

**North Hertfordshire Local Plan  
Further Examination Hearings**

**MATTER 21**

**Monday 16<sup>th</sup> March 2020**

**Statement by Jed Griffiths MA DipTP FRTPI**

**On Behalf of CPRE Hertfordshire**

**February 2020**

## Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the Campaign to Protect Rural England, Hertfordshire (CPREH). It has been compiled in response to the invitation by the Examination Inspector to submit material on the matters to be considered at the further hearing sessions in March 2020. This statement addresses the issues and questions under Matter 21 – The Objective Assessment of Housing Need (the OAN).
2. Earlier representations have been made on the OAN by CPREH. Where appropriate cross-references will be made to earlier documents and to submissions made at hearings. The purpose of this statement, however, is to focus on the issues and questions raised by the Inspector in the schedule published in January 2020.

### **Q21.1 (a) Have the “alternative OAN” figures been arrived at correctly/on a robust basis?**

3. In the introduction to Matter 21, the Inspector notes the publication by ONS of the 2016-based population and household projections. The Council considered the implications of these projections for the Local Plan in paper ED159. In a letter dated 9<sup>th</sup> July 2019, the Inspector raised issues in relation to the figures used in ED159. The Council’s response was set out in Paper A (ED171). CPREH has studied these documents and the commentary by the Council on the “alternative OAN” figures in the various projections. We note the analysis that has been completed by the Council’s consultants. The methodology and the technical process are seemingly correct. The conclusions, however, are challengeable, as explained in the answers to the questions below and in the CPREH statements on other Matters at these hearings.

### **Q21.1 (b) In the light of the “alternative OAN” figures, has there been a “meaningful change” in the housing situation?**

4. CPREH is mindful of the conclusions set out by the Inspector in paragraph 8 of his letter to the Council on 9<sup>th</sup> July 2019. He refers to the Council’s earlier paper ED159, which set out the implications of the 2016-based projections for the Local Plan. The Inspector pointed out that the results suggested that the OAN for the Stevenage HMA part of North Hertfordshire was 10,900 dwellings, and that the OAN for the Luton HMA component was 100 dwellings. This was 2,800 dwellings less than the 13,800 on which the 14,000 Local Plan figure was founded. The Inspector concluded that this difference (over 20%) amounted to a “meaningful change”

5. The Council responded to the Inspector's conclusions in the Paper ED171. The question of the "meaningful change" is summarised at paragraphs 23 – 25, where the Council asserts that "a reduction of only 6.3%" does not represent a "meaningful change". This figure, however, of 12,900 dwellings refers to a reduction from the 2014-based OAN of 13,800 dwellings. We do not accept the Council's interpretation of the "meaningful change." In our view, the key point is the figure of over 20% reduction in the projections which has been noted by the Inspector.
6. Attached to ED171 at Appendix 2 is the detailed report by Opinion Research Services which recommends that the most appropriate 2016-based OAN figure would be 12,900 dwellings for the period 2011-2031. Although this is less than the previous total of 14,000, CPREH nevertheless disagrees with this figure and the implications it would have for Green Belt policy.

**Q21.1 (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?**

7. As there has been a meaningful change in the housing situation, CPREH believes that the Local Plan should be modified to reflect a lower OAN figure as the basis for determining housing need. The principal change to the Plan therefore should be the removal of the sites that cause the greatest harm to the Green Belt, particularly to the east of Luton, totalling 2,100 dwellings (1,950 for the unmet needs of Luton Borough). As the Inspector has pointed out in his letter of 9<sup>th</sup> July 2019 (paragraph 17), these sites are proposed mainly to meet the unmet needs of Luton Borough, rather than the wider Luton Housing Market Area (HMA) or North Hertfordshire itself. CPREH agrees with this viewpoint, and will elaborate on it during the discussion of Matter 24.
8. As elaborated by CPREH in previous representations, the main issue is the harmful effect of the proposed housing allocations on the Green Belt. In addition to the removal of the sites to the east of Luton, the Main Modifications should focus on the removal of the other Green Belt sites which are now acknowledged to make a "significant contribution" to the purposes of the Green Belt. Further elaboration of this point will be made in the discussions on Matters 22 and 23.

Jed Griffiths

Hertford

26<sup>th</sup> February 2020