

## **Transition Town Letchworth Submission Relating to Matter 21 – the objective assessment of housing need (‘the OAN’)**

21.1 The Planning Practice Guidance (‘PPG’) supporting the National Planning Policy Framework 2012

(‘the NPPF’) says:

“Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.” (Paragraph: 016 Reference ID: 2a-016-20150227)

Subsequent to the last hearing sessions, 2016-based population and household projections were published. The Council considered the implications of these projections in its note ‘Implications of new household projections for NHDC Local Plan’ [ED159]. This also considers the implications of using the ‘Standard Method’ introduced through the new NPPF published in 2019. I raised some issues in relation to the figures used in ED159 in my letter to the Council dated 9 July 2019. Paper A of the Council’s response to my letter re-considers these figures. It sets out ‘alternative OAN’ figures based on various projections, along with commentary on them. In effect, these provide the basis for comparison in order to establish whether or not there has been a ‘meaningful change in the housing situation’.

- a) Have the ‘alternative OAN’ figures been arrived at correctly/on a robust basis?
  - b) In the light of the ‘alternative OAN’ figures, has there been a ‘meaningful change in the housing situation’?
  - c) If there has been a ‘meaningful change in the housing situation’, should the Local Plan be modified to reflect it and, if so, how?
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### **Potential Upward Bias in Housing Need Calculation**

Examination paper Ed171<sup>1</sup> states that:

- *“analysis of the 2014-based projections reduced the OAN to 13,800 dwellings and this formed the basis of the housing requirement of 14,000 dwellings (of which 13,800 are from the SHMA and 200 from the LHMA) proposed by the emerging Local Plan.”*
- *“A 2016-based OAN for the District of 12,900 homes has been identified”*

The table below overleaf is from ED171:

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<sup>1</sup><https://www.north-herts.gov.uk/sites/northherts-cms/files/NHDC%20response%20to%20Inspector%209%20July%202019%20Letter%20-%20Paper%20A%20%28OAN%29.pdf>

Projection	Population change 2011-31	Household growth 2011-31	Household projection-based housing need	10% market signals uplift	Objectively Assessed Need
<b>OFFICIAL PROJECTIONS</b>					
CLG 2012	25,925	13,705	14,107	1,411	15,518
CLG 2014	26,842	13,798	14,203	1,420	15,623
ONS 2016 sensitivity 2	18,991	10,828	11,146	1,115	12,261
ONS 2016 5-yr migration	18,991	9,748	10,034	1,003	11,037
ONS 2016 10-yr migration	21,489	10,547	10,857	1,086	11,943
<b>SHMA PROJECTIONS</b>					
SHMA Update June 2015	23,420	12,707	13,080	1,308	14,388
OAN Update August 2016	22,691	12,114	12,470	1,247	13,717
EiP Update Sept 2019	CLG method	19,892	11,348	1,168	12,849
	ONS method	19,892	10,076	1,037	11,409

The OAN Update in August 2016 used the 2014 CLG projections as its base data and led to an Objectively Assessed Need of 13,717. This figure was the basis for setting the housing target of 13,800 new homes in the NHDC local plan. The SHMA projection method differed from CLG 2014 projections by adjusting the migration forecast so it was based on a 10 year trend rather than five. This lowered the population forecast by over 4000 (from 26,842 to 22,691). It appears other local assumptions were also applied in the SHMA projections which combined with the migration forecasting assumption change led to a 1,684 fall in forecast household growth for the period 2011-2031 (13,798 to 12,114). It is not clear that the EiP Update in September 2019, has been derived using a consistent methodology, though it does use a 10 year migration trend. For this data set the population and housing need data is seen to increase using the SHMA approach, with household need 1,600 greater for the EIS update than ONS projections (9,748 to 11,348). Can the council confirm whether there has been a change in methodology and if there has been, explain their reasons for changing the methodology? TTL are concerned that the latest population trends may not be accounted for in the SHMA modelling and that this is leading to an overestimate of the revised housing need.

The evidence in the table above is that the ONS methodology delivers lower predictions than the CLG methodology. Additionally, utilising 5 year migration data, as distinct from 10 year, appears to give smaller household growth predictions and neither of the EiP Update scenarios take this into account. The decision to use a 10 year migration forecast and the CLG methodology biases the housing need forecast in the same upwards direction. We would support opting for the lower ONS method forecast which gives an Objectively Assessed Need of 11,409. This seems a low risk strategy as opting for the forecast methodology which gives the lower predictions is mitigated by opting for the migration forecast which gives the higher prediction.

Opting to lower the housing need to a lower estimate would help alleviate the following unresolved issues in the North Herts Local Plan:

- difficulty in providing sustainable transport options for some of the sites on the peripheries of towns.
- loss of 'significant' green belt land.
- commuter transport capacity issues, in particular on the rail network and on the A1(M) and its connecting roads to which the recently published draft of the North Central Hertfordshire Growth and Transport Plan offers limited solutions (see Appendix A).
- Existing damage to the environment from excessive water extraction from local aquifers, which will only worsen with the planned new housing (see Appendix B).

## **Tackling the Climate Emergency**

Climate emergencies have been declared by the government, Hertfordshire County Council and North Hertfordshire District Council. Since May last year there has been a new sweep of councillors and MPs. Most, if not all, had the word ‘sustainability’ in their manifestos. Reviewing the local plan is an important remedial action NHDC can take to tackle the climate emergency which the District Council declared in May 2019.

The Government’s Part L Building Regulation Consultation closed in February 2020. The proposed changes suggest that the 2020 update will not require developers to build homes with the built energy efficiency necessary for zero carbon dwellings, so the earliest this could happen is 2025 when the next update is planned. If that proves to be the case, it is disappointing. By 2025, it is expected that gas will no longer be allowed to be provided to new homes, and hopefully houses will need to be built that can operate as zero carbon dwellings. Retrofitting a home to be zero carbon compliant is much harder and costlier than building one from new. Hence, to achieve its obligation to tackle the climate emergency, NHDC should plan to build the minimum number of houses it can justify prior to the building regulations being tightened to require houses that will meet zero carbon built energy efficiency.

If the housing need can be reduced by adopting the latest household growth forecasts then North Herts District Council can amend its current local plan proposal to remove the least sustainable sites. The decision on which planned sites to remove should take into account:

- Feasibility of using sustainable transport to commute from the site.
- Proportion of zero carbon homes that will be built on the planned site (for land owned by the District or County Council, where a clear commitment to build zero carbon homes should be obtained from the relevant council).
- Significance of the site in terms of green belt / biodiversity.
- Proximity of key services to the site, including schools.

The Oxford to Cambridge corridor, which includes a new train line, has now been finalised to route slightly to the north of Hertfordshire. This corridor will offer exciting growth and employment opportunities and new housing should ideally be located to allow North Herts residents easy and sustainable access to this corridor. Limiting house building under the current, outdated plan, and starting again with a new plan which takes into account the Oxford – Cambridge corridor would provide better opportunities for local people. For example, the latter could provide for a new town within walking distance of Ashwell and Morden station. We would suggest that it is better that NHDC deliver a plan for sustainable development by say 2035 rather than a plan for unsustainable development by 2031.

## **Appendix A: Relevant Evidence from the 2020 North Central Hertfordshire Growth and Transport Plan**

One of Transition Town Letchworth's concerns with the Strategic Site (LG1) is the additional pressure on local roads that will result from this housing. In January 2020 Herts County Council published for consultation the North Central Growth and Transport Plan. This report identifies the significant car commuting between North Herts towns and Stevenage, commuter capacity issues on the A1(M) and its linking roads and that the train lines into London are at capacity at peak times. Below are some relevant extracts. The only planned interventions identified in the Strategy for Letchworth are limited to improving cycling routes to the industrial area and to adjacent towns and some minor bus routing improvements.

*“...that large numbers of trips are made between Stevenage, Hitchin, Letchworth Garden City and Baldock. In particular, many trips are made to employment locations in Stevenage. Residential and commercial development on the edge of these towns, including new development in on the edge of Stevenage in East Herts District, will increase demand for travel between the towns and from the periphery to the centre of towns. If the existing modal split is maintained, with the majority of trips made in private cars, this will place increasing pressure on the A1(M) as a spine route connecting the urban areas, as well as on the A505 connecting to Luton and Royston and the A602 between Hitchin and Stevenage. This demand for travel by car is likely to be focussed on Junction 7 and Junction 8 of the A1(M), and on routes between the A602 and A505 in the east of Hitchin. Increased demand for travel by car within towns would increase congestion on the local road network.” (North Central Hertfordshire Growth and Transport Plan Stage 1 Evidence Paper, page 43).*

*Most significant congestion and delays exist in south Letchworth with congestion and moderate delays along the A505/Baldock Rd and Letchworth Gate in the AM peak, and severe delays in the PM peak on the A505 heading towards the A1(M) junction 9. (North Central Hertfordshire Growth and Transport Plan Stage 2 Strategy Paper, page 32).*

*“Highways England is investing significantly in maintaining and improving the strategic road network (all motorways and major A-roads). The A1(M) Junction 6-Junction 8 All Lane Running scheme is one of many examples across the country of significant Highways England projects aimed at increasing capacity and improving network performance and resilience. The Junction 6-Junction 8 All Lane Running (Smart Motorway) scheme involves replacing existing hard-shoulders with running lanes. This should increase traffic throughput and it is anticipated that it will reduce congestion which is frequently experienced on this section of the A1(M) through Hertfordshire. If further investment comes forward on other parts of the A1(M)/A1 corridor further north in the future, which is not currently planned by Highways England, this could have further implications on the North Central area in terms of the attractiveness of the A1(M) for undertaking journeys. However, it should be noted that improvements to junctions along the corridor are not proposed as part of the All Lane Running (Smart Motorway) scheme. It is at these junctions where the strategic road network interacts closely with the local road network, which is managed by Hertfordshire County Council.” (North Central Hertfordshire Growth and Transport Plan Stage 3 Interventions Paper - page 33).*

Current traffic patterns analysis identified that the mode share from LETr3 is high for car trips at 55%. (LG1 will be on the periphery of area LETr3). (North Central Hertfordshire Growth and Transport Plan Stage 1 Evidence Paper, page 33).

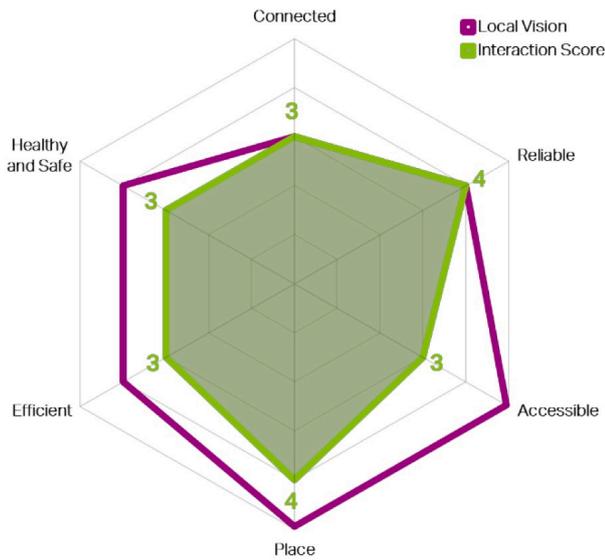


Figure 3.17 - Interaction 14: LETr3 to LETtc

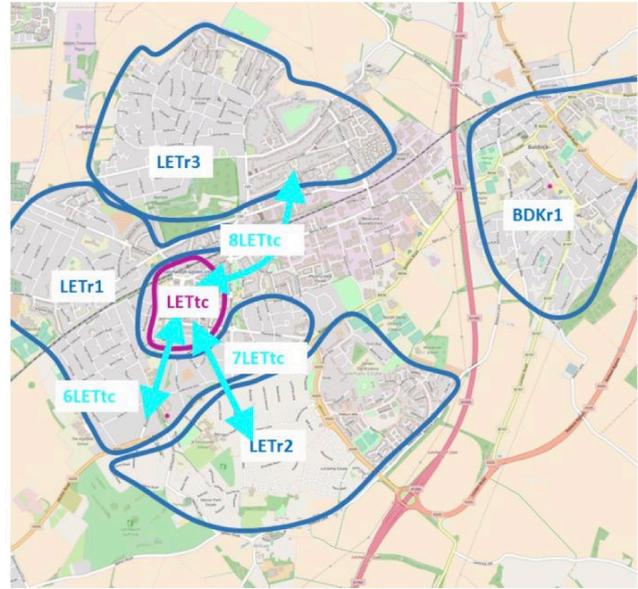


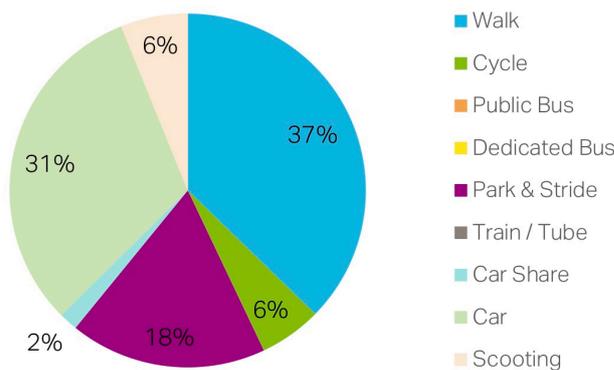
Figure 3.18 - Letchworth Garden City Interactions Map 1

*Train Service*

“..there is likely to be little capacity to add any more services, despite station and operator observations suggesting that peak hour services already operate at or above capacity. This suggests that there is demand for additional services or longer trains and that supply of additional capacity could encourage further growth.” (North Central Hertfordshire Growth and Transport Plan Stage 1 Evidence Paper, page 36)

“The planned introduction of HS2 is designed to have a positive impact on the East Coast Main Line capacity. By removing some of the long distance services from this line and instead having these operate on the new HS2 line (to destinations in the north including Sheffield and Leeds), it will provide additional capacity for more local services further south.” (North Central Hertfordshire Growth and Transport Plan Stage 1 Evidence Paper, page 37)

Letchworth Garden City



This pie chart (North Central Hertfordshire Growth and Transport Plan Stage 1 Evidence Paper Fig 4.2) shows travel mode for school trips. Letchworth has the highest car mode share in the district.

The new planned housing is all at a significant distance from the secondary schools which are all on the western periphery of the town.

## Appendix B: Biodiversity Concerns Related to North Hertfordshire Water Supply

Around 60% of North Herts water comes from underground aquifers and around 40% from river abstraction. A significant proportion is imported from other water agencies and Affinity Water can theoretically demand water from its neighbours. Affinity Water planning up to 2080<sup>2</sup> excludes any significant new 'capture and storage' projects.

Affinity Water faces the following challenges in supplying water to North Hertfordshire:

- a) The increasing population.
- b) Winter rainfall (when most water is collected) is reducing due to climate change.
- c) Regulations are reducing the volume of water that can be abstracted from aquifers.
- d) Transport costs from other agencies are increasing.

The underground aquifers feed the local chalk streams. Over-extraction of water by Affinity Water is already drying up these chalk streams and more housing would only exacerbate this problem. The RevIvel Association is a local group who are working to get action plans in place to challenge the crisis facing the river Ivel. The river Ivel, located to the north of Letchworth, runs through Baldock, Stotfold, Arlesey and Henlow. In November 2019 the group identified that "The Ivel is one of only 225 chalk rivers worldwide - 80 per cent of which are in England. These chalk rivers rely on mineral-rich, pure clean water to survive. The current water levels are catastrophic. There has been no flow above Radwell for the last 14 months. The river is dry."

When a chalk watercourse is drained continuously, a succession of marshland and dry-land species take over. If flow is then resumed, the stream may not return unaided to its pre-dryout state of biodiversity. Even if a programme of restoration is applied, the stream may take many years to recover.<sup>3</sup>

Affinity Water's Draft Final Water Resources Management Plan (June 2019) has accepted the following levels of risk:

- Temporary Use Bans, 1 in 10 years
- Drought Order Restrictions, 1 in 40 years
- Drought Permits (allows over extraction causing environmental damage), 1 in >40 years
- Emergency Drought Order (recognised as causing serious environmental damage), 1 in 200 years.

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2 [www.affinitywater.co.uk/corporate/plans/water-resources-plan](http://www.affinitywater.co.uk/corporate/plans/water-resources-plan)

3 England, Judy, Dobbek, Lukasz, Leeming, Brishan, Gurnell, Angela, Wharton, Geraldene; 2019/02/07 'Restoration of a chalk stream using wood: assessment of habitat improvements using the Modular River Survey: Restoration of a chalk stream using wood' in Water and Environment Journal, 10.1111/wej.12466

Abstract The installation of large wood and sediment berms to narrow the overwide channel of the River Bulbourne, Hertfordshire, aimed to restore geomorphological processes, improve channel habitat diversity and increase the amenity value of the park in which the river is located. The Modular River Survey provides a framework and suite of tools for river managers and volunteers to monitor and assess restoration activities. Applying this technique to the River Bulbourne before and after restoration demonstrated that the works increased physical habitat and vegetation complexity. The restored section was narrowed, substrate composition changed and the range of in-stream vegetation morphotypes increased. The initial slight improvement in riparian habitat complexity immediately following the restoration is expected to increase further over time as the riparian vegetation develops and the restored section of channel matures. A public perception and recreational use survey reviewed how visitor experience and use of the park changed following restoration.