



Introduction

This Matter Statement has been prepared by WYG on behalf of Taylor Wimpey North Thames in relation to Matter 22 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 22 – the five year housing land supply.

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 five year housing land supply and should be read alongside previous representations submitted.

Matter 22 – the five year housing land supply

Matter 22 relates to the five year housing land supply in the emerging North Hertfordshire Local Plan. Where relevant we respond to the questions identified by the Inspector.

Question 22.1a – is reducing the overall housing requirement, and undertaking an early review of the Local Plan is the most appropriate way forward? If not, why not?

Reducing the overall housing requirement is not the most appropriate way forward when all of the options have not yet been explored; such as reviewing density of the proposed allocations. Reducing the overall housing requirement is just a short-term fix to a long-term problem.

Where technical site assessments have already been carried out, they simply need reviewing to assess whether appropriate densities have been proposed for each allocation and whether there is scope to allocate additional housing to these sites, which have already been deemed appropriate for allocation. The principle of the development of these sites for residential purposes has already been established; any form of unnecessarily depressed density development should be avoided within the proposed Local Plan allocations.

Question 22.1b – is the selection of additional land for housing from previously identified sources the most appropriate way forward? If so, why?



This is an appropriate way forward; however, it is not the only option present. The existing proposed allocations should be reviewed to confirm whether the densities proposed are appropriate and if there is scope for these numbers to be increased to boost housing supply. In order to be sound the Plan must provide a strategy to meet the area's objectively assessed needs and justified by providing an appropriate strategy.

Question 22.1c – is the identification and selection of additional land for housing the most appropriate way forward? If so, why?

This is an appropriate way forward, but not considered to be the most appropriate option due to the further delay that would be caused having to review or reconsider new sites that were not originally intended for allocation within this Local Plan.

It is thought that any further progress to the Local Plan should involve reviewing the current proposed allocations in terms of density and make sure that appropriate densities are being proposed.

Question 22.1d – are there any other possible options that would be more appropriate? If so, what are they and why would they be more appropriate than the path suggested by the Council?

The Plan should seek to review the proposed allocations to ensure that the correct densities are being proposed and that site allocations are being maxed out. Suitability and availability have already been established but the amount of units on each site should be taken into consideration. This will help ensure the soundness of the Local Plan because it will be effective as it will be deliverable over the plan period, because the existing allocations have already been identified as sites that are available, achievable and deliverable for development; exceeding the numbers will not impact this.

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 this site 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 it is currently allocated. Technical documents have been prepared which support this amount of development on site.



It has come to light that even after the adoption of this Plan that the Council still will not be able to demonstrate a five year supply of housing land, so the densities proposed in each allocation must be reviewed.

Question 22.2b – 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?

The 20% buffer is wholly appropriate, especially considering the fact that the emerging Local Plan will not be able to demonstrate a five year supply of housing land. The Local Plan must be consistent with national policy to be sound.

Moreover, the housing delivery test awards the harshest penalty to North Hertfordshire as it scored below the 45% threshold under the 2019 measurement.

Question 22.2c – 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?

In the short term, it fixes the problem; but not in the long term. There are other options that could be explored which would help to potentially secure five year housing land supply. Such as, reviewing the current proposed allocations and the densities that have been proposed. As indicated in the NPPF, sites should be making efficient use of land and homes being built at low densities should be avoided. As previously stated, the Local Plan must be consistent with national policy to be sound.

Question 22.2d – is one of the other approaches to setting the five year housing land requirement explored in the Council's note, or another approach entirely, more appropriate? If so why.

An approach that the Council have neglected to consider is the review of the existing proposed allocations to see if appropriate densities are being proposed. Using the example of site CD2 in Codicote, this is allocated for 54 dwellings but a current planning application that is pending a decision demonstrates that 72 dwellings can be accommodated on site.

The evidence base has already thoroughly reviewed the proposed allocations and increasing numbers to these will not significantly alter the draft Local Plan and therefore not cause any further hold ups or require further hearing sessions.



Another approach would be a further review of the Green Belt, but this may have timescale implications for the Local Plan and require further hearing sessions to be held.

Question 22.2di – what should the Council do to ensure that it can demonstrate a five year supply of land for housing under this approach?

The Council should fully consider each proposed allocation and ensure that each site is maxed out in terms of density.

Question 22.2dii – what would taking this approach mean for the progress of the Local Plan examination?

It would ensure no further hold ups and may mean that the Council will be able to demonstrate a five year supply of housing land at the time the Local Plan is adopted.