

North Herts District Council

Local Plan

Schedule of Further Matters, Issues and Questions

Matter 21 - the objective assessment of housing need ('the OAN')

Additional Comments 3rd September 2020

Statement by J Rigg (16632)

21.1. Has the revised OAN figure for North Hertfordshire been arrived at correctly/on a robust basis and are the key assumptions made reasonable?

No.

(i) NHDC / ORS OAN assessment has not factored in the migration into North Herts (NH) associated with the development of Great Ashby (GA). **Excluding the impact of GA has resulted in a material Overstatement of OAN.**

As noted in para 1.22, (page 9): Local Plan 2011-2013: Housing Options Growth Levels and Locations: Consultation Paper February 2013 ¹), the **GA development**, the majority of which (3,000 houses) is located in NH **was originally justified in the early 1990's as meeting the needs arising from Stevenage**, not those of NH.

Para 1.23 raised the concern that some of the migration seen since 2002 was due to Stevenage need being accommodated in NH and therefore in assessing OAN for the 2011-2031 plan an adjustment to the figures is appropriate. As noted in Table 1 Possible Housing Targets (page 10) the difference between the Low migration and High migration options reflect an adjustment of 3,000 houses.

GA related inward migration should therefore be excluded in calculating OAN. Similarly the 2014 CLG / 2015 SHMA unadjusted figures overstate OAN.

(ii) Use of the 10 year migration projections is inappropriate as it includes the GA development.

(iii) Use of the Internal Migration projections encompassing a 5 year migration trend is considered appropriate as it will be more accurate, excluding the impact of GA but including the sharp decline since 2016 reflected in the principal (2 year trend) projections.

(iv) ORS also proposed an upward adjustment of 797 houses to allow for suppressed housing due to changes in the household representative rates between 2001 and 2011 (para 28). This compares with an identified actual figure of 309 in the 2015 SHMA, which was accommodated within the 10% market uplift, and therefore the proposed upward adjustment is not appropriate.

¹ http://www.north-herts.gov.uk/sites/northherts-cms/files/housing_options_part_1.pdf

(v) Pursuant to the above ORS then proposed an adjustment of an additional 673 houses to compensate for a projected lower household formation rate during 2011 – 2031 compared with 2001. This is considered inappropriate for the following reasons

a) Some 63% of proposed development relates to future inward migration. Providing for potential future suppressed household formation for people moving into NH does not address specific NH need.

b) Any adjustment for the suppression of household formation should only be applicable to existing housing stock not houses yet to be built.

c) Changes in population growth and its composition is a dynamic process. Referencing 2001 to justify an increase in the plan period when up to date information indicates a lower level of household formation going forward is inappropriate and contrary to PPG.

(vi) Calculation of the amended OAN is as follows

Projection	Household Growth 2011 - 2031	Household projection based household need	10% Market Signal Uplift	Adjustment for Institutional Population	OAN
ONS 2018, 5 year migration	7,433	7,651	765	100	8,516

21.2 In the light of this, has there been a ‘meaningful change in the housing situation’ in North Hertfordshire?

Yes, the resulting amended OAN of 8,516 is 26.6% lower than the 11,600 and 38.3% lower than the 13,800 proposed / previously proposed by NHDC

21.3 If there has been a ‘meaningful change in the housing situation’ in North Hertfordshire, should the Local Plan’s housing requirement be modified to reflect it?

Yes.