

From: Mr. Reginald Norgan

NHDC Local Plan Matter 21

a) Have the alternative OAN figures been arrived at correctly etc?

The 2014 ONS data is not up-to-date (not the latest information available)

As certain controls have now (Feb 2020) been placed upon those who may migrate into the UK it follows that future migration will be lower than before. Therefore it seems more reasonable to take the ONS 2016 population data with 5yr migration of **18,991** over 20 years (ED171 Opinion Research Services table 13, OAN calculations).

ORS give the objectively assessed need for houses relevant to the above data as **11,037**.

On that basis the average household size inhabiting these new houses is $18991/11037 = 1.72$.

If this figure were correct only one bed houses need be built in this local Plan.

Should this figure be upheld development on the sites in question must be constrained to one bed houses.

Otherwise NHDC is giving itself a false mandate to build large houses on Green belt land.

The size of the current housing stock is not fixed but adapts to a lowering of household size by various ways such as splitting large houses into smaller flats. Thus new build is not the sole adjustor to a lower average house size in order to keep in balance with a diminishing household size.

Hence new housing stock merely needs to reflect the current UK average household size – **in this case circa 2.4**.

The average household size over the whole of England is **2.41** (55.3 population divided by the number of households of 22.9 million, ONS 2016 data).

Employing the UK average household size of 2.40 (18,991/2.4) gives an OAN of 7913.

The NHDC figure of 11,037 for the OAN is therefore not correct.

As 3970 houses have already been built or with permission that leaves just **3943 to be built**.

Market Signals

The uplift to the OAN of 10% proposed by ORS is a consequence of market signals.

It is not obvious from the ORS documents that the expected demand for houses in NHDC is greater than that calculated by the ONS in their population projections. Consequently the need for an uplift of the OAN is not proven to my mind.

An important question also is whether any perceived excess pressure in the housing market should be allowed to influence the number of houses supplied to the market.

This question is doubly important where the land utilised to take these additional houses is Green Belt, as it is in the NHDC Local Plan.

Para 79 of the NPPF states:-

. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Allowing the removal of Green Belt protection merely because of a doubtfully perceived excess demand (a market signal) goes totally against the protection of the Green Belt as described in NPPF para 79.

Furthermore, the pressure of would be house purchasers is not an exceptional circumstance. It is a normal market situation.

Thus NPPF para 83 is not applicable .

In conclusion, zero uplift should be applied to the OAN of **7913**.

b) Has there been a meaningful change in the housing situation?

Yes. The change from the original OAN of 13,800 based on ONS 2014 data to ONS 2016 data of 9936 is a meaningful change due to its magnitude. Maintaining the England average household size over new build again lowers the OAN further to 7913.

This gives a total diminution in OAN of 43%, which is very meaningful indeed.

c) should the local Plan be modified?

Yes, it must be and to an OAN of 7913.

Matter 22 – the supply of land

My responses to matter 22.1

- a) Agreed, but reducing to 14000 is nowhere enough. I have shown under Matter 21 that the OAN should be 7913. That is just 56% of the NHDC figure. Together with an increase in housing density I have shown that only 20% of the original site area is required.
- b) Probably
- c) No. additional land is not needed. See my response to Matter 21.
- d) A more correct and lower OAN as given in Matter 21 is the way forward together with a substantial increase in housing density. These methods are more appropriate as the OAN figure is more realistic and a greater housing density is not limited by the NPPF.

Responses to matter 22.2

The calculation given in my responses to matter 21 that the land supply required to meet the housing needs of NHDC up to year 2031 is actually only 20% of the NHDC estimate removes any concern of a lack of 5 year housing land supply.

Matter 23 – the Green Belt Review work etc.

23.1 In Paper B NHDC considers that NPPF para 17 is its mandate to build irrespective of all other requirements of the NPPF.

But the same NPPF paragraph also states:-

*Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is **suitable for development** in their area,*

Inherently Green Belt land is not suitable for development according to NPPF paras 79, 80, 87 and 88.

Thus NHDC's mandate does not exist.

- a) have you understood the NHDC approach correctly. No Comment.
- b) The NHDC approach is neither reasonable nor consistent with national policy.

The NHDC's reasons for exceptional circumstance relevant to NPPF para 83 either do not apply or are incorrect.

- The scale of the OAN is just 60% of the NHDC figure (see my response to Matter 21) and is no way exceptional in its size.
- **The amount of land required to accommodate the OAN depends entirely on the housing density employed .**

A higher density eventually removes the need to build on the Green Belt

The average density chosen by NHDC in the current version of the Plan is just 17dph.

This is ridiculously low.

Densities of over 200 dph have been proposed at nearby Stevenage.

Increasing the density to 50dph (not unreasonable and **not exceptional**) and employing my OAN calculation would utilise only **one fifth** of the current site areas.

This shortage of suitable non-Green Belt sites as claimed by NHDC results directly and entirely from their own decision to use very low housing densities.

The total area of **non-GB sites** (Appendix 4 of HOU9 SHLAA 2016 update) is 123 hectares .

The NHDC Plan assumes zero large windfall sites in future which is unrealistic.

If instead a yearly average of 5 ha is assumed over the remaining 12 years of the Plan then the total available non-GB site area is 183 has. Thus the remaining 4000 houses could be built on non-GB land at only a slightly increased dph of 22.

The need to remove Green Belt status does not exist.

23.2 A and b) The degree of contribution to Green Belt purposes of a particular site is meaningless and therefore cannot be assessed. Land has either Green Belt status or it does not. The NPPF does not allow for degrees of contribution to that status. Such degrees of contribution has relevance only to land which does not have GB status but is being considered for that status.

Thus the change in the assessment method is meaningless.

Matter 24 - East of Luton

It is not at all fair to North Herts residents or proper for NHDC to offer to take Luton's unmet need in North Herts without first ascertaining whether the unmet need figure supplied by Luton is correct and up to date .

THIS POINT OVER-RIDES ALL OTHERS

The Luton 2014 ONS OAN is 17,800.

The 2014 data is not up to date as required by the NPPF and is superceded by the 2016 ONS data.

The 2016 figure suggest 13040. The population increase in Luton divided by the current average household size of 2.4 suggests 11,700.

Thus the Luton OAN, and hence its unmet need, must be lower than published by either 4760 or 6100.

Either way the 2000 houses East of Luton are not needed and should not be built, particularly as they would be on Green Belt land.

- a) The Luton HMA Growth Options study is based upon the out of date 2014 ONS data and is therefore not applicable or correct in its conclusions.
- b) NHDC consider that 'strong links' (to Luton) are more important than the protection of the Green Belt by the NPPF paras 79, 80, 87 and 88 etc. **This is a false priority.**

Sites with not such strong links must be preferred to Green Belt sites

- c)** If this analysis is correct, and we must assume NHDC think it so, then there is no need to offer Luton GB land of high significance relative to the GB purposes listed in NPPF para 80 for 2000 houses when sites of lesser significance for 12,800 houses exist elsewhere.
- d)** The sites of lesser contribution to GB purposes mentioned above (12,800 house) are realistic alternatives for Luton's unmet need (which anyway is current circa 5000 lower(see above) than previously estimated.
- e)** No comment