

Issues for Stage 2 – Overarching Strategy - WHBC Submission Local Plan

1. Housing Market Area

The Council should allocate sufficient sites to meet the need within its HMA and, particularly, within its borough.

2. Full Objectively Assessed Housing Need

The Council has set a housing target which is significantly below its FOAHN, whilst it is failing to allocate sites throughout the borough which are suitable, available and deliverable.

There are sites around the four large villages which could significantly contribute to meeting the FOAHN.

The Council should meet its FOAHN (NPPF paragraph 47) with capacity for longer-term requirement (NPPF paragraph 157).

The Council's failure to meet its FOAHN will cause house prices in the borough to rise further and will prejudice younger people.

3. Employment Forecasts

The Council should meet its FOAHN in order to meet its employment forecasts and to maintain economic growth. Failure to meet the FOAHN will impede economic growth and will cause a significant increase in the daily inward commute of labour, which is not a sensible or sustainable strategy.

4. Green Belt Review

The Council's Green Belt assessment has been inconsistent and has not been objective. It has started from a pre-conceived intention to limit development in the four large villages, regardless of Green Belt considerations.

The four large villages in the borough could all accommodate significant housing growth, which would be supported by existing physical and social infrastructure, without harm to the Green Belt.

SDS6 (Symondshyde) will cause severe harm to the Green Belt and should not be allocated in preference to sustainable housing sites in the large villages.

5. Green Belt – Exceptional Circumstances

There are significant exceptional circumstances in the borough, which include housing need, economic growth, social mobility and best use of national and local transport infrastructure.

The Council has, quite correctly, determined that exceptional circumstances do exist for the alteration of Green Belt boundaries and the release of land to meet housing and economic need.

The Council should now select those sites which are in the most suitable and sustainable locations. The three large villages to the south of the borough are best located to provide housing growth in the most sustainable locations. Welham Green, Brookmans Park and Cuffley should all contribute significantly to meeting the housing needs within the borough.

6. Spatial Vision and Settlement Strategy

The Council does not have an objective spatial vision or settlement strategy. It has set a housing target below its FOAHN and it is seeking to restrict development in the large villages as a principle strategy.

The Council has allocated SDS6 (Symondshyde) ahead of other more suitable and sustainable locations. This is not justified, effective or consistent with national policy.

The Council seems determined not to allocate housing sites in the large villages, despite the excellent transport links, schools and local amenities which already exist in those villages.

The Council should maximise the social, economic and environmental benefits that would be achieved by the allocation of housing sites in the four large villages and, in particular, those with a railway station.

7. Targets for Growth

The Council has consistently and persistently set targets for growth which are below its own assessment of need. Failure to meet (or even try to meet) targets for housing and employment growth cause negative social, economic and environmental consequences for the community.

The Council needs a cultural change in its attitude towards housing need and growth in the borough.

8. Five Year land Supply

The Council is failing to allocate sites that would contribute to its five year land supply and is also allocating sites at the back of the plan period which might not be delivered within the plan, or at all.

There are many suitable and sustainable sites around the large villages which are being ignored by the Council, without reason or explanation.

9. Is the overall Development Strategy being advanced by the Council sound?

No.

The Council has largely wasted the past five years pursuing a strategy which is negative and reclusive. The Submission Local Plan:

- Does not seek to significantly boost the supply of housing
- Does not meet the borough's FOAHN
- Does not provide a five year land supply
- Does not allocate housing sites in the most suitable or sustainable locations
- Is not positively prepared
- Is not justified
- Is not effective
- Is not consistent with national policy

Alex Brooker MRICS
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