

# **Regional Planning Guidance for the East of England**

## **District Level Housing Figures**

### **Report on behalf of the Hertfordshire Authorities**

#### **1. Introduction**

This report is submitted to EERA in response to its request for all County Groupings to advise on the development of District level housing figures for inclusion within RPG14. It has been developed and endorsed on behalf of all eleven local authorities in Hertfordshire.

Attached to this report is a technical paper which includes two sets of draft figures for a range of options, a synopsis of the methodology used to arrive at the figures and a summary of the key implications arising from the figures.

None of the figures 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.

This report sets out our concerns over the methodology and timescales which has been imposed upon the local authorities and the specific issues facing Hertfordshire.

#### **2. Specific Issues facing Hertfordshire**

Within the East of England there are specific issues relevant to Hertfordshire, not all of which would necessarily apply across the rest of the Region. These issues must be fully taken into account in the development of the Regional Strategy and the distribution of dwellings between Districts.

##### **a) Pattern of small to medium sized towns**

The settlement pattern within Hertfordshire primarily comprises inter-related small to medium sized towns. The County does not have a significant focus such as Norwich in Norfolk, Ipswich in Suffolk and Cambridge and Peterborough on which to focus development and investment. There is inevitably a considerable amount of movement between Hertfordshire's towns for leisure, employment and general access to services which increases the level of congestion on the County's transport network.

##### **b) Limited scope for regeneration**

It must also be recognised that the County's towns are largely a product of the 20<sup>th</sup> Century. They do not have large areas of redundant brownfield employment land or vacant dock areas in need of regeneration, and providing opportunities for housing investment. There are several Garden Cities, New and Expanded towns within the County which were carefully planned and provided with ribbons of open space. Such towns do not have

the capacity to absorb considerable tracts of new development without fundamentally changing their settlement patterns.

Whilst there are pockets of deprivation within many of Hertfordshire's towns these are small on the regional scale. Only 4 of the County's wards are in the top 119 of the most deprived wards in the Region as identified through the 2000 Index of Multiple Deprivation. Whilst this is evidence of the County's prosperity it also an indication that development is not generally needed to trigger regeneration.

### **c) Role of the Green Belt**

Most of the County is within the Metropolitan Green Belt which was established to prevent the outward spread of Greater London. It also prevents the coalescence of the small to medium sized towns which are an essential part of the character and geography of the County. The maintenance of the Green Belt is a long established key planning principle which is fully supported by local communities throughout the County. The maintenance of the Green Belt also assists urban regeneration.

Whilst occasional reviews of the inner boundaries are required to accommodate development needs it is important that the essential integrity of the Green Belt in Hertfordshire is maintained, in order to protect the character of the County. Whilst it is recognised that the need to promote sustainable patterns of development may conflict with Green Belt policy there is a need to ensure that there is an appropriate balance between such considerations.

### **d) The impact of London**

Hertfordshire's location on the outer edge of Greater London brings with it specific issues. The County has long been identified as an overspill area for the capital and this was substantially planned for with the post war new towns, and overspill settlements such as Borehamwood. Hertfordshire has also had to accommodate a significant level of unplanned overspill. No doubt this will continue.

Interestingly the Chelmer Model Zero Net Migration forecast for the County is 53,400 additional dwellings which is significantly less than the current RPG extrapolation of 65,600 additional dwellings for the period 2001 to 2021. Even at this level of growth the County would continue to accommodate a significant level of in migration. It must be noted that the County has consistently met and delivered previous housing targets set out in RPG's and should not be penalised for the failure of other areas to meet theirs.

In addition to housing pressures Hertfordshire's proximity to London brings with it inflated land and house prices, economic development pressures and transport congestion. Hertfordshire's countryside also provides a playground for London's residents.

### **e) Transport congestion**

Hertfordshire's transport infrastructure is designed primarily to serve the capital. It largely comprises radial road and rail links which provide for both

long distance and shorter commuter movements into and out of the capital. The only significant east west link is the M25.

Hertfordshire's roads and railways suffer from considerable congestion already, and little investment is planned to alleviate existing problems, let alone cater for expanding needs. It is disappointing that arising from the Multi Modal studies the only investment planned is the widening of the M25 and the M1 north of the M25 to Luton to 4 lanes, and confirmation of existing planned main line rail improvements which will do little if anything to meet Hertfordshire's transport needs.

Whilst it is recognised that other Counties in the Region may also rightly claim that they have specific characteristics, it is considered that there are a unique set of circumstances within Hertfordshire which must be taken into account. It is considered that the process so far has not recognised this, and inadequate time has been given to address them.

### **3. Methodology**

The methodology which the Hertfordshire authorities have been asked to follow is considered to be significantly flawed in both its concept and the time which has been given to develop realistic and robust Countywide figures.

#### **a) Lack of an overall Spatial Strategy**

Fundamentally there is still no overall spatial strategy for the Region and no agreement over what level of housing the Region as a whole should accommodate between 2001 and 2021, let alone for each County. The County has also been faced with changing goal posts as evidenced by the question of whether key towns should be identified as a focus for investment, and if so which ones. The only key policy decision which has emerged so far is that each County Grouping should at the very least accommodate the same level of housing development set out in approved RPG's. Even this decision has not been adequately justified.

#### **b) Uncertainty over inputs from RES and Sub-Regional studies**

There remains uncertainty over the implications arising from the Regional Economic Strategy and what this may mean in terms of housing requirements. Much of the growth area study work which impacts on Hertfordshire remains work in progress with conflicting and uncertain conclusions. This is particularly so in the case of the Stansted/M11 Corridor and Harlow Expansion where different studies have come to some different conclusions. The only clear recommendation for Hertfordshire which has come out of this work would seem to be that there should be 2,000 additional homes at Bishops Stortford.

The Milton Keynes growth area study has resulted in a recommendation for up to 3,000 additional homes on a Green Belt site to the East of Luton in North Herts District. The Hertfordshire authorities were not party to this study and it is still only at consultation stage. Even if the Bishops Stortford and

Luton conclusions had arisen from agreed studies, carried out in full liaison and agreement with the relevant authorities, the combined total of 5,000 additional dwellings does not justify a significant step change in housing provision in Hertfordshire. It certainly does not justify the upper ends of the growth What ifs which the County has been asked to examine.

There is also of course the fundamental issue of SERAS and the implications in particular for Luton and Stansted. It is understood that the Government will be publishing a White Paper with its recommendations in December. This creates huge uncertainty.

Why the Government has sought such a tight timescale for the preparation of RPG14, and the inclusion of District level housing figures, remains a mystery to the Hertfordshire authorities when there are such significant uncertainties and there remain in place reasonably up to date and sound RPG's. It is not as if RPG14 represents a roll forward of an existing RPG for an existing Region. It is a new RPG for a new Region. If it is to become the RSS, and under new legislation part of the Development Plan, it must be robust and be able to stand up to detailed and thorough examination. This takes time.

### **c) Lack of a consistent and robust methodology for the work of the County Groupings**

Hertfordshire has been asked to assess the implications of a range of What ifs from 66,000 to 86,000. This apart there has been no clear guidance on how to undertake the process and to ensure a consistent approach across the Region. From the outset the Hertfordshire authorities have had major concerns over the robustness of the What ifs and the timescale for undertaking the assessments. Despite these fundamental concerns the authorities have sought to meet EERA's requirements and to obtain political buy in to the process in order to ensure a degree of accountability. However, despite these good intentions the further the authorities have got into the process the increasingly unrealistic this has proved to be.

The absence of an overall spatial strategy, and clear policy guidance for the London Arc, which embraces much of the County, has led to the requirement to assess a number of spatial options. This added to the complexity of the number of What ifs and, the not unexpected failure of the County Council and the ten Districts to agree a baseline capacity figure, led initially to the development of an unmanageable range of figures.

The estimated capacity figures are in themselves based on a roll forward and reassessment of work carried out in respect of the recent Structure Plan Review. They do not represent a thorough reassessment through to 2021 and there are inconsistencies in the approaches taken. Some Districts have carried out full capacity studies in accordance with PP3 advice. Others have not yet done this.

#### **d) Inadequate time to do the work properly**

It was initially thought that some order could be brought to the range of options through sustainability appraisal. And may be it could. However, there is just not time to do this in a thorough, professional and robust manner.

A proper, validated sustainability appraisal using the methodology advocated by EERA takes time. Hertfordshire's politicians are not prepared to condone a submission based on a flawed methodology which might give a semblance of credibility to figures which is just not justified. Hence, there has been some reconsideration since the submission of the Interim Report on behalf of the County and the authorities are not prepared at present to submit any recommended figures.

The figures included in the appended technical report are the result of a crude distribution of shortfalls which stem from two capacity assessments, one from the County Council, the other from the combined totals of the District's assessments. The two sets of figures are based on differing distributions of household growth which in themselves highlight how sensitive the figures are to the assumptions used and how the resultant distributions show no relationship to capacity or opportunities for growth.

#### **e) Greenfield implications**

Whilst the authorities would not wish EERA to dwell at any length on the figures they do show that even if the County Council's capacity estimate is taken there is insufficient capacity to meet a continuation of the existing RPG growth level of 66,000. Additional greenfield releases over and above existing permissions and confirmed allocations will therefore be needed just to sustain existing levels of housing development.

Increasing development up to 86,000 would require major greenfield releases, which in Hertfordshire inevitably would have to be at the expense of the Green Belt. This raises the issue referred to earlier over the balance of weight to be given to the retention of the Green Belt if this conflicts with the desire to promote sustainable development. Reference has already been made to the wider strategic importance of the Green Belt in Hertfordshire and its role in assisting urban regeneration objectives.

#### **f) Democratic input**

There has been inadequate time to obtain a proper democratic input through the political process. Nor has there been any opportunity for stakeholder involvement. The implications arising from the development of District level housing figures will have a significant impact on all local authorities and there should be an opportunity for a real democratic input prior to the submission of figures to the Government.

#### **g) Recommended approach**

The Hertfordshire authorities consider that the issues are too important to do a quick and dirty exercise. It must be done thoroughly if the emerging figures are to have any credibility. For this reason the authorities decided that it would

be inappropriate to carry out any appraisal and instead to submit untested and admittedly crude figures.

The Hertfordshire authorities regret that they have had to come to such a conclusion but feel that they have no alternative. They would be more than 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.

The process has not allowed for adequate discussion between the County Groupings on such issues. Further study would also allow for proper consideration to be given to issues such as those emerging from the RES. To parachute the implications arising from such issues into the process between now and the approval of the RPG (RSS) for submission to the Government early next year is unrealistic. Whilst there will be an opportunity for formal representations, and the testing of the RPG through Public Examination, during 2004, it is important that this process is carried out on the basis of a fundamentally sound Strategy bearing in mind that there is unlikely to be any detailed consideration of the housing targets for individual Districts at the Public Examination.

#### **4. Conclusions**

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 it is not feasible, or appropriate, to make any recommendations which are robust and which will stand up to scrutiny.

Hertfordshire has an excellent track record of delivery. The authorities wish to positively engage in the process and work with EERA to develop agreed and realistic figures for inclusion within RPG14 which can then be delivered. 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.