

NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: CPRE HERTFORDSHIRE REPRESENTATIONS ON EXAMINATION DOCUMENT ED 215 - NHDC STATEMENT ON MATTER 22: HOUSING SUPPLY

CPRE Hertfordshire (CPREH) has a number of comments on the NHDC statement on Housing Supply submitted after the Matter 22 Hearing session on Housing Supply took place. These comments are made in order to inform the Inspector where the Council has, in the opinion of CPREH, misinterpreted, or failed to give the relevant context for, national policy as it applies to housing supply in local plans. The comments are set out under the relevant paragraph number of the Council's statement.

Paragraph 12, under 'context for the housing buffer'.

NHDC states that 'any failure to meet the requirement means that the district's needs are not met contrary to the objectives of national policy', but this is not the case. Paragraph 14 of NPPF 2012, the national planning policy context for the NHLP, quite clearly states that a Plan's housing requirement must take into account other national policies that may mean that need should not be met in full, cross-referring directly to specific policies for protection of, along with other specified designations, Green Belt land and AONB.

Hence, an inability to meet the area's housing need in full is not contrary to national policy in the case of North Hertfordshire, if the Plan's housing requirement is justifiably set at a lower level than the assessed level of need.

Paragraph 13.

Five other local authority areas are referred to by NHDC for comparison with North Herts, but two of these have no Green Belt land, and are not therefore comparable at all, and only Chelmsford is comparable in terms of location in relation to the London Green Belt. No weight therefore, should be given to this aspect of the Council's statement.

Paragraph 15

The Council states that paragraph 47 of NPPF 2012 requires '...the delivery of need to be evenly spread', but this is not true. The policy set out in paragraph 47 to meet need is caveated by the expression 'as far as is consistent with the other policies in the Framework'. Hence the Plan's five year housing supply requirement is determined by the Plan's housing requirement, not housing need.

Indeed this whole section of the Council's statement is predicated on the assumption that Housing Requirement is the same thing as Housing Need, which is simply not true, unless and until in the case of North Herts it is finally determined by the Inspector that the Plan's Housing Requirement should meet Objectively Assessed Housing Need (OAN) in full.

Tables

All the Tables submitted by the Council in ED215 are also predicated on meeting OAN in full, with that level of need being based on a non-standard high migration 'variant' household projection rather than the ONS 2018-based Principal household projection, that ONS itself favours.

The result of this is that a level of need is claimed by the Council that is much higher than is likely to be the case, not just based on the ONS Principal projection but also based on recent history since the start of this Plan Examination in terms of the Covid-19 pandemic and Brexit.

Paragraph 46, in the section on alternative scenarios.

In the above context, CPREH notes that none of the 'alternative scenarios' is based on a level of housing need derived from the application of the ONS preferred 2018-based principal household projection, and CPREH therefore asks the Inspector to treat the Council's evidence as incomplete and suspect.

In this summary paragraph, the Council again assumed that housing requirement is the same thing as housing need, and based the level of need and the excessive additional provision or 'buffer', on the erroneous use of a high migration variant household projection not favoured by ONS. Doing so it claims that exceptional circumstances are 'clear', which is a false presumption, as explained above, and is not a sound justification for claiming that exceptional circumstances exist for removing land from the Green Belt.

CPREH strongly urges the Inspector to reject the case for the use of the unjustified variant household projection, and the consequential excessive level of housing development and Green Belt sacrifice proposed by North Herts Council. Similarly, the excessive additional housing 'buffer' should be rejected, because the loss of Green Belt is unnecessary, in favour of a more realistic level of housing provision that respects both the national Green Belt and environmental policies.

In doing so CPREH would support a commitment by the Council to an early Plan review that will be able to reflect the reality of recent trends, the initial consequences of Covid-19 and Brexit, and genuinely up to date information from the 2021 Census on the reality of North Herts population and household trends.

CPRE Hertfordshire: June 2021