

THIS STATEMENT IS FOR:
Matter 6 – Deliverability
ISSUES: **6.1 and 6.2**

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 6 – Deliverability

Issues 6.1 and 6.2

- 2.1 Our concern is with timing. We have been involved in making representations on another Local Development Plan that was adopted in 2011. They related to a strategic land allocation for around 1000 dwellings. Six years on, planning discussions are continuing with no starts as yet on site.
- 2.2 Of the Plan's sixteen largest allocations (estimated capacity of 200 or more dwellings), five are expected to be delivering by 2020 and ten in 2021.

Plan ref.	Address	Area	Capacity	Completions Start	
				Plan	Alternative
BA1	North of Baldock	142.4	2500	2021	2026
BA2	Land off Clothall Road (Clothall parish)	6.8	200	2020	2023
BA3	South of Clothall Common (Clothall parish)	13.3	200	2020	2023
HT1	Highover Farm, Stotfold Road	38.9	700	2020	2023
KB1	Land at Deards End	12.1	200	2022	2023
KB4	Land east of Knebworth	19.3	200	2021	2022
LG1	Letchworth North	44.9	900	2023	2025
EL1	Luton East (west)	69.3	1050	2021	2024
EL2	Luton East (east)	15.1	350	2021	2023
EL3	Land north east of Luton	33.8	700	2021	2024
RY1	Land west of Ivy Farm, Baldock	15.5	279	2020	2023
RY10	Land south of Newmarket Road	14.3	300	2021	2023
GA1	Stevenage North East (Roundwood)	10.8	330	2020	2022
GA2	Land off Mendip Way, Great Ashby	49.1	600	2021	2025
NS1	Stevenage North	42.2	900	2024	2025
WY1	Land south of Little Wymondley	14.3	300	2021	2024

The Plan adoption is anticipated by the Local Development Scheme around the middle of 2018. However, with the recently announced re-scheduling of the EIP, this

is now likely to be put back towards the end of 2018, which leaves barely one year to eighteen months before completions start coming through in 2020. We believe this highly unlikely on any of the allocations listed in the above table. At the very best it is likely to be 2023 before some of the smaller and less complex of these sites start achieving completions, let alone achieve completions. Even if there are no current infrastructure, physical or ownership constraints to overcome, we believe the housing trajectory should allow a minimum of three years from adoption before recording completions from any of the sixteen allocations listed above.

- 2.3 As there have been problems in the past and very likely to be more so during the Plan period, the Council should seriously consider allocating readily available smaller sites for housing development.
- 2.4 The Plan is unsound as it 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 4.
- 2.5 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

