

Standing up for Hertfordshire's countryside

LDF Team
North Hertfordshire District Council
PO Box 480
M33 0DE

Our Ref:

Your Ref:

30th March 2012

Dear Sirs,

North Hertfordshire LDF - Core Strategy New Housing Growth Targets Consultation

In response to your invitation of 10th February 2012 to comment on Housing Growth Targets for North Hertfordshire, we are very concerned that the consultation questions and some of the supporting documents are extremely misleading, and do not solely relate to the options for new dwelling targets in the District as implied by the consultation letter and indeed by the introductory page of the Consultation Document. Despite growth levels being the stated purpose of the consultation, the key supporting document 'North Hertfordshire 2011 - 2031: Defining the Housing Requirement'; the description of Options A to G; and question 4; all refer to the likely location of development associated with various housing numbers. We consider that the results of the consultation will therefore be distorted by responses that simply support a level of growth that would avoid development in particular areas, rather than offering an opinion based solely on the perceived scale of the need for new housing, and by discouraging responses by individuals who will assume that there is a direct link between housing targets and locations. The only appropriate references to potential locations for future housing as part of the current consultation would have been 'generic', pointing out that above a certain level it is likely that new development would be necessary on Greenfield sites outside existing settlement boundaries, leaving the potential locations for these to be identified and consulted on by the Council at the Site Allocations stage.

CPRE Hertfordshire therefore requests that the Council states, and demonstrates in its forthcoming Local Development documents, that the proposed distribution of new housing development in the District will not be, and has not been influenced by responses to the Housing Growth Targets consultation. If the Council fails to do so, and uses the responses to justify proposals for development locations, we consider that the consultation process will have been unsound.

We also wish to make the following responses to the questions set out in your questionnaire.

- 1) We neither agree nor disagree. We do, however consider that there is a shortage of affordable housing, and that the existing housing stock does not adequately meet the needs of existing households in the District. We also consider that additional dwellings will be needed in the District in the short to medium term in order to meet the needs of new household formation and to help to address the imbalance between

housing stock and household requirements, particularly in terms of tenure. Please also see our comments below on question 6.

- 2) We disagree that more housing is more important than avoiding greenfield development. We do, however consider that if meeting the housing needs of the people of North Hertfordshire cannot be achieved without the use of some greenfield sites, this would justify limited development of such sites. Please also see our comments below on question 6.
- 3) We neither agree nor disagree, because of the unqualified nature of the question. We would strongly disagree that housing growth should be based on the level that would be required to provide all existing businesses in the District with their perceived catchment population. All businesses and the District's town centres must be expected to adapt to organic and sustainably planned changes in the District, as they have always have done.
- 4) We strongly disagree with the presumption in this question that there has to be a choice between greenfield development abutting Stevenage or greenfield development abutting the other towns and villages in the District. Please also see our introductory comments above.
- 5) We disagree that Option F is the 'right level of growth for the district'.
- 6) Please see our introductory comments above. In addition, we do not agree that the only means of achieving the calculated number (129) of affordable homes per year is by allowing 7,000 new dwellings to be built between 2011 and 2031, or that the Council can be confident that this level of affordable housing need, or the other assumptions on which the targets are based, will be valid beyond the short term. With the advent of the National Planning Policy Framework (NPPF) and the Localism Act, we do not consider that any growth option should be selected that would require the allocation of land in the countryside beyond established settlements in the period to 2021. The selected option should then be the subject of review within five years to determine if a different option should be pursued in the longer term to 2031, based on economic and social changes over the next few years, and consequential household forecasts. Please also see our comments below on question 8.
- 7) We consider that the prudent course would be to pursue Option G.
- 8) Please also see our introductory comments and our specific comments above on question 6. We do not consider that household projections based on the April 2008 (pre-recession) ONS population projections, are a reliable basis for forecasts of natural change in household numbers for the period to 2031, or that unconstrained demand for housing should be the basis for determining provision for in-migrant households. We also consider that the Council should seek additional mechanisms to encourage and promote a higher proportion of affordable housing in new development that does not require the overall housing provision assumed by option F. Furthermore, we believe that the NPPF, at paragraph 48, now allows the Council to include an annual allowance for 'windfall' housing in its housing land availability assessments, which should enable the Council to adjust the level of housing provision on specified sites. We therefore support a lower target than option F, and given that

option G would not require the early release of Greenfield sites, we support this option, subject to review.

We would be pleased to elaborate on the above answers to your questions, and to discuss the wider issues raised by our comments on the consultation, if you would like us to do so. We also wish to be included in future consultations on the Council's emerging Development Plan documents, and look forward to hearing from you on progress, particularly in the light of Annex 1 to the NPPF.

Thank you again for the opportunity to contribute to the consultation.

Regards,



Steve Baker
Planning Manager, CPRE Hertfordshire.