

WILFRED ASPINALL

**Submission  
to the Hearings  
North Hertfordshire Local Plan Examination  
28 September 2020**

**INTRODUCTION**

I reiterate my concern that here we are in 2020 where the Inspector is trying to examine the draft Local Plan and still there appears no determination to create a 5 year house / land supply except by spreading the allocation of house building over the remaining years of the 2011 - 2031 Local Plan. (Actually 2021 - 2031)

The government objective (and other political interests) wants to see 300,000 houses built every year for the foreseeable future. Social housing is a major issue but in order to carry out such building needs a determined opportunity to build houses for the market unless there is to be a government initiative to put funding into social housing.

I will make comment on the Inspectors analysis questions

**MATTER 21 - the objective assessment of housing need (the OAN) and the housing requirement**

As I understand there are some serious questions being asked about the methodology adopted by the ONS. The figures they have brought up, in my view, are short sighted and do not take into account the need to bring business investment into North Hertfordshire. This requires a building programme strategy that provides houses for those new employees who will work in potentially new business ventures.

21.1

The OAN figures are abstract and we all know can be used according to interpretation.

The government White Paper is suggesting that Local Plans should be less complicated and drawn up in a period of 30 months. The issue of a LP bringing forward data analysis may not be the most practical way forward.

I am therefore sceptical that the OAN figure is only looking at data not a robust analysis for a future strategic and economic house building policy.

21.2

In the light of my comments above I don't think the OAN figures demonstrate a 'meaningful change in the housing situation'. The Council are but matching their figures to meet the OAN analysis

21.3

No

21.4

Like North Herts I can only assume that Luton has adopted a policy to fit the size.

21.5

The decision appears to have been made by Luton

21.6

I am sceptical that the sites around Luton should be deleted from the LP unless there are compensatory increases in sites elsewhere in the Area. See later comments.

**MATTER 22 - the supply of land for housing**

a).

NHDC committed themselves at an earlier Hearing Session to review the LP but I have misgivings as to exactly what they mean.

In my view the LP should have been adopted much earlier. Nothing was started until the end of 2015, then done in a rush without detailed opportunity for land sites that were available and ready to go being added to the SHLAA.

In my view the Council should review what sites are available on an annual basis so that where building delays take place other sites can be added. The impression is that the main objective is to prescribe certain strategic sites and that will be the only policy until 2031.

My thinking is that a review should really take place at 5 yearly intervals, 2021, 2026 and finally in 2031. This means that work has to be undertaken 30 months prior to these dates and implemented on a specific date in these years.

The fact that this draft LP is being examined on the criteria of the 2012 NPPF does not bode well.

I understand that any review would take into account the NPPF 2019 version and if government introduce the White Paper proposals - as mentioned above - the 5 yearly review would be concluded in 30 months based on a much slimmed down and simple local strategy and LP.

With that in mind and (c) below it is my view that the 13,000 figure is inadequate

I accept CV19 constraints have and still exist but to get the economy moving the construction industry can be the motor to economic recovery. By building houses the funds spin around not just the building industry but in all walks of retail activity. NHDC should plan to develop a dynamic house building policy and not stand back on the basis of a CV19 virus problem.

b).

No I do not think the housing sites in the LP should be reduced. However effort should be given to finding new sites bearing in mind the length of time it takes to implement a starting time on site.

c).

North Hertfordshire has a reputation of underperforming in its house building programme. I see nothing in the draft LP nor any new dynamic approach to the Council strategy to support a 13% buffer. Rather the opposite should be adopted looking to a buffer of 20% - even higher.

d).

I have a view that we must build houses that provide for demand and give householders a quality of life. That means that instead of cramming houses into small sites, with limited floor plans, if it means spreading onto Green Belt lands that quality of life it should be done.

Introduction of a 20% buffer may require Green Belt release however the Council should take into account available and ready to go sites that have hitherto been passed over for inclusion in the LP (see comments in the following heading d) and (d ii) )

### **The five year housing land supply**

By adopting the "Liverpool method" the Council seem to be kicking the can down the road. Between now and 2026 and then at 2031 when the LP reviews will take place there may be a totally different approach to house building. As I mentioned earlier the construction industry should have an important strategy to build houses in order to stimulate the economy. That means the Council has to play its part in a forward plan.

In other words a hybrid Sedgefield approach should be adopted whereby the shortfall is addressed immediately as against leaving the issue for the future. By 2026 the Council could be faced with an uncontrollable demand for houses in the Area.

The Council also needs to bear in mind changes to local government if and when a Hertfordshire Unitary Council is implemented

Regarding the Councils line that the Liverpool method is the only option achievable without significant further delay that is a question of debate. The Council needs to address their reputation for underperforming and get on top of the house building regime earlier than later. If new sites are available, ready and sustainable (especially allowing local small builders and self builder) the chance to add to the stock in the LP that's should be followed. This LP should not close its eyes to only those sites in the plan.

b).

The buffer should be 20% with a commitment to rectify the underperformance during the earlier stages of the LP. A hybrid Sedgfield approach should be adopted.

c).

The approach should be to address the building regime in North Herts to cater for house demand following an early building regime that resolves the back log immediately. If this means seeking additional building sites, especially for small and medium size builders and self build to operate the Council should explore a different dynamic policy

d).

The Council should be mindful that they have underperformed in their house building regime. A number of reasons apply here but one is the impression given that building houses in North Herts is not an easy task. Under all the terms of the NPPF 2019 version and the new regime that might follow the government current White Paper there needs to be a regime to accept building planning applications that follow an approach to simplify planning application decision making. In other words to adopt a "presumption in favour" regime.

(i)

Seek more sites and give encouragement to small and medium sized builder plus self builders to tender for sites / plots knowing the decision to build will not be delayed.

Could we be forgiven to understand that building new houses cost a great deal, often on borrowed funds. Delays cost money and in some cases, not self builders, these costs are passed on to the house buyer. The Council should adopt a mindset to process planning applications quickly.

In the White Paper there is a suggestion that sites included in a Local Plan will automatically achieve an "Outline Planing Status". If that policy comes about the whole emphasis on prescribing what is in the LP will need to be reviewed otherwise a form of discrimination will exist.

(ii)

The LP should be adopted with conditions.

For instance early on in the Hearings there was a suggestion that in Category A villages there could be a provision that land outside the village boundary could be considered for building. Note carefully the wording ("could be considered").

The reason this was proposed was because a similar wording was adopted for towns

Instead of adopting that amendment the Council decided to cut its own nose off and delete the wording for towns. An inflexible approach as against a chance to assist in the Council 5 year house / land supply as and when viable available and ready to build sites became available. No flexibility.

The Council should review that position in order to increase their 5 year house / land approach

### **MATTER 23 - The Green belt review**

My opinion is that the Green Belt is a benefit for everybody and if it is necessary to release land to build houses that should be done, especially if quality of living is gained.

### **MATTER 26 - Villages for growth**

The Council should review its unilateral approach to deciding which category A villages should be defined as "villages for growth". Bearing in mind the potential changed circumstances, even since the last actual

Hearing, the demand for rural living is increasing. Those householders wanting to work from home, family connectivity points to a rural setting.

The demand for rural housing will increase and therefore coupled with my comments in Matter 22 (d) (ii) and Matter 23 the Council should adopt a policy that caters for that demand. Rather than prescribe that only certain villages be allowed "growth" without any viable reason the Council should adopt a sustainable approach. Between now and 2031 (and thereafter) any site that is available and viable should be considered for inclusion in the Local Plan.

## **CONCLUSION**

My view is that the Local Plan should be a flexible **tool** to provide a dynamic and all embracing approach to house building and infrastructure projects rather than a prescribed negative approach. I say this because the Council needs to be mindful of creating an economic and social environment (See definition in the NPPF). This will allow North Hertfordshire to develop to the benefit of all residents, new householders and business. It will provide funds for local government in their social amenity activity and benefit educational establishments, highways, transport and health facilities as well as other important activities. All that to improve residents quality of life.

WILFRED ASPINALL  
16 September 2020