

THIS STATEMENT IS FOR:

Matter 4 – The housing strategy: the supply of land for housing

ISSUES: **4.3 and 4.4 – The five year housing land supply**

Examination of North Hertfordshire District Council's
Local Plan 2011-2031

Hearing Statement

on behalf of
Greene King plc

November 2017

1 Introduction

1.1 This statement is made on behalf of Greene King plc, who own land on London Road, Baldock, between the George IV public house to the south and Chalk Hills to the north. It is referenced by the LPA as site BA12 – see Appendix A Extract from Proposals Plan.

1.2 Our focus is on how the Submission Document's overall housing proposals and alterations to the boundary of the Metropolitan Green Belt affect the town of Baldock and our client's land. It is our intention to submit a separate representation on Matter 10 – Baldock.

1.3 Our main observations in relation to the Plan's overall provisions are:

- there has been an effective absence of local development plan policy since 2001
- no new land allocations have been made since then, resulting in a consistent under-delivery of new dwellings against targets as set in the now defunct East of England Plan and subsequently by the Stevenage and North Hertfordshire Strategic Housing Market Update 2015 and its 2016 revision
- that from the very beginning of the Local Plan preparation process, the LPA should have given much higher priority to smaller sites, both in its revision of Green Belt boundaries and in making allocations that could be brought into production quickly
- given the length of time taken to produce the Submission Document, the LPA has had to backload the provision of new dwellings, using large scale new allocations that will have a long lead time before construction can start
- that the LPA's Housing Trajectory is over-optimistic about both timing and production levels from these large allocations.

1.4 In relation to our client's site BA12 and Baldock, our principal observations are:

- the LPA's revision of the Metropolitan Green Belt has been inconsistent in

relation to peripheral sites around Baldock, including our client's land next to the George IV public house

- that proposed allocation BA1 (see Appendix A) is excessive in relation to the existing town and has serious consequences for the Metropolitan Green Belt around Baldock and open countryside to the north of the town. In previous documents, BA1 was a much smaller proposal
- that both the timing and volume of production from site BA1 is unrealistic
- that site BA12's detailed assessment through both the Green Belt Review and the SHLAA processes has been inconsistent, and undue weight has been given to existing site levels and proximity to the Weston Hills Local Nature Reserve, whereby surrounding developments are subject to such levels and locations.

Housing Provision and the Local Development Plan

- 1.5 The current Local Development Plan, the District Local Plan No. 2 with Alterations, was originally adopted in 1996. Policy 26 made provision for 8000 additional dwellings in accordance with the Hertfordshire County structure Plan Review incorporating Alterations 1991. The intention was to revise this policy in the light of a further review of the County Structure Plan. However, this planned review did not take place as a result of changes to the development plan system made through the Planning and Compulsory Purchase Act 2004. Since then, no revision of the housing provision made in the District Local Plan No. 2 has been incorporated in an adopted Local Development Plan document.

Housing Provision Targets

- 1.6 The following sources have been used to provide a housing provision target for North Hertfordshire as a whole:

| Source | Period | Target (annual average) |
|--|------------|-------------------------|
| District Local Plan No.2 | 1986 -2001 | 530 |
| East of England Regional Plan | 2001 -2021 | 790 |
| OHN for North Herts and Stevenage 2016 | 2011 -2031 | 720 |

Housing Completions

1.7 The following table is a record of housing completions since 2001:

| Year | Net completions |
|----------------|-----------------|
| 2001-2002 | 724 |
| 2002-2003 | 668 |
| 2003-2004 | 490 |
| 2004-2005 | 450 |
| 2005-2006 | 591 |
| 2006-2007 | 623 |
| 2007-2008 | 723 |
| 2008-2009 | 462 |
| 2009-2010 | 334 |
| 2010-2011 | 415 |
| 2011-2012 | 384 |
| 2012-2013 | 291 |
| 2013-2014 | 259 |
| 2014-2015 | 180 |
| 2015-2016 | 341 |
| 2016-2017 | 539 |
| Total | 7474 |
| Annual average | 467 |

1.8 Reported completions have always fallen short of the targets used for calculating the five-year supply of land. This means that there has been a consistent shortfall in housing supply since 2001.

2 Matter 4 – The housing strategy: the supply of land for housing

Issue 4.3

2.1 a) *What is the five-year requirement?*

The Housing and Green Belt background paper Partial Update 2017's requirement is based on the yet to be adopted target of 500 additional dwellings per year between 2012 and 2021. Until this figure is adopted, it should be based on the OAN's annual average target of 780.

2.2 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?*

We have noted in paragraph 1.7 that recorded net completions have never met the targets used for calculating the five year land supply. The OAN makes a break with this record at 2011. We accept that such a break has been accepted at other Local Plan EIPs in considering at the five-year requirement. We agree that any backlog should be calculated from 2011.

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

There is a long history of under-delivery. In the past six years, completions have only once met the as yet unadopted target of 500 additional homes a year, and have never met the annual average derived from the OAN. There is a very strong need to take account of the shortfall that has accumulated since 2011.

2.4 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?*

The Council has adopted the Liverpool method in its Housing and Green Belt background paper Partial Update 2017. Paragraph 035 of the National Planning Policy Guidance says that the Sedgefield method should be used “where possible”. We note, however, from relevant court cases and appeals determined by the

Secretary of State, that both methods are regarded as acceptable. We have no particular view on this since, either way, there is a substantial backlog that needs to be taken into account.

- 2.5 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)?*

Five years has become a commonly accepted period in determining whether or not there has been a persistent undersupply. If the LPA's proposed target is used, the accumulated backlog is 1006 or 36% of the target requirement. Using the average target from the OAN, it becomes 2036 or 47% of the requirement. Whichever figure is taken, it is a significant shortfall and the 20% buffer should be added in accordance with the provision of the NPPF's paragraph 47.

- 2.6 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?*

We note the revised windfall allowance from the revised Housing and Green Belt Background paper and have no comments on its derivation.

- 2.7 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?*

We note the other allowances made in the Background Paper and have no further comments.

- 2.8 Taking the changes we have proposed above to the five-year housing land availability calculation produces a significantly different result, as shown in the following comparative table:

| Background Paper Calculation | | | Alternative Calculation | |
|------------------------------|--|------------|-------------------------|------------|
| A | Total housing target 2011-2031 | 15950 | A | 15950 |
| B | Completions 2011-2017 | 1994 | B | 1994 |
| C | Target 2011-2017 | 3000 | C | 4320 |
| D | Shortfall at 1 April 2017 | -1006 | D | -2328 |
| E | Target 2017-2022 | 3100 | E | 3600 |
| F | Address shortfall (Liverpool method) D* (5/14) | 359 | F | 830 |
| G | 20% Buffer (E+F*20%) | 692 | G | 890 |
| H | Total five-year requirement (E+F+G) | 4151 | H | 5320 |
| I | Projected delivery 2017-2022 | 4412 | I | 4400 |
| J | Years supply (I/H)*5 | 5.3 | J | 4.2 |

Issue 4.4

- 2.9 It follows from our comments on Issue 4.3 that we do not agree with the targets as set out in paragraph 4.99 of the Plan. There is a prolonged history of significantly delivering under target. As a result of the length of time the LPA has taken to prepare an up to date Local Development Plan, and its approach to identifying suitable land allocations, it has limited itself to options that put back even further achieving the OAN's identified housing needs. The Plan should adopt the OAN's annual average target of 780 net additional dwellings throughout the plan period.
- 2.10 The Plan is based on an unsound calculation of the five year residential land availability supply. Targets have been manipulated for no reason other than to allow the back-ending of housing completions, when the Plan's strategic allocations start yielding completions. This is against the background of a 16 year period, 2001-2017, when housing targets have never been met. The OAN contains no obvious reason for back-ending supply. The need to do so has arisen principally from the length of time it has taken to prepare the Plan as a replacement for the current Local Development Plan, adopted in 1995 – over 20 years ago.
- 2.11 The Plan is therefore unsound for the reasons outlined above and in our earlier Statements of Objection to the Plan. We have demonstrated that the Proposed

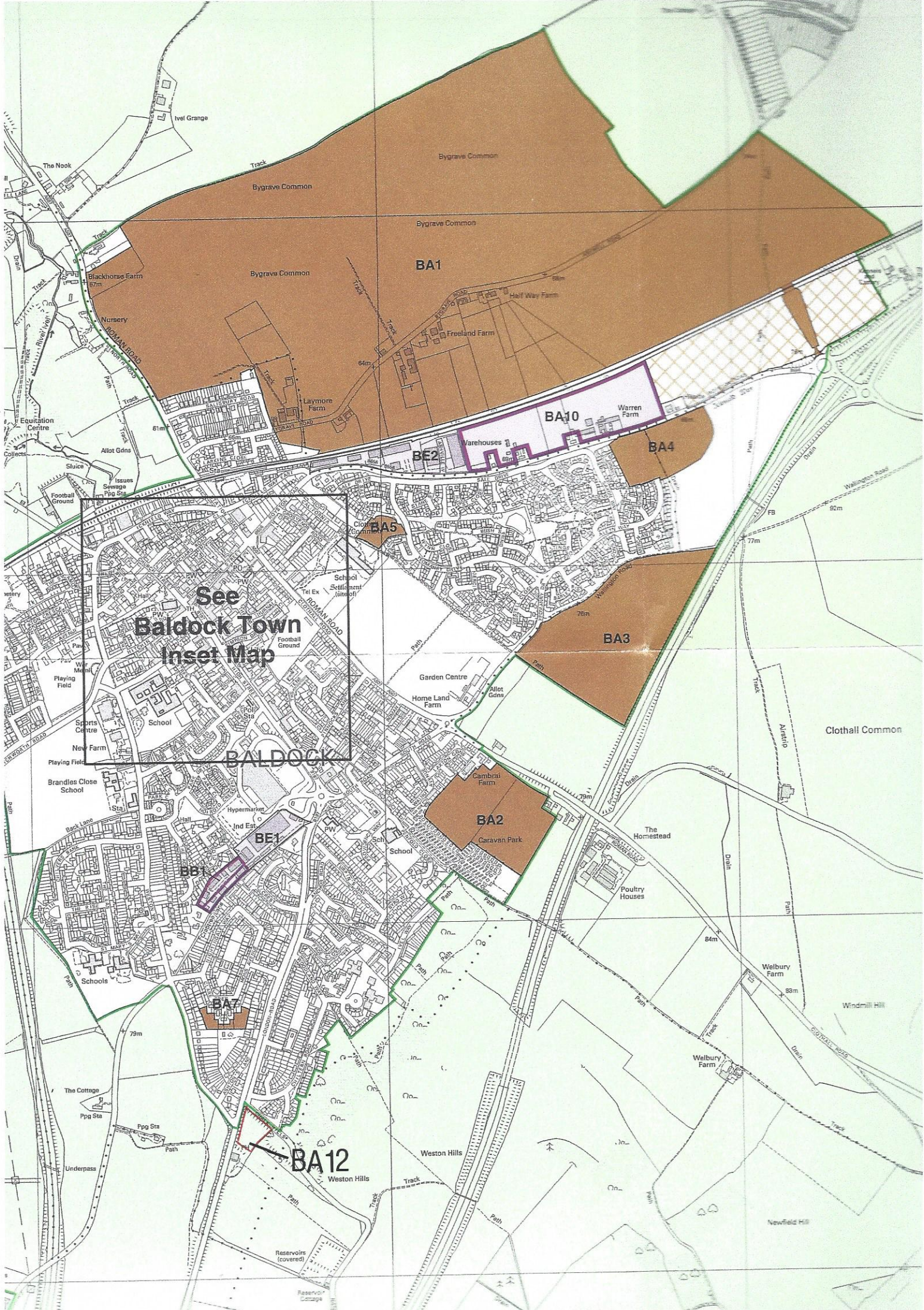
Submission Draft Document makes unrealistic assumptions about the timing of completions from its proposed strategic housing land allocations. We make further reference to these matters in our statement relating to Matter 6.

- 2.12 This Statement should be read in conjunction with statements previously submitted in October/November 2016 to the North Hertfordshire Proposed Submission Local Plan.

David Russell Associates

November 2017

Appendix A



See
Baldock Town
Inset Map

BALDOCK

BA1

BA10

BA4

BA5

BA3

BA2

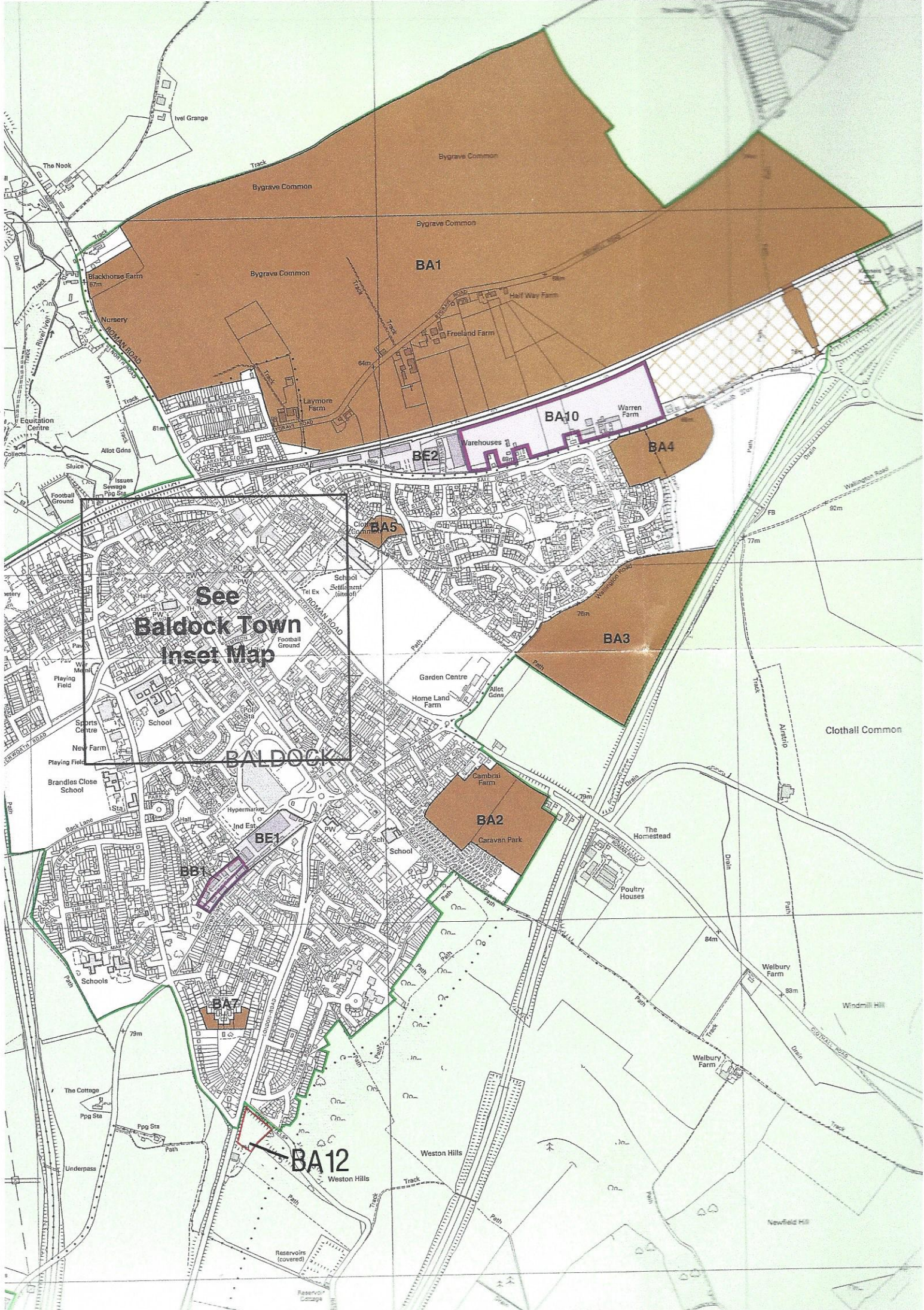
BB1

BE1

BE2

BA7

BA12



See
Baldock Town
Inset Map

BALDOCK

BA1

BA10

BA4

BA5

BA3

BA2

BB1

BE1

BE2

BA7

BA12