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Mr A Moore  
EERA  
Flempton House  
Flempton  
Bury St Edmunds  
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Your Ref:

Our Ref: RDG/SP12-0(a)

This matter is being dealt with by:

Mr R Grove  
Extension: 5810  
Direct Line: 020 8207 7459

3 November 2003

Dear Mr Moore

### **RPG14 District Level Housing Figures - Hertfordshire Submission**

I attach for your attention the requested Hertfordshire submission on the development of District level housing figures for consideration as part of the ongoing process leading to the development of a draft RPG14 for submission to the Government.

The submission has been developed by all 11 local authorities in Hertfordshire and has been endorsed by a Joint Member Panel. The submission comprises a covering report with a technical appendix. This includes a range of figures based on different assumptions and spatial options for the various Growth What – ifs which the Hertfordshire authorities have been asked to test from 66,000 through to 86,000 additional dwellings. Individual authorities may well respond further to the issues raised by this exercise.

I would though stress that none of the figures, or the development options, have been agreed, either collectively or individually, by the Hertfordshire authorities and are submitted purely to meet EERA's requirements. In fact the Hertfordshire authorities consider that the figures are seriously flawed and must not be used as a basis for District figures in the emerging RPG. It is considered that EERA should focus on the issues raised in the covering report and the associated methodologies set out in the technical appendix rather than the figures.

In considering the Hertfordshire report I would urge that particular consideration be given to the following:

- Within Hertfordshire there are specific issues which need to be considered not all of which would necessarily apply across the rest of the East of England.
- The timescale given for the submission of District level figures has proved to be totally inadequate and has not allowed for the proper development of robust figures which can stand up to sustainability appraisal and Public Examination.
- Even at 66,000 significant additional greenfield releases would need to be made in Hertfordshire.
- Some Districts do not have the capacity to meet their own housing needs within their administrative boundaries.
- There is a need to ensure that a consistent methodology is followed across the Region.
- The submitted figures highlight how sensitive they are to different baseline assumptions.

The Hertfordshire authorities have sought to work together to develop and assess District level housing figures for the growth What - ifs prescribed by EERA. They have come to the conclusion that the process is fundamentally flawed and that the majority of the authorities believe that it is not feasible, or appropriate, to make any recommendations which are robust and which will stand up to scrutiny.

The Hertfordshire authorities regret that they are not able to recommend any figures to EERA but feel that they have no alternative. They would be willing to invest the resources into a proper assessment of the options and would urge that time be given for this prior to the submission of any strategy and figures to the Government. This would also allow for cross boundary issues such as occur at Luton, and particularly in the Stansted/M11 Corridor, to be properly assessed.

Hertfordshire has a history of meeting and delivering housing figures set out in regional strategies. The current shortfalls identified by the Government are not due to an inability of the Hertfordshire authorities to deliver.

The authorities wish to positively engage in the process and work with EERA to develop agreed figures for inclusion within RPG14 which can provide a realistic basis for delivery. They recognise that EERA is in a difficult position given the Government's push for an early submission. However, it is critical that if the step change in housing provision, which the Government is seeking, is to be delivered it must be based on sound analysis. That takes time in a new Region such as the East of England, and in particular in a complex County such as Hertfordshire. The Hertfordshire authorities would urge that time is found for further research and analysis so that robust figures can be developed, tested and hopefully agreed.

I trust that our concerns will be addressed as work on RPG14 is progressed.

Yours sincerely

**Richard Grove**  
**Chairman HTCOA Planning Committee**  
**On behalf of the Hertfordshire Local Authorities**

**cc John Dowie, GO-East**