

North Herts District Council

Local Plan

Schedule of Further Matters, Issues and Questions

Matter 22 - the supply of land for housing.

Additional Comments 3rd September 2020

Statement by J Rigg (16632)

22.1 a) Is reducing the overall housing requirement to 13,000 and undertaking an early review of the Local Plan, the most appropriate way forward? If not, why not?

No, the proposed OAN represents a material overstatement of NH housing need and should be reduced to around 8,516 (please refer to Matter 21.1, Additional Comments).

Reduction of the OAN to 8,516 would enable NH to evidence a sound 5 year land bank and as such an early review of the Plan is not considered necessary.

The only reason for an early review would be to seek an increase to NH's approved OAN thereby seeking to circumvent the outcome of the current Inspection.

b) If the housing requirement should be modified to 13,000 dwellings, should the supply of housing sites proposed in the Local Plan also be reduced? If so, how?

The supply of proposed housing sites should be modified to reflect the adjusted OAN, as noted above, with the reduction focused on Strategic Green Belt sites.

A number of the strategic sites are located around Stevenage, removal of which would restrict sprawl and encroachment by the latter upon the green belt and surrounding countryside.

Removal of NS1 would as noted by NHDC Planners in para 2.77 (page 34) Local Plan 2011-2013: Housing Options Growth Levels and Locations: Consultation Paper February 2013 ²) would also prevent coalescence of Graveley and Stevenage.

c) Is a 'buffer' or around 13% an appropriate approach? If not, why not?

No, given the further reduction in the OAN proposed above, culminating in a 38% from the originally proposed 13,800, increasing the buffer to over 10% is not considered appropriate.

² http://www.north-herts.gov.uk/sites/northherts-cms/files/housing_options_part_2.pdf

d) If there is a 'buffer' of around 13%, do the exceptional circumstances required for the 'release' of land from the Green Belt for housing development exist?

No. The reduction in the OAN of 5,284 from 13,800 (38%), reduces reliance on green belt sites to support NH housing need to 1,900 (from 5,600 (calculation excludes East of Luton sites)). This reduced need significantly weakens the argument that exceptional circumstances exist to warrant the release of all the green belt sites proposed under the plan.

The five year housing land supply

22.2 a) Are the Council's calculations correct/accurate?

Yes.

b) All of the approaches used by the Council assume that the buffer required by paragraph 47 of the NPPF should be 20% - that is to say, that there has been a record of persistent under delivery of housing in the District. Has there been, such that the 20% buffer is the most appropriate?

Yes.

c) Is the 'three-stepped approach' proposed by the Council the most appropriate method for setting the five year housing land requirement? If not, why not?

No the persistent under delivery of amended targets historically would indicate the proposed approach remains very fragile, particularly given the likely impact of COVID 19 on the UK economy. In order to improve its robustness a significant reduction in the OAN is required.