

# The Friends of the Forster Country



'To preserve for all time the open green space north of Stevenage known as the Forster Country'

## North Hertfordshire District Council Examination of the North Hertfordshire Local Plan 2011 – 2031 Hearing Statement by The Friends of the Forster Country (FoFC)

**Matter 3** The housing strategy. The need for housing and the housing requirement

**FoFC Representation** Policy HS1: Local Housing Allocations- linked to Policy SP8

### HEARING STATEMENT 1

The Inspectors Guidance Notes in the section 'Purpose and scope of the examination part 3' states that, among other requirements the Inspectors role is to consider whether the Plans is sound in accordance with the National Planning Policy Framework.

We stress this point as the Planning Practice Guidance (PPG), mentioned in the Matters, is only a guidance to the NPPF and occasionally differs significantly from the NPPF.

**Matter 3 (Policy SP8) Objectively Assessed Need (OAN) for housing.**  
**The Plan is unsound as Policy SP8 is not consistent with government policy.**

We draw the Inspectors attention to para 158 of the NPPF. It states that a Local Plan should be based on **adequate, up-to-date and relevant evidence** about the economic, social and environmental characteristics and prospects of the area.

The Plan OAN is based upon the [DCLG household projections 2014](#) for the area (via the North Herts and Stevenage SHMA). The NHDC area projections presumably derive from the England and UK projections. These projections have been in error to a serious degree in the recent past and promise to be in equally serious error in the future.

The [ONS Total number of households by region and country of the UK, 1996 to 2016](#) gives the **actual** number of households present in the UK.

The ONS data shows an average annual real growth from 2008 to 2016 of **152,000**. However the [DCLG household projections for 2008 to 2016](#) give an average annual household growth of 279,000 -- an error of **84%** above actuality.

Thus, on past accuracy the DGLG are seriously at fault and cannot be considered as adequate for predicting household need.

The latest DCLG household projections 2014 predict an average annual household growth for the ten years from 2016 of **250,000**. This is **64.5%** above recent historical actuality of 152,000 which must be considered the best indicator of future household growth in the absence of evidence to the contrary.

The DCLG errors are very significant and demonstrate that the DCLG household projection data cannot be considered adequate, nor indeed relevant.

Thus, the Plan is **inadequate** and **not relevant** as required by para 158 of the NPPF.

It is not our responsibility to determine the source of the DCLG errors mentioned above. However, one source of error seems to be due to the DCLG expectation that the persons per household ratio will fall in the future from 2.35 in 2017 to 2.25 in 2031. As the [ONS Families and Households in the UK, 2016](#) states that this ratio has remained constant at 2.4 for the last decade it would seem reasonable to expect it to remain at 2.4 into the near future in the absence of evidence to the contrary.

The DCLG does not supply that evidence.

The consequences of this assumption by the DCLG are as follows:-

The DCLG household numbers and persons per household projection from 2017 to 2031 require that a further **3.432** million households will be created during that period (the calculations are given below).

Thus the 3.4 million houses created must be suitable for households averaging 2.25 persons or less. Developers do not want to build such small houses, so this scenario is most unlikely to happen. (Households of just one and two persons might prefer to live in houses of more than one or two bedrooms but it should be remembered that the Plan exists to supply housing need rather than demand. This is particularly relevant if that housing demand were to be satisfied by building on Green Belt land as in this Plan)

On the assumption that the persons per household figure remains constant at **2.4** then **1.34 million** less houses will be required than the DCLG figures suggest.

Thus, the DCLG household projections overestimate by **64%**. (the calculations are given below). This error agrees closely with the previous assumption that household growth will continue at the same rate as in the near past at 150,000 per year in the absence of other significant factors.

### **DCLG calculations**

The DCLG UK households for 2017 are 28030k ("k" stands for 1000s) with a person to household ratio of 2.35. For 2031 it is 31462k and 2.25.

Thus, the household growth is  $31462k - 28030k = 3432k$ .

The population in 2017 is  $28030k \times 2.35 = 65820k$

The population for 2031 is  $31462k \times 2.25 = 70790k$

The growth in population is  $70790k - 65820k = 4970k$

The number of households in 2031 if the persons per household remained constant at 2.35 is  $31462k \times 2.25/2.35 = 30123k$

Thus, the houses needed is  $30123k - 28030k = 2093k$

Thus,  $3432k - 2093k = 1339k$  (1.34 million houses) less.

The DCLG error is  $3432/2093 = 1.64$ . **A 64% error.**

Adjusting the Plan OAN figure of 13,800 houses by the 64% overestimation in the DCLG data gives an adjusted OAN of **8414** houses (this calculation is a guide only).

This creates a **drop of 5386** in housing need, which is very significant, especially for the North Herts Green Belt.

**However para 158 of the NPPF also requires the prospects of the area to be considered.**

One important and significant prospect is that net immigration is expected to decline going forward.

The average net immigration during the 5 years prior to 2016 (the latest data for actual household numbers) was circa 250,000. However the Government is committed to bringing net-immigration down to 'tens of

# The Friends of the Forster Country



'To preserve for all time the open green space north of Stevenage known as the Forster Country'

If the top net immigration figure of 'tens of thousands' (100,000) is taken as a future level it implies that annual net immigration will drop by circa **150,000**. To turn that figure into a drop in housing requirement we divide by 2.4 (the current persons per household). That implies a need for 62,500 less households per year. When subtracted from the actual household growth measured by the ONS at 152,000 it suggests a future annual growth of just **89,500** for the UK.

But perhaps **100,000** might be more realistic. In which case and under the above assumptions the DCLG projections are in error by **150%**.

Thus, the Plan is **inadequate and not relevant**.

If the Plan OAN is adjusted pro rata (100/250) according to the above prediction the result is just **5520** houses for North Herts (the effect on North Herts will not necessarily be the average for the whole UK, but is beyond the capability of this statement to determine precisely).

Bearing in mind that **4340** houses have already been built or have permission the new resultant future build requirement will greatly differ from the Plan requirement.

**3.2 b** The OAN for the Luton Plan is equally affected by the above argument. The adjustment may well lead to no unsatisfied need for Luton and hence no requirement for sites **EL1, EL2 or EL3**. Luton Borough should therefore be made aware of these arguments with a view to modifying their Local Plan accordingly if my argument is upheld by the Inspector.

**3.2c** The OAN for Stevenage Borough is equally affected by the above argument. The adjustment is likely to lead to no unsatisfied need for Stevenage and hence no requirement for sites **NS1, GA1 and GA2**. Stevenage Borough should therefore be made aware of these arguments with a view to modifying their Local Plan accordingly if my argument is upheld by the Inspector.

This error is very significant and demonstrates that the DCLG household projection data cannot be considered adequate nor indeed relevant.

Thus, the Plan is **inadequate and not relevant**.