



Housing Delivery Test Action Plan

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1. Introduction

- 1.1 Access to a decent, safe and secure home is seen as a basic right, but for many, houses are too expensive and the choices of high quality homes are limited. On a simple measure of affordability most parts of the country experience house prices well in excess of the 'affordable' ratio of 4:1, where local average house prices are four times local average income levels. Three Rivers is no different, in fact with an affordability ratio at around 16:1 it is one of the least affordable areas outside London¹.
- 1.2 The Government considers that increasing the supply of housing is key to improving the affordability of housing. Whilst this simplifies a very complex issue, the Government is focused on increasing the supply of new homes across the country by removing barriers to development. In the 2017 Budget, the Government announced that it would enable the housing market to deliver 300,000 homes a year on average by the mid-2020s. This objective to increase the number of new homes is reflected in the revised National Planning Policy Framework (NPPF, February 2019) and the introduction of the Housing Delivery Test.
- 1.3 Paragraph 75 of the NPPF states that *"Where the housing delivery test indicates that delivery has fallen below 95% of the authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years."*
- 1.4 The Housing Delivery Test is an annual measure of housing delivery which compares 'total net homes delivered' against 'number of homes required' over a rolling three year period. As the Council's Core Strategy was adopted in 2011 it is considered out-of-date (over 5 years from adoption). This meant that the calculation was made against the Government's local housing need figures. This resulted in a significant increase from the Core Strategy target of 180 dwellings per year. The standard method for calculating housing need was only introduced by the NPPF in July 2018. As such, the Council was retrospectively judged against a target it was not aware of at the time.
- 1.5 The Housing Delivery Test Result for Three Rivers District Council was published by the Secretary of State in January 2021. Three Rivers District Council scored 54% and in response to this, the Council has produced a Housing Delivery Test Action Plan. By preparing an Action Plan, the Council is positively responding to the challenge of increasing its housing delivery.
- 1.6 The Action Plan analyses the reasons for the under-delivery of new homes and sets out actions to improve housing delivery within the District. The actions identified in this document aim to stimulate delivery, however action will also be required by others, particularly landowners, housebuilders and registered providers, to respond to this challenge and significantly increase the level of house building. This Action Plan should be seen as part of the response, together with those planned by housebuilders, developers, registered providers, land agents, communities and Government Departments.

¹ Office for National Statistics (2021) House price to workplace-based earnings ratio
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquarterandmedian>

- 1.7 It should be noted that whilst this Action Plan seeks to support an increase in housing delivery, it cannot guarantee it. Local planning authorities do not control the operation of the housing market. The Council can focus on providing a supply of deliverable sites to help in meeting the need for new housing, however there may be other factors why sites do not come forward at a particular time which are beyond the Council's control (e.g. financial/commercial decisions).

2. Policy Context

The Housing White Paper

- 2.1 In response to the national housing crisis, the Government published the Housing White Paper 'Fixing our broken housing market' in February 2017. It set out the Government's intentions to reform the housing market and boost the supply of new homes in England. The proposed measures covered planning for the right homes in the right places, how to build homes faster and how to diversify the housing market.
- 2.2 Importantly, it proposed to hold local authorities to account for the number of new homes delivered through the introduction of a new Housing Delivery Test. The test would show whether the number of homes being built is below the required number of homes needed in that area. The test would provide a mechanism for establishing the reasons why there has been under delivery.
- 2.3 The Housing White Paper also addressed the issue of developers' land banking, in other words holding on to land to gain maximum profit by riding increases in land value. This naturally slows the rate of development, making it harder for housing demand to be met and further increasing house prices. This is an example of a practice that can be affected more by external agencies rather than the Council, which has little power to deal with developers who choose to sit on their investments.
- 2.4 The third focus of the Housing White Paper was on the development of brownfield land. The Government believes this will reduce the pressure on the countryside to provide land for housing. The Council supports development on brownfield land through publishing its Brownfield Land Register, however there are few opportunities for brownfield development in a semi-rural District constrained by Green Belt.
- 2.5 Building on the Housing White Paper, the Government published the 'Planning for the right homes in the right places: consultation proposals' in September, 2017. This set out proposals to reform the planning system to increase the supply of new homes and increase the local authority capacity to manage growth. The most significant proposal was for the introduction of a standard method for calculating local authorities' housing need. The standard method would identify the minimum number of homes expected to be planned for. This proposal marked a huge departure from previous government policy which required local authorities to prepare a Strategic Housing Market Assessment (SHMA) to identify their housing need figure and the types of housing needed in their area.
- 2.6 The Government feels that the standard approach will help simplify an overly complex system. The idea is for local authorities to have a clearly set out housing need that will be much harder

for developers to challenge when compared to the previous range of methodologies being used. This reiterates the Government's support for a plan led system that makes it harder for speculative development to take place. The aim of this is a pattern of development that helps to protect the countryside. It could also be argued, however, that the standard method takes away some of local authorities' ability to be adaptable to local circumstances and needs.

National Policy Context

- 2.7 The Government reinforced its objective to significantly boost the supply of new homes and making the local authority more accountable for delivery in their area by publishing a revised National Planning Policy Framework (NPPF, February 2019), the Housing Delivery Test Measurement Rule Book (July 2018), updated Planning Practice Guidance (PPG, February 2019) and the Housing Delivery Test: 2018 Measurement Technical note (February 2019).
- 2.8 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book². It measures the number of net homes delivered against the number of homes required over a rolling three year period.
- 2.9 The formula for the Housing Delivery Test Calculation is as follows:

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

- 2.10 The Council scored 54% in the Housing Delivery Test for 2020. This result means the Council is required to produce an Action Plan as per the requirements of paragraph 75 of the NPPF. The Action Plan analyses the causes of under delivery and demonstrates the Council's commitment to responding positively to the challenge of increasing housing delivery.
- 2.11 The NPPF requires local planning authorities to demonstrate a 5-year supply of deliverable housing land plus a buffer depending on the circumstances the local authority falls within. The Housing Delivery Test result means the Council is required to apply a 20% buffer to improve the prospect of achieving the planned supply. As a result of the previous 2019 Housing Delivery Test measurement of 41%, the Council has already been applying a 20% buffer to its 5-year supply.
- 2.12 The Housing Delivery test also means that the Council is required to apply the 'presumption in favour of sustainable development' as set out in paragraph 11 of the NPPF. As the Council is unable to demonstrate a 5-year supply of deliverable housing, it is already applying the presumption.

Local Planning Policy

- 2.13 The Three Rivers Core Strategy was adopted in 2011 prior to the publication of the NPPF in 2012 and has a housing target of 180 new homes per year. In 2013 the Development Management Policies LDD was adopted, followed by the Site Allocations LDD in 2014.

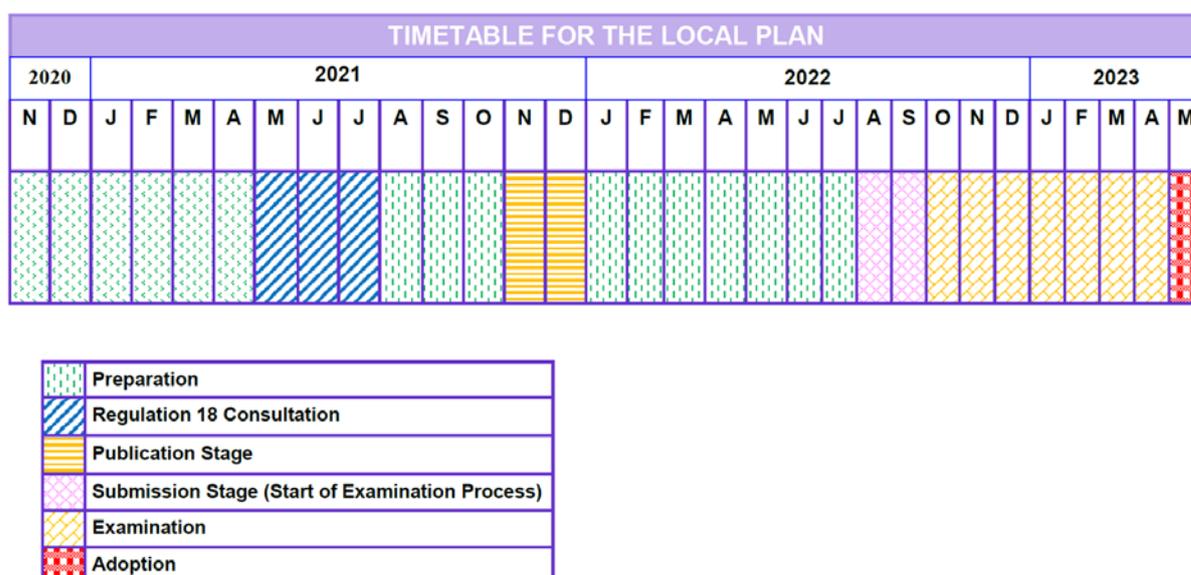
² Available at: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

2.14 The Council needs to produce a new Local Plan as the need for new homes as calculated by the Government’s standard method is significantly higher than the current housing target as set out in the Core Strategy. The uplift in need cannot be met through the current spatial strategy. The preparation and adoption of a new Local Plan is recognised as a corporate priority for the Council.

2.15 The Council carried out a Regulation 18, Issues and Options consultation from July to September 2017. A non-statutory Potential Sites’ consultation was conducted from October to December 2018. Call for Sites were run in parallel to these consultations and an additional Call for Sites was completed in August 2018. The Council has been developing Local Plan evidence base studies and assessing potential sites for allocation.

2.16 The latest Local Development Scheme was published in December 2020 and contains an updated Local Plan timetable (Table 1). A second Regulation 18 consultation is anticipated to take place over the period June – July 2021 and the Regulation 19 Draft Plan Publication is expected in late 2021.

Table 1: Local Development Scheme



Title	Brief Description	Area	Process				Review
			Start of Preparation Process	Publication	Submission to Secretary of State	Adopt	
Local Plan	Will update the strategic planning policies for the District, allocate land for housing and employment and up date Development Management Policies	District	2016	November/ December 2021	August – September 2022	May 2023	Monitored in Annual Monitoring Report.
Policies Map	Will show policy designations and sites with specific allocations	District	Alongside Local Plan	Alongside Local Plan	Alongside Local Plan	Alongside Local Plan	Alongside Local Plan

3. Housing Delivery Analysis

- 3.1 This section looks at the causes of the 'under delivery' of new homes in the District and identifies the local and national issues which influence housing delivery. A range of data and intelligence sources have been used to inform this analysis. As part of this process, the Council has engaged with stakeholders to improve its understanding of the issues effecting housing delivery. The analysis of the issues have been used to inform what actions the Council need to take to improve its housing delivery.
- 3.2 Building houses is often a complex process, there may be other factors as to why sites for housing do not come forward that are beyond the control of the Council. It requires a broader approach to be taken to increase the delivery of new homes and the use of other tools available which are beyond the traditional remit of the Local Planning Authority.

Strategic Issues Influencing Delivery

- 3.3 Delivery of market and affordable homes is a key strategic and cross boundary issue for the Council and this is reflected in joint evidence base and Joint Strategic Plan (JSP) work. The Council has a Memorandum of Understanding in place for the JSP and will be looking to have Statements of Common Ground in place with their neighbouring authorities in the near future. The high demand for new homes and a constrained land supply is a shared characteristic across neighbouring authorities and those within the housing market area.
- 3.4 A key component of Local Plan preparation is to take account of any potential shortfalls in existing infrastructure provision, and to plan for any additional capacity that may arise because of future growth. The Council is currently preparing an updated Infrastructure Delivery Plan (IDP) which will set out all of the infrastructure required to deliver the Local Plan. The IDP will set out what mitigation is required as well as identify funding streams and mechanisms required to enable development.

Increased Housing Need

- 3.5 The need for housing has increased significantly since the adoption of the Core Strategy. The Council's local housing need figure is 630 homes per year. This is calculated using the standard method as required by the NPPF. Prior to this, the Council's own evidence, the South West Hertfordshire Strategic Housing Market Assessment (SHMA, 2016) identified a need of 516 homes per year.
- 3.6 The significant increase in the need for new homes is considerably higher than the Core Strategy housing target of 180 new homes per year. The current spatial strategy in the Core Strategy does not support this increased need for housing and the Council is preparing a new Local Plan to address this.

Local Housing Performance

3.7 It is important to note that the Council had a strong record of delivering housing against the Core Strategy housing target. This is demonstrated in the Council's Annual Monitoring Reports (AMR) which monitored housing delivery against the Core Strategy housing target.

3.8 The annual net dwellings completed between 2001 and 2018 are shown in Table 2 below. Since 2001, the average number of new dwellings delivered each year up until 2018 was 207. This shows that the Council was consistently delivering above the Core Strategy target of 180 dwellings per annum. This is emphasised by the cumulative delivery figure being 3520 while the cumulative target was 3060, showing an over delivery of 460 dwellings between 2001 and 2018.

Table 2: Housing Delivery Against Core Strategy Housing Target 2001 - 2018

Year	01/02 - 08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18
Completions (Net)	1926	48	107	185	176	142	285	215	144	264
Cumulative Delivery	1926	1974	2081	2266	2442	2612	2897	3112	3256	3520
Cumulative Core Strategy Target of 180 dwellings	1440	1620	1800	1980	2160	2340	2520	2700	2880	3060

3.9 Despite a successful record of delivering above the Core Strategy housing target up until 2017/18, subsequent AMRs have monitored housing delivery against the local housing need figure as calculated by the standard method. 149 homes were delivered in the 2018/19 monitoring year against the standard method target of 620 dwellings and 446 dwellings were delivered in the 2019/20 period against the standard method target of 624 dwellings. In 2020/21, this target figure is 630 dwellings per annum which will again be likely to indicate an underperformance in housing delivery.

Affordability

3.10 In 2017 the mean house price in Three Rivers was £641,706 which is the highest in the South West Hertfordshire Housing Market Area and well above the average in the East of England and in England as a whole. This results in the District having one of the worst levels of affordability in the country coupled with an undersupply of affordable homes.

3.11 The average median income in Three Rivers is similar to the national average; in 2020 it was £29,982³, however the level of average median income required to purchase a new home is

³ Office for National Statistics (2021) House price to workplace-based earnings ratio
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquarterandmedian>

double that required in England. Data from the Office of National Statistics shows a ratio of house prices to income in Three Rivers in 2020 is 16.34⁴. This is on par with the levels experienced in London, with the ratio being higher than in several London Boroughs. This means that accessing the property market in the District is limited for most first-time buyers and even those already established on the housing ladder. Affordability is therefore a significant issue in the District and this is reflected in local housing need.

Affordable Housing Delivery

- 3.12 There are around 17 housing associations (Registered Providers) with stock in the District. Many of these associations holds land in some form, however they do not own significant land that can be effectively developed to meet local housing need on any scale. Where there are development opportunities, these tend to be dependent on the existing stock being redeveloped.
- 3.13 Many of the development opportunities that do arise are constrained or have already been exploited for their housing potential and already been developed. Within the constrained opportunities that do exist in the District, the Council expects development to be policy compliant and include delivery of affordable housing units within every development, subject to viability.
- 3.14 Much of the delivery of new affordable housing in the District comes through Section 106 agreements, where private developers make contributions towards meeting the need for affordable housing locally, which is preferred on site within private development schemes. As a result, the delivery of new affordable housing tends to be through private developers, with only a limited number of additional affordable housing units. This affordable housing is complemented by housing associations effectively re-developing their own sites.
- 3.15 During 2019/20, the AMR recorded that 82 new affordable dwellings were delivered, which is considerably higher than the 22 affordable dwellings completed the previous monitoring year and similar to the 90 affordable dwellings completed in 2017/18. In the 2016/17 monitoring year no affordable units were completed; the delivery of no affordable housing units in the 2016/17 year was due to the Council following national guidance and being unable to require affordable housing on sites of fewer than 10 dwellings. The Council has since reinstated Policy CP4(e) of the Core Strategy.
- 3.16 Three Rivers Core Strategy Policy CP4 requires a contribution towards affordable housing from all developments where there is a net increase in dwellings, this includes affordable housing contributions from small sites (fewer than 10 units). The Council seeks to maximise affordable housing provision and continues to apply Core Strategy Policy CP4 in full. Current evidence concludes that there is a continued pressing need for new additional affordable housing in Three Rivers. Sites falling below the 10 unit and 1,000 sqm threshold should continue to make a valuable contribution towards increasing the number of affordable units in the District. The delivery of affordable housing remains a critical issue.

⁴ Office for National Statistics (2021) House price to workplace-based earnings ratio
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

Housing Mix

3.17 The size of new homes being built in the District has a direct impact on affordability and on the number of new homes being delivered. There has been a historic trend for the delivery of large homes in the District, however in recent years the trend has been the delivery of smaller units. In 2019/20, the AMR reported that 94% of gross new homes completed had 1 to 3 bedrooms and in the previous year it was 79%.

3.18 The Local Housing Needs Assessment (LNHA) (2020) provides an up to date source of information regarding the size, type and tenure of homes needed in the District. It concluded that there is a higher need for new homes of 1 to 3 bedrooms in the context of the social/affordable rented tenure and the affordable home ownership tenure. For market housing, the main need is for three-bedroom dwellings, although there is a significantly greater need for 4+-bedroom dwellings in this tenure than is the case for the tenures of affordable home ownership and social/affordable rented. Table 3 below set out the number of bedrooms required to meet identified need. The LNHA also identified an acute need for affordable housing (primarily social rented tenure).

Table 3: Dwelling requirement by number of bedrooms (2020 – 2036)

	1-bedroom	2-bedroom	3-bedroom	4+ bedroom
Market Housing	5%	23%	43%	30%
Affordable Home Ownership	21%	41%	28%	9%
Social/ Affordable Rented Housing	40%	27%	31%	2%

Constraints to Housing Land Supply

3.19 One of the key issues affecting the delivery of new homes is the characteristics of the District's land supply and as a consequence it means the available land supply is severely limited. The District is embedded in the Metropolitan Green Belt. It permeates all parts of the District with 77% of the District designated as Metropolitan Green Belt. Green Belt has the highest policy protection and is identified as a constraint for development in the NPPF. The NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances through the plan making process. The emerging New Local Plan will consider whether there are exceptional circumstances for changes to the Green Belt boundaries potentially enabling more sites to be developed than is currently possible.

3.20 In addition, the land in the District has a high nature conservation value. There are a five Sites of Special Scientific Interest (SSSIs) located within the District, and part of the District is within the Chilterns Area of Outstanding Natural Beauty (AONB). The District is characterised by extensive green areas including woodland, ancient woodland, common land, farmland, rivers, and parkland. It includes the rivers Chess, Gade and Colne and their floodplains. There are 354 Listed Buildings within the District and 22 Conservation Areas. This combination means the District has a high quality, distinctive landscape with significant landmarks and strategic views. The presence of these landscape and heritage characteristics results in limited development opportunities for delivering new housing on a large scale.

Five Year Housing Land Supply

- 3.21 The AMR 2019/20 sets out the current housing land supply calculation and position⁵. The Council is currently unable to demonstrate a 5-year supply of deliverable housing against the local housing need figure which was 624 dwellings per annum at the time that the AMR 2019/20 was published. It is unlikely that the Council will be able to demonstrate a 5-year housing supply until the new Local Plan is adopted as the existing spatial strategy cannot support delivery against the new housing target of 630 dwellings per year.
- 3.22 The Council is committed to responding positively to the challenge of increasing the delivery of new homes and a number of evidence base studies have been undertaken to review the supply of future housing sites. This includes the Strategic Housing and Employment Land Availability Assessment and Urban Capacity Study. These evidence base studies will be published during the Regulation 18 consultation which is anticipated to take place over the period June – July 2021.

Housing Density

- 3.23 Much of the District is characterised by low density development. The character of the area plays an influential role in the impact on density. New development in settlements that are characterised by low density development should respect the character and appearance of the area. This can lead to more low density development. Good design can potentially help to increase densities in traditionally low density areas.
- 3.24 Until a new Local Plan is in place and given the high demand for new homes and the constrained housing land supply, it will be crucial that new developments coming forward make the most efficient use of land. This approach is supported by NPPF paragraph 123 which states that *“where there is a shortage of land for meeting identified housing need, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of each site.”*
- 3.25 The NPPF promotes the use of minimum density standards for town centres and other locations that are well served by public transport. The Council will need to consider solutions to accommodate more housing in the District’s urban areas such as increasing density through delivering more flats and smaller homes to increase housing delivery. This is supported by the LNHA (20200) which identified a need for smaller homes (one to three bedrooms) across tenures in order to widen the choices of new homes in the District. The new Local Plan will contain policies requiring higher densities in sustainable locations and will set minimum density standards for other areas.

Viability

- 3.26 The District has some of the highest land values and property prices in the country. Based on a review of viability evidence, viability is not an issue that is preventing developers from delivering new homes in the District. It may affect the number of affordable homes delivered,

⁵ This can be viewed on the Council’s website at: <https://www.threerivers.gov.uk/egcl-page/annual-monitoring-report>

however where viability has been raised as a barrier to development, market housing has been delivered in place of affordable housing. As such, overall housing delivery is unaffected.

- 3.27 Affordable housing delivery remains a critical issue, and will be addressed in the emerging new Local Plan, through site allocations requiring full policy compliance at the plan-making stage. This will involve the Council and developers agreeing to fully policy compliant site viability prior to allocation.

Implementation of Planning Permissions and Development Management Performance

- 3.28 Local planning authorities have limited influence on housing delivery once planning permissions have been granted. The timescale for the implementation of a planning permission is generally not considered to be a significant issue within the District, implementation generally occurs within the permission period.

- 3.29 The Council has continued to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. The Council has taken a proactive approach on non-implemented planning permissions by contacting applicants that have received a recent planning permission. A small number of responses were received and pre-commencement conditions were identified as slowing down development. Operational requirements of specific sites were also considered an issue, however this is beyond the Council's control. Overall, no significant barriers to the delivery of the development were raised.

- 3.30 The performance of decision making in the Council's Development Management Service is not considered to be a barrier to delivering new homes. On the whole, planning applications are being processed within the statutory timeframes. In the 2019-2020 monitoring period, 100% of major planning applications were processed within the statutory 13-week period (or within an agreed extension). This is identical to performance in the previous monitoring year and is well above the Council and national target of 60%. For minor applications, where the statutory time period to process an application is 8 weeks (or within an agreed extension), 90% were processed within this timeframe, exceeding the Council's target of 65% and national target of 70%. These statistics demonstrate the speed of decision making by the Planning Service. The timely processing of planning applications is not preventing the granting of planning permissions and in turn the delivery of new homes.

- 3.31 On those sites where planning permission is refused, the Development Management Service's appeals performance is good. The Council has continued to win appeal decisions on sites located within the Green Belt. During 2019-2020, 77% of planning appeal decisions were made in favour of the Council and dismissed. This statistic demonstrates the soundness of decision making by the Planning Service and that unsound decisions are not leading to unnecessary delays and costs to the delivery of new homes.

Infrastructure

- 3.32 The Council has considered whether the current provision of infrastructure in the District is acting as a barrier to the delivery of new homes. For existing planning permissions there are no infrastructure barriers preventing the commencement of sites.

Other barriers to housing delivery

- 3.33 There are number of challenges and barriers to overcome before housing can be delivered and/or purchased. Some may be financial in nature while others are more site specific. These barriers affect both the supply and demand side of housing delivery. The following paragraphs provide a summary of the barriers that have not already been discussed in the paragraphs above.
- 3.34 Site specific constraints include issues such as land contamination, access arrangements, landscape, flood risk and drainage, wildlife and nature, heritage assets. There can also be problems around land ownership and local opposition. The onus is on the developer to deal with these barriers, however the Council will assist where it can.
- 3.35 There are financial issues to be considered such as land value expectations and access to finance for developers and potential home buyers. These barriers are ultimately dictated by the market and are beyond Council's control.
- 3.36 Resources can be a barrier to development. There may be a lack of skills and labour availability, or a shortage of materials. Again, this is down to the market and is considered beyond the Council's control.

4. The Action Plan

- 4.1 This section sets out the actions that the Council has already taken to increase housing delivery and the future actions required to continue this work. The Council is fully committed to working proactively and is utilising the full range of tools and processes at its disposal. It is acknowledged that the delivery of new homes has a wider remit than just planning and requires actions to be undertaken by other Council services including Housing and Asset Management and Property Services.
- 4.2 The need to produce a new Local Plan is recognised as a corporate priority. By boosting housing delivery as well as responding to housing need, the Council can ensure that it delivers more homes in a way that carefully balances the objectives set out in the new Local Plan as well as making a positive contribution towards meeting its identified housing needs.

What has the Council done so far?

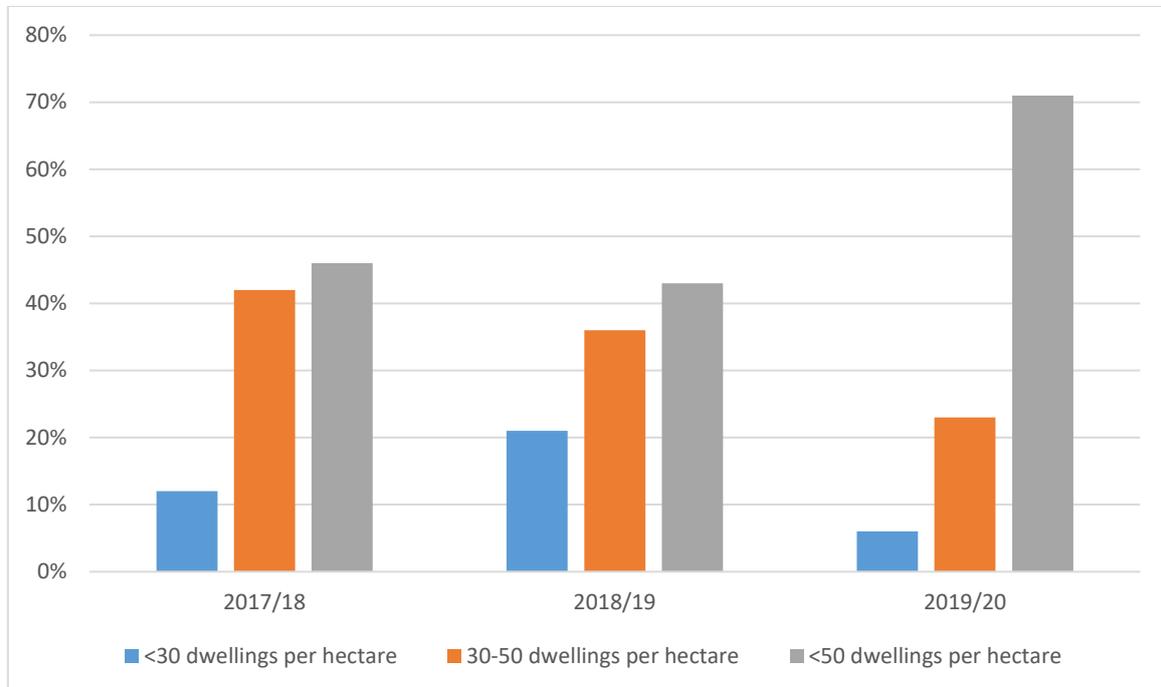
- 4.3 The paragraphs below set out the wide range of positive actions that the Council has already taken to increase the supply of new homes and support the delivery of the housing we need.
- 4.4 The Council has been progressing the preparation of the new Local Plan. The need for a new Local Plan is crucial as it will plan for as much of the identified need for housing as possible. The Local Development Scheme (LDS) has been published online and sets out the timeframe for progressing the new Local Plan.
- 4.5 To support the Local Plan, the Council has undertaken a number of evidence base studies. These include the Strategic Housing and Employment Land Availability Assessment, Edge of

Settlement & New Settlement Scoping Report and Urban Capacity Study. Multiple Call for Sites have been completed to inform these studies as well as communications with landowners and developers. All of evidence base documents will be published during the Regulation 18 consultation which is anticipated to take place over the period June – July 2021.

- 4.6 Applicants, agents and developers who have been granted planning permission have been contacted to find out if there are any barriers preventing the delivery of housing.
- 4.7 The Council is working together with the other four South West Herts authorities on the preparation of a Joint Strategic Plan (JSP). The JSP will look beyond the Local Plan period to 2050 considering strategic housing sites for development. A Strategic Growth Locations Study and accompanying Multi Modal Study (transport) are being undertaken as part of this work.
- 4.8 The Council has continued to develop and streamline its pre-application advice service. The focus has been on reducing the time spent on decision making and reducing the use of planning conditions through early engagement with applicants.
- 4.9 The Council has published a Brownfield Land Register which identifies suitable sites for housing on previously developed land. The Register is updated on an annual basis.
- 4.10 The Council has introduced a Right to Build Register for those seeking to acquire land to build a home themselves in the authority's area. The Register provides the Council with an indication of the demand for self and custom build. The Council will support self-build and custom build development through policies in the new Local Plan.
- 4.11 In 2017 the Council implemented several Article 4 Directions on the District's three strategic allocated employment sites. This removed permitted development rights in relation to the conversion of office space to residential development, providing greater control over the type and location of development.
- 4.12 The Community Infrastructure Levy (CIL) was adopted in 2015. This is used to fund infrastructure in the District. The adoption of CIL has resulted in the reduction of time spent on negotiating Section 106 Agreements between developers and the Council.
- 4.13 The Council supports the preparation of Neighbourhood Plans, which can potentially support additional growth beyond that set out in the Local Plan.
- 4.14 The Council has entered a joint venture with Watford Community Housing, delivering 33 flats including 15 affordable homes at the Chess development, with other sites in the early stages of being considered for development.
- 4.15 The Council has been considering redevelopment opportunities on sites that are owned by the Council, for example redevelopment of the Council's garage sites.
- 4.16 Since the increase in the Council's housing target, as a result of the standard method, an increase in the housing densities of residential developments coming forward through planning applications has been strongly encouraged. The average density of residential completions is shown in Figure 1 below. Despite a slight decrease between 2017/18 and 2018/19, the trend

over the last three monitoring years has been a significant increase in the number of developments built at greater than 50 dwellings per hectare, with 71% of completions built at greater than 50 dwellings per hectare in 2019/20. In addition, the number of completions built at a density of less than 30 dwellings per hectare decreased between 2018/19 and 2019/20.

Figure 1: Density of Dwelling Completions (2017/18, 2018/19 and 2019/20)



What more can the Council do?

- 4.17 The Council will continue to positively seek out further opportunities to increase its housing delivery as set out in the paragraphs below and will work closely with the relevant Council services and external organisations to achieve this.
- 4.18 The Council will deliver a new Local Plan that responds positively to the challenge of housing need and identifies a sustainable growth strategy. The Local Plan is expected to be adopted in 2023. The Council will then endeavour to keep the Plan up-to-date, reviewing it every 5 years.
- 4.19 The Council, together with the other South West Herts Authorities will deliver the Joint Strategic Plan considering strategic areas for growth. An Issues and Options consultation on the Joint Strategic Plan is expected to take place in 2022.
- 4.20 As part of the Duty to Cooperate, the Council will work with its neighbouring authorities to produce Statements of Common Ground focussing on strategic cross-boundary issues such as housing.
- 4.21 The Council will continue to reduce the number of applications determined after the statutory deadline, and continue to offer a proactive pre-application service to support the delivery of housing.

- 4.22 The Council will continue dialogue with developers and landowners to monitor build out rates and obtain information on barriers to housing delivery.
- 4.23 The CIL charging schedule will be reviewed and a new schedule adopted in the future. CIL monies can be used for improvements to local and strategic infrastructure to support housing growth.
- 4.24 The Council will review and update the Infrastructure Delivery Plan alongside the Local Plan.
- 4.25 Further joint ventures with housing associations will be explored by the Council. This will involve expanding the existing joint venture with Watford Community Housing and continuing to look at other potential partnerships with housing associations that work in the District. These joint ventures will help bring sites forward for development and assist in the delivery of affordable homes.
- 4.26 The Council will review its land ownership and work with external agencies that own land in the District to identify any potential opportunities for housing development.
- 4.27 The Council will consider whether it is appropriate to split the Brownfield Land Register into two parts, which would subsequently introduce the permission in principle consent route for sites on Part 2 of the Register.
- 4.28 Figure 1 shows that between 2018/19 and 2019/20, there was an increase in the number of completions built at a density of greater than 50 dwellings per hectare. In order to maintain a high level of residential developments built at this density threshold in suitable and sustainable locations, the Council will continue to encourage an uplift in density in residential developments where appropriate and will introduce density standards as part of the new Local Plan.