

**Cambridge office**

Strutt & Parker  
66-68 Hills Road  
Cambridge  
CB2 1LA  
Telephone 01223 459500

Cambridge@struttandparker.com  
struttandparker.com



**Hearing Statement Strutt & Parker on behalf of Rand Brothers  
(ID16073)**

**RE: Examination of the North Hertfordshire Local Plan 2011-2031 – Written statement to the Updated Schedule of Further Matters, Issues and Options, August 2020.**

Strutt & Parker has been instructed on behalf of the Rand Brothers, to respond to the current Main Modification consultation on the North Hertfordshire Local Plan 2011-2031. This response has been prepared, in relation to land between Royston Road and Cambridge Road, Barkway (Site allocation reference BK3).

The application site has been allocated within the Local Plan Proposed Submission (2016) under reference BK3 – Land between Cambridge Road and Royston Road for 140 dwellings, and is proposed for inclusion within the settlement boundary of Barkway. An Outline planning application for residential development of up to 140 dwellings was submitted to North Hertfordshire District Council on 5 June 2018. This planning application has received no objections from statutory technical consultees. The planning application has demonstrated that this site is fully deliverable for development.

Also, fundamentally, the site is not within the Green Belt and is one of the few allocations not within the Green Belt.

Notwithstanding the above, below is our response to the matters identified in the Updated Schedule of Further Matters, Issues and Options.

**Matter 21 – the objective assessment of housing need ('the OAN') and the housing requirement.**

We support the use of the latest OAN figures to calculate the housing requirements in the District. It is important to ensure the figures and assumptions used have been robustly tested to justify any reduction in housing numbers. In terms of whether there has been a meaningful change in the housing situation in the district, we do not consider that there has been. Housing delivery in the district is a significant issue which has been demonstrated by the Council's persistent under delivery of its housing requirement.

We fully support the approach that North Herts DC are taking, to provide a 13% buffer for future housing requirements, which is considered to be a sound approach. This buffer would be used to provide flexibility for sites presently delayed from coming forward due to their Green Belt location. It is also consistent with the NPPF, which sets out a requirement for a 20% buffer for underperforming authorities, which North Hertfordshire has been historically. It would also provide the Council with security for housing delivery to demonstrate a five year housing land supply by having sites available. This position is supported, particularly where it prioritises and places greater requirement on allocated sites that are not within the Green Belt to come forward.

Paragraphs 136 and 137 of the NPPF sets out that Green Belts should only be reviewed and altered where exceptional circumstances are fully evidenced and justified. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

Whilst, the applicants fully support the Council's approach to retain all allocated sites, in the event that the Planning Inspector is minded to remove any sites from the plan, it is imperative that non-Green Belt sites, which have been allocated within the emerging Local Plan such as our client's site (BK3) in Barkway, are retained. BK3 is a site that is available for development and does not have any significant land constraints and its allocation helps the Council justify the exceptional circumstances for the release of Green Belt land elsewhere.





**Matter 22 – the supply of land for housing**

The need for housing delivery within North Hertfordshire is particularly acute in the short term, with a current housing land supply figure of 1.3 years. Therefore, it is particularly important that the smaller and medium allocated sites, that are deliverable are brought forward for development in the short term. We fully support the housing trajectory for BK3 as set out within the supporting evidence base documents. As set out above, this site has been subject to an Outline planning application and is capable of being delivered within the first 5 years of the plan period. It is the applicant's intention to submit a reserved matters application on the site, shortly after the Outline Consent has been issued and we are at an advanced stage of reaching an agreement with a housebuilder to deliver the majority of housing on the site.

Overall we consider that the plan is sound in planning terms and we support the approach taken by the District Council, which aligns with the National Planning Policy Framework.

Yours sincerely

**David Fletcher**  
**Director MSc MRTPI**  
**Cambridge Planning**  
**Strutt & Parker**