



Introduction

This Matter Statement has been prepared by WYG on behalf of Taylor Wimpey North Thames in relation to Matter 21 of the North Hertfordshire Local Plan 2011-2031. It has been prepared to provide additional information responding to the matters and issues raised by the Inspector in relation to Matter 21 – the objective assessment of housing need.

The statement follows previous representations submitted on behalf of our client, to the Proposed Submission Local Plan in November 2016, the hearing statements prepared in December 2017 and the Main Modifications representations prepared in March 2019 which voiced our support of the proposed allocation of site CD2 (Codicote Wyevale Garden Centre). This statement specifically addresses matters raised by the Inspector in relation to the objective assessment of housing need ('the OAN') and should be read alongside previous representations submitted.

Matter 21 – the objective assessment of housing need ('the OAN')

Matter 21 relates to the objective assessment of housing need in the emerging North Hertfordshire Local Plan. Where relevant we respond to the questions identified by the Inspector.

Question 21.1a – have the 'alternative OAN' figures been arrived at correctly/on a robust basis?

The updated report considers that it is most appropriate to maintain the original CLG method together with the 10% uplift that the SHMA proposed. This provides a 2016-based OAN of 12,900 dwellings over the period 2011-2031. This is a reduction of 900 dwellings on the 2014-based figure.

Noting that the Government has expressed a preference for using the 2014-based projections over the 2016-base projections for plan making purposes we believe that the higher figure should be applied.

We understand that the Council rightfully want to include the most up-to-date figures within the Local Plan but think that there needs to be thought given as to why an automatic arbitrary reduction in OAN is proposed to be applied, particularly when it's already acknowledged and accepted that housing need will not be addressed by the Local Plan, which only emphasises the need to review the strategy taken.

Question 21.1b – in the light of the 'alternative OAN' figures, has there been a meaningful change in the housing situation'?



Updated housing delivery test figures were published on 13th February 2020 and show that the housing delivery test 2019 measurement for North Hertfordshire is 44% and the consequence is therefore 'presumption' i.e. presumption in favour of sustainable development; which is the most severe penalty. This concept sits at the heart of the National Planning Policy Framework. It determines that planning applications should be granted unless development compromises certain protected sites. It therefore takes the decision over the principle of the local policy framework and puts it firmly into the national framework; undermining the Local Plan and rendering it redundant.

Therefore, it is imperative that the Local Plan seeks to address housing need and be modified to boost the provision of housing by reviewing the density of all proposed allocations. Furthermore, in order to be sound the Local Plan needs to provide a strategy which addresses the area's objectively assessed housing need, which the Plan currently does not.

Question 21.1c – if there has been a 'meaningful change in the housing situation', should the Local Plan be modified to reflect it and, if so, how?

The proposed housing allocations should all be reviewed to ensure that the correct density has been allocated to each site. Using the example of site CD2 (Codicote Wyevale Garden Centre), this site was put forward in the proposed options stage of the Local Plan for 58 dwellings, however the proposed allocation is for 54 dwellings.

Furthermore, there is an application currently pending on site CD2 for 72 dwellings to which the Council have no issues with the quantum of development, subject to some minor masterplan changes. It has therefore been demonstrated that the site can provide more dwellings than is currently allocated.

The application pending and the proposed allocation shows a difference in 18 units; this is an uplift of 33.3% to the number which the Local Plan proposes to allocate. We believe that the number issued to the site in the proposed allocation should be amended to reflect the pending application because the technical work that has been undertaken for this application (albeit not yet approved) has demonstrated that the site can deliver 72 dwellings.

Options such as this have not been fully considered and we believe that a review of all proposed allocations should be undertaken. All of the technical site assessment work has already been completed and is contained within the evidence base of the Local Plan. The sites proposed for allocation have already had the principle of residential development established, it is just a case of making sure that any form of low density development is avoided and the proposed allocations are being maxed out prior to the automatic reduction in numbers.