

# North Hertfordshire District Local Plan Examination

11/17

Written Statement on behalf of Beechwood Homes

## Matter 4



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## **Matter 4 - Written Statement**

### **Introduction**

- 1 This Written Statement has been produced on behalf of Beechwood Homes (Beechwood), which are the owners of the land identified as proposed allocation HT2 in the North Hertfordshire Proposed Submission Local Plan 2011-2031.
- 2 Beechwood welcomes the opportunity to engage with the examination process, especially in relation to Matter 4 – The Housing Strategy: the supply of land for housing (Policy SP8).
- 3 Below we set out our client’s brief responses to the Inspector’s questions relating to housing land supply:

### **The five year housing land supply**

**4.3 Overall, is there a supply of specific deliverable sites sufficient to provide five years’ worth of housing, with an appropriate buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land? In particular:**

#### **a) What is the five year requirement?**

- 4 Beechwood notes that NHDC has identified the 5 year housing supply (5YLS) requirement as being 500 dwellings per annum (dpa) in the period 2011-21 and 1,100 dpa in the period 2021-31. The consequences of this being, that the annual 5YLS requirement figure more than doubles in just three and a half years’ time. This will have significant implications for the District Council, particularly when a 20% buffer is then applied.
- 5 Beechwood consider that NHDC should seek to ensure that proposed allocated sites that are capable of delivering housing provision earlier than specified in ‘Appendix 2 – North Hertfordshire Housing Trajectory – 1 April 2017’ of the Housing and Green Belt background paper (HOU1) should be moved forward to be counted as contributing to the 5YLS, where appropriate evidence has been submitted to

demonstrate this to be practical. In the case of our client's site (HT2), the envisaged delivery rates are shown as 34 dwellings in 2025 and 50 dwellings in 2026.

- 6 In our representations to the Submission Draft Local Plan we referred to the stated delivery rates set out in the Infrastructure Delivery Plan (Submission Document: T/1) which indicated that site HT2 would deliver 34 dwellings within the period 2022-26 and 50 dwellings between 2027-31.
- 7 Beechwood has submitted a Pre-app in respect of the site, and subject to satisfactory negotiations with NHDC on matters of detail, is keen to ensure that housing delivery on the site occurs ahead of the above mentioned timescales.
- 8 In relation to the proposed allocation figure of 84 dwellings, Beechwood considers that it can deliver the site in its entirety within 5 years of receiving planning permission.
- 9 In terms of demonstrating and maintaining a supply of specific deliverable sites sufficient to provide five years' worth of housing, sites that are capable of being brought forward for delivery from later on in the plan period, should be moved, and the Housing Trajectory and 5YLS amended accordingly. Boosting the 5YLS, particularly through the delivery of small and medium sized developments will provide greater choice and competition in the housing market, as well as ensure housing delivery is boosted. This being particularly important with regard to ensuring that overall housing rates do not fall whilst larger sized allocations wait to be brought on stream.

**b) Within the five year requirement, is there a need to take account of any backlog (under-delivery from earlier plan periods), or is this accounted for in the OAN?**

- 10 We would assume that any past backlog from earlier plan periods has been properly factored in to the identified OAN, in line with common practice.

**c) Within the five year requirement, is there a need to take account of any shortfall (under-delivery in the plan period ie from 2011)?**

11 Yes. We note that Table 3: 'Five-year land supply at 1<sup>st</sup> April 2017' of the Housing and Green Belt background paper (HOU1) identifies a backlog of 1,006 dwellings between 2011-17.

**d) Any shortfall should be dealt with either in the first five years of the Plan – this is the Sedgefield method – or over the whole plan period – this is the Liverpool method. If there is a shortfall to be accounted for, does the Council propose to use the Liverpool or Sedgefield method, and what is the justification for the approach proposed?**

12 NHDC has chosen to follow the Liverpool approach in terms of the existing housing backlog. Consequently, 5 / 14 of the backlog of 1,006 dwellings will be addressed in the first 5 years.

13 We consider that the Sedgefield approach to be preferable, otherwise any significant boost to housing delivery will be delayed until later on in the Plan period.

**e) Has there been a record of persistent under delivery of housing, such that a buffer of 20% should be added (for consistency with paragraph 47 of the Framework)?**

14 Yes, the Council acknowledges in HOU1 that a 20% buffer is appropriate.

**f) Has any allowance been made for windfall sites in the five year supply? If so, in the light of paragraph 48 of the National Planning Policy Framework, what is the compelling evidence to justify this?**

15 Appendix 2 of the Housing and Green Belt background paper indicates that within the first 5 years, small sites windfall allowances of 20 dwellings in 2019, 30 dwellings in 2020 and 45 dwellings in 2021 have been incorporated within the 5YLS.

**g) What (other) assumptions have been used to inform the five year supply calculation (such as any discount based on historic lapse rates, annual yields etc.) and are they justified?**

- 16 It is not apparent from looking at Table 3 (5YLS) in HOU1 that any account has been taken of past lapse rates, or any resultant adjustments made to the 5YLS calculation.

**4.4 Paragraph 4.99 of the Plan says that “housing supply will be measured against targets to deliver an average of 500 homes per year [from 2011 to 2021] ... for the period beyond 2021, a target of 1,100 homes per year will apply”. Is it intended that the five year requirement should be calculated on this basis? What is the justification for this approach?**

- 17 See our response above in relation to question (a) - What is the five year requirement?

#### **Proposed Amendments**

- 18 In order for the Plan to be found sound both the Housing Trajectory and 5YLS calculation need to be shown to be realistic and deliverable.
- 19 Beechwood consider that the Council needs to reassess housing delivery rates and timescales with landowners and site promoters on allocated sites in order to ensure that this is the case.
- 20 Our client has stated that housing delivery in respect of proposed housing allocation HT2 can occur earlier than NHDC has specified. Accordingly, it is capable of contributing to NHDC’s 5YLS given that it can be fully built out within 5 years of planning permission being granted.
- 21 It is important that this, and other such provision is properly taken account of, particularly given that the annual 5YLS requirement for North Hertfordshire significantly increases from 2021 for the remainder of the plan period.

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