

MATTER 22

APPENDIX C

ANALYSIS OF THE FIVE YEAR HOUSING LAND SUPPLY

- 1) This section is very technical but nonetheless important as within it are some indications that merit serious consideration.
- 2) I have no particular comment on which method of housing delivery (*Liverpool* or *Sedgefield*) would be more appropriate for NHDC to adopt. Although it does appear that the *Liverpool* method is more realistically achievable.
- 3) However, NHDC is constructing its arguments based upon the new proposed housing requirement of 13,000 (11,600 in North Herts and 1,400 from the east of Luton sites). Yet we have demonstrated that the 11,600 is too high and also the 1,400 on the east of Luton sites is also not realistic for the many reasons given in Matter 21 and also repeated in this paper.
- 4) In para 39, NHDC states that any suspension of the examination to look at alternate or additional sites is not viable...meaning they say that it is necessary to construct the existing housing delivery requirements of the Plan, as they see it, in a way which reflect the anticipated delivery trajectory.
- 5) I agree that it is not ideal to consider suspension of the examination and also to start looking at alternate or additional sites at this late stage, but then I am not sure who it is who might be suggesting that course of action. I consider that it is very important to have an acceptable Local Plan in place as soon as possible to forestall speculative development requests and also to provide something on which to build for when the new Planning legislation is enacted by the Government, as seems to be the plan, for the period through to mid-2022.
- 6) But this stance by NHDC does not seem to consider the strong likelihood that some sites in the Plan will need to be removed totally. For instance, we have presented clear evidence that the east of Luton sites need to be totally deleted from the Plan, saving 2,100 houses.
- 7) Furthermore, the alternative and lower OANs we offer also will result in much lower housing requirements as shown in Appendix B of Matter 21. These would range from 6,318, through 6,609 to 7,061 depending on which Market Signal is preferred (-15%, -10% and -5% respectively).
- 8) We have also in our calculations in this paper considered buffers ranging from 6%, to 13% and up to 20% - the latter figure recognising that NHDC has failed to meet its Housing Delivery Target. Together with the reduced housing need and the removal of the east of Luton sites this will result in a sufficient delivery of housing as well as give the hope that other Green Belt sites can be removed from the Plan.
- 9) Interestingly in its Para 42, NHDC is seemingly admitting that further modifications to the Plan are required in certain key areas – and specifically, in para 45 they indicate that the Inspector should provide a clear indication as to which (if any) of the proposed allocations in the Revised Trajectory he might be minded to find 'unsound' and remove from the Plan.
- 10) The Policies identified by NHDC that they indicate are likely to require further modification are SP8 (Housing) which includes all the strategic sites and proposed Green Belt allocations; SP14 (the north of Baldock site); SP15 (the

North of Letchworth Garden City site), SP16 (the north of Stevenage site); and SP19 (the east of Luton sites).

- 11) As we have strongly stated in our various representations, and proven in many different ways, we believe that the proposed east of Luton sites should be removed entirely from the Local Plan. We would also welcome any moves the Inspector might be minded to make to also remove other Green Belt sites from the Local Plan.

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