

MATTER 3/1147875

MATTERS STATEMENT

**Borough of Broxbourne
Local Plan Examination**

**On behalf of:
Countryside Properties PLC
(Representor ID 1147875)**

17 July 2018

Prepared by:
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**Our Reference:
17086**

Matter 3: Housing Development Needs & Land Supply

Issue 3.4C: Housing Allocations that are currently in the Green Belt.

The Council Proposed Main Modifications (set 1) [EXAM6] include indicative capacity figures for some allocated sites where these were not provided in the submitted Plan.

How many dwellings on allocated sites that are currently in the Green Belt are likely to be completed by 31 March 2031?

How many dwellings on allocated sites that are currently in the Green Belt are likely to be completed by 31 March 2022?

Issue 3.4H: Conclusions on Housing Land Supply

44. Based on your answers to the above questions, how many dwellings in total do you consider could reasonably be expected to be built on allocated sites that are currently in the Green Belt (a) during the plan period and (b) between 2017 and 2022?

Introduction

This statement has been prepared on behalf of Countryside Properties PLC in relation to the forthcoming Hearing Sessions for the Broxbourne Local Plan 2018-2033 Independent Examination.

Countryside Properties PLC have an interest in several sites within the Borough of Broxbourne and are keen to promote and delivery high quality residential developments within the area.

Site specific information will follow in subsequent Matters Statements.

Matter 3: Response.

We support the Local Planning Authority in the identification of their housing need and their pragmatic approach to the allocation of sites and the release of Green Belt sites where it is deemed appropriate.

We do however raise concerns in respect of the Local Planning Authority's approach to optimal site densities, which in our opinion currently results in an inefficient use of proposed allocated land across the Borough.

The need to optimise the use of individual sites has always been a key driver associated with ensuring the delivery of sustainable housing schemes. This has been reinforced in the Draft National Planning Policy Framework (March 2018), with the introduction of Chapter 11 'Making effective use of land'.

Paragraph 122 of the Draft National Planning Policy Framework states the following:

"Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) The identified need for housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) Local market conditions and viability;*
- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) The desirability of maintaining an area's prevailing character (including residential gardens), or promoting regeneration and change; and*
- e) The importance of securing well-designed, attractive places."*

Paragraph 123 further elaborates on when Local Planning Authorities should resist development at low densities, it states:

"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential developments within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*
- b) The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect accessibility and potential of different areas, rather than one broad density range; and*
- c) Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit efficient use of a site."*

Broxbourne have had a persistent under delivery of housing for 7 of the last 10 years and without the Local Plan allocations were only able to demonstrate a 3.19 years supply of housing in the 2016/17 Annual Monitoring Report. That same report advised that when the Local Plan allocations are factored in, the Authority will only be able to show 5.04 years supply of housing.

Whilst it is acknowledged that this would demonstrate a 5 year land supply, it is only marginal and it would only require the delayed delivery of a few sites to result in a further under delivery of housing and therefore a lack of a 5 year land supply.

If the Local Planning Authority were to follow the approach suggested by the Draft National Planning Policy Framework and apply minimum densities to the proposed housing sites, as opposed to listing an estimated dwelling number, there would be scope for the delivery of developments that are more dense and make the best use of land, thus avoiding unnecessarily low density developments, delivered as a result of overly prescriptive planning policies and maximising the housing delivery across the Plan period.

Main Modification

We would respectfully request that the Inspector seeks to amend the housing land allocations to reference minimum housing densities.

Conclusions

There is general support for the Broxbourne Local Plan 2018 – 2033, however, it is considered that the housing land allocations are overly prescriptive in housing density terms that will result in low density developments across the Borough, contrary to the Draft National Planning Policy Framework.

More importantly, the approach taken to site capacity will in turn increase the risk to the Borough in achieving their 5 year land supply in future years.

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