

Matter 22 – the supply of land for housing

Inspector Statement: The Overall Supply of Land For Housing

The Council anticipates the delivery of 14,650 dwellings over the plan period. It does not propose to delete from the Local Plan any of the housing sites included within it, and argues that the difference between anticipated delivery above the requirement represents an appropriate ‘buffer’ (of around 13% of the overall housing requirement). In arriving at these views, the Council has considered a number of alternative options, which are set out in its previous note and in ED191B.

TTL Response to (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?

As explained under Matter 21 Transition Town Letchworth (TTL) do not consider the latest population and household forecasts support the need for 13000 additional dwellings in the district. Nine years into the local plan period, with significant changes in the projected household need, along with changes in the Use Classes Order that will allow for a much more versatile use of town centre land, TTL consider that now is the time for a comprehensive review of the proposed Local Plan. If this occurs there should be no need for a major revision of the plan prior to its end date in 2031.

TTL Response to (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?

Housing sites should be reduced to reflect the lower North Hertfordshire housing requirement of 8874 dwellings. Given that NHDC has declared a climate emergency the decision on which planned sites to remove should take into account:

- Feasibility of using sustainable transport to commute from the site.
- Proportion of zero carbon homes that will be built on the planned site (a binding commitment to build zero carbon homes should be obtained from the land owner).
- Significance of the site in terms of green belt / biodiversity.
- Proximity of key services to the site, including schools.

Document ED191B identified that 1825 homes, planned to meet North Hertfordshires housing needs, will not now be delivered in the plan period. These homes should be removed from the local plan. Options for delivering sustainable housing, including potentially a new town, should not be constrained by the 2011 to 2031 plan including housing sites to be delivered beyond the plan timescales.

North Herts Housing Supply	Plan period	Beyond Plan Period
Built / Permission Given	4776	
Remaining In Local Plan	8495	1825

If the housing requirement is set to 8874 and 4776 houses have been built or have planning permission that leaves a requirement for 4098 homes. There are 1662 homes planned which are not on the Green Belt, 187 on Green Belt considered to be of low significance, and 1941 on Green Belt sites which are of medium significance. This totals to 3790 homes. (see Appendix A for a list of sites).

The land allocated to expand town centres and business premises in line with population growth should be reduced to reflect the lower population forecasts, and town centre reviews undertaken. Our expectation is that the remaining 308 homes required to meet the identified local housing need,

plus a small buffer, could be built on highly sustainable town centre sites which are already identified within the local plan (e.g. Gernon Road and The Wynd areas for Letchworth).

TTL Response to (c) - Is a 'buffer' or around 13% an appropriate approach? If not, why not?

The North Herts element of the plan has a buffer of 14% (13250 /11600). In addition it includes 1825 homes that will not be built in the plan period so there are 30% more homes planned for than are required.

For the developments receiving planning permission to date (4776 homes) there has been a shortfall of 113 homes built from those planned, just 2.4%. Given that brown field sites are often the most sustainable but not the most financially attractive it is imperative that the excess green field sites are removed from the plan to ensure the brown field sites are developed.

TTL Response to (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?

Some of the lower significance Green Belt land may need to be released to meet the housing need in North Herts but we do not consider the circumstances now exist for releasing the land which is considered to contribute significantly to the Green Belt.

Inspector Statement: The five year housing land supply

ED191B sets out a number of different approaches to calculating the five year supply of land for housing. By the Council's calculations, only one of these approaches – a 'three-stepped approach' based on using the 'Liverpool method' (spreading the shortfall in delivery since 2011 evenly across the remainder of the plan period to 2031) – would enable the demonstration of a five year housing land supply for each of the next five years. From my reading of ED191B, alongside the Council's previous note, the Council's position (in short summary) is that this 'three-stepped approach', combined with the commitment to an early review of the Local Plan, is the most appropriate method for setting the five year housing land requirement, because it is the only option achievable without significant further delay to the examination.

TTL Response to (d) - Is one of the other approaches to setting the five year housing land requirement explored in ED191B, or another approach entirely, more appropriate? If so, why, and:

(i) what should the Council do to ensure that it can demonstrate a five year supply of land for housing under this approach?

(ii) what would taking this approach mean for the progress of the Local Plan examination?

TTL are aware that the MHCLG's Housing Delivery Test results published in February 2020 assessed North Hertfordshire as only delivering 44% of its required housing over the three year measurement period and was the 10th worst performing district in the country.

Reducing the housing need to 8874 will allow NHDC to adopt a straight trajectory for the housing land supply. This would reduce the risk in the existing proposal where there is requirement to build significant stocks of housing in the last few years of the plan period, contrary to the Council's performance to date.

Using the approach TTL propose for updating the local plan, with sites being removed rather than added, there should be no requirement for additional public consultations and our expectation is that the revisions could be implemented swiftly. The removal of a significant number of contentious Green Belt sites should also facilitate the Local Plan examination reaching a swift conclusion.

Appendix A: Sites in the Local Plan which are yet to receive Planning Permission

Area	Homes Planned	Greenbelt status (Limited, Moderate, Significant)	Delivered beyond 2031	Town
EL1/2/3	2100	S	615	East of Luton
GA1	330	S		NE Stevenage
GA2	600	S		NE Stevenage
HT1	700	S		Hitchin
LG1	900	S	300	Letchworth
NS1	900	S	125	North Stevenage
BA1	2800	M/S	1400	Baldock
KB4	200	M/S		Knebworth
BA10 (employment)	0	M		Baldock
BA2	200	M		Baldock
BA3	245	M		Baldock
BA4 (part)	50	M		Baldock
CD1	73	M		Codicote
CD2	54	M		Codicote
CD5	140	M		Codicote
GR1	8	M		North Stevenage
HT2	84	M		Hitchin
HT6	53	M		Hitchin
IC2	40	M		Ickleford
IC3	150	M		Ickleford
KB2	184	M		Knebworth
LG3	120	M		Letchworth
WE1	40	M		Weston
WY1	300	M		Wymondley
KB1	200	M/L		Knebworth
CD3	48	L		Codicote
HT3	46	L		Hitchin
HT5	16	L		Hitchin
IC1	9	L		Ickleford
KW1	16	L		Kings Walden
SI1	40	L		St Ippolyts
SI2	12	L		St Ippolyts
BA11	20			Baldock
BA5	25			Baldock
BA7	20			Baldock
BK2	20			Barkway
BK3	140			Barkway
HT10	60			Hitchin
HT8	12			Hitchin
KM3	13			Kimpton
Letchworth Town Centre	50			Letchworth
LG10	37			Letchworth
LG13	10			Letchworth
LG15	25			Letchworth
LG16	47			Letchworth
LG18	55			Letchworth
LG4	45			Letchworth
LG5	86			Letchworth
LG6	26			Letchworth
LG8	80			Letchworth
PR1	21			Preston
RD1	22			Reed
RY11	18			Royston
RY4	61			Royston
RY7	60			Royston
TH1	12			Therfield
Windfalls	697			
TOTAL	12320		2440	