

## **NORTH HERTS LOCAL PLAN FURTHER PROPOSED MAIN MODIFICATIONS:**

### **REPRESENTATIONS BY CPRE HERTFORDSHIRE: JUNE 2021**

The following representations are made by Campaign to Protect Rural England Hertfordshire (CPRE Herts) on the North Herts District Council's Further Proposed Modifications (FPM) to the submitted North Herts Local Plan (NHLP). They are made in the light of the additional documents made available by the Council on the NHLP examination website for consultation in May 2021, and the latest available relevant information from other official sources.

CPRE Herts notes that some of the FPM's change the context for key policies in the Plan that would have major implications for the North Hertfordshire District during the plan period, but that no consequential modifications are proposed to take account of that change in context.

The Local Plan Inspector is therefore asked to reconsider the policies and proposals in the NHLP as it would be modified by the FPM's, in the light of these representations, and those in respect of the parallel additional documents consultation, before finalising his Report

The following representations are set out under the FPM number and relevant policy or paragraph number:

#### **FM 017: Paragraph 2.8**

The proposed modified text states that the North Herts District population 'is likely to be' 7,000 lower in 2031 than assumed in the submitted Plan. Based on the Council's own evidence on household size, this reduction reveals that fewer net new dwellings would be needed by that date, and beyond.

That reduced figure is however, itself based on the now out of date official ONS 2016-based population projections, not the latest, ONS 2018-based, projections, which indicate a much greater reduction from the forecast number in the submitted Plan.

There is therefore, evidence of a significantly lower level of housing need than that has not yet been fully addressed in the Plan's text and policies. In respect of Paragraph. 2.8 therefore, a further modification should be made to reduce the likely future population in accordance with the ONS 2018-based population projections for 2031.

#### **FM028: Paragraph 2.39**

The proposed modified text states that the North Herts District Objectively Assessed Housing Need (OAN) for the Plan period is 11,500, reduced from 13,800 in the submitted Plan. This in itself would mean that 2,300 fewer dwellings would be needed to meet that need, but the proposed new figure takes no account of the effects of Covid 19 or Brexit, because it is based on a 2018-based household projection by ONS, pre-dating those events.

The figure of 11,500 is also unreliable because the ONS projection chosen by NHDC is a higher, 'variant', projection that does not fully reflect the changes to migration patterns in the immediately preceding years that are widely considered to have continued since 2018 as a result of Brexit in particular. The projection that should have been used as the starting point for calculating OAN is the one recommended by ONS themselves, their Principal 2018-based household projection, that reveals a much lower level of household growth over the Plan period.

Paragraph 2.39 should therefore be modified to reflect the significantly reduced level of OAN consistent with the ONS 2018-based Principal Household Projection, pending a review

of the consequences of Covid 19 and Brexit for household formation in the District. Such a review of the NHLP that then also takes into account the findings of the 2021 National Census and the initial consequences of the Covid 19 pandemic and Brexit, could then be used by NHDC, in consultation with its neighbouring authorities to determine the scale and location of future housebuilding in the District in the medium to long term.

#### **FM029: Paragraph 2.41**

The proposed modified text states that 8,500 houses, an increase of 1,500, can be built within Luton Borough to meet Luton's own needs, rather than the 7,000 stated in the submitted Plan. This figure of 8,500, significantly and demonstrably underestimates Luton's own capacity, as shown by representations already submitted to the Examination by other parties, and by the two Councils' Statement of Common Ground (ED224) which introduces a figure of over 10,900 for Luton's own capacity, over 64 percent higher than the submitted Luton Local Plan, and on which CPRE Herts are also submitting representations.

The proposed FPM therefore fails to recognise the true scale of Luton's own capacity to meet its needs, and is therefore an unsound basis for determining the extent to which the NHLP should contribute to such needs. This failure is compounded by the Council's failure to consider the implications of the dramatic fall in projected household numbers in Luton itself, as revealed by the Principal ONS 2018-based household projection, as also clearly demonstrated in evidence to the Examination. The legal requirement for plan makers to take into account up to date information does not therefore seem to be reflected by the FPM, and the soundness of consequent proposals in the Plan to accommodate housing reserved for Luton's future needs in the area East of Luton has not been demonstrated.

#### **FM039: Policy SP2**

The proposed FPM includes a figure of 13,000 for the provision of new houses, reduced from the 14,000 figure in Policy SP8 in the submitted Plan. That reduced figure alone should mean that land for 1,000 fewer houses is proposed for removal from the Green Belt, but no consequential changes are proposed to reduce the proposed loss of Green Belt in the submitted Plan.

Indeed the proposed FPM to Policy SP2 would lead to the adjustment of the Green Belt boundaries of specified settlements to facilitate further loss of Green Belt. The failure to take into account the lower Principal ONS 2018-based household projection for North Herts, that reveals a much lower housing provision figure should be specified in Policy SP2, with the proposed Green Belt land allocations scaled back, means that the proposed FPM to the Plan would be unsound in the opinion of CPRE Herts.

#### **FM057: Policy SP8**

CPRE Herts objects to inclusion in sub-paragraph 'a' of a figure of 11,600 net new dwellings as the target for the release of land, for the reasons set out in representations on FPM 017, 028, and 039.

CPRE Herts also objects to around 100 dwellings within the Luton Housing Market Area, because there is insufficient capacity within the countryside and very small settlements in that defined area within North Herts, next to Luton, without causing significant harm to the Green Belt and local environment of that area.

CPRE Herts also considers that the introduction in sub-paragraph 'c' (iii) of a figure of '200 homes' in the specified five villages, is inappropriate, because of the harm that this would cause to the Green Belt in the absence of exceptional circumstances for doing so, now

that housing need can be expected to be much lower than assumed when the NHLP was submitted.

**FM058: Paragraph 4.86**

This FPM states that the NHDC 'evidence identifies a requirement for 11,500 homes'. In deciding on this figure the Council has ignored the authoritative evidence of the Principal ONS 2018-based household projection, that housing need is likely to be significantly lower than that assumed when the NHLP was submitted, and when housing need was considered at the relevant Examination hearings. This FPM is therefore unsound, and a much lower figure should replace it, as previously sought by CPRE Herts.

**FM 064: Paragraph 4.99**

The FPM to include a target of 1,120 dwellings a year in the District from 1 April 2024 is excessive and not justified by the actual level of housing that should be planned for, in the context of the latest information on housing need available to the Council. The figure should be reduced to be consistent with a lower housing target that takes proper account of likely reduced housing need.

CPRE Hertfordshire: June 2021