



The countryside charity
Hertfordshire

Summary of CPRE Hertfordshire's response to North Herts Local Plan – Further Main Modifications.

The North Herts Local Plan Further Main Modifications have been published for consultation (closing date 24/6) following advice from the Inspector after the Examination in Public (EiP). We can only comment on the Further Main Modifications, and no other aspect of the LP.

Our view is that the Further Main Modifications change the context for policies in the LP, and this justifies further representations which the Inspector should take account of in his final report.

Our main concerns are as follows:

1. In para. 2.8 of the Further Main Modifications, the North Herts population is stated as “likely to be” 7,000 fewer than assumed in the submitted LP. This figure is itself based on 2016 Office of National Statistics (ONS) population and household projections which are higher than the later 2018-based projections which were published in 2020.
2. Whilst the proposed text states that the Objectively Assessed Need (OAN) is 11,500 houses, reduced from the submitted LP total of 13,800 houses, this does not take account of the impacts of Covid or Brexit which have occurred since the ONS projections and which are likely to reduce housing need further. Clearly it would be wrong not to use the latest information available.
3. In any case, the reductions in housing need noted by the Inspector are not reflected in any diminution of the amount of Green Belt to be released for housing in the LP. This means that the allocations of present Green Belt sites are unsound in that they do not reflect the lower housing need stated in Policies SP2 and SP8.
4. With specific reference to Luton Borough housing needs as they affect North Herts, the Modifications say that the capacity within Luton's boundaries has increased from 7,000 to 8,500. Our representations to the EiP referred to the much higher figure of over 10,400 agreed by Luton BC and NHDC and we believe this is still an underestimate. This means that the number of houses for Luton's needs that cannot be met in Luton is in fact much lower than when their Plan was adopted (and likely to be even lower due to new completions not reported) and the East of Luton sites will not be needed at all.

These issues underline the need for the Inspector to draft his Report to reflect the latest information available as required by Government planning guidance.