

# Written Statement re Updated Further Matters, Issues and Questions

August 2020

## Examination of North Hertfordshire Local Plan 2011-2031

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

### Matter 22 – the overall supply of land for housing

### Statement from Barkway Parish Council

#### Introduction

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, of Govresources Ltd, Planning Consultant for Barkway Parish Council.
2. This statement supplements our previous representations on the North Hertfordshire Local Plan 2011 – 2031 relating to the village of Barkway, our comments on the proposed Main Modifications to the North Hertfordshire Local Plan and our responses to the Further Matters, Issues and Questions, January 2020.
3. This statement addresses the Inspectors Updated Schedule of Further Matters, Issues and Questions, August 2020 **Matter 21 – the objective assessment of housing need ('the OAN') and the housing requirement**, in relation to the further reduction in the overall dwelling requirement for North Hertfordshire and its impact on Site Allocation Policy BK3, and **Matter 22 – the supply of land for housing** concerning the overall supply of land for housing, in relation to the continued allocation of Site BK3..

#### Matter 21 - The objective assessment of housing need ('the OAN') and the housing requirement

4. NHDC's considered response to the publication of the 2016-based population and housing projections [ED159] and their response to the Inspectors letter on this paper; Paper A: The 2016-based household projections and Objectively Assessed Need, stated the author's expert opinion which concluded that a reduction in OAN of only 6.3% does not represent a meaningful change (Appendix 2, Paragraph 3).

5. NHDC acknowledge that the OAN in the current LDP proposals is overstated by between 900 and 2591 dwellings depending on which methodology is used for the calculation. This reduction did not take into account a reduction in the number of dwellings making up NHDC's contribution to Luton's unmet needs, which remained at 1,950 in order to be self-sustaining in terms of educational provision.
6. When considering the local circumstances in Barkway, where Site Allocation BK3 contributes only 1% to the original OAN of 14,000 dwellings yet amounts to an increase of households in Barkway of 62%, a reduction in overall OAN for North Hertfordshire should have resulted in the deletion of this site, which represented such a marginal contribution.
7. The new revised calculations [ED191A] made by NHDC conclude that a 2018-based OAN equates to a 17% reduction on the 2014-based OAN figure for North Hertfordshire. We consider this to be a much more meaningful change than the previous revised 2016-based OAN.
8. However, NHDC's paper ED191B Appendix 1 NHDC 5 year Housing Supply at 1 April 2020\_.pdf, paragraph 18 proposes no change to its proposed spatial strategy, other than deleting those housing allocations that are built or substantially built, including Barkway Site Allocation BK1.
9. We agree that there has been a meaningful change in the housing situation in North Hertfordshire and that this change should be reflected not only in the Local Plan's housing requirement but also in the Plan's spatial strategy, to include the deletion of Site Allocation BK3.

## **Matter 22 – The overall supply of land for housing**

### **(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?**

10. The overall housing requirement should be reduced to 13,000.
11. We do not agree that continuing with the Plan as it now stands, with an early review, is a sound approach. This approach may have been acceptable where there was a question of possible under provision of sites for housing, allowing NHDC time to access additional sites. The opposite is now the case. There is an overprovision of sites including sites attached to villages in unsustainable locations and Green Belt sites.
12. The Local Plan would remain unsound if it were to continue to be progressed with unsustainable housing Site Allocations despite an overall reduction in the number of new homes needed by 2,950. This includes sites in the rural area, attached to small villages such as BK3 and sites in the Green Belt.
13. The reduced level of OAN and the lower housing requirement should also have a knock-on effect of either reviewing or deleting the villages for "growth" strategy

from the Plan, as this policy was invented to justify unsustainable housing Site Allocations which are no longer needed.

14. In its current form, the Local Plan is unsound and an early review of the Plan cannot be supported.

**(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?**

15. We support NHDC's urgency to have an up to date Local Plan to prevent opportunistic development proposals. As NHDC states in ED191B, any suspension of the examination to consider alternate or additional sites is not a viable option. However, an exercise must be undertaken to remove the most unsustainable Site Allocations from the Plan commensurate with the overall reduction in OAN and housing land requirement.
16. A site on green land in the rural area or Green Belt land, once allocated, is highly likely to be developed. The loss of land in rural North Hertfordshire must be justified. If that loss cannot be justified by the need for housing, either overall, or in a particular location, it should not be allocated.
17. We have made submissions on Matter 23 – the Green Belt Review and site selection process, Matter 25 – the new land proposed for allocation through the main modifications and Matter 26 – villages for “growth” which support our assertion.
18. To be sound, the most unsustainable Site Allocations, which are not required to meet the OAN and housing land requirement must be deleted. We repeat our firm view that Site Allocation BK3 is unsustainable in terms of its impact on the village of Barkway and its remote location.

**Amendments to the Plan**

19. In summary, further modifications of the Local Plan are necessary so that the Plan is sound and can continue to adoption. The amendments to the Spatial Strategy must be to delete the most unsustainable Site Allocations from the Plan in line with the reduced OAN and housing land requirement.