

Mr M Middleton
Planning Inspector
C/O Ms Louise St. John-Howe
Programme Officer
PO Box 10965
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CO10 3BF

11th February 2021
By email only

Dear Mr Middleton,

Response to EX224, EX224A and EX224B – WHBC Local Plan Examination

I am responding to EX224, EX224A and EX224B (Housing Trajectory) in the Stage 9 consultation.

I am bewildered by the examination affording the Council an opportunity to consider whether, or not, the 2018 ONS Household Projections would cause a meaningful change to the Objectively Assessed Need, after nearly four years since submission. It was obvious that the Council would leap at the opportunity to reduce its OAN and to cause further delay and obstruction to the examination?

Turley has indicated (EX218) that it could shuffle the numbers to justify a reduced OAN of 14,300 dwellings over the 20 year Plan period 2016 to 2036. However, this is only a half-hearted attempt by Turley to placate its paymaster.

The Council was not satisfied with the Turley advice. It threatened to replace Turley with another consultant and, when that failed, it required its own planning officers to present a lower OAN to the examination, without any credible evidence and without any support from Turley.

Notwithstanding the attempt by Turley to help the Council as much as it could, the Council's planning officers (no doubt under pressure from a small group of Members) have sought to advance an OAN of just 13,800 dwellings. However, still not satisfied, the Councillors were only willing to allocate sufficient sites to meet a housing target of 13,277 dwellings. Remarkably, this included certain sites that are unlikely to be delivered, in whole or part, during the Plan period. Furthermore, whilst desperately seeking to reduce its OAN and its housing target, the Council has simply focused on numbers, nothing else. It has forgotten that housing mix, across all sectors, is also required to make the Plan sound. So, now we have a fabricated OAN, a fictitious housing target and an abundance of one and two bedroom flats all within the same area. That is not a sound strategy.

The Council's attempt to claim a five-year housing land supply (based on the flawed OAN) is also pure fiction. It is simply formulating a housing trajectory with no robust evidence to support its position.

Table 1 in EX224 assumes an OAN of just 668 dwellings per annum (13,360), This falls 1,000 homes below the lowest Turley estimate of OAN (based on the 2018 ONS household projections) and it falls 2,640 below the established OAN of 800 dwellings per annum (based on the government's preferred 2014 projections).

Table 2 in EX224 claims to provide a 4.3 year housing supply against an OAN of 800 dwellings per annum. However, when the housing trajectory in EX224A is viewed, it contains 700 dwellings on PB1 (plucked from thin air) and it reinstates BrP4/HS22, BrP7/HS24, Cuf12/HS29, Cuf7/HS30, HS33 and Symondshyde. None of these sites are sound and the Council has, itself, formally resolved to request that you delete all of these sites from the submitted Plan. As a consequence, Table 2 in EX224 is without any substance or credibility.

In order for this examination to make progress, the OAN should remain at 800 dwellings per annum (16,000 for the Plan period) and the Council should be required to allocate those sites which have been repeatedly found to be suitable, available and deliverable in the four large villages.

Sadly, until you confront the Brookmans Park "Elephant in the room" this Plan will go around and round in circles, much to the satisfaction of the Council.

The previous plan expired in 2011. The submitted plan was intended to commence in 2013. Commencement was then brought forward to 2016, due entirely to delays caused by the Council. It is now 2021 with no prospect of a sound Plan. It looks like the Council is hoping that it has worn you down to the extent that you might give up and approve whatever it presents to you.

Yours sincerely

Howard J Dawson FRICS