

For and on behalf of
New Road (Ashbrook) Ltd. and the Taylor Family (ID: 5189)

Matter 22
North Hertfordshire Local Plan 2011 – 2031 Examination

Housing Land Supply

Prepared by
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Strategic Planning & Research Unit

North Hertfordshire Local Plan Examination
Matter 22 Hearing Statement
On behalf of New Road (Ashbrook) Ltd. and the Taylor Family
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1.0 INTRODUCTION

- 1.1 This response to the Inspector's Schedule of Further Matters, Issues and Questions (January 2020) in respect of the North Hertfordshire Local Plan 2011 – 2031 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd.
- 1.2 This Statement addresses the calculation of five year supply and the housing requirement to be met within the plan period in the context of the NPPF2012 and relevant soundness tests.
- 1.3 SPRU has been instructed to appear at the Additional Hearings for the North Hertfordshire Local Plan Examination on behalf of New Road (Ashbrook) Ltd and the Taylor Family. Our client is an important stakeholder in achieving and delivering the Local Plan's objectives for sustainable development.
- 1.4 Our clients' specific interests are briefly summarised below and demonstrate opportunities to deliver sustainable development at land South West of Hitchin ('Hitchin Priory'):
 - New Road (Ashbrook) Ltd. and the Taylor Family (ID: 5189)
- 1.5 The Council's evidence base on relevant strategic priorities including housing need and release of land from the Green Belt provides support for the opportunities identified in order to provide for sustainable development at the main settlement of Hitchin.
- 1.6 These interests are in-turn informed by substantial local knowledge and experience of the context for development in North Hertfordshire and seeking to ensure this is reflected in a sound and legally compliant spatial strategy for the area.
- 1.7 SPRU have made submissions to previous rounds of consultation as part of the Local Plan process as well as participating in the 2017 Hearing Sessions. This statement should be read in conjunction with all previous contributions.

2.0 MATTER 22 - HOUSING LAND SUPPLY

Q1) Issue 1 – The overall supply of land for housing

a) **Is reducing the overall housing requirement, and undertaking an early review of the Local Plan, the most appropriate way forward? If not, why not?**

- 2.1 The circumstances that North Hertfordshire District Council presently find themselves in, where the submitted plan remains clearly unsound despite the proposed Main Modifications, is entirely of their own making. This is because the Council:
- Has ignored substantial outstanding objections to the calculation of objectively assessed housing needs and assessment of housing land supply throughout the plan-making process;
 - Has ignored opportunities to select sites from a wider potential range of clearly suitable reasonable alternatives;
 - Has only now acknowledged via the preparation of Examination Document ED178 that constraints to the length of the plan period and the examination of the plan under transitional arrangements leave it unable achieve the required boost to supply or address requirements in full during the plan period
- 2.2 Paragraph 47 of the NPPF2012 sets an overarching objective for local planning authorities to boost significantly the supply of housing. This imperative has been set out in national policy for almost a decade, with the main terms unchanged in the Revised NPPF2019.
- 2.3 The mathematical approaches now proposed by NHDC in ED178 reflect the overall failure of this plan-making process to address housing need while simultaneously meaning the authority is seeking to protect itself from challenge for at least five years.
- 2.4 The government put into place policies with the intention that they ensure supply towards housing needs is increased. Paragraph 47 of the NPPF2012 provides measures for plan-making and decision-taking that seek to ensure a deliverable and developable supply of sites sufficient to meet housing needs. These require, *inter alia*:
- Meeting housing needs in full, as far as consistent with national policy, including support for sites critical to delivery of the housing strategy;
 - Providing for a five year supply of specific, deliverable sites at all points in the plan period;
 - Identifying and supporting developable supply over years 6-15 of the plan period; and
 - Providing a housing trajectory that clearly indicates the expected rate of delivery towards market and affordable housing needs
- 2.5 At present the submitted plan as proposed to be amended fails to meet every one of these objectives.
- 2.6 The justifications for the approach now being promoted by NHDC are set out in the 5 bullet points in paragraph 4 of ED178. None of these relate to the aims in paragraph 47 in terms of meeting the government's housing objectives as identified above.
- 2.7 The approach being advanced by the council is that any plan is better than no plan and by implication they will address the outstanding issues later (in five years' time when they are required to review the plan). Firstly, there is no guarantee either that there will be a meaningful review of this flawed plan. Secondly, there is no guarantee that NHDC will be able to produce a plan that delivers the much higher housing requirement as

required by the NPPF2019 as it was incapable of delivering a plan to meet the lower requirement calculated under the NPPF2012.

- 2.8 The Council is specifically seeking to ensure that the tools and triggers provided by national policy to ensure a significant increase in housing delivery are actually used to frustrate supply and delay meeting housing needs.
- 2.9 Each element of the Council's proposed approach must be separately assessed in soundness terms before deciding they are appropriate. We have provided a summary of relevant examples and considerations in **Appendix 1**. We find that neither approach has been adequately justified by the Council's evidence base.
- 2.10 Our Appendix 1 also addresses why it is inappropriate for the Council to suggest these mechanisms will provide *stability* to the calculation of housing land supply. This is because whatever the justification the Council give at this examination that maybe acceptable to the Inspector this only has relevance to the five year land supply assessment at this Examination in the context of the NPPF2012. The deliverability of sites will be assessed against the requirements of the NPPF2019 upon adoption.
- 2.11 We conclude that the broad nature of issues identified, and proposed approach, correspond with assessment of housing land supply in the Uttlesford Local Plan, where the Inspectors considered that a similar proposed trajectory was 'too steeply stepped'.
- 2.12 This is reflected by the fact that the 'second step' in the proposed North Hertfordshire trajectory relates to an increase of **+150%** (500dpa vs 1250dpa). There is no evidence to demonstrate that the Local Plan supports this increase in annual supply based on the sites identified.
- 2.13 The Inspectors concluded **that the solution for a more appropriate trajectory to boost supply** would require a wider range of allocations providing deliverable and developable supply over the plan period.
- 2.14 Details of our client's site, appended to our Matter 23 Statement, correspond with this objective. Options for phasing and delivery of the indicative Masterplan reflect that Phase 1 (c.277 units) will be provided alongside the realignment at the Gosmore End roundabout. This demonstrates an early contribution towards infrastructure priorities and housing supply in the plan period.
- 2.15 In-combination, the proposed mechanisms appear to be a unique interpretation of national policy in terms of their approach to managing the planned requirements. The circumstances in North Hertfordshire are not so unique that they support this exceptional approach, which cannot be considered justified, effective, positively prepared or consistent with national policy and this underlies soundness failings with the plan as a whole.
- 2.16 The proposed approach and the Council's supporting evidence to support forecast supply has two key flaws:
- i) Opportunities to support deliverable and developable supply that would support the Council's ability to meet its planned requirements have been unnecessarily dismissed; and
 - ii) In any event the Council has not demonstrated how it has addressed issues with delivery and deliverability in terms of forecast supply.
- 2.17 Paragraph 4 of the Council's ED178 sets out reasons why it considers *pragmatic* solutions are needed to address the calculation of land supply against a reduction in the proposed housing requirement. However, no confidence can be attributed to the

Council's proposed approach in terms of whether it would achieve the points outlined in bullets 1-5 to this part of ED178.

- 2.18 The Council states that it is seeking to avoid delays to measures in the Local Plan that will increase future delivery.
- 2.19 However, in terms of the deliverability of identified supply it is clear the mechanisms represent a further delay to providing a step-change towards meeting needs in the short-term. Key issues relating to the delivery of strategic sites and achieving the highest rates of growth are in-effect deferred to a future review of the Local Plan, which may further impact on the phasing of such schemes and their longer-term contribution towards needs.
- 2.20 We are mindful that the Inspector has sought significant additional information in order to assess the Council's position on forecast supply and concur that this is essential. It is not yet possible to confirm that a reduced requirement and the stepped trajectory is capable of supporting the Council's proposed calculations of supply.
- 2.21 Without prejudice to any evidence the Council is able to adduce, SPRU's previous submissions to the Local Plan Examination demonstrate that the Council has previously failed to take into account the lead-in and built out rates for large strategic sites (see our original Matter 4 and Matter 6 Hearing Statements). The Council does not have a strong track record in the delivery of large strategic sites but its previous assumptions for annual delivery rates have significantly exceeded the findings of local and national evidence.
- 2.22 **Appendix 2** to this Statement provides updated assumptions for lead-in and delivery rates for proposed Local Plan allocations for 200 or more units, based on the commentary in our previous submissions. We have also reflected details in ED178 and the Council's latest AMR and have applied some flexibility to the NPPF2019 definition of deliverable. For example, for sites proposing 300 or fewer units with a named promoter or developer we have considered potentially delivery within the five-year period.

Identifying the Contribution towards unmet needs from Luton

- 2.23 Policy IMR1 of November 2018 version of the Local Plan (showing proposed Main Modifications) sets out a housing requirement of 15,950 net dwellings over the plan period. The IMR1 figures therefore include the contribution towards unmet needs for Luton. The housing requirement identified in Policy IMR1 would seek to ensure the contribution towards Luton's unmet needs (identified in Policy SP2 and SP8) would be met in full in the period to 2031. This aligns with the plan period of the adopted Luton Local Plan. This is consistent with NPPF2012 paragraph 182.
- 2.24 Any contribution towards Luton's unmet needs within adopted development plans has already been substantially delayed given that these are calculated for the period of the Luton Local Plan 2011-2031.
- 2.25 The proposed amendment to reduce the Local Plan housing requirement is unsound (not justified and not effective) as it fails to provide detail of what, if any, is the proposed reduction in the contribution to Luton's unmet needs over the plan period.
- 2.26 Paragraph 73 of the 2019 Framework is clear that the five year land supply requirement should be calculated against the housing requirement set out in adopted strategic policies for plans less than 5 years old. To ensure Plan is effective in decision making (2012 Framework, paragraph 182) and provides the necessary clarity to calculate a 5 year housing land supply (2019 Framework), the contribution towards Luton's unmet needs (on the basis of annualised and stepped approaches to the housing requirement over the plan period) should be clearly set out.

- b) Is the selection of additional land for housing from previously identified sources the most appropriate way forward? If so, why?**
- 2.27 The councils excuse for not wishing to consider additional sites, in that it might take additional time, is extremely weak (ED0178 paragraph 34).
- 2.28 If the SHLAA and SA process of considering reasonable alternatives has been undertaken with any degree of thoroughness, then there will be a considerable number of additional “developable” and indeed “deliverable” sites in the evidence base that could be added with little additional work.
- 2.29 This shortfall is not a new phenomenon but was clearly identified as an issue by objectors at the start of the examination and more recently by the Inspector. NHDC has had ample opportunity to undertake the necessary work and consultation on additional sites they have simply chosen not to take this path.
- 2.30 The Council is aware of a substantial number of reasonable alternatives, including our client’s site at South West Hitchin, that are capable of addressing the shortfall in identified supply to maintain a rolling supply of deliverable and developable sites against an appropriate trajectory.
- 2.31 The suggestion that this process of site selection is better left to the plan review could be read as an acceptance that the SHLAA and SA processes have not been sufficiently robust in site selection and testing of reasonable alternatives.
- 2.32 The Council’s suggestion is that the site selection process for the early review can be undertaken unencumbered by the constraints of this Examination. However, this means that it could lead to a second review of Green Belt boundaries within the next five years. NHDC is entirely silent on the prospect of whether the early review will include a review of the Green Belt boundary.
- 2.33 If this promised review does not include Green Belt review, then the statement that the selection of additional sites to meet housing need should be delayed to a subsequent review is disingenuous.
- 2.34 In the circumstances that Green Belts should endure to beyond the end of the plan period then the site selection process is actually “best” undertaken in the context of this Plan, if this plan is to fix the Green Belt boundaries for the long term.
- 2.35 It is entirely within the Council’s gift to grant planning permission on draft allocations in the Green Belt; there is no reason for these to be “stalled” if there are considered to be circumstances to justify their release now.

c) Is the identification and selection of additional land for housing the most appropriate way forward? If so, why?

- 2.36 Site selection now will assist in selecting those types of sites that can deliver quickly and meet the actual housing need rather than the mathematically constructed housing requirement now being proposed.
- 2.37 Site selection now, if undertaken to meet the higher housing requirement suggested in our representations, will result in a single plan altering the Green Belt in the area once rather than what may become a continued nibbling of the Green Belt as one short term plan is replaced by another.
- 2.38 For the reasons outlined above resolution of relevant soundness issues can be addressed via previously identified sources.

d) Are there any other possible options that would be more appropriate? If so, what are they and why would they be more appropriate than the path suggested by the Council?

- 2.39 No, the most appropriate option and the one that is in full accordance with the NPPF 2012 is for the NHDC to use this opportunity to identify the range of sites that will actually deliver the housing requirement rather than proceed in such a way that takes no account the future uplift required to meet the standard method figure.
- 2.40 Given that the process of identifying a wider range of sites will still require the identification of strategic sites it is entirely plausible that these larger sites will not deliver entirely within the plan period and as such as part of Modifications to be proposed it is considered appropriate that the Council should also extend the plan period to cover the full 15-year period upon adoption.
- 2.41 This would offer a longer horizon to profile the delivery of strategic sites and address the accumulated shortfall in supply. An alternative end date of 2033 or 2035 is not likely to impose fundamental barriers to an early review or alignment with neighbouring plans. The details of our client's land at South West Hitchin demonstrate that the site represents a suitable alternative in these circumstances (see our Matter 23 Statement). This reflects an opportunity to contribute to supply throughout an extended plan period beyond 2031, while also supporting a phased approach delivering an early contribution towards housing and infrastructure delivery.
- 2.42 This is considered preferable to the alternative of basing the housing requirement on the calculation of local housing need using the government's standard method. This would allow past underperformance to be reflected in the figure for the housing requirement (i.e. 891dpa) but would not be consistent with the Examination of the Plan under the NPPF2012 and transitional arrangements.

Q2) Issue 2 – The five year housing land supply

a) Are the Council's calculations correct/accurate?

- 2.43 In our assessment the Council's calculations are correct from a mathematical perspective and we have prepared 'rolling trajectories' to replicate all six scenarios provided in ED178. However, the calculations fail to satisfy the soundness tests for the ability of the Plan to maintain a five year supply given the absence of evidence to support the deliverability of forecast supply. The Council's rolling calculation of supply is helpful but not informed by information for individual sites. It is directly at odds with the Council's calculation of **1.3 years' supply** for development management purposes.
- 2.44 The Council's proposed approach would rely on the position at 1 April 2020 upon adoption, assessed against the NPPF2019 test of deliverable. This incorporates a requirement of 1,250 dwellings in 2024/25, against claimed forecast delivery of 1,468 units. This Council provides a 'best case' calculation of 5.32 years' supply but this cannot be treated as accurate given the lack of clear evidence to inform the assessment for deliverable supply.
- 2.45 As demonstrated in our **Appendix 3**, if the level of delivery achieved is only 80% of the Council's forecast total in 2023/24 and 2024/24 the land supply calculation under the Council's proposed approach falls to **4.72 years' supply**. For context, the 80% reduced forecast in 2024/25 (1,174 units) nonetheless represents a c.430% increase on recorded delivery in 2018/19.

b) All of the approaches used by the Council assume that the buffer required by paragraph 47 of the NPPF should be 20% - that is to say, that that there has been a record of persistent underdelivery of housing in the District. Has there been, such that the 20% buffer is the most appropriate?

- 2.46 It is clear that the Council has a poor track record in forecasting delivery and a immediate uplift in supply is required to meet full housing needs.
- 2.47 The Council's explanation of 'step 2' at paragraph 39 of ED178 setting out its proposed approach also explains that North Hertfordshire would **"be a 20% authority, at least to start with"**. The Council here is implicitly linking its proposed stepped requirement of 500dpa for the period 2019 – 2024 with the 20% buffer as a material consideration influencing its decisions on the scale of the stepped requirement. This is not in accordance with Planning Practice Guidance relevant to stepped trajectories (ID: 68-039-20190722).
- 2.48 More significantly, in document ED178 the Council is understating the implications of its proposed approach to the calculation of the Housing Delivery Test (HDT).
- 2.49 Since document ED178 was prepared the 2019 Housing Delivery Test result has been published, with North Hertfordshire delivering only 44% of the number of homes required. In accordance with paragraph 215(a) of the NPPF2019 this means that footnote 7 to paragraph 11(d) is engaged for the purposes of decision-taking and application of the presumption in favour of sustainable development. The implications of the Council's proposed approach should be read in that context.
- 2.50 Paragraph 48 of the Council's own Housing Action Plan contains a forecast updated calculation of the 2018 Housing Delivery Test based on the stepped trajectory as proposed through Policy IMR1 in the 2018 Local Plan with Main Modifications.

Table 1. Forecast HDT under Proposed Policy IMR1

	2015-16	2016-17	2017-18	Total
Homes required under proposed stepped approach	500	500	500	1,500
New homes delivered	341	539	281	1,161
Illustrative HDT result under stepped approach proposed in Local Plan:				77%

2.51 It is not disputed that this approach is consistent with the Housing Delivery Test Rule Book (paragraphs 12 and 18) where new strategic policies adopted. However, the Council's proposed further amendments to the stepped trajectory have a drastic effect on how its past performance is measured and the resulting consequences for the Housing Delivery Test. We have forecast the equivalent results for the HDT in 2018 and 2019 based on the trajectory in Appendix A of the Council's ED178:

Table 2. Forecast 2019 HDT Result Based on ED178

	2015/16	2016/17	2017/18	2018/19
Number of Homes Required	350	350	350	350
Number of Homes Delivered	341	539	282	220
Illustrative Stepped HDT Result			111% HDT 2018	99% HDT 2019

2.52 This demonstrates the significant impact of the proposed stepped trajectory as it effectively rewrites history, in that for NHDC which according to the HDT published on the 13th February 2020 by the government was 44%. In the circumstances for North Hertfordshire it is inappropriate that the buffer would reduce to 5% under its approach in ED178.

2.53 In simple terms this mathematical construction is simply a device to frustrate the planned requirements for housing over the plan period and obscure the Council's failure to significantly boost supply.

2.54 The plan's contribution towards Luton's unmet needs is also relevant towards calculation of the planned requirement and the Housing Delivery Test. For this reason, the plan needs to be clear whether it is able to provide the full contribution towards Luton's unmet needs of 1,950 dwellings over the plan period and explain the implications of this for calculation of the HDT (which **must** include any agreed **annualised contribution towards unmet need**).

c) Is the 'three-stepped approach' proposed by the Council the most appropriate method for setting the five year housing land requirement? If not, why not?

2.55 We have addressed the proposed approach in the context of the proposed reduction in the housing requirement under Q1 above. The proposed approach does not satisfy the requirements of NPPF2012 paragraph 47.

2.56 The proposal by NHDC is to invert the purpose of the five year supply calculation from a tool to secure 5 years' worth of deliverable sites to meet genuine housing need to a protection measure for a plan that seeks to seriously undersupply housing below the

genuine housing need.

2.57 The 'three-stepped' approach is not necessarily inappropriate in principle but is unsound when coupled with the Liverpool method and in not demonstrating that needs can be met in full over the plan period. The first two steps of the trajectory should also correspond as closely as possible to the full assessment of housing need prior to adoption, rather than simply acting as a device to eradicate any underperformance in the period 2011 to 2019.

d) Is one of the other approaches to setting the five year housing land requirement explored in the Council's note, or another approach entirely, more appropriate? If so, why, and:

2.58 While it is apparent that it will be extremely challenging for the Council to demonstrate and maintain a rolling five year supply of deliverable sites over the plan period against full objectively assessed housing needs this is principally an issue given its present selection of sites. It would, we suggest, be much easier and quicker to secure a five year supply by the identification of more and varied sites to contribute towards housing needs in the first five years following adoption. However, as submitted the Plan is clearly unsound.

2.59 The Plan is not capable of being made sound using the combined mathematical slight of hand of the 'three stepped' and 'Liverpool' approach. NHDC must demonstrate how the housing requirement can be met in full over the plan period; or it satisfies paragraphs 14 (bullet 2), 47 (bullet 1) and 182 of the NPPF2012 to demonstrate that housing needs cannot be met in full having considered all reasonable alternatives. This test cannot be passed as the SA recognises that there are reasonable alternatives in terms of other sites.

2.60 Any approach must also clearly indicate the ability to contribute towards unmet needs from Luton.

2.61 The most appropriate solution is therefore dependent upon the approach taken to the underlying projections.

2.62 There is clearly an argument that the plan period, or at least the housing requirement should start at the date of the projection and that any unmet need at that time can be taken into account either by the projections themselves or by the application of an uplift to reflect market signals.

2.63 If as suggested in SPRU's submissions the projections are 2014-based, then it might be reasonable to have a stepped approach from 2014 to 2020 (6 years) being based upon the projections themselves i.e. 730 DPA (**Matter 21 Appendix 1 - 708 x 1.03**) (4375 units total 2014 – 2020 (rounded)).

2.64 This would mean the requirement in the resulting period to 2035 (15 years) being made up of the residual of the full OAN requirement (Full OAN per annum = $708 \times 1.03 \times 1.25$ (911dpa)). This residual requirement is calculated as $911 + 73 = 984$ dpa ($5469 - 4375 = 1094$; $1094 / 15 = 73$; $911 + 73 = 984$) **plus** Luton's unmet need.

2.65 **Appendix 4** at the end of this Statement illustrates a trajectory for our proposed approach to meet full housing needs along with a rolling calculation of housing land supply based on NHDC's forecast supply in ED178 (notwithstanding our concerns with the evidence for delivery of specific sites). This allows the 'gap' of additional supply required to demonstrate a five year supply to be assessed.

2.66 A shorter plan period could be considered under this approach. In soundness terms this would mean a lower overall total for objectively assessed housing needs to be

addressed, but a shorter period over which to achieve a step-change in delivery and address the residual OAN including uplift for market signals.

2.67 This approach would only be successful if it is combined with the allocation of a range of additional deliverable sites. This approach would maintain NHDC as a 20% buffer authority and would still engage the presumption under the HDT if it continues to under-perform.

2.68 It is recognised that this approach effective spreads the 25% uplift to address market indicators for the period of 2014 to 2020 across the whole of the remaining period (2021 to 2035) but given the scale of the uplift at 25% this is considered acceptable. It would not be an acceptable approach for a reduced uplift such as 10%.

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

2.69 In addition to the allocation of additional sites, including our client's land at South West Hitchin, Modifications should also provide clearer indicators and triggers within the Monitoring Framework to identify where the housing trajectory is not performing as anticipated. Monitoring should provide a robust approach and rationale for the Council to provide clear evidence for the deliverability of sites, to be assessed against the NPPF2019 definition upon adoption.

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

2.70 The results of the Housing Delivery Test 2019 make clear the implications of the acute and sustained failure to address housing needs in North Hertfordshire with only 44% being delivered in the last 3 years.

2.71 A delay in adoption of the Local Plan to address the current soundness issues and incorporate the allocation of additional sites (of which the Council is already aware) is a proportionate and appropriate response in ensuring that the plan-led system satisfies the requirement to significantly boosting the supply of housing.

2.72 Other examples include;

- a. Examination of the Vale of Aylesbury Local Plan indicate this process can be achieved in around 18 months,
- b. Welwyn and Hatfield have undertaken further call for sites, Green Belt Study review, Green Gap Study
- c. Epping Local Plan inspector has highlighted need to review a number of housing sites

2.73 The approach as proposed by the Council based on the contents of the submitted Local Plan is directly at-odds with the recognition of the imperative to increase supply based on the Housing Delivery Test consequences.

iii. if taking this approach would lead to a significant further delay to the Local Plan examination – which, for example, may be the result if new housing sites would be needed – would that have a consequential impact on the amount of new land that would need to be allocated for housing?

2.74 If the Plan was delayed by a further 18 months the consequential impact would be dependent upon the approach taken by the Council. If they remain unreasonable and retain the 2031 end date of the Plan, then in theory the delay would not cause any additional land to be allocated beyond that required to deliver the housing requirement;

It might simply require these allocations to come forward more quickly.

- 2.75 An 18 month delay is unlikely to have significant implications for the prospects for delivery on large strategic sites, while it will also remain in the Council's control to grant planning permission on sites already proposed for allocation. However, the proactive implication of this delay is that if the range and mix of allocated sites is increased (including further identified supply on small and medium sites) this is likely to materially improve the prospects for delivery within the first five years following adoption.
- 2.76 If as we suggest that the time period for the plan is extended to 2035 to be compatible with the guidance then this would also require more land to be allocated for housing but this form of long-term planning and providing certainty of supply and of future impact is actually a good thing; another description would be "strategic planning" for the future.

APPENDIX 1 – COMPARISON OF CIRCUMSTANCES FOR ‘STEPPED’ TRAJECTORIES AND THE ‘LIVERPOOL’ METHOD TO ADDRESS ACCUMULATED SHORTFALL

i) Circumstances Supporting use of a ‘Stepped trajectory’:

- A1.1 The NPPF2012 and associated planning practice guidance does not define the terminology for a ‘stepped’ housing trajectory or the circumstances where this may be appropriate. It is, however, accepted that NPPF2012 Paragraph 47’s requirement to illustrate delivery against a trajectory does not necessarily envisage a straight line profile of supply, particularly where this is dependent on the type of sites included in the forecast supply.
- A1.2 It is relevant to consider the definition in the most recent NPPG for the purposes of identifying appropriate circumstances for a ‘stepped’ trajectory. Paragraph ID: ID: 68-019-20190722 notes that stepped trajectories are relevant when considering the ability to identify specific developable sites later in the plan period, where assumptions support a reasonable prospect either within years 6-10 or 11-15. Conclusions on the developability of sites should support the justification for a stepped trajectory. This is broadly consistent with the requirements of paragraph 47 of the NPPF2012.
- A1.3 NPPG elaborates to explain that where considering the prioritisation of sites local planning authorities should also seek to provide flexibility and identify those sites that could come forward sooner. Stepped requirements are only likely to be appropriate **where planned requirements can be met fully within the plan period**. Stepped requirements may be considered to unjustifiably delay meeting housing needs where they are not supported by evidence of a clear step change in housing requirements compared to previous policies. Authorities must also demonstrate the requirements of longer-term phasing plans for strategic sites(ID: 68-021-20190722).
- A1.4 Stepped requirements should reflect step changes in the level of housing expected to be delivered rather than following constraints to the Council’s own decisions on strategy and the type and scale of sites identified in the early part of the plan period. It is clear from the Council’s proposed approach that the Council’s choice of stepped requirements is backward-looking and have little relevance to actual levels of housing need. The stepped requirements from April 2024 onwards are furthermore unrealistic and not based on a realistic or justified forecast increase in supply from large strategic sites.
- A1.5 The stepped approach is only necessary because NHDC did not choose to select an appropriately wide range of sites in terms of size and location which would have greatly assisted early delivery.

ii) Circumstances Supporting the Liverpool Approach:

- A1.6 Planning Practice Guidance relevant for the Examination of the NHDC Local Plan under transitional arrangements (ID: 3-035-20140306) states that *“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’”*.
- A1.7 This guidance is unequivocal – if the council is to adopt an approach to spread backlog over the plan period, as well as a stepped approach, it needs to have approached its neighbouring authorities to ascertain if these authorities could allocate land which could meet this need. This raises a serious procedural and legal issue which is:
- A1.8 There is no email chain that such a consultation has taken place
- A1.9 The Duty to Cooperate has to be undertaken prior to submission – on this specific matter it would not have been possible to undertake this duty.

- A1.10 The adoption of the Liverpool approach now, without undertaking the Duty to Cooperate at the appropriate time, clearly presents a procedural and legal dilemma which is simply not addressed by the Council.
- A1.11 A longer-term view may need to be taken on the factors contributing to past under-delivery. This is necessary in order to determine whether past under-performance triggers a requirement to bring forward an additional supply of housing.
- A1.12 It is acknowledged that as the North Hertfordshire Local Plan incorporates a commitment to address unmet needs from Luton it may not be appropriate to seek to 're-export' unmet needs to neighbouring authorities simply so that the Sedgefield approach can be adopted. However, the proposed use of the Liverpool approach must also be assessed in terms of its impact on meeting needs in full over the plan period (including addressing the contribution of 1,950 homes towards Luton's unmet needs). The Council's proposed approach in ED178 does not explore these potential impacts of the Liverpool method in terms of how contributions towards Luton's needs will be met to 2031.
- A1.13 The overwhelming evidence for persistent under-delivery in North Hertfordshire relates to the absence of an up-to-date plan or adopted spatial strategy identifying land to meet identified needs in full (whether as identified in the RSS or OAHN) for a substantial period of time. The background to failures in plan-making is relevant to the Council's acknowledged shortfall against relevant targets but is also rolled-forward within the proposed approach in ED178 to adopt the Liverpool method and a 'stepped trajectory'.
- A1.14 Examples where the Liverpool method is adopted are typically supported by a housing trajectory (in accordance with paragraph 47 of the NPPF2012) demonstrating how needs can be addressed over the plan period. In contrast, the use of the Liverpool method in North Hertfordshire effectively accentuates the 'gap' between the planned for provision for deliverable and developable supply in the plan period and the plan's ability to meet full housing needs. In the circumstances for the District this effectively means that the Council anticipates a substantial proportion of any shortfall against proposed requirements upon adoption will effectively be deferred to the end of the plan period. This will need to be considered in the context of an early review and against the Council's own proposed requirement of 1,250 dwellings per annum from April 2024, which is itself unrealistic and unachievable.
- A1.15 Application of the Liverpool method to the five-year requirement upon adoption simply demonstrates that the Plan has not maximised opportunities for additional housing supply. It does not address the requirements in national policy to provide an aspirational but realistic approach or respond flexibly to rapid change and is therefore unsound.
- A1.16 Because the Council has accepted that it is unable to even come close to meeting needs in full over the plan period to 2031 it is therefore unsound to adopt the Liverpool approach prior to undertaking an early review, which the Council has already conceded is appropriate. The Council's proposed approach in ED178 is therefore unsound. This conclusion is applicable irrespective of any standalone conclusions on the overall requirement or any different approach to the 'stepped' trajectory.

iii) Comparison of Areas Using Both Mechanisms:

- A1.17 Comparisons with areas that have proposed similar mathematical approaches to North Hertfordshire are limited and inevitably fact-sensitive depending on the circumstances of each area and the profile of supply identified.
- A1.18 We are aware of the Poole Local Plan, which has a 'two-step' trajectory and follows the

Liverpool method. However, in this case the stepped requirements (500dpa, 710dpa and 815dpa) reflect increases of +42% and +15% respectively. The plan period runs to 2033 (with the Local Plan adopted in 2019). The stepped requirement for the period 2018 to 2023 (710dpa) is equivalent to the area's objectively assessed housing need, unlike the proposed stepped requirement on adoption in North Hertfordshire. The stepped requirement for the first part of the plan period (2013 to 2018) relates to an adopted Core Strategy target, and nonetheless means that a significant shortfall is acknowledged on adoption of the Plan. The use of the Liverpool approach was endorsed in those circumstances. A longer-term step was specifically supported by Natural England due to the need to prepare a SANGS mitigation strategy in the context of a Local Plan review by 2023. Nonetheless the plan in principle covered a 15 year-period (2018/19 to 2032/33) upon adoption.

- A1.19 The West Oxfordshire Local Plan also follows a broadly two-step trajectory and provides for the Liverpool method to address shortfall. However, in this case the five year requirement within the five-year period upon adoption clearly identifies a contribution towards the unmet needs in Oxford City as well as providing for in excess of West Oxfordshire's own OAHN from 2023/24. As a result, the increase in the stepped requirement between 2023/24 and 2024/25 (975dpa vs 1125dpa) is only +15.4%. The Plan also acknowledges a substantial shortfall upon adoption based on an initial requirement of 550dpa. The 'Liverpool' method was endorsed in West Oxfordshire largely on the fact that this was based on a clearly identified contribution towards Oxford City's unmet needs over the plan period. The 'stepped approach' reflected realistic delivery timeframes for schemes including the Cotswolds Garden Village.
- A1.20 Neither of these examples support the approach now proposed in North Hertfordshire. Other examples, such as the Rugby Local Plan, include a stepped approach but this is applied alongside the Sedgefield method to address past undersupply. Furthermore, the justification for the stepped requirement in the first part of the Rugby Local Plan trajectory is again based on a previous adopted Core Strategy requirement.
- A1.21 One clear example of an area that compares more closely with North Hertfordshire is the adjoining Uttlesford District Council. Both Poole and West Oxfordshire were cited as potential reasons to support the proposed approach in Uttlesford.
- A1.22 The Inspectors appointed to undertake Examination of the Uttlesford Local Plan have recently written outlining fundamental soundness concerns and recommending that the Plan is withdrawn. Uttlesford District Council has also sought to rely on a 'stepped trajectory' incorporating the Liverpool approach to addressing past undersupply. Notwithstanding that the 'stepped requirement' for the District in the first part of the plan period (2011/12 to 2021/22) corresponds with the objectively assessed housing need (unlike in North Hertfordshire) this approach was robustly criticised for providing a trajectory that was too steeply stepped later in the plan period. The relates to an increase from 568dpa to 714dpa for the remainder of the plan period to 2032/33 (+25%).
- A1.23 The issues identified were compounded by the lack of evidence to support large strategic sites undermining the potential to provide for five years' deliverable supply even under the proposed trajectory. The Inspectors concluded **that the solution for a more appropriate trajectory to boost supply** would require a wider range of allocations providing deliverable and developable supply over the plan period.
- A1.24 We conclude that the broad nature of issues identified with the combined impact of the 'stepped' and Liverpool mechanisms in Uttlesford corresponds with North Hertfordshire. This is reflected by the fact that the 'second step' in the proposed North Hertfordshire trajectory relates to an increase of **+150%** (500dpa vs 1250dpa). There is no evidence

to demonstrate that the Local Plan supports this increase in annual supply based on the sites identified.

iv) *The Council's Proposed Justification for 'Stability' in the Land Supply Calculation*

- A1.25 The Council seeks to provide *stability* and avoid scenarios where its housing land supply position is challengeable soon after adoption. The Council has identified the successful challenge to the position of Milton Keynes Council within six months of the adoption of Plan:MK. The proposed approach of North Hertfordshire Council is equally likely to result in the same outcome. This is because whatever the justification the Council give at this examination that maybe acceptable to the Inspector this only has relevance to the five year land supply assessment at this Examination in the context of the NPPF2012. As with the MK appeal any Inspector at any future appeal will need to judge the approach to the five year land supply against the extant policy context and if that is the NPPF2019 then the justification for the "Liverpool" approach is different to that under the NPPF2012.
- A1.26 While the submission Local Plan is being examined under transitional arrangements the supply of deliverable sites post-adoption will be tested against the 2019 Framework. This is particularly important as the land supply position will not be 'fixed' as part of the Local Plan Examination. The Council has altogether failed to demonstrate how its steeply stepped trajectory will maintain a rolling five year supply of deliverable sites.
- A1.27 It should be noted that Milton Keynes Council sought leave and was refused permission to challenge the Appeal Decision referred to in ED178 Paragraph 4. The findings are therefore lawful and significant in terms of exposing the absence of Milton Keynes Council's five year supply of deliverable sites, noting the application of the NPPF2019 test of 'deliverable' and the absence of clear evidence provided by the Council. In that case, the Inspector was also entitled to adopt the Sedgfield method to assess past undersupply.

APPENDIX 2 – SPRU ASSUMPTIONS FOR DELIVERY OF PROPOSED SITE ALLOCATIONS (UPDATE TO MATTER 4 AND MATTER 6 HEARING STATEMENTS)

		Status	LPA Commitment	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	Deliverable in 5 yrs (Council 2020-2025)	2019-35	Post Plan Period
BA1	Land North of Baldock	EIA Scoping request submitted (17/01344/1SCP) in May 2017 by Hertfordshire County Council, the landowner and promoter. No planning application submitted or approved. No update in ED178 or 2018/19 AMR	2800									171	171	171	171	171	171	171	171	0	1368	1432
BA2	Land West of Clothall Rd Baldock	Landowner/Promoter is Hertfordshire County Council. No planning applications submitted or approved.	200							60	60	60	20							0	200	0
BA3	Land South of Clothall Common	No application submitted. Not listed in Council's ED178. Location within Green Belt	245							60	60	60	60	5						0	245	0
EL1-3	East of Luton	Application submitted April 2017 for EL1 and EL2 (17/00830/1) and August 2016 for EL3 (16/02014/1). Both undetermined	2100								171	171	171	171	171	171	171	171	171	0	1539	561

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		Status	LPA Commitment	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	Deliverable in 5 yrs (Council 2020-2025)	2019-35	Post Plan Period
NS1	Land north of Stevenage	Promoted by Croudace Homes. EIA Scoping application 18/01610/SCOP submitted June 2018. No further activity	900								86	86	86	86	86	86	86	86	86	0	774	126
GA1	Land at Roundwood	Application submitted July 2016 reference 16/01713/1 by Croudace Homes for part full, part outline for up to 360 dwellings. Undetermined. No update in Council's ED178. Proposed allocation for 330 units	330						60	60	60	60	60	30						0	330	0
GA2	Land North-East of Great Ashby (SP18)	Proposed allocation. SoCG signed between Picture SRL and NHDC February 2018. No further update in Council's ED178. Delivery pushed back from NHDC's Matter 6 Update	600								86	86	86	86	86	86	84			0	600	0
HT1	Higover Farm Hitchin	Scoping request submitting in May 2017 under reference 17/00680/1SCP by Bellcross Homes. SoCG signed 2018. No update in Council's ED178 or 2018/19 AMR	700							86	86	86	86	86	86	86	86	12		0	700	0

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		Status	LPA Commitment	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	Deliverable in 5 yrs (Council 2020-2025)	2019-35	Post Plan Period	
KB1	Deards End Knebworth	Promoted by Knebworth House Education Preservation Trust and Knebworth Estates as landowner. No update in Council's ED178 or AMR 2018/19	200							60	60	60	20							0	200	0	
KB2	Gypsy Lane Knebworth	Promoted by Knebworth House Education Preservation Trust and Knebworth Estates as landowner. No applications. NHDC Matter 6 Update assumes site sequentially follows KB1	184										60	60	60	4					0	184	0
KB4	East of Knebworth	SoCG completed between NHDC and Gladman Developments Feb 2018. No planning applications. No update in ED178 or 2018/19 AMR	200						60	60	60	20									60	200	0
LG1	North of Letchworth	Promoted by landowner Letchworth Garden City Heritage Foundation. No planning applications. SOCG 2017. No update in ED178 or AMR 18/19. Council Matter 6 update pushed back	900								86	86	86	86	86	86	86	86	86		0	774	126
RY1	Ivy Fm Royston	OP granted under 16/00378. RM granted October 2019. Included in 18/19 AMR for 210 units. Trajectory reflects detailed permission	279			30	60	60	60	60	9										210	279	0

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		Status	LPA Commitment	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	Deliverable in 5 yrs (Council 2020-2025)	2019-35	Post Plan Period
RY2	N of Newmarket Rd Royston	RM to be brought forward under three phase. Identified in 18/19 AMR and ED178 update.	330	30	60	60	60	60	60											300	330	0
RY10	S of Newmarket Rd Royston	Application pending under reference 17/00110/1 by Countryside Properties and Sir Francis Newman. Resolution to permit 325 dwellings	325					60	60	60	60	60	25							120	325	0
WY1	Little Wymondley	Pre-app submitted. Bovis Homes. No update in ED178 or Council's 18/19 AMR	300						60	60	60	60	60							60	300	0
	Totals		10593	30	60	90	120	180	360	566	944	1066	991	781	746	690	684	526	514	750	8348	2245

APPENDIX 3 – COMPARISON OF NHDC SCENARIO 6 LAND SUPPLY CALULCATIONS

Table 1. Rolling Calculations of Housing Land supply over the Plan Period (Five-Year period Commencing April 2019) (NHDC Scenario 6)

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
Year (Plan Period)	20	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Cumulative supply	384	675	934	1114	1455	1994	2276	2496	2897	3391	3865	4645	5850	7318	8738	10116	11465	12764	13866	14841	
Submission LP requirement	350	350	350	350	350	350	350	350	500	500	500	500	500	1250	1250	1250	1250	1250	1250	1250	
Cumulative requirement	350	700	1050	1400	1750	2100	2450	2800	3300	3800	4300	4800	5300	6550	7800	9050	10300	11550	12800	14050	
Residual	13616	13325	13066	12886	12545	12006	11724	11504	11103	10609	10135	9355	8150	6682	5262	3884	2535	1236	134	-841	
Annualised requirement	700	717	740	769	805	836	858	902	959	1009	1061	1126	1169	1164	1114	1052	971	845	618	134	
Shortfall (Start of Plan Period)	-34	25	116	286	295	106	174	304	403	409	435	155	-550	-768	-938	-1066	-1165	-1214	-1066	-791	
Annual Shortfall / Surplus	34	-59	-91	-170	-9	189	-68	-130	-99	-6	-26	280	189	705	218	170	128	99	49	-148	-275
Cumulative Shortfall / Surplus	34	-25	-116	-286	-295	-106	-174	-304	-403	-409	-435	-155	550	768	938	1066	1165	1214	1066	791	
5-yr Base Requirement	1750	1750	1750	1750	1900	2050	2200	2350	2500	3250	4000	4750	5500	6250	6250	6250					
With Shortfall / Surplus (Sedgefield)	1750	1750	1775	1866	2186	2345	2306	2524	2804	3653	4409	5185	5655	6250	6250	6250					
With 20% Buffer	2100	2100	2130	2239	2623	2814	2767	3029	3365	4384	5291	6222	6786	7500	7500	7500					
Annualised Requirement (Sedgefield)	420	420	426	448	525	563	553	606	673	877	1058	1244	1357	1500	1500	1500					
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
5Yr Supply	1455	1610	1601	1562	1783	1936	1871	2369	3354	4421	5347	6251	6820	6914	6548	6103					
5-Yr Calculation (Sedgefield)									4.98	5.04	5.05	5.02	5.03	4.61	4.37	4.07					
5-yr Base Requirement	1750	1750	1750	1750	1900	2050	2200	2350	2500	3250	4000	4750	5500	6250	6250	6250					
With Shortfall / Surplus (Liverpool)		1741	1757	1784	1989	2148	2238	2417	2627	3433	4205	4992	5597	5857	5610	5312					
With 20% Buffer		2089	2108	2141	2387	2578	2685	2900	3152	4120	5045	5990	6716	7029	6732	6374					
Annualised Requirement (Liverpool)		418	422	428	477	516	537	580	630	824	1009	1198	1343	1406	1346	1275					
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
5Yr Supply	1455	1610	1601	1562	1783	1936	1871	2369	3354	4421	5347	6251	6820	6914	6548	6103					
5-Yr Calculation (Liverpool)									5.32	5.37	5.30	5.22	5.08	4.92	4.86	4.79					

Figure 1. NHDC Scenario 6 Housing Trajectory

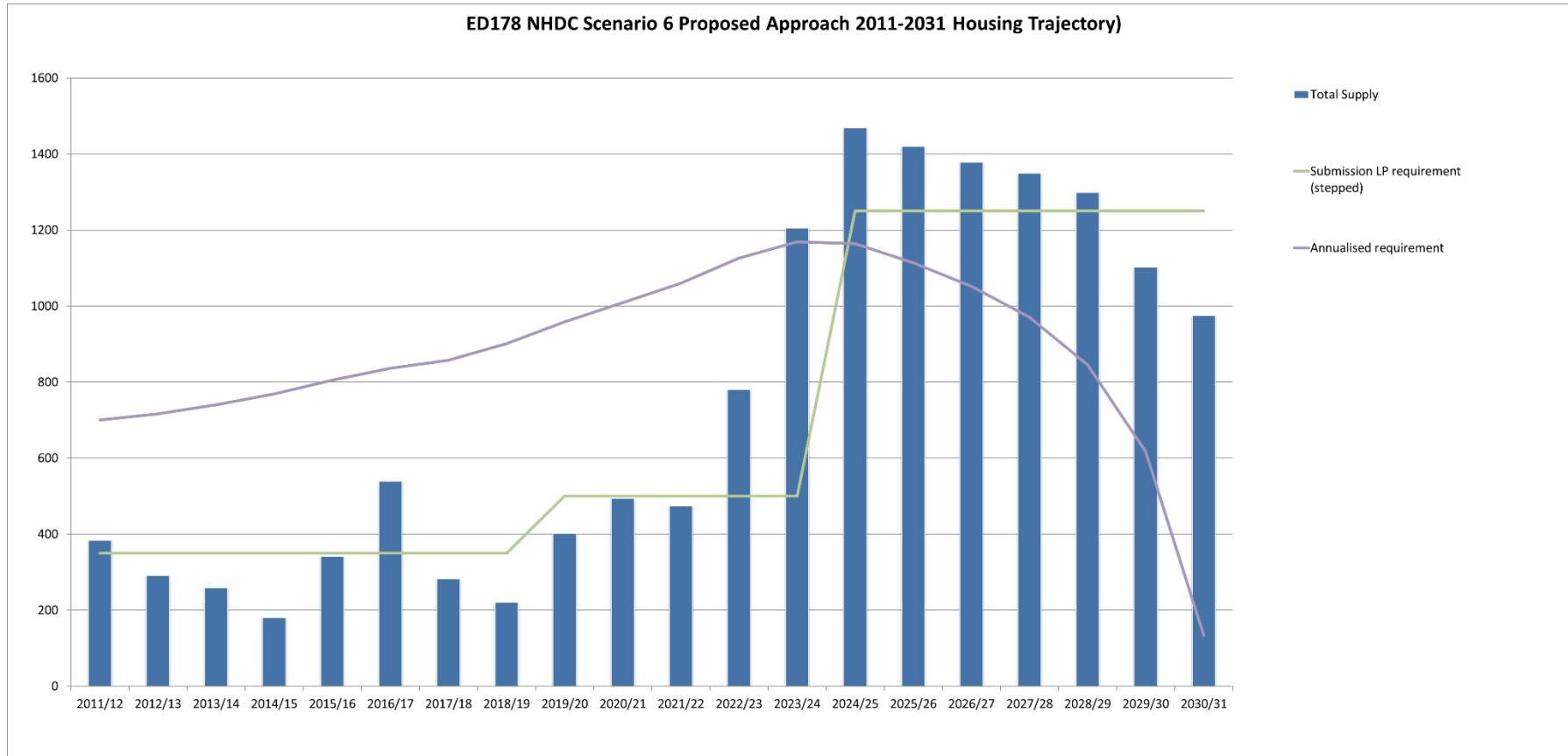


Table 2. SPRU Rolling Calculations of Housing Land supply over the Plan Period (NHDC Scenario 6 with 80% of forecast delivery for 2023/24 and 2024/25 – 4.72 years’ supply at 1 April 2020)

TOTALS	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Total
Source of supply:														
Completions														1114
Supply Sites	220	401	494	474	780	964	1174	1420	1378	1349	1299	1102	975	13192.4
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
Year (Plan Period)	13	12	11	10	9	8	7	6	5	4	3	2	1	
Cumulative supply	2496	2897	3391	3865	4645	5609	6783	8203	9581	10930	12229	13331	14306	
Submission LP requirement	350	500	500	500	500	500	1250	1250	1250	1250	1250	1250	1250	
Cumulative requirement	2800	3300	3800	4300	4800	5300	6550	7800	9050	10300	11550	12800	14050	
Residual	11504	11103	10609	10135	9355	8391	7217	5797	4419	3070	1771	669	-306	
Annualised requirement	902	959	1009	1061	1126	1169	1199	1203	1159	1105	1023	885	669	
Shortfall (Start of Plan Period)	304	403	409	435	155	-309	-233	-403	-531	-630	-679	-531	-256	
Annual Shortfall / Surplus	-130	-99	-6	-26	280	464	-76	170	128	99	49	-148	-275	
Cumulative Shortfall / Surplus	-304	-403	-409	-435	-155	309	233	403	531	630	679	531	256	
5-yr Base Requirement	2350	2500	3250	4000	4750	5500	6250	6250	6250					
With Shortfall / Surplus (Sedgefield)	2524	2804	3653	4409	5185	5655	6250	6250	6250					
With 20% Buffer	3029	3365	4384	5291	6222	6786	7500	7500	7500					
Annualised Requirement (Sedgefield)	606	673	877	1058	1244	1357	1500	1500	1500					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
5Yr Supply	2369	3113	3886	4812	5716	6285	6620	6548	6103					
5-Yr Calculation (Sedgefield)		4.63	4.43	4.55	4.59	4.63	4.41	4.37	4.07					
5-yr Base Requirement	2350	2500	3250	4000	4750	5500	6250	6250	6250					
With Shortfall / Surplus (Liverpool)	2417	2627	3433	4205	4992	5597	6029	6056	5847					
With 20% Buffer	2900	3152	4120	5045	5990	6716	7235	7267	7016					
Annualised Requirement (Liverpool)	580	630	824	1009	1198	1343	1447	1453	1403					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
5Yr Supply	2369	3113	3886	4812	5716	6285	6620	6548	6103					
5-Yr Calculation (Liverpool)		4.94	4.72	4.77	4.77	4.68	4.58	4.51	4.35					

APPENDIX 4 – SPRU PROPOSED APPROACH TO LOCAL PLAN HOUSING TRAJECTORY

Figure 1. SPRU Proposed Approach to Local Plan Housing Trajectory

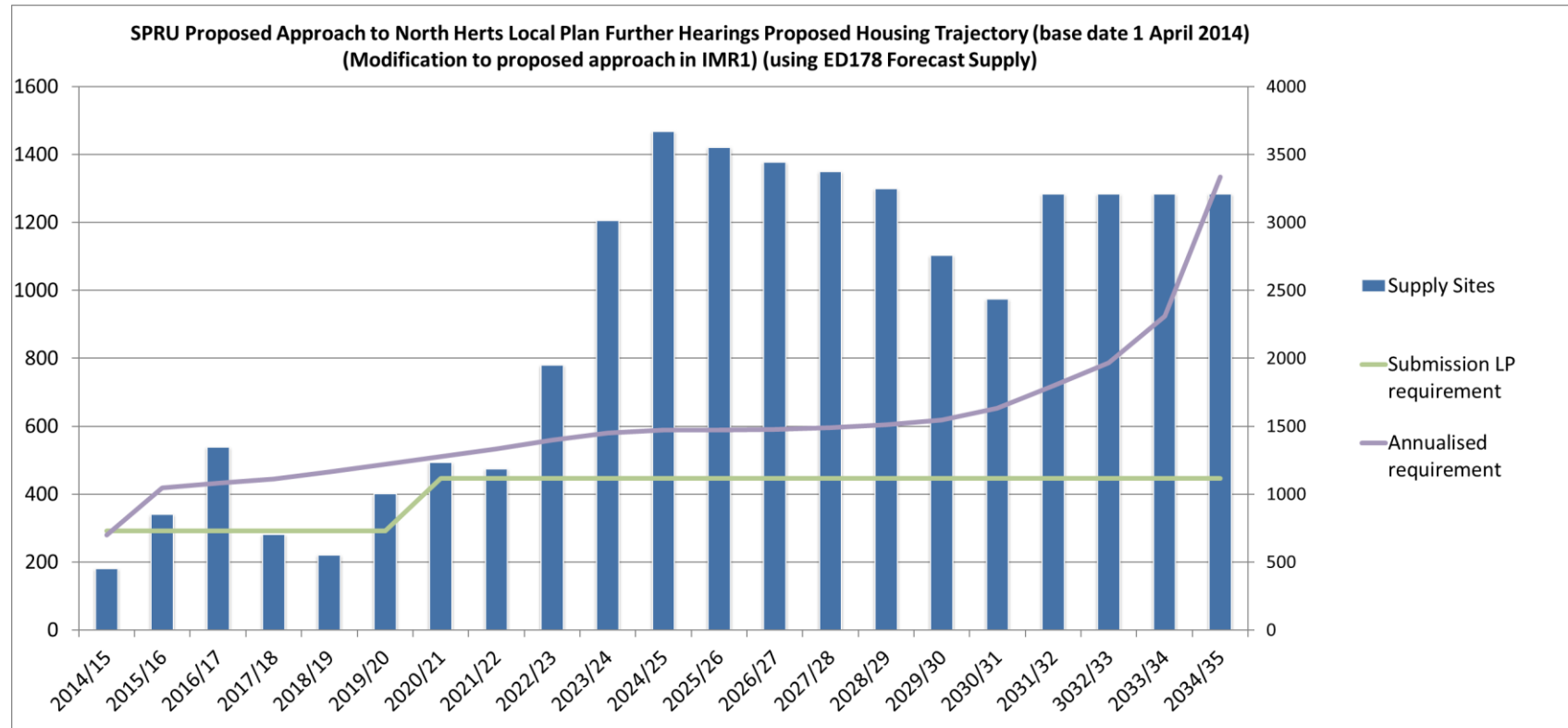


Table 1. SPRU Rolling Calculation of Housing Land Supply based on Proposed Trajectory and ED178 Forecast Supply (2014 – 2035 Plan Period)

TOTALS	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	Total
Source of supply:																		
Completions																		0
Supply Sites	220	401	494	474	780	1205	1468	1420	1378	1349	1299	1102	975	1284	1284	1284	1284	19043
Total Supply	220	401	494	474	780	1205	1468	1420	1378	1349	1299	1102	975	1284	1284	1284	1284	19043
Submission LP requirement	729	729	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	1114	
Shortfall (Start of Plan Period)	2083	2411	3031	3671	4005	3914	3560	3254	2990	2755	2570	2582	2721	2551	2381	2211	2041	
Annual Shortfall / Surplus	-509	-328	-620	-640	-334	91	354	306	264	235	185	-12	-139	170	170	170	170	
Cumulative Shortfall / Surplus	-2083	-2411	-3031	-3671	-4005	-3914	-3560	-3254	-2990	-2755	-2570	-2582	-2721	-2551	-2381	-2211	-2041	
5-yr Base Requirement	4800	5185	5570	5570	5570	5570	5570	5570	5570	5570	5570	5570						
With Shortfall / Surplus (Sedgefield)	6374	7268	7981	8601	9241	9575	9484	9130	8824	8560	8325	8140						
With 20% Buffer	7649	8722	9577	10321	11089	11490	11381	10956	10589	10272	9990	9768						
Annualised Requirement (Sedgefield)	1530	1744	1915	2064	2218	2298	2276	2191	2118	2054	1998	1954						
5Yr Supply	2369	3354	4421	5347	6251	6820	6914	6548	6103	6009	5944	5929						
5-Yr Calculation (Sedgefield)	1.92	2.31	2.59	2.82	2.97	3.04	2.99	2.88	2.92	2.97	3.03							
5-yr Base Requirement	4800	5185	5570	5570	5570	5570	5570	5570	5570	5570	5570	5570						
With Shortfall / Surplus (Liverpool)	5263	5836	6374	6653	6982	7239	7349	7350	7378	7439	7538	7712						
With 20% Buffer	6316	7003	7648	7983	8378	8687	8819	8820	8853	8927	9045	9254						
Annualised Requirement (Liverpool)	1263	1401	1530	1597	1676	1737	1764	1764	1771	1785	1809	1851						
5Yr Supply	2369	3354	4421	5347	6251	6820	6914	6548	6103	6009	5944	5929						
5-Yr Calculation (Liverpool)	2.39	2.89	3.35	3.73	3.93	3.93	3.92	3.71	3.45	3.37	3.29	3.20						



Strategic Planning & Research Unit

North Hertfordshire Local Plan Examination
Matter 22 Hearing Statement
On behalf of New Road (Ashbrook) Ltd. and the Taylor Family

February 2020

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