the future for housing.
- 5.32 It does appear that the housing market is recovering, house prices are rising and demand is strong. This is reflected in excellent completion rates in Dacorum for the 2020/21 period and across Hertfordshire as a whole.

h) Planning decision performance

- 5.33 Dacorum has a good track record of processing planning applications within the statutory timeframes. On the whole, we do not see that the timely granting of planning permissions is a major impediment affecting the supply and delivery of new homes.
- 5.34 The Development Management service is dealing with applications in an efficient and effective manner. In the 2019-2020 monitoring period, 77% of major planning applications were processed within the statutory 13-week period (or within an agreed extension). This is well above the national target of 60%. For minor applications, where the statutory time period to process an application is 8 weeks (or within an agreed extension), 72% were processed within this timeframe, exceeding the national target of 70%. Furthermore, 78% of other applications were processed, again, greater than the target set nationally.

6. How can we improve delivery?

- 6.1 This part of the Action Plan sets out the steps the Council is taking or needs to take in order to support the accelerated delivery of housing in Dacorum. The Action Plan also complements other existing corporate plans, policies and strategies outlined in section 2 of this document which provide a framework for the delivery of our housing priorities.
- 6.2 However, partnership working with the private sector remains critical to securing more new homes in the borough.
- 6.3 Set out below are a number of short, medium and longer-term initiatives that we are undertaking to improve housing supply and delivery. While we discuss these under separate headings they are often interlinked, overlapping and mutually inclusive.

a) Corporate focus on delivery

- 6.4 The Council accepts that a step change in delivery is essential in order to tackle its many housing challenges. Indeed, we have a strong corporate “open for business” ethos in terms of our dealings with new development opportunities. Furthermore, we are using our own resources and in developing our programmes and actions, to ultimately achieve practical progress and delivery on the ground.
- 6.5 We have a number of over-lapping corporate structures, strategies and programmes in place to prioritise regeneration, renewal, and recovery, and in particular to support the delivery (directly and indirectly) of more market and affordable homes. These measures all have the full support of our senior leadership teams and Councillors. Furthermore, many of these extend beyond the Council to other public and private delivery partners.
- 6.6 Such programmes include:
- The Dacorum Growth and Infrastructure Strategy;
 - The Corporate Plan;
 - Hemel Place Strategy;
 - Hemel Place Board;
 - Hemel Town Centre Place Strategy;
 - South Hemel Opportunity Area;
 - The Dacorum Economic Recovery Plan; and
 - Dacorum Economic Recovery Board.

Some of these are covered in further detail in the sections below.

b) Covid and Economic Recovery

- 6.7 The Council recognises the fundamental importance of helping the borough overcome the adverse effects of the pandemic and its impact on economic growth and wellbeing. We are formulating what steps we need to take to support

investment in the local economy and employment opportunities post-Covid, but also taking into account the implications of new international trading relationships and continued automation in the work place. This in turn will support sustained confidence and recovery in the housing market.

6.8 We are preparing an economic recovery strategy (Dacorum Economic Recovery Plan) which will be overseen by a partnership-led new Dacorum Economic Recovery Board. The document will be monitored and reviewed on an annual basis by the board. Much of its focus will be on Hemel Hempstead as the major town and key employment centre in the borough.

6.9 The draft Plan was reported to and approved by Cabinet on 19th October 2021.¹⁹

c) An improving housing supply position

6.10 While the Covid pandemic and economic recession have impacted on the housing market, there are excellent signs that future supply and activity are on a positive trajectory. This is in part related to ever widening national changes to planning control to allow properties to be converted to housing without the formal need for planning permission. Indeed, completions are substantially up in the 2020/21 period with a record 751 (net) homes delivered. This represents a sizeable 54% increase on the previous year's position (489 homes). Such improvements are also reflected in rising completion rates for the county as a whole (the highest since 2008).

6.11 Commitments (including those schemes pending the completion of legal agreements) also remain strong as at 1st April 2021 i.e. into the next 2020/21 HDT reporting period. This represents a net supply of nearly 4,000 homes (3,997 homes (net)). Indeed, commitments have virtually experienced year-on-year increases over the last five year (Table 6.1). Furthermore, commitments also remain high at county-level.

Table 6.1 Net housing commitments in Dacorum 2016-2021

Period	No. of (net) commitments	% change from previous year
2016/17	2,415	n/a
2017/18	2,901	+20%
2018/19	3,222	+11%
2019/20	3,116	-3%
2020/21	3,997	+28%

Source: DBC monitoring

6.12 It is also worth noting a potentially healthy supply of 2,354 homes from larger new-build (100+ homes) schemes in the pipeline and under construction or with and/or pending planning permission (Appendix 1). Furthermore, the Council has yet to determine:

¹⁹ [Agenda for Cabinet on Tuesday, 19th October, 2021, 7.30 pm \(dacorum.gov.uk\)](#)

- an outline scheme (19/02749/MOA) for 350 homes at Marchmont Farm, Hemel Hempstead (Local Allocation LA1); and
- a full application (21/03855/MFA) for 441 homes at the former Gasworks site, London Road, Hemel Hempstead (Housing Allocation H/2).

6.13 Recent levels of commitments have also been complemented by a broadly year-on-year growth in the number of housing starts (Table 6.2).

Table 6.2 Annual housing starts in Dacorum 2016-2021

Period	No. of starts in the period	% change from previous year
2016/17	613	n/a
2017/18	733	+20%
2018/19	762	+4%
2019/20	588	-23%
2020/21	763	+30%

Source: DBC monitoring

6.14 The latest work on the housing trajectory (as at 1st April 2020) also points to a near year-on-year improving supply. However, while still not fully achieving local need, they are at the upper end of what is required. It is worth noting that in reality actual completions of 751 (net) homes during 2020/21 exceeded the equivalent predicted figure for that same period (of 649 homes) (Table 6.2). Furthermore, these figures do not take into account the impact of Covid or make any adjustments for the latest position on housing schemes, the new Local Plan growth position and preferred sites, and other initiatives to boost supply.

Table 6.2 Projected housing supply (as at 1st April 2020)

Period	No. of (net) projected completions	Shortfall compared to LHN (1,023 homes pa)	% achievement of LHN
2020/21	649	-374	63%
2021/22	852	-171	83%
2022/23	454	-569	44%
2023/24	947	-76	93%
2024/25	921	-102	90%
Total	3,823	-1,292	75%

Source: DBC monitoring

d) Progressing the Local Plan and other policy documents

6.15 The Council is looking to move the new Local Plan forward as expediently as possible, as this will be key to establishing a development strategy that will:

- identify housing allocations to meet need;

- set out specific policies and standards to promote, as appropriate, higher densities and effective use of land;
 - achieve a high quality of design and place-making; and
 - provide clarity to developers on contributions and levels of affordable housing.
- 6.16 However, it is vital that we undertake critical additional evidence base work, particularly around opportunities to increase urban capacity in Hemel Hempstead and assessing the implications of the Habitat Regulations Assessment on the preferred development strategy. We are currently progressing this evidence gathering work which will support moving the Plan forward.
- 6.17 The Council is working closely with the Planning Advisory Service (PAS) on project managing the plan programme, so as to maintain as much momentum with the Local Plan as possible in the circumstances and to minimise delays. We are in regular contact with PAS and continue to discuss programming and technical issues with them with a view to identifying potential solutions. The Council intends to prepare an updated Local Development Scheme as soon as it is in a position to.
- 6.18 We are also seeking to progress other supporting policy and technical work. They have the potential to identify additional short to medium term urban development opportunities, particularly in Hemel Hempstead under a number of initiatives tied to the Hemel Place Strategy (see below).
- 6.19 The Council is progressing a number of Supplementary Planning Documents (SPDs) linked to the Core Strategy. These will provide further support and clarity for new developments at and through the pre application and application stages. The SPDs will cover the following policy areas:
- Biodiversity Net Gain
 - Social Value (skills)
 - Stewardship and Open Space
 - Affordable Housing (and will incorporate the update of the Affordable Housing Clarification Note²⁰)
- 6.20 A particular priority of the Council, linked to preparing the Affordable Housing SPD, is producing a First Homes interim statement to help guide developers to submit and deliver such schemes. In addition, the Social Value (skills) SPD could begin to start to address some acknowledged skills shortages in the construction industry.

e) Hemel Place Strategy

- 6.21 The Council is developing a Hemel Place Strategy given that the town will be the main focus for significant transformation over the next 20-30 years, particularly in response to the Hemel Garden Communities proposal.

²⁰ [affordable-housing-spd---clarification-note---update-aug-2019.pdf \(dacorum.gov.uk\)](#)

6.22 The strategy will set out a long term plan for the regeneration of Hemel Hempstead and set a path for recovery beyond the pandemic. It will be managed through a multi-agency Hemel Place Board consisting of a range of Council partners and key local stakeholders.

6.23 An early priority of the Strategy will be to develop a comprehensive approach to managing change in retailing in Hemel Hempstead Town Centre, effects that have in part been exacerbated by Covid19. The new Place Strategy will ensure that the town centre is fit for purpose for the future by providing the right mix of facilities, that it addresses structural changes in retailing, and that it meets the needs for a growing residential population. This project also includes a pilot design coding for the Paradise industrial area (Paradise Design Code) in order to support housing-led schemes there²¹.

f) South Hemel Opportunity Area

6.24 The Council is undertaking further detailed place-making work as part of the South Hemel Hempstead Opportunity Area²² under the umbrella of the Hemel Place Strategy. It will cover all or parts of the Apsley, Boxmoor and Two Waters area of the town.

6.25 The strategy will provide a long-term vision, explore opportunities for repurposing, renewal and regeneration of this areas help deliver wider transformation of the town, and, importantly, identify scope for a range of new development to supplement the housing supply.

g) Updating the SHLAA/Call for Sites/Brownfield Sites Register

6.26 The Council continues to be proactive with identifying potential housing sites through a variety of mechanisms, although it has traditionally found it difficult to find deliverable sites on previously developed land. This is because there are relatively few major opportunities available for development in the urban areas (and elsewhere), and many developers and landowners tend to proceed straight through to the planning application stage. However, structural changes as a result of Covid-19 and the relaxation of planning controls may make this process more productive and aid the release of development opportunities in the future.

6.27 The Council is taking steps to keep the Strategic Housing Land Availability Assessment (SHLAA) up to date and relevant. We have undertaken an in-house review of the 2016 SHLAA through the preparation of the new Local Plan and its evidence base. This has involved separate greenfield and urban site assessments (given their different characteristics and assessment criteria) which were published as part of the evidence base to support the latest round of consultation of the new Local Plan²³.

²¹ [HPS Appendix 4 - Paradise Design Code.pdf \(dacorum.gov.uk\)](#)

²² [South Hemel Opportunity Area \(dacorum.gov.uk\)](#)

²³ [Evidence base for the new single local plan \(dacorum.gov.uk\)](#)

- 6.28 The recent update of the SHLAA was underpinned by earlier Call for Sites work associated with preparing the previous consultation version of the Plan in late 2017²⁴. Furthermore, the latest Local Plan consultation saw landowners bring forward additional sites to our attention which in theory could have potential for allocation, although these are yet to be appraised.
- 6.29 In reality, the Call for Sites exercise is an open ended one to maximise opportunities for landowners to bring to our attention potential locations for development. Moreover, the Council has recently created an online and interactive Local Plan register to further encourage and simplify this process²⁵.
- 6.30 Interestingly, what we are now finding is that landowners who submitted sites through the Local Plan process (and this would also include a few preferred identified sites) are now beginning to pursue them through the planning application process. In theory, this could bring forward deliverable sites, although some do raise a number of fundamental policy implications.
- 6.31 The Council manages and publishes a Brownfield Land Register (BLR) that overlaps with the Call for Sites process²⁶. The BLR does identify a pipeline of brownfield sites which is updated annually, but these are generally from a number of already known sources of allocations, call for sites and permissions. Therefore, they add little to our understanding of the housing supply.
- 6.32 We are also required to manage and publish a Custom and Self Build (CSB) register²⁷. This provides us with a better understanding of the demand for this type of housing. We are exploring ways of improving their supply, including taking a more proactive stance on communication and awareness of CSB.

h) New Council Housing development programme

- 6.33 The Council will continue to use its assets and resources to directly deliver affordable (and some market) homes through its new build and garage disposal programmes. We have a good track record for delivering new homes to date and the lifting of the borrowing cap on the HRA has presented an opportunity to accelerate delivery and enable a sustainable ongoing development programme. Indeed, the Council is looking at expanding its programme of housebuilding and also to review its land ownership for further opportunities.
- 6.34 Following a short period of in-activity of those housing schemes on-site during lockdown and a steady return to capacity, the outlook remains positive in the near to medium term for the housing supply from both the new-build and garage disposal development programmes.
- 6.35 The Council continues to progress schemes to detailed approval and starts on-site. Table 6.2 below sets out completions to date and what is in the development pipeline. Subject to securing planning permission, we anticipate current delivery

²⁴ [Issues and Options consultation 2017 \(dacorum.gov.uk\)](https://www.dacorum.gov.uk/consultations/2017-issues-and-options-consultation)

²⁵ [Local Plan Sites Register \(dacorum.gov.uk\)](https://www.dacorum.gov.uk/consultations/local-plan-sites-register)

²⁶ [Brownfield Land Register \(dacorum.gov.uk\)](https://www.dacorum.gov.uk/consultations/brownfield-land-register)

²⁷ [Self-build and custom housebuilding register \(dacorum.gov.uk\)](https://www.dacorum.gov.uk/consultations/self-build-and-custom-housebuilding-register)

of a further 368 properties in total comprising of 348 new-build homes and 20 homes from former garage sites.

Table 6.2 The Council Housing development programme

Scheme	Status	Unit Nos	
Built to date	Farm Place, St Peters, Elms, Aspen Ct, Queens St, Able House, Longlands	138	338
Kylina Court	Completed January 2019	79	
Swing Gate Lane New	Completed Autumn 2019	9	
Swing Gate Lane Refurb	Completed Autumn 2020	3	
Magenta Court	Completed September 2020	29	
Martindale	Completed November 2020	65	
Northend Garage Site	Completed June 2020	6	
Westerdale Garage Site	Completed July 2020	6	
Gaddesden Row	Completed January 2021	3	
Eastwick Row	Start on Site Spring 2021	36	
Coniston Road	Start on Site Spring 2021	10	
Bulbourne	Design Commenced	10	322
St Margarets Close	Design Commenced	48	
Wilstone	Submitted for Planning Approval	6	
Randalls Ride	Submitted for Planning Approval	30	
Garage Sites	Submitted for Planning Approval	20	
Paradise Depot	Design Commenced	40	
Paradise Fields	Planning Approval Achieved	58	
Cherry Bounce	Design Commenced	80	
LA1	Design Commenced	30	
Total		706	706

6.36 In addition, our Housing Development team are constantly looking at sites that become available to assess the viability for social housing, and it is likely that this process will only add further to the supply. For example, the Council owns land within the Local Allocation LA1 Marchmont Farm which does not form part of the scheme that is currently being determined (19/02749/MOA). This could deliver around 30 additional homes.

6.37 The Council continues to assess the suitability for redevelopment of our garage sites for council homes and anticipate that current proposals will deliver 64 homes (Table 6.3), although there is a slight overlap of sites shown in Table 6.2. Such sites will continue to make a steady, albeit modest, contribution towards the housing supply.

6.38 The Council is also looking at other land that it owns to bring forward housing and housing-led schemes in Hemel Hempstead, some of which are already identified as allocations (and some of which are subject to planning applications):

Allocation	Location	No. of homes	Comment
MU/3	West Herts College site and Civic Zone, Queensway / Marlowes / Combe Street (north) / Leighton Buzzard Road	200	Land is to be developed in three main parcels, two of which are effectively complete in 2021/22.

			Remaining land owned by Council, but access / construction / delivery is now further complicated by the presence of the new Hill / Gade development either side of the land.
L/1	Market Square and Bus Station, Marlowes / Waterhouse Street	100	The Council is undertaking feasibility work to deliver a mixed housing, commercial and leisure scheme there.
LA1	Marchmont Farm	30	Additional land within the wider LA1 allocation owned by the Council but separate from current submitted scheme (19/02749/MOA). Possible application could be submitted in 2022.
-	Paradise Depot, Hemel Hempstead	56	Forms part of the Paradise GEA. Plan policy supports wider reuse of commercial land for housing. The Council's Housing Development team has submitted a scheme for 56 flats (21/04352/MFA).
H/11	Land r/o St Margaret's Way / Datchworth Turn	46	The Council's Housing Development team has submitted a scheme for 46 homes (21/03089/MFA).

Table 6.3 Future garage disposal sites

Development	Number of units	Unit Type
Housewood End, Hemel Hempstead	3	3 No. 3 bed houses
Dione Road, Hemel Hempstead	4	3 No. 2 bed houses 2 No. 3 bed houses
Sempill Road (East), Hemel Hempstead	4	4 No. 1 bed apartments
Sempill Road (West), Hemel Hempstead	5	3 No. 3 bed houses 2 No. 2 bed houses
Sleddale, Hemel Hempstead	8	3 No. 1 bed apartments 3 No. 2 bed apartments 2 No. 3 bed houses
Beechfields, Kings Langley	4	2 No. 2 bed houses 2 No. 3 bed houses
Randall's Ride, Hemel Hempstead	30	18 No. 1 bed apartments 12 No. 2 bed apartments
Land at rear of 36 – 42 Tring Road, Wilstone	6	4No. 2 bed houses 2No. 3 bed houses
Total	64	

i) Improved Development Management processes

6.39 The Development Management team continue to explore ways to improve their service to ensure that the planning application system is not a barrier to development opportunities. The focus remains on delivering speedier outcomes and decisions across the service. However, this needs to be seen in the light of acknowledged severe workload pressures across the team which we are seeking to resolve together with working with stakeholders and other consultees to move applications through the system quicker.

6.40 The service has progressed/is progressing the following key actions:

- It has put in place fast track arrangements for processing the smallest scale cases, such as house extensions and other domestic development. This has freed up resources to spend on major applications.
- It is exploring the scope of new technology to automate more of the development management system with the aim of providing a faster and more efficient service. This could include the use of AI and automation to speed up the planning application administration process.
- It is continuing to develop its Planning Performance Agreement (PPA) protocol.
- It has revised its pre-application process.
- It has secured additional resources to ensure a quicker response turnaround from key internal and external consultees such as with our Trees and Woodlands team.
- The enforcement team has been focussing on significant major developments²⁸ with the aim of speeding up delivery.

²⁸ Schemes of 75 or more homes or a site area of 2.0ha or more.

<ul style="list-style-type: none">• Review major sites schedule and identify areas where proactive steps can be taken.• Identify sites where development has stalled and discuss what proactive steps can be taken to get back on track.• Review and update assumptions on the housing sites identified within the Council's 5 year land supply and update the Council's Housing Implementation Strategy	proposals (pre-pre-app), Overview of Housing Implementation Strategy
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6.45 Furthermore, preparing SPDs and design codes for large sites will improve clarity and allow decisions to be made more quickly.

6.46 In theory, the Council could use its compulsory purchase order (CPO) powers in order to unblock sites that are experiencing local difficulties in the land market or where it is proving complicated to assemble the land. We do not see a need for this at present, but we aim to keep matters under review should circumstances justify their use.

k) The digital reform of the planning system

6.47 The Government is committed to streamlining, simplifying and modernising the planning system and to make it more data-driven. This entails a move away from both legacy analogue systems and a “documents not data” approach. The benefits of digitisation include:

- making planning information easier to find, understand, share and interact with.
- delivering a positive shift in both the speed and quality of decision making.
- improving collaboration and accessibility of information.
- standardising modelling and improving accessibility provides a new opportunity to record and learn from the actual performance data.
- ensuring that all decisions are founded on the most current, relevant and accurate data.
- better cross-referencing of data across an authority and externally.
- using new mapping technology and 3D modelling to improve how local authorities visualise and make assessments of their areas, and to evaluate the success of previous decisions.

6.48 As part of this reform, the Government has announced 10 local authorities, including Dacorum, who are taking part in a local pathfinder programme to trial the use of digital, map-based local plans. This process will include testing new local plan data standards and templates for more machine-readable information.

- 6.49 Dacorum is also one of 13 authorities piloting new digital initiatives to make the planning process more open and accessible and to boost public engagement under the PropTech Engagement Fund.
- 6.50 Furthermore, the Council is working with the County Council to enhance collaboration with other organisations, including the use of IT systems and a move towards spatial rather than traditional forms of data. This initiative is in its infancy, but will allow for better sharing of information and quicker decision making in the near to medium future.
- 6.51 These initiatives should be seen in the light of local steps we are already taking to make better use of available technology, as outlined in the sub-sections above. They also demonstrate our proactive approach to the use of digital tools in the planning process and with the ultimately aim of boosting supply and delivery. It wants to be at the forefront of establishing best practice and improving the level of involvement in and quality and speed of its decision-making process.

l) Engagement with the development industry

- 6.52 The Council recognises the importance of engaging with the development industry in order to support the supply and delivery of new homes in the borough. This is on-going and is particularly focussed on the planning application process, as explained above. However, the Strategic Planning team have also been engaging with the development industry as part of the site identification and appraisal process to the Local Plan.
- 6.53 The Development Management team are aware of the benefits of such engagement and previously held regular agents forums. They are considering whether this is something worth resurrecting later in 2022.
- 6.54 Furthermore, the Hertfordshire Growth Board (HGB)³⁰ – which brings together leaders of the 11 councils and the Local Enterprise Partnership – are now running a new joint Hertfordshire Developers Forum. This is to support growth challenges in the county. The forum facilitates regular and more focussed engagement with house builders, developers and their agents/consultants. Dacorum attends and is an active participant of this forum.
- 6.55 The forum allows the private and public sectors to work together to focus on delivery, to help remove barriers to growth and to deliver future economic prosperity in their respective areas. One particular emerging area the HGB wants to explore with its developer partners is modern construction methods as a means of accelerating delivery.

m) Article 4 Directions

- 6.56 The Council has introduced a number of Article 4 directions across the borough³¹. These have been in response to national changes to widen the scope

³⁰ [Hertfordshire Growth Board \(dacorum.gov.uk\)](https://www.dacorum.gov.uk)

³¹ [Article 4 directions \(dacorum.gov.uk\)](https://www.dacorum.gov.uk)

of changes that can be made from commercial uses to residential without the need for planning permission.

- 6.57 We believe that these are fully justified in each case and carefully targeted in order to protect key commercial areas and the role they perform for the local community and local economy. They strike an appropriate balance between providing further opportunities for housing development and safeguarding such areas from continuing loss and decline. For example, office conversions to residential have certainly boosted supply and delivery and ensured effective use of vacant properties. Unfortunately, this has been at the cost of a significant downturn in office floorspace and an estimated loss of several thousand associated jobs.
- 6.58 However, we will keep these Article 4 directions under regular review. We have already confirmed changes affecting Hemel Hempstead town centre³². Furthermore, we will consider whether there is a need to further refine and target their coverage, particularly in respect of those affecting designated General Employment Areas, in order to widen opportunities for development.

n) Monitor and Review

- 6.59 The Council has a good system in place to monitor housing supply, implementation and delivery. We remain proactive which means that we have a good understanding of sites (allocations, applications and permissions) and site activity. Thus we are able to identify adverse supply and delivery issues in a timely manner and react to them much sooner.
- 6.60 The monitoring and information system is underpinned by the services provided to the Hertfordshire districts by the County Council's Information and Monitoring team under an annual Service Level Agreement (SLA) with them. In particular, they provide us with detailed site-specific information and reporting tools through their CDP Smart monitoring system.
- 6.61 We are also undertaking an in-house review of our monitoring and information routines in order to improve their efficiency, timeliness, accuracy and reliability. This will involve us discussing issues of resourcing, staffing, technology and training with our internal and external information partners. One particular goal of ours is to take advantage of the opportunities for efficiencies/automation offered by the digital reform of the planning system.
- 6.62 The review also ties in with enhancements of the County Council's SLA for the 2022/23 period covering further detailed monitoring of development which we will be discussing with them.

³² [Item 6 Report to DMC - HEMEL HEMPSTEAD TOWN CENTRE ARTICLE 4 - 11 November 2021.pdf](#)
(dacorum.gov.uk)

7. What are we doing next?

- 7.1 The Council is committed to improving the delivery of new homes and in doing more to help our residents get access to housing. We have seen increasing levels of house building in Dacorum over the last couple of years and looking ahead there is still much we can continue to do to sustain this trend.
- 7.2 Currently, the Council has ambitious emerging plans for renewal, regeneration and recovery, particularly concentrating on Hemel Hempstead as the main town and economic driver in the borough. This is underpinned by a strong focus on growth and the delivery of market and affordable homes. With regards to the latter, we have an excellent track record of directly providing council homes.
- 7.3 Through the Action Plan, the Council must take a cross-cutting approach to enable an increasing supply of homes. In broad terms and based upon local issues and challenges identified in the document, the main improvements cover:
- A stronger corporate focus and prioritisation on delivery to drive behaviour and decision making across the Council aligned to wider aspirations for regeneration, renewal and recovery in the borough;
 - A proactive approach to using Council land and resources to deliver more council homes;
 - Continuing improvements to and investment in the development management and enforcement systems to make the application process more efficient and effective and decision-making speedier;
 - Continuing focus on unblocking significant and complex major schemes;
 - Updating planning policy to support and ensure consistency in the decision-making process;
 - Supporting the business community to recover from the Covid pandemic and thus provide confidence to the housing market.
- 7.4 The Action Plan set out below identifies areas for immediate improvements to delivery and also medium to long-term actions in support of growth ambitions.

Action Category	Description	Outcome	Timescales	Responsibilities
1. Corporate:				
	Covid and Economic Recovery	Corporate policy approach emerging with draft recovery plans approved. While not immediately related to supply and delivery, a strong local economy will help stimulate demand in the housing market.	Short/medium term/long term	Corporate / Dacorum Economic Recovery Board / Hertfordshire Local Enterprise Partnership
	Hemel Hempstead Place Strategy	Elements of the Place Strategy are evolving including early public engagement, visioning and baselining work on the Hemel Town Centre Strategy and Paradise Design Codes. These in turn will help with identifying policy approaches and potential development opportunities in Hemel Hempstead. The Hemel Place Board will ensure strong management and buy-in from the community and key stakeholders.	Short/medium term	Corporate / Hemel Place Board
	Hertfordshire Developers Forum	The HDF offers an opportunity to discuss supply and delivery matters at a county-level with the development industry.	Short/medium/long-term	Corporate / Hertfordshire Growth Board

		Possibility of engaging with a number of developers and other organisations, and sharing knowledge and best practice.		
2. Policy:				
	Progress Local Plan to adoption	Continuing focus to move Plan forward. While some blockages and uncertainties are acknowledged to the plan programme, work is ongoing to advance a sub area place strategy (South Hemel Opportunity Area), progress the evidence base and understand the implications of the HRA on the development strategy. Emerging SPDs will provide a useful policy spring board for the Plan. The Local Plan (with a focus on design codes and SPDs) will front load and resolve a lot of the detailed issues to allow schemes to move swiftly through the system once the Plan is adopted.	Short/medium/long-term	Strategic Planning
	Progress supporting SPDs	Need to update existing policy framework through new SPDs in light of national changes. These will	Short/medium term	Strategic Planning

		provide greater clarity and certainty for the decision-making process in support of improved delivery.		
	Design coding	The Council is piloting two design coding projects. These will provide greater clarity and certainty for the decision-making process in support of improved delivery. We see these as a key plank of the new Local Plan and will allow smoother transition to delivery.	Short term	Strategic Planning / Development Management
	Monitoring and review	The Council will continue to carefully monitor implementation and rates of delivery through the land position statements, AMRs and other ad hoc routines. This will provide feedback on the success of the Action Plan and whether there is a need to review it or carry out further measures, as appropriate.	Short/medium term	Strategic Planning
3. Processes:				
	Improvements to DM processes	Various initiatives being pursued to improve the effectiveness and efficiency of the planning application process, to prioritise major	Short/medium term	Development Management / Legal

		<p>schemes, and to support applicants at key stages. New technology offers opportunities for streamlining and automation of systems.</p> <p>Continuing to use and refine Planning Performance Agreements as a way of managing and resourcing larger and/or more complex schemes.</p>		
	Digital Reform of the Planning System	<p>Explore and take advantage of the benefits of digital reform to support a clearer, more efficient plan-making and decision-making service for users. Outcomes not yet known. The Council has secured national funding for a number of pilot schemes.</p>	Medium term	Strategic Planning / Hertfordshire County Council
	Identifying new sites / Call for sites work / Updating the SHLAA	<p>Call for sites exercise in support of the Local Plan on-going. Process has been part automated to encourage and speed up submissions. This process may identify additional development opportunities. Such work will link to and support updating of the SHLAA.</p>	Short/medium term	Strategic Planning

		Area based work under the Hemel Place Strategy could also help identify and explore further suitable sites for new homes.		
	Article 4 Directions	Tighten coverage of Article 4 directions to ensure a better balance between opportunities for housing development and protecting employment and retailing. New Article 4 directions are being considered and introduced.	Short term	Strategic Planning / Development Management
4. Direct delivery:				
	New Build Programme	The Council continues to support and resource both programmes. Ongoing pipeline supply in place and being programmed. Ad hoc opportunities actively being pursued so as to identify additional new build sites. Further review of Council land underway to explore additional development opportunities.	Short/medium term	Strategic Housing / Housing Development / Commercial Assets & Property Development - Communal Buildings / Housing
	Garage disposal programme			
5. Supporting delivery:				

	Unblocking major developments	On-going work on a case-by-case basis to identify and resolve blockages with relevant parties. Bespoke actions will be required. The focus of attention remains on resolving negotiations between applicants and stakeholders on key infrastructure to allow the completion of legal agreements. MRM will continue to be a key officer forum to identify delays, and to coordinate discussion and action in respect of progressing applications. Actions will need to be escalated to senior management team, if necessary.	Short/medium term	Development Management / Legal / Hertfordshire County Council / Infrastructure Providers
	Using Compulsory Purchase Powers	No evidence to suggest that CPOs are necessarily required to improve supply / delivery. However, there is a need to keep their potential use under review if required to release sites.	Short/medium/long term	Corporate / Development Management / Legal

APPENDIX 1 - Larger new-build (+100 homes) sites in Dacorum

Applic. No.	Address	No. of units	Progress
<i>a) Under construction:</i>			
4/00049/19/RES	Land north of Dacorum Way, West Herts College, Marlowes, Hemel Hempstead	110	Complete in 2021/22
4/01459/18/RES	Land adj. to The Forum and Dacorum Way, Hemel Hempstead	150	Complete in 2021/22
4/01331/18/MFA	Frogmore Road Industrial Estate, Hemel Hempstead	170	Complete in 2021/22
4/00958/18/MFA	LA5, Land at Icknield Way, Tring	226	43 homes completed in 2021/22
	Sub-total	656	
<i>b) With planning permission:</i>			
4/02539/16/MFA	Spencer Park Phase 2, Hemel Hempstead	440	Not started*
20/00963/MFA	66-72 Wood Lane End, Maylands Avenue, Hemel Hempstead	158	Not started
	Sub-total	598	
<i>c) Schemes pending completion of legal agreement:</i>			
4/3266/18/MFA	Land at LA3 west Hemel Hempstead	1,100	
	Sub-total	1,100	
Total (a) + b) + c))		2,354	

Source: DBC monitoring

* Reserved matters granted 13.07.21 under 21/01517/RES

APPENDIX 2 - Office to residential prior approvals as at 1st April 2021

Applic. No.	Address	No. of units	Progress
20/00587/OPA	8D Chipperfield Road, Bovingdon	1	n/s
4/01821/17/OPA	89 Marlowes, Hemel Hempstead	16	u/c
4/03150/17/OPA	Hamilton House, 111 Marlowes, Hemel Hempstead	70	u/c
4/00193/18/OPA	Hempstead House, 2 Selden Hill, Hemel Hempstead	64	u/c
4/01352/18/OPA	Vantage House, 23 Mark Road	30	n/s
4/01588/18/OPA	Nexus House, Boundary Way, Hemel Hempstead	26	n/s
4/01745/19/OPA	24 London Road, Hemel Hempstead,	1	n/s
20/00154/OPA	Charleston House, 13 High Street, Hemel Hempstead	5	u/c
20/00388/OPA	Nash House, 12 London Road, Hemel Hempstead	10	n/s
4/02172/19/OPA	Parker House, Maylands Avenue, Hemel Hempstead	30	n/s
4/02230/19/OPA	Technology House, Maylands Avenue, Hemel Hempstead	85	n/s
4/01257/16/OPA	Akeman Business Park, Akeman Street, Tring	24	u/c
4/02762/16/OPA	Akeman Business Park, Akeman Street, Tring	17	u/c
Total		379	

Source: DBC monitoring

n/s = not started

u/c = under construction