

Updates to the Proof of Evidence of Ben Pycroft re: Five Year Housing Land Supply
For Hallam Land Management Limited | 26-108

Outline planning application for a mixed-use development including up to 600 dwellings
and 60 units of elderly accommodation – Land north of A507, west of A10, Buntingford
LPA ref: 3/24/0966/OUT, PINS ref: 6008238

Project: 26-108
Site Address: Land north of A507, west of A10, Buntingford
Client: Hallam Land Management Limited
Date: Wednesday, August 19, 2026
Author: Ben Pycroft

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1. Introduction

- 1.1 This statement is submitted on behalf of Hallam Land Management Limited (i.e., the Appellant) in support of its appeal against the decision of East Hertfordshire District Council to refuse to grant planning permission for:

“Outline planning application for development of up to 600 dwellings (C3), up to 60 units of elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridges over the A10, with all matters reserved save for access.”

at land north of A507, west of A10, Buntingford (LPA ref: 3/24/0966/OUT, PINS ref: 6008238).

- 1.2 It provides updates to Ben Pycroft’s proof of evidence in relation to the Council’s 5 Year Housing Land Supply (5YHLS) following the publication of the revised National Planning Policy Framework (the Framework) and latest Housing Delivery Test (HDT) results on Monday 17th August 2026.
- 1.3 From the outset, the calculation of East Hertfordshire’s 5YHLS has not changed following the publication of the revised Framework or HDT results. Therefore, the respective positions in relation to 5YHLS for this appeal are as set out in table 1.2 of Ben Pycroft’s proof of evidence.



2. Updates to Ben Pycroft's proof of evidence

Section 1 – Introduction and summary

- 2.1 This section remains the same except for paragraph 1.10, bullet 2 which should be updated to now refer to the standard method for calculating local housing need being set out in Annex D of the Framework.

Section 2 – Planning policy context

- 2.2 This section remains the same except for paragraphs 2.6 to 2.9, which should be replaced with the following text:

National Planning Policy Framework

- 2.3 The Framework was published in March 2012. It was revised in July 2018, February 2019, July 2021, September 2023, December 2023, December 2024 (with minor updates on 7th February 2025), and most recently on 17th August 2026.

- 2.4 The relevant sections of the Framework in relation to my proof of evidence are:

- Section 4: Achieving sustainable development, including:
 - Policy S5(1)(j), which explains that only certain forms of development should be approved outside of settlements, including
“j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test²⁷), and where the development would:

i. Be physically well-related to an existing settlement²⁸ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.”
- Section 6: Delivering a sufficient supply of homes, including:
 - Policy HO1(1a), which states that:
“Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure and pitch and plot requirements for their areas over the plan period, drawing on the land availability assessment in accordance with policy PM9. This should include:



- a. In relation to housing:
 - i. A supply of specific deliverable sites for five years following the intended date of adoption of the plan, with an appropriate buffer (as set out in Annex D); and
 - ii. A supply of specific, developable sites or broad locations for growth for the subsequent years 6 to 10 and, where possible, for the remaining plan period, where the plan covers more than 10 years.”
- Policy HO13(1), which refers to the Government’s objective of significantly boosting the supply of homes;
- Policy HO2(3) which states that housing requirement figures should:
 - “a. Reflect the extent to which the identified needs of the area can be accommodated over the plan period as a minimum, in accordance with policy S1; and
 - b. Be higher than the overall figure identified in the local housing needs assessment where appropriate. This includes situations where a higher housing requirement is necessary to meet the needs of neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment.”
- Paragraph 75, in relation to an allowance for windfall sites;
- Annex D: Housing calculations and supply, including:
 - Paragraph 8, which states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites. This should be sufficient to provide a minimum of five years’ worth of housing, assessed against their housing requirement in the development plan, or against their local housing need (calculated using the standard method) where the development plan housing requirement is more than five years old.”
 - Paragraph 9, which states:

“The supply of specific deliverable sites should include a buffer (moved forward from later in the plan period) of:

 - a) 5% to ensure choice and competition in the market for land; or
 - b) 20% where there has been significant under delivery⁷⁴ of housing over the previous three years, to improve the prospect of achieving the planned supply; or
 - c) For the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined a version of the Framework published prior to December 2024⁷⁵,



and whose annual average housing requirement⁷⁶ is 80% or less of the most up-to-date local housing need figure calculated using the standard method set out above.”

Footnote 74 states: “This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.”

Footnote 75 states: “Or the housing requirement is more than five years old and the relevant development plan policies have been reviewed and found not to require updating.”

Footnote 76 states: “Defined as the total housing requirement, divided by the number of years in the plan period. For joint local plans, the percentage should be applied in aggregate across the joint local plan area.”

- Paragraph 12, which states:

“Local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences apply:

- a. Where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in the future;
- b. Where delivery falls below 85% of the requirement over the previous three years, a buffer of 20% should be added to the identified supply of specific deliverable sites. This is in addition to the requirement for an action plan;
- c. Where delivery falls below 75% of the requirement over the previous three years, an evidenced unmet need for housing is deemed to exist for the purpose of applying policy S5(1)(j) in this Framework. This is in addition to the requirements for an action plan and 20% buffer.”

- Annex A: Implementation, including:

- Paragraph 3, which explains that where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, or the purposes of policy S5(1)(j), if the most up-to-date local housing need figure (calculated using the standard method set out in Annex D) is greater than the housing requirement set out in adopted development plan policies, this should not be considered as evidence of unmet need, for a period of five years from the date of the plan’s adoption..



- Annex B: Glossary, including:
 - The definition of “deliverable” on page 104-105; and
 - The definition of “windfall sites” on page 115.

Section 3 – What constitutes a deliverable site?

- 2.5 This section remains the same except for paragraphs 3.8 and 3.9, which should be replaced by the following text:

Current National Planning Policy and Guidance

- 2.6 The definition of “deliverable” is set out on page 104-105 of the Framework (August 2026) and states:

“Deliverable: To be considered deliverable, sites for housing or other pitches and plots should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that homes will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long-term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that homes will be delivered on-site within five years.”

- 2.7 Other than adding references to “or other pitches and plots”, the definition of deliverable was not amended in the revised Framework published in August 2026.

Section 4 – Housing Delivery

- 2.8 Paragraphs 4.1 to 4.4 (including tables 4.1 and 4.2) should be replaced with the following text:

Housing Delivery Test

- 2.9 The latest (2025) HDT results were published on 17th August 2026. The result for East Hertfordshire is summarised in the table below:



Table 4.1 – Published 2025 Housing Delivery Test Result

	Housing requirement				Housing delivery				HDT%
	2022-23	2023-24	2024-25	Total	2022-23	2023-24	2024-25	Total	
East Hertfordshire	840	960	1041	2840	889	1265	755	2909	102%

- 2.10 As above, the Council achieved a HDT result of 102% and therefore the policy consequences set out in Annex D, paragraph 12 of the Framework do not currently apply due to the HDT result.
- 2.11 However, the 2024 and 2025 HDT results use the local housing need calculated under the previous standard method where this applies. This was around 1,041 dwellings per annum. In East Hertfordshire, this was used as the requirement for half of the year in 2023/24 as the District Plan became five years old in October 2023. It is also used as the requirement for 2024/25.
- 2.12 Moving forward, the HDT will be measured using the local housing need calculated using the standard method set out in the PPG. Against this figure, the Council’s trajectory is only predicting completions of 738 dwellings in 2025/26 and 984 dwellings in 2026/27. Therefore, it is likely that the Council will fail the 2026 and 2027 HDT as shown in the following tables:
- 2.13 Tables 4.3 and 4.4 and the remainder of the section remain.

Section 5 – East Hertfordshire’s 5YHLS

- 2.14 No updates are required to this section.

Section 6 – Matters agreed re: 5YHLS

- 2.15 This section remains the same except for paragraph 6.1, bullet 2 which should be updated to now refer to the standard method for calculating local housing need being set out in Annex D of the Framework.

Section 7 – Matters not agreed re: 5YHLS

- 2.16 This section remains the same except for paragraphs 7.52 and 7.53, which should be replaced with the following text:



National Planning Policy and Guidance

2.17 Policy HO3(2) states that:

“Where an allowance is to be made for windfall sites as part of the identified supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the land availability assessment, historic windfall delivery rates and expected future trends.”

2.18 The definition of “windfall sites” is provided on page 115 of the Framework as follows:

“Sites not specifically identified in the development plan”.

Section 8 - Conclusions

2.19 No updates are required to this section.



