

## MATTER 22 – THE SUPPLY OF LAND FOR HOUSING

### ED178 FROM NORTH HERTS DISTRICT COUNCIL

NAME OF REPRESENTOR – David Dorman, Mangrove End Cottage, Mangrove Green, Cockernhoe, Herts, LU2 8QE

#### a) Introduction – the overall picture

- 1) This Matter is very technical in nature but nonetheless very important as it goes to the heart of some of the more contentious issues facing communities in North Hertfordshire as a result of the NHDC draft Local Plan.
- 2) On a general introductory point it must be desirable for there to be an agreed NHDC Local Plan as soon as reasonable, rather than run the risk of there being a planning vacuum in which opportunistic land developers might seek to get approvals for house building on an ad-hoc basis, rather than as part of a planned and sustainable approach through the Local Plan process.
- 3) The delays in finalising the Local Plan are due in no small part to the strong objections being put forward by communities across North Hertfordshire – especially those potentially suffering from the loss of Green Belt for housing development. The Inspector has rightly sought clarifications/changes to the Local Plan through the Examination process.
- 4) As a result of these delays NHDC has now decided that instead of a total housing requirement across its area of 15,950 (14,000 from North Herts and 1,950 to meet the unmet needs of Luton), it will now seek only to build 14,000 houses in total – and, by virtue of the calculations suggested by the Council for its preferred option going forward, this will also enable the required 5-year supply of land for housing.
- 5) The Council states in its ED178 (para 39) that ‘ **it is important to be clear that the Council is not proposing the removal of any sites from the Plan. The reduction in projected delivery arises from the forecast completion of several strategic sites now being extended beyond 2031**’.
- 6) This must mean that there will be continued uncertainty for numbers of communities across the District. Some of this may be allayed shortly as a result of the Inspector asking NHDC to provide a paper setting out the sources of supply to show on a year-by-year basis the supply from each of the proposed housing allocations and other sources such as windfall sites across the entire period.
- 7) Such a document should be similar to the Strategic Housing Land Availability Assessment such as has been published by Luton Borough Council in updated form in November 2019. This shows in clear detail each of the allocated land sites earmarked for development through to 2035 and the number of houses planned to be constructed at each site on a yearly basis. It is from this document that those of us residing in the area around Cockernhoe to the East of Luton have been able to discover that the planned house building programme in Luton would render it almost certainly unlikely that there will be a significant unmet housing need from Luton that would require the building of 1,950 homes to the East of Luton.
- 8) It seems as though the Inspector’s work with NHDC is akin to pulling hens teeth – everything that might be useful for the Inspector and the threatened communities to know has to be dragged out from the Planners at NHDC.

**b) The questions posed by the Inspector**

- 9) The Inspector posed four initial questions. The first of these was: **Is reducing the overall housing requirement, and undertaking an early review of the Local Plan the most appropriate way forward? If not, why not?**
- 10) It does seem that local authorities have to undertake a review of their Local Plans within five years and NHDC makes the point that this will be necessary to align with, or reflect the views of, Local Plans within shared Housing Market Areas. They point out that in the case of Luton, the review there is expected by the end of 2019. We are not certain if this review has been completed but we assume that the updated Luton SHLAA (see para 7) is a document that either represents the review or heavily informs it. If that is the case then the clearly demonstrated over-achievement in house building and building projections in Luton which will render unnecessary the need for unmet housing to be provided on prime Green Belt land from within NHDC in the East of Luton sites, will mean that the 1,950 houses in this area will not be required. Indeed in para 7 of ED178 NHDC repeats the Government policy that; **'for a number of years housing need alone does not represent very special circumstances'** (this policy is in relation, of course, to the restrictions on building on Green Belt land which must demonstrate very special circumstances in order to be allowed to proceed).
- 11) It does seem a strong co-incidence that the housing reduction figure proposed by NHDC exactly mirrors the requirement currently planned for building in the East of Luton sites.
- 12) Whether this turns out to be the case we shall have to see, but in any event, the possible provision of housing to help meet unmet needs from Luton will almost certainly have to come from Central Bedfordshire which is by far the biggest neighbouring contributor to Luton in the Luton HMA. Certainly NHDC has made it clear in ED173 (Para 23) that either it will build 1,950 homes in the East of Luton for Luton's needs or it will build none at all.
- 13) Question 2: **Is the selection of additional land for housing from previously identified sources the most appropriate way forward? If so, why?**
- 14) In some cases across North Hertfordshire this may well be an option, particularly in built-up areas. It doesn't seem to be appropriate for existing Green Belt land where there are considerable objections already. In the case of the East of Luton sites, the only one of three sites brought forward for potential development (for 1,950 houses) is either unlikely to go ahead, or if it does go ahead will be full to capacity. The other two sites to the East of Luton are deemed unacceptable for development, being either too close to London Luton Airport (the southern site allocation) or too close to the Chilterns AONB and Putteridge Bury (the northern site allocation).
- 15) Question 3: **Is the identification and selection of additional land for housing the most appropriate way forward? If so, why?**
- 16) It does seem that trying to find additional land for development at this stage would possibly lead to further delays in the Local Plan implementation such that speculative approaches by developers might be encouraged, rather than allowing a Plan-led sustainable approach to development. That said, the possible approach suggested by NHDC of relooking at this at a 5 -year review might be worth pursuing especially,

as they suggest in Para 30 of ED178, that any additional sites that might be assessed could include the feasibility of a new settlement. Many of the representors in North Herts are alive to the possibility of a third Garden City (Osborn Garden City) that could possibly be constructed on rural land not in the Green Belt to the north part of the District, possibly in co-operation with Cambridge.

**17) Question 4: Are there any other possible options that would be more appropriate? If so, what are they and why would they be more appropriate than the path suggested by the Council?**

18) A significant option that we can suggest and which has already been alluded to above - is, namely the total deletion from the Local Plan of the 1,950 houses proposed to be built to the East of Luton to help meet Luton's unmet housing needs. We have demonstrated that these houses are not needed and so removing them from the Plan would be a sensible decision and allow the Plan to move forward, albeit other areas of North Herts that are campaigning against elements of the Local Plan that affect them also will have to be satisfied that the Plan meets their requirements.

19) The question also arises how does this revised NHDC figure of 14,000 houses tie in with the latest Objectively Assessed Need (OAN) for housing that has been completed by Opinion Research Services at the Inspector's request (as per Matter 21 and paper ED171).

20) This shows a further drop in likely housing needs from the 14,000 in the Local Plan (for NHDC's own needs) to 12,900. Has NHDC taken into account this revised and lower OAN when projecting its reduced housing plans in ED178?

**c) The further questions asked by the Inspector**

21) The further questions posed by the Inspector in 22.2 are primarily directed towards NHDC in terms of their analysis of the three--step approach they are proposing as to the way forward and to secure a robust 5-year land supply for housing.

22) As such, we believe these questions to be primarily technical and best answered by NHDC.

23) We do, however, welcome the Inspector's request of NHDC for them to provide a complete list of sources of land supply to show on a year-by-year basis the supply from each of the proposed housing allocations. This will serve to remove any scope for 'fudging' by NHDC of their plans and help to remove some of the distrust felt by many campaigners as to the way NHDC seems to manage its planning activities.

24) However, depending on the response by NHDC to this request which we hope will be available for all responders to view in good time before the public hearings, there may well be the need for a further response.