

# East Hertfordshire District Plan Examination

09/17

Statement on behalf of The Woodhall Estate

## Hearing Statement



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## **Part 1: Matter 2 - Hearing Statement**

### **Introduction**

- 1 This Hearing Statement has been produced on behalf of the Woodhall Estate (including the Woodhall Farming Company), a privately owned rural estate located between Stevenage and Hertford.
- 2 The Woodhall Estate is very extensive and includes land and property in and around Watton-at-Stone, a large village having some 2,300 inhabitants (950 households). The village is served by a railway station and supports a range of community facilities and services, including a Primary School and Doctor's surgery.
- 3 The Woodhall Estate welcomes the opportunity to engage with the examination process, especially in relation to Matter 2 – The Development Strategy – Housing.
- 4 The main issue identified by the Inspector to be examined is:

*Has the Plan been positively prepared and is it justified, effective and consistent with national policy in relation to the overall provision for housing?*

### **Responses to Inspector's Questions - Calculation of the Objectively Assessed Need for Housing (OAN) and the housing requirement: Policies DPS1 and DPS2**

#### **Question 1**

- 5 The starting point for identifying the OAN is the most up to date demographic data of relevance. This being the DCLG 2014- based household projections.
- 6 The DCLG 2014-based household projections show a higher level of projected household growth across all four local authority areas (East Hertfordshire, Epping Forest, Harlow and Uttlesford) in comparison to the 2012 data. The overall increase over the 22-year period 2011-2033 is now projected to be 50,697 households, compared to the growth of 49,638 households projected by the 2012-based data – an overall increase of 2.1% (paragraph 2.6, Updated Housing Topic Paper [ED121]).

- 7 It is important that proper regard is had to the latest household projection figures. Our clients recognise that these are only a starting point and other local factors will also need to be considered as well. It is also vital that any adjustments made are both accurate and realistic. The District Council refers in paragraph 2.12 of ED121 to the DCLG household projections being informed from migration trends from the 5-year period 2009-14. It then refers to migration trends for the Housing Market Area (HMA) being higher in recent years, which is reflected by the projected population growth. It suggests that it is more appropriate to adopt a longer base period to establish robust migration trends. Whilst our clients would agree that an element of caution needs to be applied to short-term trends, it also needs to be recognised that trends can significantly change. Therefore, suitable regard needs to be given to ensuring that where circumstances and long-term trends have fundamentally changed, adequate account is taken of these changes in direction or speed.
- 8 In terms of whether the District Council's evidence base for OAN needs reflects national policy and guidance, our clients are broadly satisfied that it does. There are however some question marks regarding some of its assumptions and adjustments. The overall conclusion of the document is to reduce the previous OAN estimate from 54,608 to 51,700 for the HMA, and for East Hertfordshire results in a reduction from 19,500 to 18,396 dwellings.

### ***Question 2***

- 9 It is apparent that migration assumptions are of crucial importance in terms of determining the total amount of housing provision that will be required.
- 10 Paragraphs 2.7 – 2.8 of the West Essex and East Hertfordshire SHMA Establishing the Full OAN – July 2017 (ED112) acknowledge that whilst the HMA gained an average of 1,120 persons annually from 2001-2011 due to net migration, the 2012-based Sub-National Population Projections (SNPP) suggests a net gain of 2,640 persons on average each year. Furthermore, the 2014-based SNPP also identify higher rates of migration than past trends: an average annual gain of 2,850 persons over the 25-year projection period 2014-2039. It states however that it is important to recognise that these projections are based on short-term migration trends.

- 11 Paragraph 2.13 of ED112 goes on to flag-up the dramatic increases experienced in recent years in relation to in-migration rates.

**“More recently, the 10-year trend has increased up to an average gain of 2,500 persons over the period 2005-2015; however, the latest 10-year average (which covers the period 2006-2016) appears to have broadly stabilised at this level, with an average gain of 2,510 persons. This change has been driven by an increase in estimated net migration over the 3-year period 2012-2015 which totalled 10,340 persons (an average of 3,450 per year) and peaked at a gain of 4,320 persons in 2013-2014. The gain recorded for this 3-year period is comparable to the long-term 10-year average (1,090 persons per year; 10,900 persons over 10 years); therefore, over these 3 years, the number of people moving to the area was broadly comparable to the number that would previously have been expected over 10 years. Furthermore, the gain recorded for the single year 2013-2014 is equivalent to almost half the population gain over the decade 2001-2011”.**

- 12 In-migration has been rising in recent years in many areas. Adequate regard needs to be given to the implications of this trend continuing to ensure that sufficient housing provision is made to satisfy the demand for housing in the HMA over the course of the Plan period, especially as there has been significant international in-migration occurring nationally. There have also been movements out from London to areas such as East Hertfordshire where property prices are somewhat lower. It is important that proper regard is had to such trends.
- 13 The recently published Greater London Authority (GLA) 2016-based projections show that the central variant identifies a growth of 47,248 households and a housing need of 49,116 dwellings over the period 2011-2033, with net migration averaging a gain of 2,809 persons annually and household sizes projected to reduce to 2.315 persons by 2033 (paragraph 2.30 of ED112 refers). These figures are very consistent with the DCLG 2014-based figures which project the highest rate of household growth (and therefore yield the highest overall housing need) with a projected gain of 2,848 persons annually due to net migration and an average of 2.320 persons per household by 2033 (paragraph 2.32 of ED112).

- 14** Recent migration rates suggest that a move back towards previous, and much lower, past migration rates, now appears somewhat questionable. Particularly given that the original SHMA initially projected that net migration would only average 1,390 persons annually.

**Question 3**

- 15** Paragraph 2.8 of ED121 recognises that the initial assessment of the DCLG 2014-based household projections data, using a 10-year migration trend over the period 2005-2015 rather than the inter-census period 2001-2011, and maintaining the previously applied 20% uplift (this was not reviewed at the time), indicated that the OAN for the HMA had risen from 46,058 dwellings to 54,608 dwellings. For East Hertfordshire, the level of need was identified as being 19,427 dwellings between 2011 and 2033, which equated to a need for 883 dwellings per year.
- 16** The original Strategic Housing Market Assessment (SHMA) proposed a 20% uplift to the housing requirement. The proposed uplift has now been reduced to only 14% in size in the SHMA update. Our clients consider that given the latest market signals and the severe affordable housing need, this reduction is unwarranted.

**Question 4**

- 17** The West Essex and East Hertfordshire SHMA – Affordable Housing Update – July 2017 (ED111) demonstrates the importance of East Herts’ affordable housing requirement.

	Affordable Housing Need (households)				
	East Herts	Epping Forest	Harlow	Uttlesford	Total
Unmet need for affordable housing in 2016					
Total unmet need for affordable housing	<b>1,698</b>	1,187	1,379	587	4,851
Supply of housing vacated	<b>494</b>	522	742	201	1,959
Overall impact of affordable housing need in 2016	<b>1,204</b>	665	637	386	2,892
Future need for affordable housing 2016-33	<b>2,481</b>	2,186	2,461	1,781	8,909

Total need for affordable housing 2016-33	<b>3,685</b>	2,851	3,098	2,167	11,801
Average annual need for affordable housing	<b>217</b>	168	182	127	694
Proportion of overall need for affordable housing	<b>32%</b>	35%	61%	26%	35%

(Source, Fig.21: Assessing affordable housing need for West Essex and East Herts by local authority - ORS Model)

- 18** The above table clearly indicates that the highest level of affordable housing need within the HMA is within East Hertfordshire (3,685 households). This is a matter that needs to be properly addressed within the plan.
- 19** Paragraph 4.6 of ED111 further highlights the importance that needs to be given to address affordable housing requirements:

**“Given that the identified OAN already incorporates a significant uplift on the baseline household projections, this will contribute to increasing the supply of affordable homes through market housing led developments. The Councils will need to consider whether there is sufficient justification for any further increase in the total housing figures included in the local plan (beyond the identified OAN) as part of their policy response to meeting the identified need for affordable housing; although it will be important for them to consider the implications of providing a higher level of market housing than identified by the OAN, in particular the consequences on the balance between jobs and workers...”** (our emphasis).

- 20** Our clients consider that the substantive affordable housing need demonstrates that a 20% uplift to the housing requirement is still fully justified, and that the proposed 14% increase is inadequate.

**Question 5**

- 21 Where the evidence points to an alteration in historic trends, the Local Plan needs to make sure that sufficient new homes will be capable of being provided over the course of the Plan period.
- 22 It would be wrong to seek to delay Local Plans by requiring work to stop to take account of new population or household projection figures. However, it is important to ensure that the Local Plan is sufficiently flexible to take account of new projection figures. Clearly, if the recent trends point to likely further increases in housing numbers, it would be appropriate to ensure that overall housing provision will be sufficiently flexible and large enough in size to ensure that likely future growth is properly factored in.
- 23 It is not evident that 18,396 dwellings would meet the full OAN, given the reduced size of the uplift (14%) being proposed to the overall housing requirement.

**Question 6**

- 24 It is not apparent as to the extent that the District Council has considered local policy considerations in determining a final housing requirement figure.

**Response to Inspector's Questions – Spatial distribution / supply: Policy DPS3****Question 9**

- 25 The District Council previously at the Regulation 18 stage proposed options which would have resulted in housing allocations being identified within the villages, with emphasis on the larger-sized Group 1 Villages, which are more able and appropriate locations to accommodate residential growth. The District Council has subsequently decided that housing provision outside of urban areas will largely be left to future neighbourhood plans to address. Our clients consider this approach to be unacceptable as it will inevitably result in further delays in addressing the District's housing needs, which are already extremely pressing.

**Question 11**

- 26 In view of our clients concern in relation to the District Council's ability to meet the full OAN, there is a need to reconsider the approach to the allocation of land within the Group 1 Villages, especially as the over reliance on large-scale sites which are notoriously difficult to deliver in a timely way.

**Response to Inspector's Questions – Housing Delivery: Policy DPS3****Question 15**

- 27 No, we do not consider that the Plan will realistically provide for a five-year housing supply and agree that a 20% buffer is appropriate. The main reason being its over-reliance upon larger-scale sites which will often require significant 'up-front' infrastructure provision to secure delivery.
- 28 Our clients believe that there is a strong need to allocate more, smaller-scale sites in sustainable locations. The Group 1 Villages present a significant opportunity to address this issue, and the allocation of land such as that which exists in Watton at Stone can make a valuable contribution towards ensuring the District Council maintains a 5-year housing land supply. The development of smaller sites can offer significant advantages and can be readily brought forward in comparison with much larger strategic sites, which inevitably take a considerable time to develop. In addition, the advancement of smaller sites can help to support local construction firms, thereby promoting the principles of sustainable development.

**Responses to Inspector's Questions - The approach to housing development in villages: Policies DPS3, DPS6, VILL1 and VILL4****Question 1**

- 29 The District Council's Updated Housing Topic Paper - August 2017 (ED21) indicates that rather than allocating sites through the Local Plan, parish councils will be encouraged to prepare neighbourhood plans to deliver growth to meet the overall village housing requirement of at least 500 dwellings. The Topic Paper indicates that development in the Group 1 Villages in the Rural Area Beyond the Green Belt would be sustainable (it does not mention those within the Green Belt) and suggests that they are required to provide for a minimum 10% increase in housing stock from 2017 onwards or from where the 10% figure has been derived. While the Topic Paper

indicates that when consideration is given to the number of commitments that are expected to contribute to the village housing requirements, and the progress being made on the preparation of neighbourhood plans, the District Council will be able to achieve the overall village housing requirement of at least 500 dwellings. There can be no certainty this will occur. The neighbourhood planning groups are under no obligation to allocate land within their neighbourhood plans for development and as will be noted below only two of the eight Group 1 Villages have produced a pre-submission draft neighbourhood plan.

### **Question 2**

- 30** The Local Plan is generally cognisant of the issues facing rural communities which are not dissimilar to those experienced in other parts of the country. The Plan correctly identifies that the retention of local services is a key issue, particularly for rural communities and that the challenge is to maintain existing services whilst supporting the provision of new ones against the backdrop of an ageing population.
- 31** Many villages have seen little if any additional development for several decades. Villages are therefore becoming less dynamic places, making it difficult to maintain local services. In addition, the absence of rural housing gives rise to further challenges for younger residents that wish to remain within the locality. In the interests of sustainability, it is essential that rural communities continue to flourish and remain vibrant places in which to live and work.
- 32** The District Council's Development Strategy is predicated on the basis that much of its unmet housing need will be met adjacent to Bishops Stortford, Hertford, Sawbridgeworth and Ware and the neighbouring towns of Stevenage and Welwyn Garden City. It does not however give sufficient consideration to the needs of rural communities. It is evident that the approach to development in villages is too restrictive and lacks sufficient flexibility. This could lead to further decline within the rural area thereby making existing villages less vibrant and sustainable in the future.

### **Question 3**

- 33** Policy VILL1 arbitrarily sets a target of at least 10% additional growth to the larger Group 1 Villages without any proper consideration to the physical and environmental capacity of the settlements to accommodate further growth. Evidence submitted in

support of our client's representations to the pre-submission draft Local Plan demonstrates, without wishing to prejudice the production of a neighbourhood plan for the village, that land is available for development which could accommodate around 125 dwellings in a highly sustainable location without undermining the purposes of Green Belt land, as set out in the NPPF, or causing traffic or other environmental problems.

#### **Question 4**

- 34** As of September 2017, 16 parishes and community groups in East Hertfordshire were in the process of, or had nearly completed the preparation of their neighbourhood plans, with a further two neighbourhood plans having been 'made' (adopted). While this is a commendable achievement, only four of the Group 1 Villages beyond the Green Belt and two Group 1 Village within the Green Belt are subject to neighbourhood area designations out of a total of eight. Of these eight, only two villages (Standon & Puckeridge and Walkern) have produced a pre-submission draft neighbourhood plan and are at Stage 4 of a seven-stage process. The remainder, including Watton-at-Stone, are at Stage 2.
- 35** Without wishing to decry the abilities of local communities to produce neighbourhood plans, it is evident from records held by the District Council that some groups have remained at Stage 2 since 2014. It is therefore over optimistic to expect further homes and jobs to come forward via the neighbourhood planning process. Some communities may not have the inclination, capacity, or resources available to produce such a plan, especially as their production is normally reliant upon the use of volunteers. The suggested approach is therefore likely to exacerbate the challenges faced in rural areas rather than abate them. The approach also contains a further flaw in that if a neighbourhood plan sought to bring forward any meaningful amount of development it is unclear how it would be viewed against the strategic policies contained within the Local Plan given the level of restraint envisaged.
- 36** Whilst Policy VILL4 contains a review mechanism in the event of under delivery via the neighbourhood planning process, deferring decisions until a later part of the Plan period suggests the Plan has not been positively prepared. It does not address the issues that have been identified as affecting rural communities now and these are only likely to become more acute, especially for those communities that are situated

within the Green Belt, such as Watton-at-Stone. Consequently, the Plan is does not promote the principles of sustainable development.

- 37** Finally, Policy DPS6 would appear to be unnecessary because neighbourhood planning groups are required under the provisions of Schedule 4B to the Town and Country Planning Act, 1990 and The Neighbourhood Planning (General) Regulations, 2012 (as amended) to submit a Basic Conditions statement demonstrating compliance with the strategic polices of the Local Plan as well as other matters.

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**NW/1479**  
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