

**North Hertfordshire Local Plan
Further Examination Hearings**

Matter 22

Tuesday 17th 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 an invitation by the Examination Inspector to submit material on the on the matters to be considered at the further hearing sessions in March 2020. This statement addresses the issues and questions under Matter 22 - the five-year housing land supply.
2. Earlier representations about the supply of housing land have been made by CPREH. Where appropriate, cross-references will be made to previous documents and to representations made at hearing sessions. The purpose of this statement, however, is to focus on the issues and questions set out by the Inspector in the schedule published in January 2020.

The Overall Supply of Land for Housing

Q22.1 (a) is reducing the overall housing requirement, and undertaking an early review of the Local Plan, the most appropriate way forward? If not, why not!

3. In the introduction to Matter 22, the Inspector refers to the latest note (document ED178) produced by the Council which updates the overall housing trajectory for the plan period and the five-year supply of land for housing. From its interpretation of the document, CPREH agrees with the Inspector's conclusions that the overall housing requirement as set out in policy SP8 cannot be met, and that the Council will not be able to demonstrate a five-year housing land supply when measured against draft policy IMR1. Paper ED178 also sets out the ways in which the Council believes these issues can be resolved.
4. The detailed CPREH response is explained below in the answers to the Inspector's questions. At the outset, however, one point is clear. The evidence of the 2016-based household projections, both for North Hertfordshire and the wider housing market area, and the need to take account of paragraph 14 of the NPPF 2012 in setting the housing requirement, fully justifies the setting of a lower requirement figure.

5. In order to ensure that the overall housing requirement is justified and can be delivered, the Council proposes a new main modification to the Local Plan. This would reduce the requirement to 14,000 dwellings. As explained by the Council in paragraph 5 of its note, this would be coupled to a clear commitment to an early review of the Local Plan. CPREH supports this approach, particularly as it would reduce the impact on the Green Belt and the countryside. We do not, however, agree with the revised OAN figure of 14,000 dwellings. Our concerns about these issues have been expressed in previous statements to the examination on Matters 3 and 4.

6. The Council also states that its approach, including an early review, would provide a platform of relative stability in terms of the planning process. Further opportunities would then be explored “to boost housing supply and meet longer-term development requirements.”

7. CPREH agrees that an early review would provide stability, but this should be considered against a period of uncertainty in terms of plan-making. There a number of matters which need to be addressed by the recently-elected government which may affect the context for planning policy at both the national and local level. These matters are as follows:
 - (a) The current Local Plan is being examined against the provisions of the 2012 National Planning Policy Framework (NPPF). A review would be examined in terms of the more recent NPPF (July 2019) or its successor;

 - (b) A new set of 2018-based population and household projections is expected from the Office for National Statistics (ONS) later in 2020. It is widely predicted that the new forecasts will be consistent with the previous 2016-based projections. They would therefore be much lower than the 2014-based assumptions that were used when the Local Plan was originally prepared and submitted.

 - (c) The 2021 population census will provide a more accurate set of statistics against which the Local Plan can be reviewed, probably in 2024.

- (d) It is anticipated that the government will review the standard method for the objective assessment of housing need (OAN). The “alternative” OAN, considered under Matter 21 and in the Council’s paper ED171, is based on the North Hertfordshire element of the Stevenage Housing Market Area (HMA). The Local Plan also includes a housing allocation to contribute to the housing requirement for Luton Borough. As argued in the CPREH statement on Matter 24, future assessments should consider the wider strategic relationship between North Hertfordshire, Luton Borough, Central Bedfordshire, and Aylesbury Vale.
- (e) The government has re-stated its support for the Green Belt, yet it is also committed to a house-building target of 300,000 dwellings per annum by the mid-2020s. This dilemma has been exposed at innumerable Local Plan examinations, not only in Hertfordshire, but also in the wider South East of England. In future reviews of government policy, this must be resolved.

Q22.1 (b) is the selection of additional land for housing from previously-identified sources the most appropriate way forward? If so, why?

Q22.1 (c) is the identification and selection of additional land for housing the most appropriate way forward? If so, why?

8. These questions are linked together. In its paper ED178, the Council discusses these options at paragraphs 30 -38. Both are rejected, mainly because the selection of any additional sites would lead to the suspension of the examination and further periods of public consultation. Based on its experience of the Welwyn Hatfield Local Plan, CPREH strongly supports this conclusion.

Q22.1 (d) Are there any other possible options that would be more appropriate? If so, what are they and why would they be more appropriate than the path suggested by the Council?

9. CPREH considers that there are no other possible options that would be more appropriate. In paragraphs 37 and 38 of ED171, the Council discusses and rejects the extension of the plan period. This can only be supported if there is a firm commitment to an early review.

The five year housing land supply

Q22.2 (a) Are the Council’s calculations correct/ accurate?

10. It would appear that the Council’s calculations in themselves are technically correct and accurate. Nevertheless, CPREH has difficulties with many of the conclusions, as set out below.

Q22.2 (b) All of the approaches used by the Council assume that the buffer required by paragraph 47 of the NPPF should be 20% - that is to say, that there has been a record of persistent under-supply of housing in the District. Has there been, such as the 20% buffer is the most appropriate?

11. CPREH has commented on this issue in its previous representations to the Examination on Matter 3 and has stated that the Council has not demonstrated an acute or intense housing need. The 20% buffer is therefore not appropriate. We note that the Inspector has asked the Council to prepare a short paper addressing the issue in the above question. Until that paper is available CPREH is unable to comment fully on this question. Nevertheless, we would emphasise that the housing target should be dependent on the housing requirement figure, which clearly should be lower than in the submitted Local Plan. This figure should not be, and has not been, calculated under the provisions of the NPPF July 2018 and the “standard method” set out in the accompanying Planning Practice Guidance (PPG).

Q22.2 (c) Is the “three-stepped approach” proposed by the Council the most appropriate method for setting the five-year housing land requirement? If not, why not?

Q22.2 (d) Is one of the other approaches to setting the five-year housing land requirement explored in the Council’s note, or another approach entirely, more appropriate?

12. The “three-stepped approach” proposed by the Council in paragraph 39 of ED178 is coupled to an early review of the Local Plan. This suggested approach (Appendix B, Scenario 6) is broadly endorsed by CPREH for the reasons set out above in answer to Question 22.1 (a). It would lead to the adoption of the Local Plan with none of the substantial delays experienced by other local planning authorities, as for example in Welwyn Hatfield.
13. As part of this revised approach, the Council should take a more robust approach to the review of urban capacity, particularly in the four main towns. In previous representations to the Examination, CRPEH has argued that there should be a much higher assumption for windfall developments based on the increasing scale of such developments since the Local Plan was prepared. The government has also relaxed controls on changes of use the redevelopment of land and buildings. Taken together, CPREH believe that there is considerably more scope for developments on previously-developed land. The question of higher densities on these types of sites should also be addressed.

14. This issue has confronted other Green Belt authorities, both in Hertfordshire and elsewhere in the South East of England. Immediately to the south of North Hertfordshire, in Welwyn Hatfield Borough, the Council has been involved in the Examination of its Local Plan since September 2017. Following a further iteration of its Green Belt Review and a fresh call for housing sites, the Council has published a set of proposed changes to the Plan, which would involve a lesser impact on the Green Belt. These changes include greater allowance for windfall developments and increases in urban capacity. For example, at the Wheat Quarter site in Welwyn Garden City, there is a planning permission for 1454 dwellings (28% of which are affordable). Here the prospective developers have now indicated that 700 – 900 additional dwellings could be provided on the site, compared to earlier figures.
15. There are other examples. At Marshgate Drive in Hertford, a recent appeal decision will lead to the provision of up to 385 dwellings on a former gas works site. This site was allocated for development in the recently-adopted District Plan 2018, but for mixed uses, limited to “around 200 dwellings.” In the Borough of Broxbourne, a former industrial area at Delamere Road, Cheshunt, became available and is now expected to make a valuable contribution (1,800 dwellings) to the Local Plan housing numbers.
16. In these changing circumstances, CPREH supports the Council’s overall approach to achieving a five-year housing land supply. It must be supplemented, however, by a more rigorous drive towards the optimisation of urban capacity and policy measures to increase urban density. A recent National Housing Audit highlighted the fact that low densities in housing created a greater propensity for poor design outcomes. Ultimately, a change in the Council’s approach will lead to a reduction of the pressures for the development of Green Belt land. It will also reduce urban sprawl and car dependency.

Jed Griffiths

Hertford

26th February 2020