

HERTFORDSHIRE COUNTY COUNCIL

**CABINET
MONDAY 10 November 2003 AT 2.00 P.M.**

Agenda Item No.

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**SUBJECT: HERTFORDSHIRE SUBMISSION TO THE REGIONAL
PLANNING PANEL ON DISTRICT LEVEL HOUSING
FIGURES FOR RPG14**

Report of the Director of Environment

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1. Purpose of report

- 1.1 This report sets out the work undertaken within Hertfordshire to supply district level housing figures to the East of England Regional assembly and its Regional Planning Panel as part of the process for developing Regional Planning Guidance 14.

2. Summary

- 2.1 The East of England Regional assembly (EERA) is currently producing draft Regional Planning Guidance (RPG 14) up to 2021. As part of this work, EERA has asked the County Council and Districts to work within a regional county grouping to produce a set of housing numbers, within specified county ranges. For Hertfordshire this range is within the band 66,000 – 86,000 houses over the RPG period.
- 2.2 Appendix 1 sets out the response that has been submitted to EERA. This is a technical submission, produced by officers to fit the housing targets. The cover report raises significant concerns about the validity of EERA's methodology, the timetable and the lack of transparent and locally democratically accountable processes.

3. Conclusion

- 3.1 The Cabinet may wish to consider the implications of the technical housing numbers submission for Hertfordshire and consider whether it wishes to submit this report to County Council in order to make a formal response to EERA that sets out its concerns.

4. Background

- 4.1 The East of England Regional assembly (EERA) is currently producing draft Regional Planning Guidance (RPG 14) up to 2021. At your previous meetings Cabinet has responded to consultations concerning the Harlow Options Study, the M11 London Stansted Growth Area and the Milton Keynes/Luton sub-regional study.
- 4.2 As part of its work producing RPG14, EERA has asked the County Council and Districts to work within our regional county grouping to produce sets of housing numbers, within specified county ranges. For Hertfordshire, this range is within the band 66,000 – 86,000 dwellings over the RPG period to 2021. The baseline figure of 66,000 new dwellings is a roll forward of current RPG rates. Hertfordshire is then asked to work through the implications of growth projections in bands of 5,000 dwellings up to 86,000.
- 4.3 This technical process has progressed in a situation within which certain fundamental decisions have yet to be made. Hertfordshire has been asked to assess the implications of growth levels up to 86,000 dwellings because EERA has yet to make decisions on key need and spatial strategy matters. These have significant implications on the overall level and spatial distribution of growth at a Regional and County level. For example :
- which population/household/dwelling projections are more likely to reflect the future “policy-unconstrained” position;
 - the implications of the Regional Economic Strategy;
 - firm outcomes from growth area studies;
 - the possible implications of the Regional Affordable Housing Study;
 - infrastructure, planning policy and environmental constraints.
- 4.4 The 66,000-86,000 growth options are intended to cover levels of growth which might arise from future decisions on these and other matters.
- 4.5 Appendix 1 sets out the response that has been submitted to EERA. It has been endorsed at a meeting of District and County Executive Members on 28 October. At previous meetings, Members agreed that they wished to see a purely technical submission made to EERA. This submission is prefaced with a covering report setting out both the issues that Hertfordshire faces and significant concerns about the validity of EERA’s methodology, the timetable and the lack of transparent and local democratically accountable processes.

5. Preparation of District housing numbers

- 5.1 The work to produce the submission has been led by HCTOA, the county wide Planning Officers grouping. This work has been supported by HCC’s Forward Planning Unit and has been subject to review under

joint member processes to discuss the implications of the work and to agree the direction of the outline submission.

- 5.2 Members from County and Districts have met to discuss the implications of the work and to agree the direction of the outline submission. At their meeting on 23 September, Hertfordshire local authorities agreed the direction they wished to see the work progress and a joint press release was agreed to alert the public to the impact of housing growth that would be significantly above the current capacity projections of both the County and the districts.
- 5.3 At their meeting of 14 October, Hertfordshire local authorities agreed that a technical submission should be made by officers, but that in a covering report it should be made clear that this submission was not endorsed by any of the Hertfordshire authorities.
- 5.4 Particular concerns are raised about the robustness of the methodology, the overly prescriptive timetable which meant that districts had insufficient time to undertake robust capacity analysis, the scale of greenfield development implied by the growth options and the lack of local democratic processes.
- 5.5 The technical submission is based upon a number of scenarios, using housing figures from several sources, including those emerging from the sub regional studies and distributions made on a pro-rata basis to districts. The inclusion of the scenarios does not imply the feasibility or desirability of these scenarios. In consequence of adopting this approach, it has not been possible to undertake a sustainability appraisal of these options, or to assess other options such as a new settlement, to determine where housing growth would be best placed within the county.
- 5.6 The submission also makes it clear that Hertfordshire authorities are more than willing to invest resources into a proper assessment of the options so that robust figures can be developed, tested and hopefully agreed. This would also allow for cross boundary issues to be properly assessed. It urges that time be given for this prior to the submission of any strategy and figures to the Government.

6. County Council Response

- 6.1 Cabinet may wish to consider the position it wishes to take in order that EERA is aware of the County Council's concerns. This may cover the following points:
 - HCC wishes to see developed Regional Planning Guidance that is central to the Region's work in addressing the major issues that it faces to 2021 and beyond. To achieve this, the county-based housing numbers submissions across the Region should be based upon a robust methodology, an agreed regional spatial strategy

and supported by processes that are democratic, open and transparent. It does not consider that these criteria have been met.

- HCC is concerned about the overall time constraint in the RPG process. This has led to insufficient democratic involvement by locally elected Members in determining a matter which has significant strategic impact across the county. Lack of time to conduct consultation within local authorities and with other stakeholders has a major impact on the extent to which the process can be judged as open and transparent and its conclusions can be considered to address the concerns of Hertfordshire.
 - The Regional Planning Panel should be aware of the unique environment within Hertfordshire, where its geographic location and economic generation characteristics have led previously to substantial development. This has been achieved within tight constraints by using available urban capacity to the full. The county is not in the position to take any more than its fair share of growth, and certainly not at the levels set out in the housing target ranges. The scale of greenfield development that would be required to meet the growth options is considered to be totally unacceptable.
 - The timetable for submitting the housing numbers has not allowed sufficient time for any analysis of capacity other than desktop exercises. As a result, the Hertfordshire submission has no validity for planning purposes and cannot be used further to provide housing numbers or locations.
 - The Regional Planning Panel should consider how best to use the currently emerging sustainability appraisal of the draft RPG to determine the most sustainable options for housing locations and to consider a new settlement as an option within the Region.
 - There is willingness for all of Hertfordshire's authorities to work together, and with adjoining authorities where necessary, to take the district level housing figures work forward within a suitable strategic framework, with interim decisions made on scale of growth and a spatial strategy justified and within a robust technical methodology.
7. Other authorities and stakeholders within the Region, and within the county, may share the concerns of the County and Districts. As part of the process to ensure that the County Council's views are widely known, a copy of the cover report to the submission should be sent to all Hertfordshire Parish and Town Councils.

8. Financial Implications

This work is being met within existing budgets. The implications for the County Council of levels of growth will be significant, particularly in areas where additional services will be required to support new and enlarged communities.

9. Conclusions

The Cabinet may wish to consider the implications of the technical housing numbers submission for Hertfordshire and consider whether it wishes to submit this report to County Council in order to make a formal response to EERA that sets out its concerns.

Background Papers

RPG 14 - Guidance Notes to County Groupings on the Preparation of District Level Dwelling Distribution, EERA, 2003

Appendix 1 - Regional Planning Guidance for the East of England – District Level Housing Figures – Report on behalf of the Hertfordshire Authorities - to follow