

**Matter 8: Five Year Land Supply**

*Are the Council's assumptions sound?*

We do not consider the Council to have a five-year housing land supply even using the stepped trajectory. The Council's past performance would indicate the need to provide a 20% buffer as set out paragraph 47 of the NPPF and this would leave the Council with just 4.4 years of housing land supply if the back log of delivery is addressed in the first five years of the plan as set out in PPG. Without the stepped trajectory the Council's supply of land dwindles to just 4.1 years. The table below summarises the Council's position with regard to their 5-year land supply based on the stepped trajectory.

	<b>Liverpool method with 5% buffer</b>	<b>Liverpool with 20% buffer</b>	<b>Sedgefield with 5%</b>	<b>Sedgefield with 20%</b>
Basic five-year requirement 2017/18 to 2021/22	2490	2490	2490	2490
Backlog 2013/14 to 2016/17	135	135	379	379
total 5-year requirement 2017/18 - 2021/22	2625	2625	2869	2869
Buffer applied (5%/20%)	2757	3150	3012	3443
Supply 2017/18 to 2021/22	3032	3032	3032	3032
surplus/shortfall	275	-118	20	-411
years supply in first five years	5.50	4.81	5.03	4.40

In addition to our concerns that the Council do not have a five-year land supply are their assumptions regarding the non-implementation of existing planning permissions. The Council have assumed this to be 2.5% however this is much lower than the standard 10% usually applied. We cannot find any evidence supporting such a low rate. A 10% non-

implementation rate will place further pressure on an already marginal 5-year housing land supply.

*Is the proposed windfall allowance appropriate?*

As set out in our representation on the submission draft we continue to consider the proposed windfall allowance to be too high for the 2020 to 2032 period and not supported by the evidence. We have not been able to find any justification that windfall will double in the last five years of the Plan has been put forward by the Council.

Is the proposed split housing trajectory sound?

Planning Practice Guidance sets out that any backlog in supply should be addressed within the first five years of the plan. The proposed split housing trajectory effectively seeks to deliver this backlog across a ten-year period and as such the approach is not consistent with national policy.

*Is the overall development strategy being advanced by the Council sound?*

Whilst we recognise that there are constraints within Welwyn Hatfield the Council are not meeting their housing needs in full as required by the NPPF. More could have been done to release land for development. For example, the Council could have removed villages from the Green Belt that are currently washed over as set out in paragraph 86 of the NPPF. This could have identified further development sites both in these settlements and on the edge without compromising the integrity of the Green Belt. The Council have also imposed infrastructure constraints that could have been overcome which has further limited their supply of developable land. Finally, the approach taken by the Council means that they do not have a five-year housing land supply that is in conformity with the approach required by national policy and guidance. Further sites need to be allocated to address both these issues to ensure the plan is sound.

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