



Strategic Planning & Research Unit

For and on behalf of
**Linden Homes Strategic Land (Eastern)
New Road (Ashbrook) Ltd. and the Taylor Family**

Examination of North Hertfordshire Local Plan
Representations to Inspector's MIQs Hearings
Matter 4

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4.0 Matter 4 – The Housing Strategy: The Supply of Land for Housing (Policy SP8)

Q4.1 - Policy SP8 says that new homes will be delivered through the following sources:

- **Completions, permissions and allowances – 4,340**
- **Strategic housing sites – 7,700 Local housing allocations – 4,860**

This totals 16,900 new dwellings. What is the justification for planning a supply of around 6% above the Plan requirement?

- 4.1 We consider this builds in flexibility. We also consider that given the high level of risk being built into the strategy that this level of flexibility is insufficient.
- 4.2 Our analysis presented more fully in response to Matter 6 is that the Council have been extremely optimistic with regard as to the likelihood of the strategic sites progressing through the planning system much more quickly than many others. While this might be true of one or two of the main allocations expecting them all to progress much faster than national averages, is building in the risk of failure and continued under provision of housing.
- 4.3 Similarly expecting strategic sites to deliver at rates higher than the national average is also building in risk. Research (NLP From start to finish) does not support the premise that high value market areas will necessarily deliver housing more quickly through the system or achieve higher build out rates once on site.
- 4.4 Our analysis applied the average annual build out rate for each type of site and also the average time it takes each type of site to get through the system. This is a very useful reality check for the Council. It highlights the degree to which the successful implementation of the plan is dependent upon both the planning system and the developers performing above the average.
- 4.5 This analysis suggests that if the planning system and developers both deliver average performances then there could be almost **2,700 fewer dwellings at the end of the plan period than anticipated**. This would be a serious failure of the plan.
- 4.6 Having identified the potential for failure when measured against the average performances of the system and the market, it is in our view necessary to build in a degree of flexibility. In fact, such flexibility is a requirement of the finding the plan sound.

Q4.2 - 4,340 dwellings are expected from completions, permissions and 'other allowances'. Paragraph 4.89 of the Plan says that these allowances include windfall delivery as well as 'broad locations'.

a) How many homes have been completed since 2011?

b) How many other homes have been granted planning permission since 2011, but have yet to be completed?

c) What level of contribution is anticipated from windfall sites? What is the justification for including windfall delivery in the overall supply?

d) What are the 'broad locations' referred to? What is the justification for their inclusion in the supply?

4.7 The classification of "broad locations" should not be utilised to prevent the proper scrutiny of sites that the Council are relying upon to meet their needs. The use of both broad locations and windfall increases the risk of the strategy not delivering the housing requirement as fewer sites are able to be properly tested.

4.8 Leaving 550 dwellings to be delivered through "broad locations" is simply too risky and given the importance of delivering housing, the Council should be able to identify sites within these broad locations or have a record of delivery which would be calculated as part of the windfall. The fact that the Council can do neither suggest that there is considerable doubt that this scale of dwelling provision will be delivered for these locations.

Q4.3 - Overall, is there a supply of specific deliverable sites sufficient to provide five year worth of housing, with an appropriate buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land? In particular:

a) What is the five year requirement?

b) Within the five year requirement, is there a need to take account of any backlog (under-delivery from earlier plan periods), or is this accounted for in the OAN?

4.9 We do not consider that the OAN has taken into account the necessary changes to reflect the impact of suppressed households but it is not appropriate to bring forward any undersupply from pre-2011 i.e. before the plan period

c) Within the five year requirement, is there a need to take account of any shortfall (under-delivery in the plan period ie from 2011)?

4.10 Yes, as our modelling of the OAN stems from the 2011 census so undersupply against this up-to-date OAN should be taken into account.

d) Any shortfall should be dealt with either in the first five years of the Plan – this is the Sedgfield method – or over the whole plan period – this is the Liverpool method. If there is a shortfall to be accounted for,

does the Council propose to use the Liverpool or Sedgfield method, and what is the justification for the approach proposed?

4.11 The shortfall should either be accommodated in the first 5 years or according to the NPPG the Duty to Co-operate should be engaged to establish if the need can be accommodated in other neighbouring areas.

d) Has there been a record of persistent under delivery of housing, such that a buffer of 20% should be added (for consistency with paragraph 47 of the Framework)?

4.12 Yes

f) Has any allowance been made for windfall sites in the five year supply? If so, in the light of paragraph 48 of the National Planning Policy Framework, what is the compelling evidence to justify this?

4.13 No Comment

g) What (other) assumptions have been used to inform the five year supply calculation (such as any discount based on historic lapse rates, annual yields etc.) and are they justified?

4.14 No Comment

Q4.4 - Paragraph 4.99 of the Plan says that "housing supply will be measured against targets to deliver an average of 500 homes per year [from 2011 to 2021] ... for the period beyond 2021, a target of 1,100 homes per year will apply". Is it intended that the five year requirement should be calculated on this basis? What is the justification for this approach?

4.15 The evidence provided in our REG19 OAN report is that there is a substantial housing need in the early part of the plan period. This is supported by the affordability indicators, the most recent DCLG household projections and the assessment of affordable housing.

4.16 The affordable housing need is in fact frontloaded into the period to 2021 as it is specifically attempting to address a backlog of housing need.

4.17 The DCLG household projections also suggest that housing demand will be frontloaded into the early part of the plan period.

4.18 The proposal for a "stepped trajectory" makes the plan contrary to Framework Paragraph 17 as it fails to deliver the homes the country needs by failing to meet the full, objectively assessed needs for market and affordable housing in the housing market area. In doing so, the plan fails to explain why meeting the full OAN would be contrary to the policies of the Framework (Paragraph 47).

4.19 NPPG (Paragraph: 026 Reference ID: 3-026-20140306) provides clear guidance that where insufficient sites have been identified against objectively assessed needs plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.

4.20 It goes on to state that if following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for. If there

is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate.

- 4.21 The Council are proposing a stepped approach to the housing requirement in an attempt to side step the five year land supply calculation. The NPPG is clear **where the OAN cannot be met in the first five years then the DtC must be engaged**. It does not allow for the engagement of a different approach taken to the definition of the housing requirement simply to avoid the consequences of national policy.
- 4.22 There is nothing in any of the DtC statements that can give any confidence that approving the plan as submitted will result in the unmet housing need early in the plan period being met in other locations. The proposal is simply one of deferring the need.
- 4.23 This deferral of demand will have a negative impact on affordability within the area and as such polices, and allocations should be amended to make sure that the required houses are delivered even if there are timing issues with one or more of the proposed allocations.

APPENDIX 1

		Status	LPA Commitment	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Deliverable in 5 yrs (Council)	2016-31	Post Plan Period
BA1	Land North of Baldock	EIA Scoping request submitted (17/01344/1SCP) in May 2017 by Hertfordshire County Council, the landowner and promoter. No planning application submitted or approved.	2800								171	171	171	171	171	171	171	0	1197	1603
BA2	Land West of Clothall Rd Baldock	Landowner/Promoter is Hertfordshire County Council. No planning applications submitted or approved.	200						60	60	60	20						0	200	0
EL1-3	East of Luton	Application submitted 2016 pending. Submitted by developer Croudace	2100							171	171	171	171	171	171	171	171	0	1368	732
NS1	Land north of Stevenage	Promoted by Croudace Homes. No planning applications.	900							86	86	86	86	86	86	86	86	0	688	212
GA1	Land north of Great Ashby	Application submitted July 2016 reference 16/01713/1 by Croudace Homes for part full, part outline for up to 360 dwellings.	600					86	86	86	86	86	86	84				86	600	0
HT1	Higover Farm Hitchin	Scoping request submitting in May 2017 under reference 17/00680/1SCP by Bellcross Homes	700				86	86	86	86	86	86	86	86	12			172	700	0
KB1	Deards End Knebworth	Promoted by Knebworth House Education Preservation Trust and Knebworth Estates as landowner. No planning applications.	200					60	60	60	20							60	200	0

KB2	Gypsy Lane Knebworth	Promoted by Knebworth House Education Preservation Trust and Knebworth Estates as landowner. No planning applications.	184						60	60	60	4						0	184	0
KB4	East of Knebworth	Supported by Lightwood Strategic but unclear if they are the promoters. No planning applications.	200					60	60	60	20							60	200	0
LG1	North of Letchworth	Promoted by landowner Letchworth Garden City Heritage Foundation. No planning applications	900						86	86	86	86	86	86	86	86	86	0	774	126
RY1	Ivy Fm Royston	Screening opinion request submitting in October 2015 for 311 dwellings under reference 15/02749/1SO. No applicant name and no further applications.	279				60	60	60	60	39							120	279	0
RY2	N of Newmarket Rd Royston	Application approved in December 2016 under reference 14/02485/1 for 330 dwellings by The Hoy Farming Partnership	330		60	60	60	60	60	30								240	330	0
RY10	S of Newmarket Rd Royston	Application pending under reference 17/00110/1 by Countryside Properties and Sir Francis Newman For 325 dwellings.	300				60	60	60	60	60							120	300	0
WY1	Little Wymondley	Pre-app submitted. Bovis Homes	300				60	60	60	60	60							120	300	0
	Totals		9993	0	60	60	326	532	824	965	1005	710	686	684	526	514	514	978	7406	2673

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