



LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM

North Hertfordshire Proposed Submission Local Plan

Please return this form to North Hertfordshire District Council either by email to : local.plans@north-herts.gov.uk or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Colin"/>	<input type="text" value="Rosanna"/>
Last Name	<input type="text" value="Campbell"/>	<input type="text" value="Metcalfe"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Hill Residential"/>	<input type="text" value="Savills (UK) Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Unex House"/>
Line 2	<input type="text"/>	<input type="text" value="132-134 Hills Road"/>
Line3	<input type="text"/>	<input type="text" value="Cambridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CB2 8PA"/>
Telephone Number	<input type="text"/>	<input type="text" value="01223 347235"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="rmetcalfe@savills.com"/>

Part B - Please use a separate sheet for each representation

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Site

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i)	Legally Compliant	Yes	<input type="text"/>	No	<input type="text"/>
ii)	Sound	Yes	<input type="text"/>	No	<input checked="" type="text" value="X"/>

If No, which of the Soundness tests does it fail?

Positively prepared	<input checked="" type="text" value="X"/>
Justified	<input checked="" type="text" value="X"/>
Effective	<input type="text"/>
Consistent with National Policy	<input checked="" type="text" value="X"/>

iii)	Complies with the Duty to co-operate	Yes	<input checked="" type="text" value="X"/>	No	<input type="text"/>
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5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

On behalf of our client, Hill Residential Limited, Savills (UK) Limited have been instructed to respond to general matters raised within the North Hertfordshire Proposed Submission Local Plan including responding to issues in respect of their land interests at Lucas Lane, Hitchin (allocated housing site HT5 and omission site "Land adjacent to Site HT5").

Policy SP8 within the Plan states that the Council will release sufficient land to deliver at least 14,000 new home's for North Hertfordshire's own needs. Some 13,800 homes will be provided within that part of the District falling within the Stevenage HMA while around 200 will be provided with the Luton HMA.

We object to Policy SP8 on three grounds:

- 1 Failure to meet the District's objectively assessed housing needs (OAN);
- 2 Failure to provide a sufficient supply of housing across the plan period;



3 The inconsistency with Development Management Policy HS2 (Affordable Housing).

It is our view that this policy is neither positively prepared, justified nor consistent with national policy, and it therefore cannot be considered sound.

Objectively Assessed Need

Policy SP8 states at least 14,000 new homes will be delivered over the plan period to meet North Hertfordshire's needs. Around 13,800 new homes will be provided in the part of the District falling within the Stevenage Housing Market Area (HMA). This not consistent with the Stevenage and North Hertfordshire Strategic Housing Market Assessment (SHMA) Update 2015 which identifies the OAN in this area to be 14,400 new homes (720 per annum). As a minimum, this policy should be amended to provide for the release sufficient land to deliver at least 14,600 new homes (14,400 in the Stevenage HMA and 200 in the Luton HMA). An amendment to Policy SP 8 is thus advocated in Section 6 of the Representation Form.

We also have some concerns as to how the OAN for North Hertfordshire was arrived. The OAN was calculated using the 2012 Household Projections which are no longer the most up to date following the publication of the 2014 projections in June 2016. In accordance with the NPPG, wherever possible, local needs assessments should be informed by the latest available information (Reference ID: 2a-016-20150227). Whilst the NPPG notes the 2012 projections as the most up to date, this has not recently been updated. We therefore consider the OAN should be revisited to take account the revised household projections.

Housing Supply

We do not consider that the stepped approach to housing supply, set out in the supporting text to Policy SP8 (paragraph 4.99), is consistent with the NPPF and NPPG. Paragraph 47 in the NPPF requires local authorities to identify specific deliverable housing sites sufficient to provide five years worth of housing against their housing requirements. Whilst a stepped approach might be appropriate in specific circumstances (i.e. in areas still struggling from the recession), it is not considered appropriate in North Hertfordshire which has a strong housing market and a pressing housing need.

Based on a requirement to deliver 13,800 homes (which as noted above is considered too low), the Plan should provide for the delivery 690 dwellings per year. Given that there has consistently been under delivery of housing in North Hertfordshire since 2008 (as shown in recent Annual Monitoring Reports) and in the most recent update the housing land supply is shown to be just 2.2 years (SHLAA Update, 2014), it is essential that sufficient housing sites are identified to come forward early in the plan period. The Council should therefore look to identify additional housing sites which can be delivered in the next 1-5 years. Where appropriate, proposed housing numbers on identified sites should also be increased. For example, Site HT5 is allocated for the delivery of 16 units but can be further extended to deliver an additional 8 units, bringing the total capacity of the site to 24 dwellings as shown on the accompanying Illustrative Masterplan. Please see our response to Site HT5 for further details.

There is a clear and significant need for new homes now. The NPPF seeks to significantly boost the supply of new homes and to meet needs as and when they arise. It is not appropriate for the plan to backload housing delivery as it will cause more people to fall into needing affordable

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housing as their needs are not being met and it will exacerbate house price inflation as demand will continue to exceed supply. If there is to be any phasing of the annual housing requirement across the plan, that should be front-loaded to help eliminate existing affordable housing needs. We do not consider it sound to backload housing provision, but in any event, if a phased approach to housing is to be followed that should be set out in Policy SP8. .

Affordable Housing

Our client does not object to North Hertfordshire's overall affordable housing targets as set out in Policy HS2 (Affordable Housing). It is, however, considered that Policy SP8 is inconsistent with Policy HS2. Policy SP8 makes a misleading reference to affordable housing targets being 40% which is not the case for sites of less than 24 units.

In light of the above, this policy cannot be considered sound.

(Continue on a separate sheet if necessary)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).* You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to meet housing need and sufficiently boost the supply of housing as advocated by paragraph 47 of the NPPF, this policy needs to plan for increased housing.

The Council should look to meet its housing needs across the plan period and identify sites which are deliverable in the next 1-5 years, including providing for under delivery since the start of the plan period.

Regarding the housing growth with the plan period, the figure needs to be updated to reflect updated information within recent SHMA and the most recent 2014 household projections. As a minimum, paragraph 1 of Policy SP8 should be amended to read:

- a. Release sufficient land to deliver at least 14,600 new homes (730 per annum) for North Hertfordshire's own needs. Of these:
 - i. around 14,400 will be provided within that part of the District falling within the Stevenage Housing Market Area (HMA); while
 - ii. around 200 will be provided within that part of the District falling within the Luton HMA;

With regards to the affordable housing element of the policy, Part (f) (i) should be amended as follows:

- i) *33% of all homes over the plan period as Affordable Housing for local needs, meeting the affordable housing targets set out in Policy HS2 where viable.*

(Continue on a separate sheet if necessary)

Please note your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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To enable a full discussion and investigation of the matters at hand.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Do you wish to be notified when the Local Plan is submitted?

Yes, I do wish to be notified

No, I do not wish to be notified

10. Signature:

R. Metcalf

Date:

30/11/2016