

## **East Herts Local Plan Examination in Public**

### **Hearing Statement from Councillor Bob Toll ID 835947**

14th September 2017

I wish to lodge the following statement: -

#### **Matter 2 - The approach to housing in villages - Policies VILL1 and VILL4**

Hunsdon is defined as a Category 1 Village in Policy VILL1 and thus is assessed by the District Council as being one of the more sustainable villages in the District to accommodate growth. This assessment was based on the crudest of methodology which was eventually discredited and abandoned.

Hunsdon Parish Council vigorously disputed the methodology because in reality the situation is - local JMI school over subscribed, limited satellite health centre, no public transport to the nearest town Harlow and its railway station, excessive traffic on narrow winding dangerous country lanes accessing the village, inadequate surface water drainage and issues with flooding, limited water supply, constrained sewage disposal.

There was no robust objective analysis of the ability of the village to accommodate growth. I therefore maintain that the Villages policy has not been based on accurate supported evidence and is consequently unsound.

The Policy sets a minimum of 37 new dwellings for Hunsdon in the plan period. However the policy is vague in VILL1(VII) as to the method of assessing the ability of the village to accommodate the 10% increase let alone in excess of this, although this problem of sustainability is recognised in 10.2.3. The assumption that the villages as a whole can accommodate an increase of 500 dwellings is unsupported, let alone more than 500. There is no detailed analysis of the impact on the localities and no strategy to provide the necessary infrastructure to mitigate this. Indeed the IDP (15.2) states that the impact of the housing will be limited even though the target figure is a minimum, so how can the cumulative effects of development in the rural areas be judged as such? The strategy is therefore unsound.

The policy is perverse in that it should be setting a maximum number that can be accommodated, not a minimum and establishing trigger points controlling additional development relating to the infrastructure necessary to sustainably support numbers in excess of a properly assessed base maximum.

Currently there are approved developments for 41 dwellings in the parish and applications for a further 52 before the District Council. The shortfall in the 5 year

housing supply consistently overrides other planning considerations when decisions are made which means development is unstructured and piecemeal and consequently unsupported by the necessary improved infrastructure, degrading our environment and increasing pressure on the already stretched local services. I therefore have no confidence that VILL1 (VI) will secure the control and management of housing development in our community.

Further I have no confidence in the IDP policies 15.3 and 15.4 because Herts CC as Highways Authority, when responding to the housing applications recently approved in Hunsdon, made no comments about capacity and safety and as Education Authority, failed to deal with lack of school capacity.

However, HCC have highlighted the lack of school capacity in Category 1 Villages in their comments dated December 2016 on Chapter 10 of the Presubmission District Plan. It is interesting to note that HCC (in paragraph 10.4) are saying that provision for primary school places should be secured through the Neighbourhood Plan process when considering additional housing.

In summary, we in Hunsdon currently are enduring a planning vacuum regarding the management of housing development and this District Plan under examination gives no confidence that the situation will change. Villages 10.2.10 is in effect an open invitation to exploit our villages. There is a lack of appreciation on the part of the District and County Councils of the problems faced by the villages and the proposed policies are not robust enough to manage and solve these issues.

My response to your questions from the experience of the situation in Hunsdon is:

- There is immense pressure to develop land adjoining the village and at the current rate Hunsdon on its own will potentially be meeting a third of the District's requirement to 2022.
- This scale of development is unsustainable without improved supporting infrastructure and consequently we should not be entertaining such a prospect without proper analysis and investment. Taking Hunsdon as an example of a so called category 1 Village there are serious doubts therefore that the villages **can or should** accommodate the target figure for 2033.