

NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: MATTER 4:

THE HOUSING STRATEGY – THE SUPPLY OF LAND FOR HOUSING (Policy SP8)

Statement from CPRE Hertfordshire

1. I am Stephen Baker, DMS, BSc, Dip TP, MRTPI, Planning Manager at Campaign to Protect Rural England Hertfordshire (CPREH).
2. This statement supplements our original representations on Chapter 4 of the Proposed Submission North Herts Local Plan, which still apply, and seeks to address the Inspector's questions as set out in his schedule of Matters and Issues, on Matter 4, The Supply of Land for Housing (Policy SP8).
3. CPREH's statement on Matter 3 is also directly applicable to this issue in respect of the proposed dwelling supply in excess of objectively assessed need, and we therefore ask the Inspector to also consider that statement and our original representations on Policy SP8.

Inspector's Issues and Questions

The overall supply of land for housing

Issue 4.1: What is the justification for planning a supply of around 6% above the Plan requirement?

4. CPREH considers that this level of provision in the Plan is not justified and is not consistent with national policy in respect of the Council's proposed housing requirement / target set out in Policy SP8, as explained in detail in our representations on Chapter 4 of the Plan, and in our statement on Matter 3.

Issue 4.2 c): What level of contribution is anticipated from windfall sites?

5. A key Green Belt purpose is to '*assist in urban regeneration, by encouraging the recycling of derelict and other urban land*' (NPPF paragraph 80, CPREH emphasis)
Failure to fully acknowledge the likely scale of windfall development, and capacity of existing previously developed land, risks the unnecessary loss of valuable greenfield sites, including Green Belt.
6. Similarly NPPF paragraph 51 urges Council's in areas 'where there is an identified need for additional housing' such as North Hertfordshire to encourage the change of use of underused employment land for housing.

7. CPREH considers that the Council has underestimated the scale of housing development that can be accommodated on previously developed land in the District and will refer to the Council's evidence documents on this question, including ED3 the new Housing Background Paper.
8. In particular the scale of likely windfall development in the District during the plan period is considered to be far too low in the context of current national policy and recent changes to permitted development rights. One example is the amendment to the GPDO that came into force last month, and applies for a period of three years, that allows changes of use from Class B1(c) light industrial to residential under the prior approval process.
9. CPREH asks the Inspector to recommend that the calculation of housing capacity that can be provided in the District before land is needed to be found in the Green Belt is significantly increased.

Issue 4.3 d): What are the 'broad locations' referred to?

10. CPREH is concerned that, as the contribution to housing supply from such locations are not included under either large or small site windfalls, the only other potential locations where development could take place is in areas removed from the Green Belt and countryside beyond the Green Belt, but not proposed as site allocations. Such areas are not referred to in the text of the Plan, but some areas are identifiable around the edges of the towns, by comparing the policies map with the current Green Belt boundary in the Adopted District Local Plan. We presume that there would also be a significant supply as a result of villages being taken out of the Green Belt.
11. This whole issue is closely associated with the Council's proposals to remove specific areas of land from the Green Belt as part of the Plan's strategy, which are also dealt with separately under Matters 2, 3, 5 and 7.
12. We consider this to be another example of inconsistency with national planning policy for the protection of the Green Belt as set out in the NPPF, because of the failure to demonstrate exceptional circumstances for the removal of land from the Green Belt.