

Mrs L. A. Needham,
Leader of the Council
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

6th February 2015

Dear Mrs Needham,

We the undersigned are writing this open letter to express our deep dissatisfaction with the draft Local Plan prepared by North Herts District Council (NHDC) and our opposition to the consultation process currently being undertaken.

Our opposition arises from the following:

1. **Housing numbers**

Following previous consultation processes NHDC have made recommendations as to the number of new homes that will be required to meet the housing need that significantly differ from the numbers now being proposed. For example, in 2012 the Council stated that its preferred option was for 7,000 new homes. Yet despite the enormity of the difference between this number and the 14,200 homes now being proposed, the draft provides no explanation of how this figure has been arrived at.

In October 2013 Steven McPartland, MP for Stevenage, submitted a Freedom of Information Request to NHDC in an attempt to understand how the housing numbers were being calculated and the reason why they were constantly changing. NHDC refused to honour that request and no justification for the housing numbers was provided.

With the draft Local Plan proposing a 26% increase in the district's housing stock and development within the Green Belt, it is intolerable that no explanation of how this 'housing need' has been calculated has been provided. We therefore demand that a detailed explanation as to how NHDC have calculated the housing needs of the district be made public before the final 'Proposed Submission' is completed.

2. **Inadequacy of the Plan**

Paragraph 156 of the National Planning Policy Framework (NPPF) states that the '*local planning authorities should set out the **strategic priorities** for the area*', yet the draft Local Plan issued by NHDC fails to achieve this most fundamental requirement.

In 2009 the document Hertfordshire Guide to Growth produced by the Centre for Sustainable Communities at the University of Hertfordshire and the Chancellor, Lord Salisbury, observed:

'In recent years, much of Hertfordshire's growth has been piecemeal, occurring without a greater masterplanning strategy. In most cases, growth occurs on opportunity sites identified by local authorities or "found" by private developers.'

In the NHDC draft Local Plan it appears that nothing has changed; the sites identified for development appear to be opportunistically based on the willingness of land-owners to allow development, rather than on any long-term strategy to provide sustainable development to 2031 and beyond.

Moreover, the document also fails to set out how the additional requirements described in paragraphs 156 and 157 of the NPPF will be met. For example, how transport or water and sewage infrastructure will be enhanced to accommodate the increased population, where additional school places will be created, how health needs will be met etc.

The conclusion of the research carried out by the University of Hertfordshire in 2008 was that the optimal means by which the county could accommodate a large increase in housing was

by the creation of a new Garden City. Their research concluded that such a development would easily accommodate all of the current development proposals as well as providing capacity for further expansion well into the next century. It would also have the advantage of being able to meet all of the planning guidelines outlined in the NPPF while minimising the adverse impact on existing communities and infrastructure bottlenecks.

3. Protection of the Green Belt

Green Belt policy, as set out in the NPPF, makes it clear that permanence is an essential characteristic of Green Belt and that a Green Belt boundary should only be altered in exceptional circumstances using the Local Plan process to consult on such changes.

The draft Local Plan proposes numerous instances of Green Belt development with the only justification being in paragraph 2.7 which states: *'The levels of growth required in North Hertfordshire and lack of suitable brownfield sites or sites within settlement areas mean that it is not possible to accommodate all the identified housing and employment needs in sustainable locations outside of the Green Belt.'*

However, not only does the draft Local Plan fail to justify the extent of the housebuilding being proposed, it fails to set out the *'exceptional circumstances'* that the NPPF requires as justification for each of the Green Belt developments.

This document does not therefore meet the consultation requirements envisaged by the NPPF and, as such, no Green Belt developments should be proposed until (a) the extent of the housing need has been justified, and (b) a comprehensive explanation of the *'exceptional circumstances'* is provided for each development site.

In raising these objections we are not blind to the fact that a Local Plan is needed and that some development is necessary. However, the requirement set out in the NPPF (paragraph 47) is to objectively assess the need for housing and to identify *'sites sufficient to provide five years worth of housing'* against that requirement.

The current draft Local Plan has identified sites that it deems sufficient to meet the housing need for 20 years. We believe that this is unnecessary and would instead propose an alternative approach.

Once we are agreed on what the housing needs for the district are, we do not believe it will be difficult to quickly reach agreement on a five year development plan to accommodate the appropriate requirements for that period. As envisaged by the NPPF, this five year plan will need to be updated annually on a rolling basis.

Producing a five year plan will meet the requirements of Government, will prevent the risk of uncontrolled development and, most importantly of all, will buy sufficient time for a comprehensive strategic review to be carried out including the option of a new Garden City and a long-term plan to be developed.

Yours sincerely,

Mr J Dalton, Chairman, Barkway Parish Council
Mrs J Paterson, Chair, Bygrave Parish Council
Mrs H Gregory, Chair, Codicote Parish Council
Mr P Bracey, Chairman, Gravely Parish Council
Mr D Hardstaff, Chairman, Kimpton Parish Council
Mr A Sleator, Chairman, Knebworth Parish Council
Mrs J. Rayment, Chairman, Langley Parish Council
Mr R Wainright-Lee, Chairman, Newnham and Caldecote Parish Council
Mrs J Neal, Chair, Offley Parish Council
Mrs P Waters, Chair, Pirton Parish Council
Mr R Warnham, Chairman, Sandon Parish Council
Mr T Moody, Chairman, Weston Parish Council
Mr G Seller, Chairman, Wymondley Parish Council