



Introduction

This additional Statement has been prepared by WYG on behalf of Taylor Wimpey North Thames in relation to additional questions raised by the Inspector under Matter 22 of the North Hertfordshire Local Plan 2011-2031 Examination, ahead of the rearranged Hearing sessions.

We have previously submitted a Statement in response to the initial Issues and Questions in respect of Matter 22, and this should be read alongside that.

22.1 a) Is reducing the overall housing requirement to 13,000 and undertaking an early review of the Local Plan, the most appropriate way forward?

The main issue with reducing the housing numbers for NHDC relates to the reliance on the ONS household projections, in an authority with an acknowledged and accepted record of persistent under delivery (as confirmed throughout ED191B, around the requirement for a suitable buffer).

Such under delivery of dwellings will have constrained new household formation over a substantial period of time. The question of applying a suitable buffer is addressed below, but links to the overall housing number and under delivery.

If under delivery was fully acknowledged and redress sought, it would be appropriate to account for under delivery on top of the housing number rather than within it. In applying this to the reduced 13,000 target, a higher overall number would be appropriate. Retaining a higher figure remains the most appropriate. The Council maintain within ED191B that their trajectory suggests an anticipated delivery of 14,656 over the plan period. A reduced requirement should not be supported, given the current and historic circumstances in NHDC.

In terms of an early review, we would support the inclusion of such a policy, but only as a last resort. Notwithstanding the enforced CV19 related delays, progress in preparing the Draft Plan currently being Examined has been slow. If the Inspector considers this an appropriate part of a solution to get a sound Plan adopted, the review must be part of a specific policy.

Such a policy should commit to the submission of a revised Plan for Examination within 3 years of the date of adoption of the current emerging draft Plan.



22.1 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?

Such an approach would not be supported, and clearly should not be considered.

Reducing the number of sites would be counter-productive to addressing what is an acknowledged shortfall against housing need. Reducing housing numbers should not be an automatic solution, and removing sites certainly should not. Where a site has been considered and deemed appropriate for allocation, it has a more important role to play than ever in contributing to housing delivery.

As articulated above, the Council need significant numbers to address both need and – crucially – the acknowledged under delivery of housing in the district. Housing allocations are a crucial means of delivering land. The Council maintain in submitted documents an anticipated total delivery of 14,650, representing a 13% uplift on their proposed new requirement.

Housing allocations deliver an extra layer of certainty versus a likely attrition rate for as yet unidentified windfall sites, and a number of planning applications are submitted (including on our client's site), awaiting determination once clarity around the Local Plan is known (ref Paragraph 9 of ED191B). The housing allocations are clearly required for NHDC to have any prospect of delivering the accepted significant shortfall in dwellings.

We would agree with the Council's position that there should be no review of proposed housing allocations.

c) Is a 'buffer' of around 13% an appropriate approach?

It is noted that the proposed buffer has fluctuated during the various stages of Plan preparation, as set out within the Council's document ED191B.

We would agree with the Council's suggestion at Paragraph 28 of that same document that the retention of a buffer of this level should the proposed amendments be adopted is appropriate for the reasons of flexibility, greater certainty, and better prospect of ensuring a 5YLS.

It supports the argument that proposed housing allocations should not be reviewed through the remainder of examination, a position that the Council indeed propose.



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?

The Inspector's narrow criteria against which to comment on this question is noted. Also noted and agreed is the extent to which exceptional circumstances have already been examined through the process to date. The proposed green belt releases have been through detailed assessment and specific circumstances considered throughout those stages.

We have already endorsed the retention of proposed housing allocations within the adopted Plan. This would include green belt releases, some of which – including our client's – are vacant, previously developed sites, clearly suitable for redevelopment.

The existence of a buffer in effect double to that proposed under the current – and most suitable – retained housing figure should not remove any previously considered exceptional circumstances.

There is still the intention to deliver sites, and where appropriate the Council should do so.

Five Year Housing Land Supply

We are aware that the Council are continuing to propose the Liverpool method of calculating need, their stated position being this is the only way to address shortfall.

This is not the most appropriate means to address housing shortfall, and we would support the representations that others have made in detail that the Sedgefield approach should be utilised, in an effort to make up the backlog within 5 years.

This also provides further justification for retaining the proposed housing allocations, as addressed against the 22.1 questions above. In allocating sites as proposed, a greater potential land supply is secured, thus maximising the prospect of addressing the shortfall in the early life of the plan.

Our previous submissions to this Plan have outlined that there are available sites, and that these are perhaps not being maximised in terms of their delivery output. To suggest there is no way of meeting the shortfall prior to considering in detail all options such as these, is premature and a negative approach to plan-making in circumstances where housing need is as it stands in North Herts.

To answer the Inspector's question, we acknowledge that a change such as that would clearly result in a delay in examination, and that may not be preferred at this stage.

