

14 September 2020

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Dear Louise,

Further to your email of 16 August 2020, please find my comments on the Further MIQs for the NHDC Local Plan Examination in Public for consideration by the Inspector.

Thank you for your kind assistance,

Best regards,

Hayley Ward

ED194 - Further MIQ's for the NHDC Local Plan
Examination in Public – Sept/Oct 2020:

Matter 21:

The objective assessment of housing need ('the OAN') and the housing requirement

21.2 In the light of this, has there been a 'meaningful change in the housing situation' in North Hertfordshire?

HW: Yes, I would say this reduction in numbers does represent a meaningful change.

21.3 If there has been a 'meaningful change in the housing situation' in North Hertfordshire, should the Local Plan's housing requirement be modified to reflect it?

HW: Yes, the Local Plan's housing requirement should be modified to reflect this meaningful change.

21.4 Has the indicative OAN figure for Luton been arrived at correctly/on a robust basis and are the key assumptions made reasonable?

*HW: In Luton Borough Council's Strategic Housing Land Availability Assessment of November 2019, it states that **their entire need (not unmet need) is 8,500**. They have delivered 4,325 of these in the period 2011 to 2019, which represents and oversupply of 925 dwellings in the first 8 years of the plan (they planned to build 3,400 in this period). And LBC have a 7.83-year land supply.*

21.5 In the light of this, has there been a 'meaningful change in the housing situation' in Luton?

HW: Yes. On reading Luton Borough Council's Strategic Housing Land Availability Assessment of November 2019, it states that their entire need (not unmet need) is 8,500. They have delivered 4,325 of these already and have a 7.83-year land supply. Therefore, it would appear at this time, that there is a potential shortfall of 1,451 houses – but in 8 years' time.

21.6 If there has been a 'meaningful change in the housing situation' in Luton, should the East of Luton sites be modified or deleted from the Local Plan?

HW: Yes, as based on the above figures, the east of Luton sites do not appear to be needed for another 8 years, therefore it would seem odd to develop them before the review of the NHDC Local Plan – indeed in 8 years' time, more studies may have been done and the unmet need of 1,451 may no longer exist, or be revised down further.

Also, why are NHDC taking 96% of the projected shortfall from Luton that may or may not be needed in 8 years' time? Why aren't other neighbouring authorities taking a 'fair share' of the unmet need (if, indeed, there is any at all)?

Matter 22 – the supply of land for housing

b) If the housing requirement should be modified to 13,000 dwellings, should the supply of housing sites proposed in the Local Plan also be reduced? If so, how?

HW: Yes the supply of housing sites should be reduced. How they should be reduced could be arrived at as follows:

- 1. Any site which is subject to a Neighbourhood Plan which has been adopted and 'made' by NHDC but which has been completely ignored in the creation of the Local Plan and the site allocations, should be removed from the plan*
- 2. Any site which is currently Green belt should be removed from the local plan*
- 3. Any site where evidence exists that development could lead to an increase in flood risk to existing dwellings should be removed*
- 4. Any site where the main mode of transport is highly likely to be the private car (due to location and public transport not being very plentiful or convenient) should be removed*
- 5. Any site where there is an existing traffic congestion issue which would also be heavily exacerbated by an increase of vehicular movements generated by development should be removed*
- 6. Any site where there is a known air quality issue should be removed*
- 7. Any site which serves the specific purpose of preventing urban sprawl should be removed so that it can continue to prevent large towns from merging into one another, particularly where this would mean small villages are swallowed up into and become part of large towns*
- 8. Any site where development would not create the opportunity for affordable homes, but rather would attract a build of "aspirational homes" and a premium price, should be removed from the plan*
- 9. Any site which meets several or all of the above tests should be removed.*

One such site which meets all the above test is site WY1, which I would suggest should be the first to be removed from the local plan. NHDC have site WY1 allocated to provide 350+ dwellings, but the Wymondley Parish suffers all the above problems and 92% of those who were surveyed in the creation of the plan said they wanted to preserve the existing designated greenbelt in the Parish which prevents it from being swallowed up into neighbouring large towns and also, that in a village

of less than 350 existing dwellings, they community believe that building 50 or less dwellings is perfectly adequate (and possibly excessive) to meet the needs of the Parish.

- c) Is a 'buffer' or around 13% an appropriate approach? If not, why not? If there is a 'buffer' of around 13%, do the exceptional circumstances required for the 'release' of land from the Green Belt for housing development exist?**

HW: I do not understand how a "Buffer of 13%" has been arrived at or why it should be included a plan where the numbers are already being reduced. Since NHDC originally overestimated the housing requirement, it would appear that housing need is on a downward trajectory, possibly meaning that an oversupply is looming and no buffer at all is needed.

As I still have not seen any evidence of exceptional circumstances for removing any green belt, I do not believe any exist to justify the removal of any green belt in Hertfordshire, particularly as it is the most densely populated county in the country already. I believe that green spaces are incredibly important not just to human health and well-being of existing generations, but for generations to come.

NHDC's Local Plan itself opens with a statement about what a wonderful county it is, how people love to visit, work and live here, and about the wonderful mix of towns and villages and countryside – and yet the same plan seeks to destroy it all.

We see migration from London to Hertfordshire because of the green spaces, however, with the combined plans of NHDC, East Herts District Council, Bedfordshire Borough Council and Stevenage Borough Council, it seems the North Herts area in particular, if all the plans go ahead, will have very little, if any countryside left. Instead, it will be like London in the mid-20th century, polluted and covered in smog. Not to mention the loss of biodiversity and all the ecological consequences.

I fear for what that means for the very air that we breathe, and potentially premature deaths from increased respiratory diseases, and also for what it means for climate change, and the very real possibility there is of humans becoming extinct. It seems dramatic, but it is a real threat. If all the local authorities worked together, there is a bigger opportunity than piecemeal plans – there is an opportunity to safeguard our existing countryside and to build a model "green" garden city – to be a shining example of the way forward in development - not just in this area but across the entire nation – and ultimately, help to keep the planet safe and inhabitable for years to come.

Thank you for taking the time to read my comments.