

Further Matters Issues & Questions

On behalf of Warden Developments Limited



Phillips Planning Services Ltd.
Town Planning and Development Consultants

Matter 21

The objective Assessment of Housing Need (OAN) & the housing requirement

As I understand it, the Council intends that the housing requirement should be modified in the light of the revised OAN calculations, and that an overall requirement of 13,000 dwellings is proposed, comprising of 11,600 to meet North Hertfordshire's needs and 1,400 to help address unmet needs in Luton.

21.2 In the light of this, has there been a 'meaningful change in the housing situation' in North Hertfordshire?

&

21.3 If there has been a 'meaningful change in the housing situation' in North Hertfordshire, should the Local Plan's housing requirement be modified to reflect it?

1. As the Council acknowledges at paragraph 13 of the response paper (ED191A) a reduction of between 11 – 17% in the OAN for North Hertfordshire is 'meaningful'.
2. However, we do not consider that this should result in a reduction in the housing requirement figure to 2031 and / or certainly should not result in any reduction in the proposed site allocations. This is due to the acute position that the authority finds itself in, in terms of the poor rates of housing delivery which had taken place over recent years and the very restricted supply of available housing sites currently available.
3. For example, and as we set out in greater detail in our Matter 22 Statement, the authority is now one where the 'presumption in favour' in the context of the Housing Delivery Test applies and is only able to demonstrate a 1.3 year housing land supply position. There is an urgent need to boost supply not suppress it.
4. Further, due to the extremely slow progress which has been made toward the adoption of the plan it is only likely to only provide for 10 years housing post adoption and an early review will be required. This is likely to plan for a longer time horizon, perhaps to 2040 or 2045 and will involve a further review of housing requirements in that period. In basic terms a much larger quantum of housing land will be required in the review plan.

5. The review plan will be prepared and submitted for examination well before the end date of the current draft plan, potentially 2024 / 2025. This will in effect make any housing figure adopted as part of the current plan redundant at that point. It will be superseded by an updated figure taking account of assessed needs at that time. Whilst we do not consider it likely that the current draft plan if adopted as planned would result in any oversupply of housing, particularly over the short timeframe it is likely to be in existence. However the requirement in the review plan would of course reflect the position at that time.

6. Notwithstanding the issue of whether the requirement figure remains as originally proposed or is reduced we agree with the Council's position that the housing sites as currently proposed for allocation should not be reduced in any way. The retention of all of the proposed sites provides a 13% flexibility buffer, (an element which arguably should have been present in the plan anyway), and will allow the plan to begin delivering new homes and release some supply into the local market whilst the review plan is being prepared.