



# **Background Paper – Selecting the Core Strategy Housing Target**

**June 2012**

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## 1. Introduction

1.1 The purpose of this housing paper is to explain:

- (a) how the housing target in the Pre Submission Core Strategy (October 2011) (PSCS) has been selected; and
- (b) why this is the appropriate level to plan for.

1.2 Policy CS17: New Housing in the (PSCS) states that 430 net new homes per year can be delivered over the period 2006 to 2031. The Council considers that in setting the Core Strategy housing target a key factor is:

- The amount needed to meet the objectively assessed needs for market and affordable housing.

This refers to advice in the National Planning Policy Framework (para. 47) that states:

“To boost significantly the supply of housing, local planning authorities should:

Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”

1.3 The target should also be influenced by a range of other factors (para. 14.16 of the Core Strategy):

- The ability to deliver a sufficient, flexible and steady housing supply;
- The opportunities to ensure a mix of housing (both in terms of tenure and type);
- The timing of key infrastructure to support new housing;
- The balance between jobs and homes;
- The support to the local economy and achievement of regeneration targets;
- The effect of new developments (i.e. the land used);
- The relationship to environmental constraints and impact upon the character of particular settlements; and
- The desire to protect the countryside.

1.4 The Council considered a range of housing growth options (that would vary according to time and place) before reaching a conclusion on an appropriate target. These were:

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- A lower option - based on urban capacity within settlements (with a housing target of 370 dwellings per annum (dpa));
- A middle option - that sought to balance environmental, social and economic factors by looking at how development was distributed across settlements and its impact on them (with a housing target of 430 dpa); and
- A higher option – this was more demand-led (delivering at least 500 dpa or 12,500 homes 2006-31)

The lower and middle options excluded a full contribution from windfalls.

- 1.5 National policy guidance and the views of the community were important contextual considerations.

## 2. POLICY BACKGROUND

### (a) National Advice

2.1 The Council understands and has contributed to the setting of provision rates in Hertfordshire. It has taken full account of Government planning policy set out in Planning Policy Guidance and Planning Policy Statements as it has evolved. The Pre-Submission Core Strategy has had regard, in particular to:

- PPG2 Green Belt
- PPS3 Housing (see Appendix 1 for a brief summary of advice)
- PPS7 Sustainable Development in the Rural Area
- PPS12 Local Development Framework

The Council also considered the implications of the draft NPPF (July 2011).

2.2 The **National Planning Policy Framework (March 2012)** (NPPF) has been published and the Council now needs to test the appropriateness of the housing target against this planning policy guidance.

2.3 The NPPF seeks to provide a framework that:

“..local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.” (para. 1)

This local approach is repeated within later advice in the framework:

“Local Plans are the key to delivering sustainable development that reflects the views and aspirations of local communities.” (para. 150)

2.4 At the heart of the NPPF is a presumption in favour of sustainable development which requires that in plan-making (para. 14):

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless:
  - any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - specific policies in this Framework indicate development should be restricted.

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2.5 Paragraph 17 sets out core planning principles. It sees planning as being proactive in delivering development and infrastructure. Planning should objectively identify and meet the housing and other development needs of an area, and respond positively to wider opportunities for growth. However, there is also a need to take account of the roles and character of different settlements such as:

“...protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside..”

2.6 Paragraph 47 states that to boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirement with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

2.7 Paragraph 48 sets out advice on windfall sites explaining that local planning authorities (LPAs):

“...may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

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- 2.8 The NPPF stresses the importance of delivering a wide choice of housing by ensuring local planning authorities (LPAs) (para. 50):
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; and
  - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
  - where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.
- 2.9 Paragraph 51 states that LPAs should take steps to bring back into residential use empty housing and building in line with local housing and empty homes strategies and, where appropriate, through the use of compulsory purchase orders.
- 2.10 The framework sets out a number of strategic priorities for local plans including delivering the homes and jobs needed in the area and related physical and social infrastructure (para. 156). LPAs must also ensure the evidence base for housing, employment and other uses is integrated, and that they take full account of relevant market and economic signals (para. 158).
- 2.11 Paragraph 159 emphasises the need for LPAs to have a clear understanding of housing needs in their area by:
- preparing a Strategic Housing Market Assessment to assess their full housing needs;
  - identifying the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
    - meets household and population projections, taking account of migration and demographic change;
    - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community;
    - caters for housing demand and the scale of housing supply necessary to meet this demand; and
  - preparing a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 2.12 The NPPF sees as essential early and meaningful engagement with neighbourhoods, local organisations and businesses (para. 155).
- 2.13 However, it is clear that a balance needs to be struck between delivering against objectively assessed development needs and weighing up any adverse impacts (when assessed against the NPPF as a whole) or where development should be

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restricted (e.g. in the case of the Green Belt, SSSI or AONB) (para. 14). Thus in the context of planning positively for development it is reasonable to look at the role of a number of factors i.e. those listed in Chapter 1.

2.14 The Government continues to attach great importance to the openness and permanence of the Green Belt (para. 79). The NPPF has retained the five key tests for the Green Belt (para. 8) formerly in PPG2: Green Belts:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.15 Great weight should also be given to conserving the landscape and scenic beauty in the CAONB and its wildlife and cultural heritage (para. 115).

### **(b) Strategic guidance and provision**

2.16 There has been continuity in planning policy. That includes consideration of a wider area than just Dacorum. Issues other than household demand forecast have proved important when deriving housing targets or provision levels for this and adjoining authorities.

### **(i) Historic rates of provision**

2.17 Housing provision within regional guidance and structure plans have always been assessed against population and household forecasts, although this has not necessarily resulted in them satisfying full demand.

2.18 Regional guidance and structure plans have generally sought to reduce the impact of future development on the countryside and the environment of Hertfordshire. In particular, Hertfordshire structure plans have considered the environmental capacity of the county to accommodate additional housing, encouraged development of growth areas away from the Green Belt, and effectively sought to meet its own housing need (i.e. assuming some immigration). This strategy can be neatly summarised as follows:

“... the Secretary of State is not saying that Builders should be able to build just where they wish or that land should everywhere be made available sufficient to accommodate all the people who might want to live in an area. To do so would be to negate the very purpose of the Green Belt and other policies to protect and conserve important environmental features. Therefore, although the distribution of housing development around the County will enable a contribution to demand



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to be made, the scale of this has to be limited by Green Belt and other constraints.”<sup>1</sup>

- 2.19 Apart from high levels of growth brought about during the development of Hemel Hempstead New Town during the 1950s-70s, there has been a planned reduction in housing rates since the 1980s (Table 2.1). While building rates have always been measured against objectively assessed demand and need, the targets have reflected the considered capacity of the borough to absorb extra dwellings so as to prevent adverse impacts on the environment of the borough’s settlements and without increasing intrusion into the Green Belt and Rural Area. Growth pressure has therefore been diverted away from the Dacorum area (and south west Hertfordshire) into other parts of the county beyond the Metropolitan Green Belt.

**Table 2.1 Hertfordshire County Structure Plan - Housing targets in Dacorum**

	Period	Annual Rate (Total provision)	
		County	Dacorum
1976 County Structure Plan (Approved Secretary of State September 1979) – control level, basis for preparation of local plans	1971 - 91	75,300-80,800 / 3,765-4,040*	545 (10,900)
Alterations No.1 (Approved Secretary of State October 1984) – achieve target, do not (normally exceed)	1976 - 91	4,210 (63,100)	620 (9,300)
1986 Review (Approved Secretary of State May 1988) – local plan to make provision for	1986-96	4,170 (62,500)	453 (6,800)
1991 Alterations (Approved Secretary of State October 1984) – local plan to make provision for	1986-01	3,800 (57,000)	347 (5,200)
1991-2011 Hertfordshire Structure Plan Review (Adopted 1998) – local plan to make provision for	1991-11	3,250 (65,000)	360 (7,200)

Note:

\* 3 areas had higher and lower levels (not Dacorum / West Hertfordshire). All provision rates include windfalls.

- 2.20 Through regional planning, some of Dacorum’s and Hertfordshire’s growth has been accommodated over a wider area by other authorities e.g. Aylesbury, South (now Central) Bedfordshire / Luton, Milton Keynes etc. The geography of the borough is such that it is not unreasonable to expect some needs at its edges to be met by other settlements.

<sup>1</sup> Para. 5.3.8, Hertfordshire County Structure Plan Review Explanatory Memorandum (Approved 1986 Review)

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- 2.21 The rates of housing provision in Hertfordshire set out in earlier regional guidance (RPG9: March 1994 and March 2001) pointed to continued pressure for housing in the county. The **County Structure Plan Review (1991-2011)** (CSPR) acknowledged this pressure and the implications of other population and household forecasts. In opting to set a lower level of provision of 65,000 new homes than that provided in RPG9<sup>2</sup> it continued to recognise the environmental constraints of accommodating additional housing in the county and accepted the need for a planned diversion of growth away from the Metropolitan Green Belt.
- 2.22 The CSPR set a housing target for Dacorum of 360 dpa. The Council considered this a reasonable rate in the context of striking a balance between the Borough's projected household growth and the impact of housing on the environment and the constraints of the Green Belt.<sup>3</sup> It was also an acceptance that some of the locally generated need would have to be met outside of the district, and that this would have implications for meeting affordable housing needs. However, some greenfield housing sites and land held in reserve were considered necessary in order to achieve its housing requirement.
- 2.23 While annual completion rates may have varied over time, their delivery has met or exceeded planned rates (Table 2.2). Dacorum is not therefore an authority that has under delivered (ref para. 47, NPPF).

**Table 2.2 Local Plan target and actual delivery**

<b>Plan</b>	<b>Target</b>	<b>Delivery</b>	<b>Difference</b>
Dacorum District Plan	9,300*	10,568	+1,268
Dacorum Borough Local Plan 1986-2001	5,200	6,234	+1,034
Dacorum Borough Local Plan 1991-2011	7,200	7,223	+23

Note: \*Measured against a 15 year Structure Plan Alterations 1980 requirement of 9,300 (1976-91)

All provision rates include windfalls.

Source: DBC Monitoring

### (ii) Regional Guidance

- 2.24 The Regional Strategy (RS) (the **East of England Plan (EoE Plan)**) has been important in the context of considering housing provision in Dacorum (summarised in Appendix 2)<sup>4</sup>.

<sup>2</sup> Lower than RPG 9 which proposed 66,660 new homes.

<sup>3</sup> Paras. 14.10-14.12, Dacorum Borough Local Plan 1991-2011

<sup>4</sup> The RS remains part of the development plan until formally revoked.

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- 2.25 The EoE Plan initially set a target of 315 dwellings for Dacorum between 2001 and 2021, but was subsequently increased following the Examination in Public and Panel Report recommendations. Policy SS3 identified Hemel Hempstead as a key centre for development and change (KCDC). Policy SS7 allowed for strategic reviews of Green Belt around the town. Policies H1 and LA2 proposed an additional 12,000 dwellings in Dacorum between 2001 and 2021 (600 per annum). However, after taking account of the 2001-2006 shortfall, Policy H1 required a 2006-2021 building rate of 680 per annum. The policy also required the rate to remain at 680 per annum beyond 2021. This equated to a total of 17,000 homes over the period 2006 to 2031. Policy H1 expected land within St Albans district at Hemel Hempstead to contribute to Dacorum's target
- 2.26 The RS was subject to a High Court challenge by Hertfordshire County Council /St Albans District Council. The challenge proved successful because the judge ruled that the SA/SEA process underpinning the proposed major expansion at Hemel Hempstead and Welwyn Garden City / Hatfield was inadequate. The judge therefore deleted the housing targets for Dacorum and Welwyn Hatfield Councils from the RS. However, Hemel Hempstead was still classified as a key centre for development and change.
- 2.27 Following the High Court decision, the Government started a 'repair process' to insert housing targets where they were missing. It is not known what the effect would have been for Dacorum or any other authority. No suggestion was ever published, and the process was abandoned by the Coalition Government.
- 2.28 During the examination of the Regional Plan consultants, Entec, submitted the Gorhambury Estate Proposal, which was on land on the eastern side of Hemel Hempstead: most is in St Albans district (see Appendix 3). The proposal involved around 6,000 new homes in two new neighbourhoods, extension of the Maylands Business Park, and related development over a period of about 25 years. In considering alternative growth scenarios for the town later, the Council concluded it would be better to deliver closer to 5,300 homes in the same area<sup>5</sup> The Panel stated they did not support any specific landowner proposals. However, given the scale of growth at Hemel Hempstead to 2031 it seems certain that most or all of the Gorhambury Estate Proposal was intended.
- 2.29 Policy LA2 otherwise made clear it supported retention of long-standing Green Belt restraint. Towns, such as Berkhamsted and Tring, should make as much provision within the urban area as is compatible with the maintenance of their distinctive characters and identities.

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<sup>5</sup> DBC Assessment of Alternative Growth Scenarios for Hemel Hempstead (March 2009)

### 3. FACTORS GUIDING THE HOUSING TARGET

3.1 In order to be objective in setting a housing target, the Council has considered:

- what a reasonable assessment of housing need and demand shows;
- how the Council should respond to that assessment i.e.
  - what the implications of meeting and not meeting that assessment are; and
  - whether there are realistic alternative targets; and
- what a reasonable planning strategy would be.

3.2 Thus the fundamental question is how much of this objectively assessed development it is reasonable for the Council to meet given the Metropolitan Green Belt (which covers half of the district and whose inner boundaries tightly follow the edges of urban areas), its high landscape quality (particularly the Chilterns Area of Outstanding Natural Beauty), and the need to safeguard other environmental assets (e.g. ecology, built and archaeological heritage, character of its towns and villages etc.). These factors are relevant in setting a housing target.

#### (a) Assessment of the need for market housing

3.3 Housing projections are an important starting point against which to assess demand. One of the key variants is migration.

3.4 The Government (CLG) 2006-based and 2008-based household projections suggest respectively a housing growth of 12,000 households over the period 2006 to 2031 and 13,000 households from 2008 to 2033. However, the **London Commuter Belt (West) Strategic Housing Market Assessment 2008** (SHMA) did not include any estimate of future housing demand as it was constrained by the (then) Regional Strategy figures (see para. 2.26).

3.5 Using the two sets of household projections to establish the level of growth in dwellings over the period 2006 to 2031 would imply that the Council should be planning for around 13,500 dwellings if it is to meet full projected demand and levels of in-migration in the borough (i.e. 540 dwellings per annum).

3.6 The Office of National Statistics (ONS) has also published on 21<sup>st</sup> March 2012 the 2010-based sub-national population projections for Dacorum. This shows the population increasing from 141,600 to 165,900 over the period 2010 – 35 (i.e. by 24,300 or 17.2%).

3.7 Other household projections are also available (see Table 3.1). They are discussed in the **Population: Background Note for the Core Strategy (April**

**2009) and the Population Projections and the LDF – Background Information Note (September 2011).**

**Table 3.1: Dwellings Projections for Dacorum Borough Council**

Source of Projection	2006	2011	2021	2031	Change 2006-31
CLG (2006 based) <sup>1</sup>	59,131	61,170	66,268	71,365	12,234 <sup>3</sup>
CLG (2008 based) <sup>1</sup>	58,112	60,966	66,064	71,569	13,457
Chelmer Standard '09 <sup>2</sup>	58,831	60,768	64,439	66,784	7,953
Chelmer ZNM '09 <sup>2</sup>	58,799	61,322	66,329	70,194	11,395
Chelmer Standard '11 <sup>2</sup>	58,261	60,622	67,057	72,740	14,479
Chelmer ZNM '11 <sup>2</sup>	58,261	60,241	65,714	70,309	12,048

1: CLG household projections converted to dwellings by multiplying by 1.0195 because the latest information from ONS/CLG (2001) relating to dwelling stock and household spaces showed a difference of 1.95%.

2: Chelmer household projections converted to dwellings by multiplying by 1.0196 because that is the difference between households and dwellings in the Chelmer zero net migration model.

3: At a 3% allowance for vacancies, this figure would be about 12,400. It was referred to in the Consultation Draft Core Strategy (November 2010) as a nil-net migration level of 12,400 dwellings. That was incorrect and should have referred to the 2006-based CLG household trend projection.

- 3.8 The two Chelmer '09 sets of projections were produced by the East of England Regional Assembly (EERA) in December 2009 to inform the review of the East of England Plan. The Chelmer Standard '09 illustrates how the population would change if demographic trends during the period 2001-06 continue. The Chelmer ZNM (Zero Net Migration) '09 projection illustrates how the population would change if there was a balance between the number of in and out-migrants.
- 3.9 The two Chelmer '11 sets of projections were provided by consultancy Barton Willmore. The Chelmer Standard '11 model demonstrates how the population would change if short-term migration trends over the period 2004-09 were continued. This assumed a relatively high level of net in-migration over a short period of time significantly above that compared to longer-term trends<sup>6</sup>. The

<sup>6</sup> Para. 3.6, The Population Projections and the LDF – Background Information Note (September 2011)

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Chelmer ZNM (Zero Net Migration) '11 projection illustrates how the population would change if there was a balance between the number of in and out-migrants.

**Table 3.2 Comparison of dwelling projections to Core Strategy housing target and housing programme**

Source of Projection	Change in Dwellings Projected 2006-31	% Policy CS17 delivers against the Dwellings Projection compared with the Pre-Submission Core Strategy Target (1)   Programme (2)	
		Target (1)	Programme (2)
CLG (2006 based)	12,234	87.9	92.5
CLG (2008 based)	13,457	79.9	84.1
Chelmer Standard '09	7,953	135.2	142.3
Chelmer ZNM '09	11,395	94.3	99.3
Chelmer Standard '11	14,479	74.2	78.2
Chelmer ZNM '11	12,048	89.2	94.0

Notes:

(1) 430 dwellings per annum (i.e. 10,750 homes 2006-31)

(2) 11,320 dwellings 2006-31 (Table 8 in the Pre-Submission Core Strategy)

3.10 While the housing target and programme under Policy CS17 do not satisfy all the national (and other) projections it is at least within the range set by these figures and performs better than the lower housing option (Option 1) target.

3.11 Population and housing projections are an important starting point, but that they should not be applied mechanically. The projections have limitations as the County Structure Plan Review (1991-2011) (CSPR) warned:

“All such projections need to be treated with considerable caution, as they depend on making a number of difficult assumptions about a range of complex issues.” (para. 136)

3.12 Migration is an important (and often volatile) component of the projections. For example, the CLG's household projections include a significant level of in-migration. However, it is difficult to measure (especially at district level) and in Dacorum has proved to be volatile over the last ten years (shifting from net out to net in-migration), particularly in the last five years<sup>7</sup>.

<sup>7</sup> Paras. 2.1 – 2.5, The Population Projections and the LDF – Background Information Note (September 2011)

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- 3.13 Below national level there is no published information that splits the household projections into the natural increase and migration elements. However, the ONS 2008-based population projections do provide a breakdown of natural change and migration, and these points to a 70:30 split<sup>8</sup>. This proportion suggests that to at least satisfy natural change over the plan period we should plan for 9,400 homes (i.e. 70% of the 13,457 homes stated in Table 3.1). Therefore, the middle housing growth option would cater for meeting some net in-migration (and higher still under the Policy CS17 housing programme), although not as much as implied by the household projections.
- 3.14 The projections could potentially be exaggerated. ONS have been working on improving their methodology for producing local authority long-term migration estimates for England and Wales (Appendix 4).
- 3.15 The ONS work points to an indicative decrease in levels of immigration in the county and for Dacorum, using the new methodology, against the mid-2006 to mid-2010 population estimates (Table 3.3). While the outcome of the revised methodology has fed through to the 2010-based sub national population projections, it is unclear if this will feed into revising the associated CLG household projections.

**Table 3.3 Indicative impacts on the migration estimates for Hertfordshire and Dacorum between mid-2006 and mid-2010**

	Current Total	New indicative total	Indicative change	% change in immigration
Hertfordshire	44,206	35,290	-8,916	-20.2
Dacorum	4,496	3,465	-1,031	-22.9

Source: ONS Crown Copyright ©

Note: the table is reproduced in full in Appendix 3

- 3.16 For Dacorum, the revised estimate of 2006-10 migration (i.e. the “new indicative total” in Table 3.3) is 1,031 people lower than the original estimate (i.e. the “current total” in Table 3.3). In other words, the new estimate is nearly 260 people per year lower than the original estimate. Based on an average household size of 2.43 (2001 Census) this means that about 107 fewer homes per annum were needed for migrants between 2006-10 than previously thought.
- 3.17 On face value, it does tend to suggest that the objectively assessed demands are potentially exaggerated and should be reduced. It is unclear to what extent the implications of the revised methodology might apply over the full plan period, but if the revised migration levels were used in this way they would suggest that housing demand could be exaggerated by as much as 2,675 homes (i.e. 107 homes x 25 years).

<sup>8</sup> Para. 3.2, The Population Projections and the LDF – Background Information Note (September 2011)

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- 3.18 Even if no retrospective changes are made to the Government's household projections, it would not be unreasonable to assume that the next version of the household projections will take into account the revised migration estimates. This may lead to lower household projections for the borough in the future.
- 3.19 Both the Government's and the Chelmer projections are trend based and therefore do not necessarily reflect the impact of future policy change(s) and other factors that might affect household formation. The Chelmer models have been subject to criticisms by Oxford Economics<sup>9</sup>.
- 3.20 The forecasts are based on projecting short-term trends, including assumptions for both natural increase and migration. It is a crude measure in that it is not constrained in any way by policy decisions or capacity of an area to accommodate the forecast level of growth. Sub regional household projections (including CLG projections) are also less robust than those at the regional level.
- 3.21 There are a variety of forecasts that can be used as a measure of housing demand. It is clear that they do vary and all have their shortcomings. Therefore, it is difficult to say which is necessarily the most appropriate to use. However, the Council accepts that the national population and household projections are reasonable measures for assessing demand in the light of other projections and against other factors.
- 3.22 The Council would argue whether it is reasonable to plan to meet levels of in-migration given Green Belt constraints. It is also important that the housing target reflects on all factors that make up the evidence base to the Core Strategy and not solely demand. Therefore, there should also be a discussion of other factors such as the implications of changes in household size and levels of sharing, economic factors, and the ability to actually accommodate growth.
- 3.23 The NPPF (para.79) recognises the key role of the Metropolitan Green Belt in Dacorum when considering need and demand, particularly in relation to the prevention of encroachment into the countryside and in assisting regeneration (generally in the borough and specifically in the case of Hemel Hempstead).
- 3.24 Dacorum has for many years been a net exporter of households given the constraints of the Green Belt and other factors. Hertfordshire County Council has argued for, and this has been accepted by the Secretary of State, a policy of general development restraint that recognised the borough's Green Belt and environmental constraints. The approach accepted that there should be an element of net out migration over time. The Council would argue that this

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<sup>9</sup> See para. 3.8 of DBC Population Projections and the Core Strategy – Background information note (September 2011)



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continues to be relevant in determining its housing target. This point was acknowledged by the previous Local Plan Inquiry Inspector:

“In an area that is subject to significant Green Belt constraints and where there is a limited supply of “brownfield” land, it seems reasonable to assume that there will be some net [out] migration.” (para. 7.2.13 of the Inspector’s report)

This has led to a shift in households to the north and east of the county and towards larger centres such as Luton/Dunstable, Aylesbury and Milton Keynes.

- 3.25 Furthermore, household forecasts are based upon the assumptions for projected new household formation rates being realised. However, it is debatable the extent to which all household formation will materialise given the negative effects of current housing affordability and the recession / employment opportunities on household formation. These factors can lead to a delay in leaving the parental home and transitions to independent living, partnership and family formation. It is unclear how long some of these problems will persist over the plan period. However, affordability is likely to remain an issue, and will affect housing demand in Dacorum.

### **(b) Assessment of the need for affordable housing**

- 3.26 Although meeting affordable housing need is a priority, the Council wants to strike a balance between this, the reality and viability of delivery, and other competing factors when setting a housing target.
- 3.27 There is high demand for social housing, as demonstrated in past housing needs surveys (HNS) in 1999<sup>10</sup> and 2003<sup>11</sup> that showed a need for respectively 5,174 and 4,425 households. They point to a backlog to be met and a continuing (lower level) need as households form or household circumstances change. The number of households on the housing waiting lists has steadily increased over the past few years (Appendix 5). There are currently over 5,900 households on the Council’s Housing Register<sup>12</sup>. It should be emphasised that the housing register is an imperfect reflection of demand in that anyone can register and it also includes an element of double-counting.
- 3.28 Homelessness in Dacorum is low despite an increase over the past 6-12 months (Appendix 5). The recent increase in homelessness acceptances cases may be due to factors such as growing unemployment or increased numbers of parental evictions.

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<sup>10</sup> DBC Housing Needs Survey 1999 (Fordham Research Ltd)

<sup>11</sup> DBC Housing Needs Survey 2003 (David Coutie Associates)

<sup>12</sup> The Council is moving to a new Housing Register system (Abitas) through the Moving with Dacorum initiative. The public now has to re-register their interest in properties. This process is likely to lead to a reduction in numbers of households removing the problem with double-counting in the older system.

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- 3.29 The activities of the Housing Options Team (e.g. housing advice/signposting of households towards other partner agencies that can assist e.g. mortgage /debt advice, or rent deposit guarantee scheme) are helping to limit the incidences of homelessness.
- 3.30 The **London Commuter Belt (West) Strategic Housing Market Assessment 2008** (SHMA) indicated there was a need for all forms of housing in Dacorum. In particular, it found that there was:
- a social rented housing requirement of 3,100 homes (i.e. 221 per annum in the borough over the period 2007 to 2021).
  - no identified need for intermediate housing.
  - a need for 1, 2 and 3-bed social rented homes.
  - a need for family (3 and 4-bed) sized market housing.
- 3.31 The model used to estimate the housing requirement was underpinned by the higher EoE Plan growth scenario for Dacorum. If rolled forward to 2031, this would be equivalent to around 5,525 homes, i.e. 220 dpa. The use of the higher regional growth scenario may have inflated overall need.
- 3.32 The Council does not consider it represents a realistic level to plan for. Even with a reduction in qualifying thresholds and an increase in the level of overall contribution, it would be a major challenge:
- past delivery rates have been relatively low (an annual average rate of 76 homes since 2001<sup>13</sup>);
  - not all sites are necessarily suitable or will qualify for affordable housing; and
  - the viability of development must be taken into account.
- 3.33 Policy CS19 seeks an affordable housing target of 35%. The target was one that was considered achievable and deliverable within the recommendations of the **Affordable Housing and Section 106 Viability Study (November 2009)**.
- 3.34 Taking into account actual delivery since 2006, the lower growth option would not deliver on the numbers of affordable homes as much as the middle option (respectively around 2,700 and 3,300 affordable homes<sup>14</sup>). The latter would make a more significant contribution to meeting housing need across the lifetime of the plan, especially through higher levels from the greenfield local allocations (Appendix 6). Short to medium term there is a good pipeline of major identified sites to deliver affordable homes<sup>15</sup>.

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<sup>13</sup> Section 7, DBC Annual Monitoring Report 2010/11

<sup>14</sup> Para. 15.15, Consultation Draft Core Strategy (as at 1<sup>st</sup> April 2009 base)

<sup>15</sup> Appendix 3, DBC Annual Monitoring Report 2010/11

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- 3.35 A demand-led housing option would help deliver more affordable homes, but this would have wider Green Belt, greenfield land take, environmental and infrastructure implications for the borough (discussed below), and what could be delivered under the middle option is still a significant contribution towards meeting need.
- 3.36 The Council has not observed the effects of housing need as being unduly serious over recent years, e.g. it has not observed longer-term high levels of homelessness. Numbers shown in the housing register are significant, but exaggerated because it is demand led. The Council acknowledges that HNSs have shown a high level of need. The methodology suggests this may always be the case. HNSs do not take into account the fact that some people:
- pay out a significantly larger proportion of their incomes in mortgage or rent payments than assumed in the HNS;
  - receive help from their families to enable them to purchase open market housing;
  - choose to buy or rent open market housing with friends;
  - decide to buy or rent open market housing in cheaper locations away from their home town.
- 3.37 Affordable housing is a key corporate and planning priority of the Council and it is committed to an accelerated delivery of housing to take advantage of the New Homes Bonus Scheme, particularly as affordable housing will attract a slightly higher rate. It is putting in place financial and staff resources to focus on affordable homes and boost delivery generally including:
- completing a Local Investment Plan to ensure better partnership working with the Homes and Communities Agency (HCA) e.g. investment, land and policy etc.;
  - setting up a majors (delivery) team within the Development Management service to support development through the planning process;
  - ensuring planning and housing functions work more closely together to deliver housing;
  - making £3 million available over the next two years from its Capital Grant to support the delivery of affordable housing on sites;
  - establishing a Dacorum Property Development Group to identify and bring forward potential housing sites from Council owned land;
  - establishing a 'Dacorum Delivery Programme' setting out key regeneration projects and how they will be delivered;
  - using New Homes Bonus grant for delivery and regeneration projects (e.g. partnership working with the HCA).
  - progressing the "Council New Build Programme" to develop 45 affordable homes by 2015 under additional funding offered by the HCA.

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- 3.38 The redefinition of affordable housing may help to deliver more affordable homes. Affordable rent housing is less subsidised and could prove more commercially attractive to deliver for developers and registered providers.
- 3.39 The Council recognises the importance of keeping up to date with changing housing needs. To this end, the Council has commissioned a follow up to the SHMA for 2012<sup>16</sup>. The document is being finalised and should be published in late summer / early autumn 2012. It will review the outputs of the earlier 2003 HNS including current housing market activity, housing costs and income, population growth and household projections, future size of affordable housing, and older persons accommodation, and also provide a quantitative assessment of housing need.

### (c) The opportunities to ensure a mix of housing

- 3.40 Land supply, the character of potential sites, their location and potential delivery have been considered.

#### (i) Land availability

- 3.41 Tables 3.4 and 3.5 set out the Council's assessment of housing land supply (as at 1<sup>st</sup> April 2011) with regards to, respectively, the Policy CS17 housing target and housing programme. The former differs from the latter by excluding any windfall contributions in years 0-10. The housing programme takes into account all reasonably available forms of housing supply over the lifetime of the plan, including commitments, Strategic Housing Land Availability Assessment (SHLAA) sites, other assumptions about future housing, and the contribution from windfalls. Estimates of capacity are underpinned by policy assumptions about density, parking provision and amenity standards, and local land supply.

**Table 3.4 Housing Supply estimate (Policy CS17) – as at 1<sup>st</sup> April 2011**

#### (a) Housing Supply Estimate (excluding Green Belt Releases)

<b>Source of Supply</b>	<b>Total</b>
Previously developed land <sup>1</sup>	6,094
Greenfield <sup>1</sup>	1,644
Garden land <sup>1</sup>	668
<b>Sub-total (1)<sup>1</sup></b>	<b>8,406</b>
Windfalls ( <i>excluding contributions in years 0-10</i> ):	
(i) Previously developed land	444
(ii) Garden land	378
<b>Sub-total (2)</b>	<b>822</b>

<sup>16</sup> DBC Housing Market and Needs Assessment 2012

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<b>Sub-total (3) (i.e. (1)+(2))</b>	<b>9,228</b>
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**(b) Housing Supply Estimate (including Green Belt Releases)**

<b>Source of Supply</b>	<b>Total</b>
Green Belt releases	1,550
Sub-total (1)	8,406
<b>Total</b>	<b>9,956</b>
Green Belt releases	1,550
Sub-total (3)	9,288
<b>Total</b>	<b>10,778</b>

Sources: DBC (Annual Monitoring Report 2010/11) and HCC Monitoring

Note: <sup>1</sup> i.e. completions, planning permissions and identified sites or locations for 5 or more dwellings

**Table 3.5 Housing Supply estimate (Policy CS17 housing programme) – as at 1<sup>st</sup> April 2011**

**(a) Housing Supply Estimate (excluding Green Belt Releases)**

<b>Source of Supply</b>	<b>Total</b>
Previously developed land	6,094
Greenfield	1,644
Garden land	668
<b>Sub-total (1)</b>	<b>8,406</b>
Windfalls ( <i>including contributions in years 0-10</i> ):	
(i) Previously developed land	744
(ii) Garden land	630
<b>Sub-total (2)</b>	<b>1,374</b>
<b>Sub-total (3) (i.e. (1)+(2))</b>	<b>9,780</b>

**(b) Housing Supply Estimate (including Green Belt Releases)**

<b>Source of Supply</b>	<b>Total</b>
Green Belt releases	1,550
Sub-total (1)	8,406
<b>Total</b>	<b>9,956</b>
Green Belt releases	1,550
Sub-total (3)	9,780
<b>Total</b>	<b>11,330</b>

Sources: DBC (Annual Monitoring Report 2010/11) and HCC Monitoring

Note: the proportion of the supply which is greenfield is calculated as follows:  $1,644 + 668 + 630 + 1,550 = 4,492 \div 11,330 \times 100\% = 39.6\%$

- 3.42 The technical work indicates that there is sufficient supply to deliver on both lower and middle housing scenarios over the lifetime of the Core Strategy, although the middle scenario requires Green Belt releases. Supply is boosted further (Table 3.5) if full account is taken of windfalls (discussed below). The housing supply position work is regularly updated and refined through the Housing Land Availability Papers (2009 and 2011) and via the Annual Monitoring Report monitoring process<sup>17</sup>.
- 3.43 Tables 3.4 effectively sets out an urban capacity approach to supply i.e. sites within the boundaries of existing towns and large villages. This forms the basis of the lower growth scenario (Option 1 in the Consultation Draft Core Strategy). The Council does not consider that lower targets than this are justified.
- 3.44 Table 3.4 demonstrates that the middle housing scenario (Option 2 in the Consultation Draft Core Strategy) is realistic and achievable given the capacity of the borough to accommodate new homes. This is on the basis of an increasing reliance on greenfield land in the supply. 40% of the supply would be greenfield (see note to Table 3.5). The identification of Green Belt releases (through local allocations) has been accepted by the Council, despite significant local opposition.
- 3.45 Any higher housing scenarios require more Green Belt land (see Table 3.6 below).

**(ii) Location/Distribution**

- 3.46 Distribution is not a determinant of the housing target, but it does have some bearing on what can be delivered. The Council has assessed what can reasonably be accommodated at different places in terms of:
- population change;
  - the settlement hierarchy (which implies controlling development away from the main town while meeting a spread of needs);
  - land availability and infrastructure requirements (particularly primary school thresholds);
  - impact on the character of settlements; and
  - its Place Workshop work and community views.
- 3.47 The Council has carried out an analysis of the distribution of growth through the sustainability appraisals (SA). This acknowledged the merits of dispersing development between the towns whilst allowing for some local needs to be met in smaller settlements and rural areas. This would support regeneration needs,

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<sup>17</sup> The latest position can be found in the 2010/11 Annual Monitoring Report

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improve levels of community vitality, help service the needs of surrounding areas, and minimise the impacts on the borough's natural environment.

- 3.48 The Council has also undertaken a detailed housing location analysis (e.g. **Housing Growth Options at Hemel Hempstead (June 2009)** and **Assessment of Local Allocations and Strategic Sites (October 2010 and May 2011)**<sup>18</sup>) in combination with SA/Strategic Environmental Assessment work on individual housing sites. This helps form a basis for assessing levels of growth for settlements under the Place Strategies and for delivering more than the lower housing option. The assessments also took into account the impact on the Green Belt and other key environmental designations, transport and archaeology. Such technical work highlighted the environmental sensitivity of certain locations and the impact of development on the character of settlements, their effects on the Green Belt, and the effects on infrastructure thresholds (see sub-sections (e) and (f) below).
- 3.49 The middle housing option would allow for a good mix of housing needs/demands to be met in different locations over time, relative to the lower scenario, and with some incursion into the Green Belt.
- 3.50 Difficult policy decisions would need to be made in order to bring forward additional housing land under the demand-led scenario, either affecting the strategy at particular places (and the character and infrastructure at these settlements), or requiring acceptance of growth by another authority.
- 3.51 There is limited potential to provide additional housing on previously developed land and within the urban areas. Increasing that supply would be at the growing expense of the character of settlements (by town cramming) or through the conversion of employment land to housing. The latter would reduce the type and spread of employment opportunities in Dacorum, and lead to an imbalance between jobs and homes. If a balance was not maintained, there would be pressure for employment expansion into the Green Belt.
- 3.52 Using more greenfield/Green Belt land (see Table 3.6) would lead to growing pressure on infrastructure, and adverse environmental consequences for the countryside and urban fringe, the character of towns and villages, and the essential role of the Green Belt (especially maintaining its open character) (see section (f) below).

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<sup>18</sup> Final version updated June 2012

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**Table 3.6 Green Belt Land Take**

Option	Number of hectares	
	@ 25 dwellings per Ha	@ 30 dwellings per Ha
Option 1	-	-
Option 2	62	52
Option 3 (CLG (1) 2006)	128	107
Option 3 (CLG (1) 2008)	172	143

Note: (1) CLG household projections

### (iii) Delivery

3.53 Over the last 20 years in Dacorum the housing completion rate has been 361 dpa (Appendix 7). The uplift in housing delivery required in order to achieve higher housing options would be challenging (Table 3.7). If projected forward this historic rate would be sufficient to achieve around the lower housing option level. The middle housing option would represent an increase of 20-25% over the average annual delivery rate: this has not happened in a very long time. If a demand-led option were to have been supported it would have been exceptionally challenging to deliver as measured against past rates, involving an even greater uplift of around 50%.

**Table 3.7 Uplift in overall and annual housing target**

	25 year Target		Uplift required on annual delivery 1991-2011 <sup>1</sup>
	Overall	Annual	
Lower option (Option 1) <sup>2</sup>	9,250	370	2.5%
Lower option (Option 1) with windfall <sup>3</sup>	9,750	390	8.0%
Middle option (Option 2)	10,750	430	19.1%
Middle option (Option 1) with windfall <sup>3</sup>	11,250	450	24.7%
Demand led (Option 3) (CLG forecast 2006-based)	12,400	496	37.3%
Demand led (Option 3) (CLG forecast 2006-based) with windfall <sup>3</sup>	12,900	516	42.9%
Demand led (Option 3) (CLG forecast 2000-based)	13,500	540	49.6%
Demand led (Option 3) (CLG forecast 2008-based) with windfall <sup>3</sup>	14,000	560	55.1%



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### Notes:

- (1) 361 dwellings per annum
- (2) In Draft for Consultation Core Strategy (November 2010)
- (3) For first 10 years of the remaining plan period assumed as 50 dpa for this paper.

- 3.54 The Council expects to deliver more than the middle housing target (see Table 3.5), if full account is taken of all windfalls (i.e. previously unidentified housing sites, particularly in years 6-10). Windfalls have been an integral part of housing supply (at a rate of around 90 dpa over the last 10 years for small windfalls), and their contribution should be acknowledged.
- 3.55 The Council has looked at the effects of garden land on the housing supply, in the light of the NPPF (ref. para. 48). Small garden windfalls (i.e. new build sites) represent 42 dpa (Appendix 8) of the windfall assumptions within the housing target and housing programme under Policy CS17. Even with their removal from the windfall sub-total (2) (see Tables 3.4 and 3.5), it is quite possible to achieve the middle housing option. Their removal would initially suggest a revised housing target of 10,700 dwellings (i.e. 11,330 - 630 = 10,700) or 428dpa. However, the Council considers that a potential contribution from large windfall sites and possible additional capacity from previously developed sites in the Green Belt means that a target of 430 dpa is robust.
- 3.56 Even with its best endeavours, the Council cannot guarantee the timing and delivery of all housing allocations, especially given a volatile housing market. However, larger windfalls in the towns (such as the former Kodak site, Hemel Hempstead (434 dwellings)) have helped the Council achieve the DBLP housing target while unimplemented greenfield housing allocations have been carried forward to the Core Strategy. There is no reason why other large windfalls will not continue over the lifetime of the plan, particularly as they are continuing to come forward and contribute to the supply (e.g. Sappi Graphics (450 dwellings)).

### **(d) The economy and regeneration**

- 3.57 The Council considers it is important to achieve full employment, to secure a balance between jobs and homes, and to maintain a reasonable balance over levels of commuting (relative to 2001 Census levels). New jobs can help reduce levels of in-commuting and are also important in terms of supporting the recognised sub-regional role of Hemel Hempstead. The new homes would help support these objectives by helping to attract firms and skilled workers and in boosting demand for local services.
- 3.58 In Dacorum, housing growth provides opportunities to support local regeneration and employment objectives. It also supports the local economy and in order to achieve a number of regeneration objectives for Hemel Hempstead. This includes continuing the recovery of the Maylands Business Park following the Buncefield explosion and strengthening its sub-regional economic role,

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revitalising the environment and offer of the town centre, and generally improving the physical and social infrastructure of the New Town

- 3.59 The Consultation Draft Core Strategy (October 2010) referred to a net growth of more than 18,000 jobs over the plan period based on conclusions from a wider study of seven Hertfordshire districts<sup>19</sup>. This high forecast reflected the EoE Plan's high economic growth aspirations, higher housing growth levels of 680 dpa, and Hemel Hempstead's role as a main regional economic growth driver. The study put forward provision targets for employment land in these Hertfordshire districts based on employment forecasts, and provided an indication of the number of jobs. The work was supplemented by a local study advising on the local delivery of the strategy<sup>20</sup>.
- 3.60 The Regional Plan's housing target has been quashed and the Council is not now working to that target or its associated jobs growth. 18,000 jobs would represent an unrealistically high forecast for additional workers and over-estimates the economic potential of the borough. It would have implied significant in-commuting and pressure for additional greenfield employment land, particularly business expansion into the adjoining St Albans district. The Council was also concerned there would be a jobs-housing mismatch.
- 3.61 The employment forecast has recently been updated<sup>21</sup>. The study assumed a mid point between the lower and middle housing options (i.e. a rate of 400 dpa), as there would have been too small a difference in results to justify modelling them separately. It recommended that the jobs target be reduced to around 10,000 over the period 2006-2031. Such a figure achieves a closer balance with the housing target of 430 net additional homes per year, whilst recognising the sub-regional role of Maylands Business Park. The approach was endorsed within the Sustainability Appraisal, which considered that a reduction in commuting levels would help reduce traffic congestion and carbon emissions.
- 3.62 The revised jobs growth target implies that there would no longer be a need for any additional land-take from the Green Belt, particularly through employment expansion into St Albans district. Growth can now be achieved through existing planned supply on previously developed land and via development of the Maylands Gateway, which would continue to support the sub regional role of Maylands Business Park.
- 3.63 Now the Core Strategy has a better balance between employment and housing growth, there is no longer a good argument that the level of housing growth should be higher (than the middle option) to support economic growth. The

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<sup>19</sup> Hertfordshire London Arc Jobs Growth and Employment Land (February 2009)

<sup>20</sup> The South West Hertfordshire Employment Land Update (June 2010)

<sup>21</sup> Dacorum Employment Land Update 2011 (July 2011)

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middle option will be better than the lower option in supporting jobs growth and is still reasonable in:

- supporting the continued recovery of the Maylands Business Park following the Buncefield explosion and to strengthen its sub-regional economic role;
- revitalising the environment and offer of the town centre;
- boosting local services and facilities;
- delivering greater levels of infrastructure; and
- generally improving the physical and social infrastructure of the New Town.

### (e) Infrastructure

- 3.64 Technical work on infrastructure acknowledges that there are existing infrastructure deficits in the borough. For all forms of infrastructure, future demand will be greatest at Hemel Hempstead, reflecting the concentration of development there. The work also indicates that in terms of infrastructure, there are no absolute constraints to the delivery of the amount of development proposed by the low to middle housing options.
- 3.65 However, the greater the scale of growth the more infrastructure issues and costs have become important. For example based on the (then) RS growth level, the **Hertfordshire Infrastructure and Investment Strategy (October 2009)**<sup>22</sup> (HIIS) estimated the infrastructure cost in the borough to be significant, at £354 million. The HIIS involved the County Council and all Hertfordshire districts and contributed to discussions on both the location and characteristics of growth (especially in the Key Centres for Development and Change identified in the RS) and related service provision and infrastructure needs.
- 3.66 The levels of development assessed by the Council's **Infrastructure Delivery Plan (February 2011)** (IDP) (supported by the **Dacorum Strategic Infrastructure Study (February 2011)** (DSIS)) demonstrates that neither the lower or middle housing options raise any significant issues that cannot be resolved through ongoing close working with infrastructure providers. However, the study points to considerable demand for infrastructure associated with growth (especially at the higher scenario tested (725 dpa)), including transport, social and physical infrastructure. The Place Strategies have tried to reflect the broad infrastructure capacity of settlements and their ability to absorb new development.
- 3.67 A more demand-led approach to growth would have significant implications for transport. The HIIS pointed to road infrastructure issues in planning for regional levels of growth, including concerns over the traffic flows along and junction

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<sup>22</sup> To be partially updated winter 2012. It will update housing and job numbers, but not infrastructure requirements, and set out an action plan to improve the management of infrastructure planning and delivery countywide..

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- capacity of the M1, and the probable need for a Hemel Hempstead northern bypass (at a considerable infrastructure cost of £70 million). Even at lower levels of growth there were still concerns expressed over the impact on the M1 and the local road network of Hemel Hempstead.
- 3.68 Similarly, the IDP highlighted concerns over the strategic road network (J20 of the M25 with the A41, and J8 of the M1) and local network including:
- junctions along the A414 towards the M1 in Hemel Hempstead;
  - around Hemel Hempstead town centre;
  - through Apsley on the A4251; and
  - along Berkhamsted High Street and at the Kings Road/Kingshill Way junction.
- 3.69 Updates of the IDP and HHS are providing more recent information on infrastructure issues in the borough. The Council is commissioning a new transport model run for Hemel Hempstead during the autumn of 2012. It will update an earlier run in 2010. The modelling will take into account proposals in the town centre (e.g. new foodstore), and include new traffic survey data.
- 3.70 Primary school thresholds have been an important factor in determining the potential for development, particularly in the smaller settlements (e.g. Bovingdon and Kings Langley). School planning has proved complex in planning for housing growth. The Council has had to ensure new housing is being matched by sufficient school capacity in settlements. Secondary schooling has also proved to be sensitive in Berkhamsted and Tring. The situation is further complicated by the possible impact of changing from three to two- tier system in Berkhamsted.
- 3.71 Providing up to demand-led levels of housing will increase pressure to:
- expand existing school sites (not all have the capacity or ability to expand e.g. Berkhamsted);
  - find new school sites in the urban area (this is proving complicated to deliver e.g. a new school to serve Hemel Hempstead town centre);
  - ensure adequate playing fields are provided (e.g. Tring Secondary School);
  - accommodate growth through expanding existing schools and identifying new school sites (e.g. Berkhamsted) in the Green Belt.
- 3.72 The sensitivity of providing new schools is highlighted by objections to the Pre-Submission Core Strategy to the identification of Education Zones in the Green Belt in Berkhamsted, which would allow new school facilities for the town.
- 3.73 While the public have raised water management as a local concern, it has not affected the choice of housing target. Potable water can be dealt with through local network reinforcement (new and upgraded mains). In terms of waste water,

the DSIS emphasised that sewage infrastructure in the towns and larger villages will need to be upgraded with growing levels of growth. Hemel Hempstead and Tring were sensitive to even low levels of growth. Expansion of the capacity of waste water treatment works (WWTW) serving Dacorum is required at either Blackbirds or Maple Lodge. Thames Water Utilities will be undertaking modelling work to determine which WWTW they will need to expand.

**(f) Environmental effect**

- 3.74 In Dacorum there is a range of environmental designations affecting the borough e.g. wildlife sites, landscape designations, conservation areas and flood zones. A balance has been drawn taking into account an understanding of environmental impacts, guided by the results of Sustainability Appraisals and other site specific appraisals.
- 3.75 Growing development pressures will increase the probability of adverse effects on the quality of the countryside, its landscape, wildlife, heritage and other natural resources. Negative impacts on high quality landscapes (such as the Chilterns Area of Outstanding Natural Beauty (CAONB) that covers nearly half the borough) and nature conservation designations (e.g. Special Area of Conservation) must be avoided. The countryside is sensitive to change and its intrinsic character should be safeguarded.
- 3.76 Delivering on or below the lower housing option will reduce the impact on the environment compared to the middle scenario. Conversely, increasing the housing target towards demand-led options will inevitably have a greater impact on the environment. It will lead to growing Green Belt and greenfield land take (see Table 3.6) and the effects of outward urbanisation. This can be in the form of both pressures on the countryside and on urban green spaces, together with the green infrastructure linking the two. Consultation to date has highlighted a strong local desire to protect such assets.
- 3.77 The higher the target, the greater the land-take around settlements. An increased housing rate would impact on the setting of towns and villages and their local character, particularly on the urban fringe. Some areas are quite sensitive to change e.g. around Berkhamsted and Tring because of their proximity to the CAONB, effects on farmland, and impact on the setting of these towns. The NPPF (para. 115) supports conserving the landscape and scenic beauty in the CAONB and its wildlife and cultural heritage. The sensitive landscape of the Chilterns should temper decisions on the ability of Dacorum to accommodate growth.
- 3.78 Increasing levels of development would undermine the role of the countryside around the edge of settlements (para. 8.23 in the Pre-Submission Core Strategy). There would be increased pressure for outward growth of settlements,

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- on the network of green spaces and smaller amenity areas, and on garden land through infilling. The latter has proved an especially sensitive issue with residents and parish councils in some areas (e.g. Berkhamsted).
- 3.79 The impacts in both rural and urban locations can be direct (e.g. urbanisation or the adverse effects on the character of neighbourhoods) or indirect through additional activity and movements (e.g. impacts on designated Air Quality Management Areas).
- 3.80 The Council has assessed the environmental effects of development on the countryside and urban fringe through Housing Growth Options at Hemel Hempstead (June 2009) and Assessment of Local Allocations and Strategic Sites (October 2010, May 2011 and June 2012 for the final report). The latter, in particular, analysed a number of potential housing sites against a range of factors, and identified a list of preferred locations. It highlighted the sensitivity of certain locations to development and their adverse effects on the character of settlements and surrounding countryside.
- 3.81 An SEA/SA has been undertaken at each stage of the Core Strategy to assess the implications on the amount and location of housing growth and whether it would give rise to any significant environmental effects. The work has pointed to greater impact on the natural environment with higher levels of housing. Much of the adverse effects were linked to the intrusion into the Green Belt and loss of greenfield sites.
- 3.82 The sustainability appraisal report in November 2010 (accompanying the Consultation Draft Core Strategy) highlighted no significant sustainability issues arising from pursuing either the low or middle housing options. However, this was not the case when a higher (demand-led) level of growth (Option 3) based on 500 dpa (i.e. 2006 CLG household projections) was tested. The sustainability appraisal identified that there would be significant adverse effects upon landscape and townscape objectives, including increased resource use, waste and emissions to air, and loss of tranquillity. Furthermore, the Sustainability Appraisal Report (September 2011) tested a dwellings growth based on the 2008 CLG household projections (538 dpa). It found similar adverse effects on environmental objectives.
- 3.83 The Council has also analysed the impact of housing growth as part of an Appropriate Assessment<sup>23</sup> (AA) screening process at the Issues and Options Stage (2008) of the Core Strategy. The proposed strategy put forward at that stage was not considered to have a significant impact on the Special Area of Conservation (Chilterns Beechwoods), as all the identified large-scale development fell outside of the 3km buffers. However, it did identify indirect

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<sup>23</sup> Halcrow: DBC Core Strategy Issues and Options Paper – Study to Inform Appropriate Assessment (Screening report) April 2008

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impacts from development on the west of Hemel Hempstead and the associated increase in recreational use. This was linked to the high regional growth target being met in Hemel Hempstead through new road infrastructure (northern bypass), and very large scale development around Chaulden/Fields End/Gadebridge (northern growth strategy).

- 3.84 The AA has been updated<sup>24</sup> to take account of the High Court quashing of the regional housing growth target and to reflect the Council progressing a reduced housing programme. The reduction in the scale of housing was seen to reduce the risk of air pollution and recreation disturbance on the SAC. No identified significant effects on the SAC were identified from individual developments assessed against these risks. Natural England advocate a pre-cautionary approach - i.e avoidance and mitigation measures - in respect of the cumulative effects on the SAC of major development around Hemel Hempstead and other nearby urban centres.

### (g) Effects of consultation

- 3.85 The NPPF (and previously PPS12: Local Spatial Planning) stresses the importance of participation, community involvement and engagement with delivery stakeholders during plan preparation. Furthermore, the evidence base should be underpinned by views of the local community and others who have a stake in the future of their area.
- 3.86 The Council has undertaken considerable consultation to help it reach a decision on the planning strategy. **Volume 7 of the Core Strategy Report of Consultation** provides an overview of the consultation process. Overall, there has not been a clear consensus of views on the housing target, although there is no demur from the key public bodies to the Council's chosen figure.
- 3.87 During the consultation on the Issues and Options Paper in mid-2006 a range of housing options were put forward for comments (from 315 to up to 500 dpa). The preferred housing level was the lowest one. The Council then consulted in November 2006 on the RSS Panel Report that recommended significant growth at Hemel Hempstead. There was clear opposition to the scale of growth in the town.
- 3.88 Proposals for major growth at Hemel Hempstead resulted in further technical work and discussions with landowners. This led to consideration of three broad locational options in the **Assessment of Alternative Growth Locations for Hemel Hempstead (May 2009)**. The work favoured an eastern growth strategy, adapting the Gorhambury proposal submitted as part of the Examination process (see para. 2.29 above).

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<sup>24</sup> Halcrow: Dacorum Core Strategy Habitats Regulations Assessment – (September 2011)

## Selecting the Core Strategy Housing Target (June 2012)

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- 3.89 A number of Place Workshops covering the six main settlements and the countryside and involving key local stakeholders were held during the end of 2008 / early 2009. A full range of topics were discussed, including levels of and alternative sites for housing. The workshops highlighted local concerns over development and the sensitivity of settlements to growth, particularly those away from Hemel Hempstead. In the case of the Hemel Hempstead Place Workshop, attendees were generally supportive of an eastern focus to growth in the town.
- 3.90 The **Emerging Core Strategy** did not include the growth strategy options at Hemel Hempstead because of the High Court decision. In the absence of a regional housing target, the Council retained the Dacorum Borough Local Plan provision level (360 dwellings pa). The Council took the view that if additional sites were needed to meet housing demands, the focus would be at Hemel Hempstead and this would be discussed in the next version of the Core Strategy. The level of new housing set out in each Place Strategy together with local development options generated significant negative feedback, particularly at Berkhamsted and Tring. However, the Citizens Panel were broadly supportive of levels of growth at Berkhamsted, Tring, Bovingdon and Kings Langley.
- 3.91 The **Consultation Draft of the Core Strategy** put forward two housing targets:
- Option 1 (370 dpa) – this aimed to optimise the use of land within defined settlements i.e. an urban capacity approach.
  - Option 2 (430 dpa) – this added to Option 1 through the inclusion of modest extensions to existing settlements (i.e. local allocations).
- 3.92 The Council was fully aware there was no clear agreement of views and that there were local sensitivities over development. Of the two targets put forward, on balance the lower housing Option 1 was supported by local residents and key organisations, principally due to opposition to development in the Green Belt (and the local allocations). The Citizens Panel also preferred this option. Others felt an even lower target should be considered due to worries over the impact of development on local infrastructure and upon the character of settlements, particularly those outside of Hemel Hempstead.
- 3.93 Conversely, most landowners and their agents (many of whom were promoting housing sites) argued for a target even higher than Option 2 taking into account the latest population and household projections, housing need, securing a balance between jobs and homes, and concern over the over reliance on windfall sites. Housing growth was discussed with the Dacorum Partnership (Local Strategic Partnership) which was broadly in favour of Option 2. This option was also favoured by some local residents as they saw this as a suitable balance between building homes and meeting local needs with protecting the environment/Green Belt.



## Selecting the Core Strategy Housing Target (June 2012)

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- 3.94 The housing section and site information contained within some of the Place Strategies did give rise to major concerns, mainly from individuals. There continued to be concerns over growth and the adequacy of infrastructure, and opposition to local allocations.
- 3.95 The Council considered that the demand led housing target option (i.e. 500(+) dpa) was neither appropriate nor could be satisfactorily delivered:
- it had been consulted on in 2006 and was rejected by much of the population;
  - it would have significant landscape, Green Belt, and other impacts;
  - key sites in Dacorum which could be part of the supply have problems (e.g. Shendish – traffic, landscape and other impacts).
- 3.96 The demand led housing target option has been considered.
- 3.97 The SA/SEA assessed the impact of all three housing scenarios and was itself subject to consultation. Its conclusions have been referred to above (see section (f) above)

#### 4. GENERATION OF OPTIONS

- 4.1 In deciding on an appropriate housing target the Council has had to take account of changing national advice, demand and need for housing, the removal of its regional allocation, responses at each stage of the Core Strategy, and continuing work on its evidence base. This has led to the Council having to carefully balance many (often competing) factors.
- 4.2 The quashing of the regional housing allocation in 2009 and the failure of the Government to reinstate or amend it meant the Council was left to set its own target. It has carefully considered the merits of three principal growth options against Government policy advice, technical evidence and the responses to growth issues on the Core Strategy to that date.
- 4.3 The Council decided to consult on two alternative targets in the Consultation Draft (November 2010): an Option 1 target of 370 dwellings per annum and an Option 2 figure of 430 dwellings per annum (respectively the lower and middle options discussed in this paper).
- 4.4 Option 1 aimed to optimise the use of land within defined settlements and broadly represented a continuation of existing rates of delivery (at 360 dpa). This was offered as a base-line approach.
- 4.5 The land availability assessment and further updates (**Housing Land Availability Papers (May 2009 and July 2011)**) pointed to the existence of a relatively good supply of housing from urban capacity over the plan period. Given this level of supply and other factors, the Council rejected planning for below Option 1. This option was considered to represent an inappropriate position for the Core Strategy given its mismatch with urban capacity, previous rates of completion and evidence of demand and need.
- 4.6 The additional higher level of housing under Option 2 was to be achieved through Green Belt locations on the edge of settlements (maximum of 1,550 units), termed local allocations in the Consultation Draft (Appendix 6). The local allocations have been refined through the Place Workshop process, tested against other development alternatives and their environmental impacts assessed.
- 4.7 The Consultation Draft of the Core Strategy did not include any final decision on the selection of any Green Belt releases. In terms of developing the Place Strategies, the housing target options anticipated Hemel Hempstead would remain the main focus for growth. The issue was how much development it should accommodate. Elsewhere, levels of housing would be geared towards meeting more locally generated need whilst maintaining the character of these settlements.

4.8 The lower housing option (Option 1) was realistic in as much as it:

- reflected housing land supply;
- accorded with past delivery rates;
- focussed on delivering urban capacity and thus would minimise impact on the Green Belt and the countryside on the edge of settlements; and
- had the most benign environmental impact and infrastructure demand compared to the middle and demand-led scenarios.

It also better mirrored the views of those in the local community opposed to higher housing growth in general and its impact on the Green Belt, local infrastructure and the character of individual settlements. In addition, it was the best option for a continuing, regular supply beyond the plan period.

4.9 The Council has continued to appraise the merits of a demand-led housing growth (i.e. 500 dpa and above). This would meet national population and household projections, would provide most housing, and would have better reflected the views of many landowners and developers who were supporting higher levels of growth. More affordable housing would be deliverable.

4.10 The NPPF states local planning authorities should plan on the basis of meeting objectively assessed need. However, it also emphasises the need to take into account the adverse effects of doing so and that plan-making should reflect the views and aspirations of the local community. Thus the Council believe the housing target should reflect on local circumstances. For example, is it reasonable to plan to meet levels of in-migration for an authority in the Green Belt and Chilterns Area of Outstanding Natural Beauty? The ability of the Green Belt to accommodate growth has continued to be a factor in:

- determining Dacorum's housing allocation;
- accepting some measure of development restraint; and
- recognising there will be some net out-migration.

4.11 The Council would have had to make difficult policy decisions in order to bring forward additional housing land under the demand-led scenario. It would have required a substantial uplift in housing delivery far in excess of rates experienced in the recent past. Local opinion did not generally support this level of development. The evidence base pointed to worsening implications on the amount and cost of infrastructure with growing housing levels, particularly on Hemel Hempstead. The sustainability appraisal highlighted increasing adverse environmental effects over the other two scenarios. Increasing housing levels will only add to pressure for greenfield and Green Belt land take, and lead to a greater negative impact on local character. These have all been major factors in the Council not pursuing higher levels of growth.

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- 4.12 Option 2 (target – 430 dpa) would meet a substantial proportion of market housing demand, but not all. It greatly improves on the lower option. The Council is concerned that housing projections should not be applied mechanically and that their limitations should be acknowledged (such as the possibility of over exaggerating migration levels) in setting a housing target.
- 4.13 Option 2 requires a considerable uplift on past rates of completions, and is higher than any annual average rate since the Hemel Hempstead New Town era. If full account is taken of the potential from windfalls, more housing would be delivered above 430 dpa.
- 4.14 The Council has not welcomed Green Belt releases but it has supported some in order to achieve the benefits of additional housing, which has generally proved controversial with local communities. This demonstrates the Council's commitment to:
- plan positively for growth;
  - minimise the gap between full demand and actual delivery;
  - provide opportunities to meet the locally generated housing needs of settlements; and
  - ensure greater flexibility in the supply.
- 4.15 The option is considered to reflect the broad conclusions of detailed technical work on the level of housing Dacorum would have had to potentially accommodate at the time of planning for its regional allocation.
- 4.16 This option can still achieve a considerable level of affordable housing over the lifetime of the plan, especially in the light of lower past completion rates. The plan strategy would allow a spread of housing needs to be met across the borough. The Council is focussing resources to boost the delivery of affordable homes and recent changes to the definition of affordable housing (with the creation of the affordable rent category) may make its delivery more financially attractive.
- 4.17 New technical work (in 2011) on employment floorspace is recommending provision of around 10,000 jobs. Employment and housing growth is now better balanced. There is no longer an overriding case to argue for the housing target to be higher than the middle option to support economic growth.
- 4.18 The sustainability appraisal showed that Option 2 was, on balance, reasonable. Selecting the middle option also gives greater weight to the concerns of developers and landowners that the Council should better respond to demand and need and achieve a greater balance between jobs and homes. There was also support for this scenario from the Dacorum Partnership and some organisations, particularly those involved in welfare.

## 5. CONCLUSIONS

- 5.1 The Council recognises that there is demand and need for housing in the borough over the lifetime of the Core Strategy.
- 5.2 The recent national household projections are a reasonable yardstick for assessing demand, but the Council is concerned they should not be applied mechanically. The projections have shortcomings because they are based on short term trends and recent migration rates have tended to be volatile. These factors should be acknowledged when measuring the housing target against demand. There is a probability that the projections are inflated. The effect of some household formation being postponed would not be serious.
- 5.3 A key question is how much of the objectively assessed demand it is reasonable for the Council to plan for given the Metropolitan Green Belt (which covers half of the district and whose inner boundaries tightly follow the edges of urban areas), its high landscape quality (particularly the Chilterns Area of Outstanding Natural Beauty), and the need to safeguard other environmental assets (e.g. ecology, built and archaeological heritage, character of its towns and villages etc.). Weight should be given to these factors in assessing what level of growth the borough should accommodate.
- 5.4 The Council has acted positively. It has considered the merits of three housing target scenarios:
- low (at 370 dwellings per year (Option 1));
  - medium (at 430 dpa (Option 2)); and
  - demand-led levels (delivering 500 dpa or more).

It has tested these scenarios against changing national advice, the demand and need for housing, responses at each stage of the Core Strategy, and continuing work on its evidence base. There has been no clear consensus of views from public consultation, although there was a weight of local opinion against higher levels of growth.

- 5.5 It is difficult to see how full demand can be achieved satisfactorily given the Green Belt and other environmental constraints of the borough. Some diversion of growth of pressure beyond the Metropolitan Green Belt would not be unreasonable, if required.
- 5.6 The Council has rejected the low housing scenario. It represented a continuation of past annual average rates of completions (at 361 dpa), had the least environmental impact, and would have minimised the impact on the Green Belt and infrastructure requirements. However, it would have performed least well in

## Selecting the Core Strategy Housing Target (June 2012)

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- terms of meeting housing demand and need, and in satisfying other employment and regeneration objectives for the borough, particularly for Hemel Hempstead.
- 5.7 The Council felt it would also be inappropriate to plan below this scenario.
- 5.8 The demand-led scenario would have fulfilled Government projections. However, it would have represented a significantly more challenging uplift to housing delivery compared to recent annual average completion rates. The sustainability appraisal pointed towards a greater environmental impact over the other two scenarios. Planning for higher levels of housing will add to the need for greenfield and Green Belt land take, result in a mismatch with current predicted jobs growth, and lead to a greater impact on local character and infrastructure capacity.
- 5.9 The middle option is appropriate given local circumstances. The sustainability appraisal demonstrated that, on balance, the scenario was reasonable. It leads to a sound policy that best strikes a balance between competing factors whilst accommodating growth at the higher end of the range of household projections and significantly improving on the delivery of affordable homes over the lower scenario. However, it also takes into account land availability, environmental, social and economic factors and minimises the impact on the Green Belt and the borough's high quality landscape.
- 5.10 The option is considered to reflect the broad conclusions of detailed technical work on the level of housing Dacorum would have had to potentially accommodate at the time of planning for its regional allocation. The work concluded that around 11,500 dwellings were appropriate in the borough to 2031 (i.e. a rate of 440-460 dpa).
- 5.11 Recent technical work (in 2011) on employment floorspace has updated the earlier regional jobs growth figure of 18,000 jobs. It recommends provision of around 10,000 jobs. Employment and housing growth is now better balanced. There is no longer a strong argument for the housing target to be increased beyond the middle option to support economic growth.
- 5.12 This scenario provides for a phased and balanced programme of housing by location while protecting the character of settlements and the countryside.
- 5.13 The middle housing option represents a considerable uplift over past annual average rates of completion. Moreover, if full account is taken of windfalls then more may actually be delivered. There is also flexibility in how the supply can be delivered in terms of, for example, the timing of release of local allocations in the Core Strategy and in bringing forward development on land in Council ownership.
- 5.14 Setting a housing target of 430 dwellings per annum is reasonable, taking into account a range of issues and views, the evidence base, and other factors.

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## Appendix 1 Summary of advice in PPS 3 Housing

- 1.1 **PPS3: Housing (June 2011)** (PPS3) set out previous national guidance on determining housing provision (paras. 32-35). Local Planning Authorities were to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon a range of factors
- Evidence of need and demand, set out in Strategic Housing Market Assessments (SHMA).
  - Advice from the National Housing and Planning Advice Unit (NHPAU) 21 on the impact of the proposals for affordability in the region.
  - The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.
  - Evidence of the availability of suitable land for housing using Strategic Housing Land Availability Assessments (SHLAA).
  - The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.
  - A Sustainability Appraisal of the environmental, social and economic implications, including costs, benefits and risks of development.
  - An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.
- 1.2 PPS3 stressed the need to take into account consultation with developers, infrastructure providers and the wider community in developing the most appropriate strategy and policies for addressing current and future need and demand for housing in their local area (para. 39).
- 1.3 Paragraphs. 32 -35 inc. stated that regional policy had an important role in guiding the mix (para. 21) and amount of local housing provision.



**Appendix 2: Dacorum's changing Regional Strategy housing target**

<b>Source of housing target</b>	<b>Average annual provision rate</b>	<b>Total 2001-2021</b>	<b>Notes</b>
Draft revision to the Regional Spatial Strategy (RSS) for the East of England, December 2004	315	6,300	-
East of England Plan EiP Report of the Panel June 2006	530-620: See notes	12,000	Includes expansion into St Albans. The panel report gives 5 year indicative phases of levels of development. For Dacorum these are 2,650 (530) for 2001-06 and 3,100 (620) thereafter (dwellings pa in brackets).
Secretary of State's (SOS) proposed changes to the draft revision to the RSS for the East of England, December 2006	680 (2006-2021) See notes	12,000	Includes expansion into St Albans. The SOS decided to amend the figures for housing provision from 2006-2021 to take account of 2001-2006 completions (1,860) whilst leaving the Panel's recommended total for the 2001-2021 period unchanged.
SOS's proposed changes and further proposed changes to the draft revision to the RSS for the East of England, October 2007	680 (2006-2021)	12,000	Includes expansion into St Albans. The annual provision rate takes into account completions during 2001-2006.
Adopted RSS for the East of England, May 2008	680(2006-2021)	12,000	Includes expansion into St Albans. The policy required Local Planning Authorities, when setting housing targets, to assume that the annual rate of provision after 2021 will be the same as the rates in the policy for 2006 to 2021 or 2001 to 2021,

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			whichever is higher
High Court decision following legal challenge mounted by Hertfordshire County Council and St Albans City & District Council, July 2009	-	-	The decision removed Dacorum's housing target from the RSS for the East of England.
Draft Revision to the RSS for the East of England, March 2010	310	N/A	The housing target for Dacorum over the period 2011-2031 was 6,100.
Core Strategy – Draft for Consultation, November 2010	370 (option 1)	N/A	Housing programme over period 2006-2031: 9,835. The housing programme differs slightly from the sum of the average annual provision rate because of different assumptions about windfall.*
	430 (option 2)	N/A	Housing programme over period 2006-2031: 11,835. The housing programme differs slightly from the sum of the average annual provision rate because of different assumptions about windfall.*

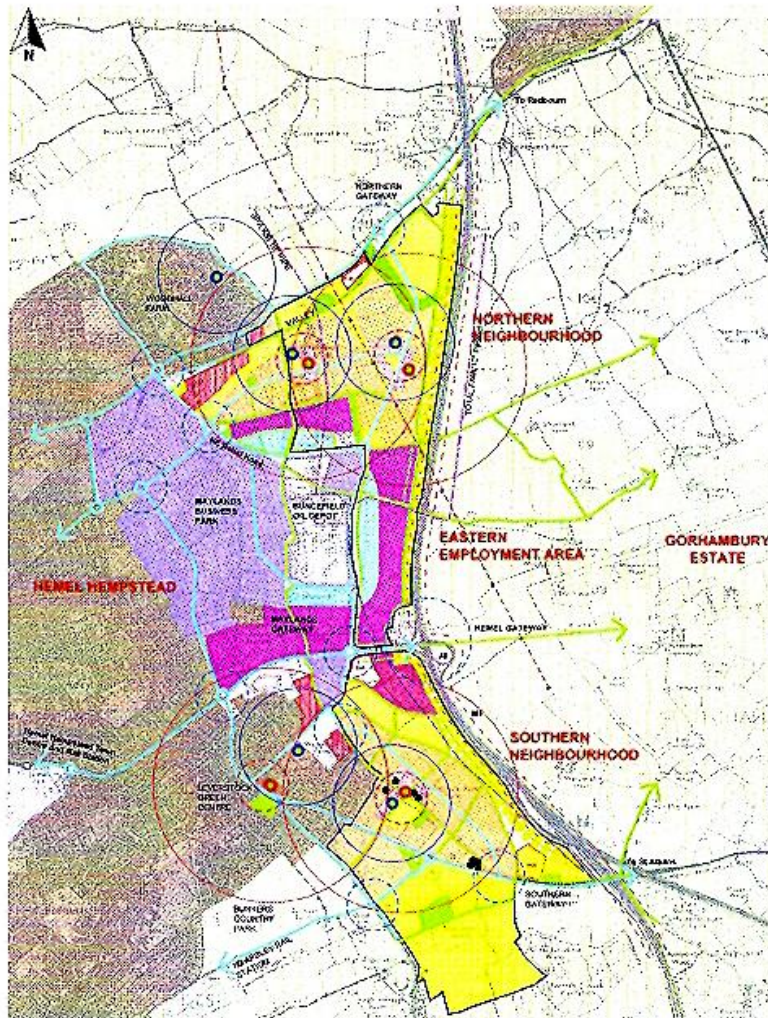
\* In setting the annual target for housing, no allowance could be made for windfalls in the first ten years of the plan period, in accordance with Government guidance (now cancelled) in PPS3. However, the housing programme does make an allowance for windfalls later in the plan period.

**Appendix 3: Map of the Gorhambury Estate Proposal**



*Creating the environment for business*

2.6 **Urban Design Approach to the Eastern Edge**



Source: Proposed Development at Gorhambury: Hemel Hempstead East – Supporting Information (January 2008)

**Appendix 4: Hertfordshire County Council background note to the Improved Methodology for estimating immigration to Local Authorities in England and Wales – 17<sup>th</sup> November 2011**

As part of the Migration Statistics Improvement Programme (MSIP), ONS has introduced a major improvement to the methodology for producing local authority long-term migration estimates within England and Wales.

The new approach is based on using administrative data sources to distribute the England and Wales immigration totals from the International Passenger Survey (IPS) directly to Local Authorities. The approach splits the IPS into different streams, mainly by 'reason for migration' (e.g. worker, student, other) and then maps each stream to the most relevant administrative sources which are then used to distribute immigrants to each local authority. For example, workers are distributed using National Insurance (NINo) data from the Department of Work and Pensions (DWP); students are mainly distributed using Higher Education Statistics Agency (HESA) data, while children and some other migrants are distributed using 'Flag 4s' from the GP patient register data (PRD).

The improved methodology has been developed as part of the cross-government Migration Statistics Improvement Programme (MSIP) and replaces the 'model-based' approach that was developed earlier in the Programme and implemented in May 2010 for the mid-2002 to mid-2008 population estimates series.

ONS have published indicative impacts of the new methodology on the mid-2006 to mid-2010 population estimates series at local authority level. The improved mid-year population estimates are indicative in nature because they are designed to show users the impact on local authorities of incorporating the improved immigration estimates. ONS will not be revising official population estimates at this stage, as this will have to be done again following the 2011 Census. Therefore, the current mid-year population estimates, (that is, those published in June 2011) will remain the official series.

The table below shows the overall unrounded indicative impacts on the immigration estimates for Hertfordshire and each of the districts between mid-2006 to mid-2010.

		<b>Total immigration mid-2006 to mid-2010</b>			
Area Code	Area Name	Current Total	New indicatives total	Indicative Revision	% change in immigration
<b>E10000015</b>	<b>Hertfordshire</b>	<b>44,206</b>	<b>35,290</b>	<b>-8,916</b>	<b>-20.2%</b>
E07000095	Broxbourne	1,452	1,702	250	17.2%
E07000096	Dacorum	4,496	3,465	-1,031	-22.9%

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E07000097	East Hertfordshire	4,360	3,659	-701	-16.1%
E07000098	Hertsmere	4,218	3,114	-1,104	-26.2%
E07000099	North Hertfordshire	2,199	2,222	23	1.0%
E07000100	St Albans	6,156	4,040	-2,116	-34.4%
E07000101	Stevenage	3,317	1,842	-1,475	-44.5%
E07000102	Three Rivers	2,046	1,597	-449	-21.9%
E07000103	Watford	8,960	4,734	-4,226	-47.2%
E07000104	Welwyn Hatfield	7,002	8,914	1,912	27.3%

For Hertfordshire as a whole this would mean a decrease in the estimated immigration of 8,916 (20.2%). This decrease is reflected in seven out of the ten districts, most significantly affecting Watford and St Albans where there are decreases of 4,226 (47.2%) and 2,116 (34.4%) respectively. Also notable in percentage terms is the decrease of 1,475 (44.5%) in Stevenage.

There are indicative increases in Welwyn Hatfield and Broxbourne of 1,912 (27.3%) and 250 (17.2%) respectively whilst North Hertfordshire is relatively unchanged with just a small increase of 23 (1.0%).

Had ONS decided to revise the official population estimates at this stage the above changes would be reflected in the total population at mid-2010. as shown in the table below.

		<b>Total population at mid-2010</b>		
Area Code	Area Name	Current Total	Indicative Revision	% change in population
<b>E10000015</b>	<b>Hertfordshire</b>	<b>1,107,521</b>	<b>-8,916</b>	<b>-0.8%</b>
E07000095	Broxbourne	90,609	250	0.3%
E07000096	Dacorum	142,881	-1,031	-0.7%
E07000097	East Hertfordshire	138,476	-701	-0.5%
E07000098	Hertsmere	99,924	-1,104	-1.1%
E07000099	North Hertfordshire	125,809	23	0.0%
E07000100	St Albans	138,753	-2,116	-1.5%
E07000101	Stevenage	81,766	-1,475	-1.8%
E07000102	Three Rivers	88,932	-449	-0.5%
E07000103	Watford	86,003	-4,226	-4.9%
E07000104	Welwyn Hatfield	114,368	1,912	1.7%

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ONS does intend to incorporate the improved immigration estimates into the 2010-based subnational population projections, which will be made available for the next local authority funding settlement.

Further information on the methodology improvement can be found on the ONS website:

<http://www.ons.gov.uk/ons/guide-method/method-quality/imps/improvements-to-local-authority-immigration-estimates/index.html>

including:

- Documentation describing the improved methodology
- Indicative local authority long-term immigration figures based on the improved method for the last five years (mid-2006 to mid-2010)
- Indicative local authority population estimates for the last five years (mid-2006 to mid-2010)
- A range of supporting tables and analysis

ONS would welcome the views of users on this new methodology, the local authority long-term migration estimates as well as views on the indicative mid-year population estimates.

Any comments should be e-mailed to [imps@ons.gsi.gov.uk](mailto:imps@ons.gsi.gov.uk) no later than 20 January 2012.

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**Appendix 5 Number of households on the waiting list and the number of homelessness acceptances**

	<b>No. Of households on the waiting list</b>	<b>No. Of homelessness acceptances</b>
<b>2011/10</b> (as at the 1 <sup>st</sup> April 2011)	5,926	37
<b>2010/09</b> (as at 1 <sup>st</sup> April 2010)	5,863	14
<b>2009/08</b> (as at 1 <sup>st</sup> April 2009)	5,374	25
<b>2008/07</b> (as at 1 <sup>st</sup> April 2008)	4,794	61
<b>2007/06</b> (as at 1 <sup>st</sup> April 2007)	4,413	81

Note:

Number of households on the waiting list (Source HSSA)

Number of homelessness acceptances (source CLG P1Es)

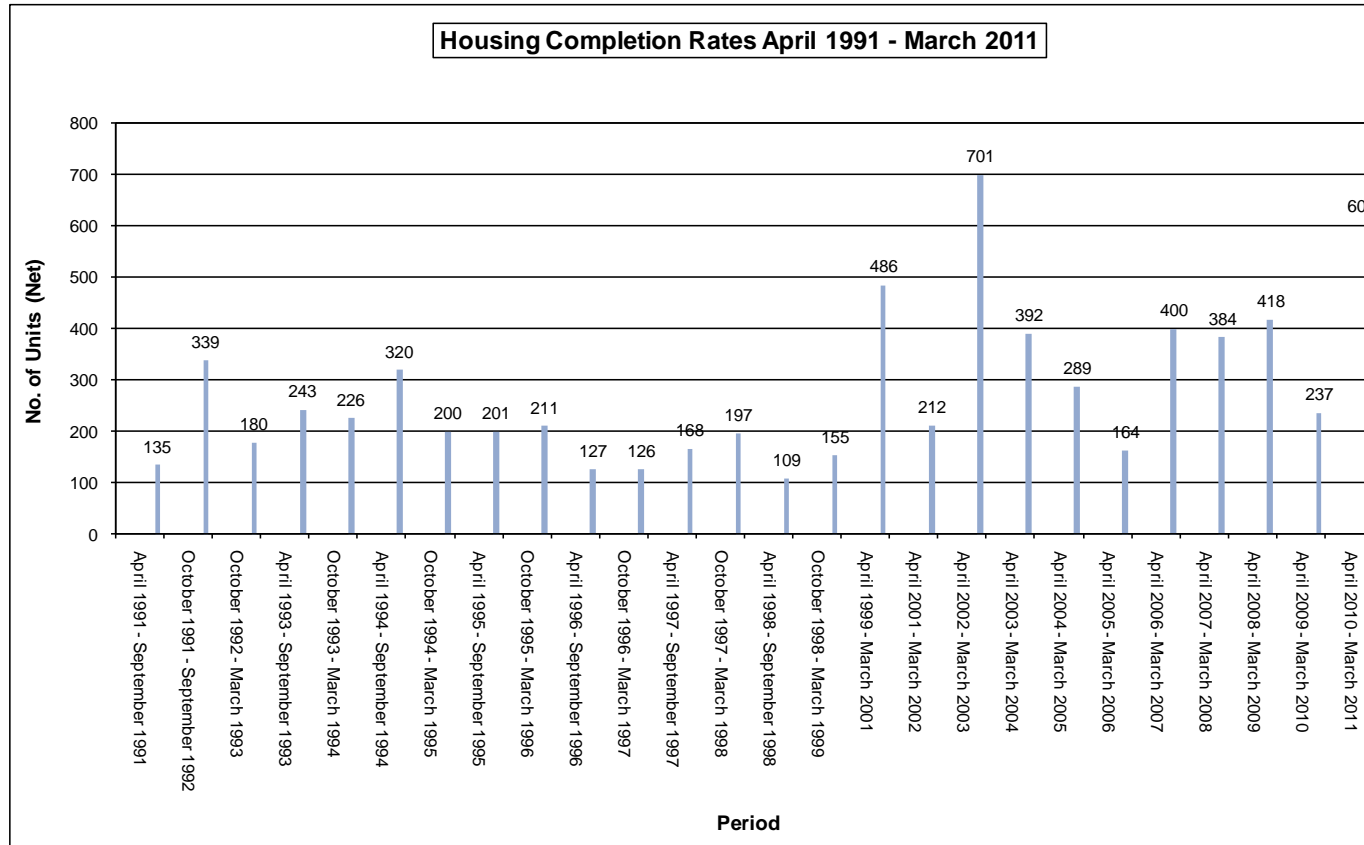
**Appendix 6 Local allocation in the Consultation Draft of the Core Strategy**

<b>Settlement</b>	<b>Location</b>	<b>Net Capacity</b>
Hemel Hempstead	Marchmont Farm	300
	Old Town	80
	West Hemel Hempstead	Up to 900
Berkhamsted	Hanburys, Shootersway	60
Tring	Icknield Way, west of Tring	150
Bovingdon	Chesham Road / Molyneaux Avenue	60



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Appendix 7 Housing completions in Dacorum 1991 – 2011



Source: DBC Monitoring

## Appendix 8 Housing Completions 2001-2011

### (a) Garden land and completions 2001-2011

Year	Overall year net completions	Garden land (small sites)	% of overall year net completions	Garden land (large sites)	% of overall year net completions	Total garden land as a % of net year completions
2001/02	234	24	10	5	2	12
2002/03	797	17	2	0	0	2
2003/04	486	30	6	12	2	8
2004/05	277	37	13	25	9	22
2005/06	267	46	17	49	18	35
2006/07	401	73	18	18	4	22
2007/08	427	58	14	64	15	29
2008/09	266	60	23	59	22	45
2009/10	264	32	12	3	1	13
2010/11	293	40	14	10	3	17
<b>Total</b>	<b>3,712</b>	<b>417</b>	<b>11</b>	<b>245</b>	<b>7</b>	<b>18</b>

Source: HCC Monitoring

Note:

1. Small sites = new build involving 4 or less units
2. Large sites = new build involving 5 or more units
3. Completions from completed sites rather than the year of actual completed dwelling.
4. Monitoring Year 1st April - 31st March.
5. Excludes conversions and mixed developments where the majority of the site was conversion.
6. All figures are net.
7. Small garden sites average out at 42 dpa i.e. 417 divided by 10 years.

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**(b) Housing completions by type of development 1<sup>st</sup> April 2001 – 31<sup>st</sup> March 2011**

	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	Total	Annual rate
<b>Large Sites (5 or more units)</b>	163	615	306	200	97	272	281	281	165	534	2,914	291
<b>Small Sites (4 or less units)</b>	28	28	40	29	46	77	72	71	45	32	468	92 (small = 47 Conv = 45)
<b>Conversion and change of</b>	23	64	50	62	24	54	37	67	28	39	448	
<b>Total</b>	214	707	396	291	167	403	390	419	238		3,830	383

Source: DBC Land Position Statements

Note: All figures are net and exclude losses from non-residential development.