

## Housing Growth Projections based on ONS 2012 Published February 2015

### Consultation Response

#### Representor 283/Mrs E Morawiecka

The latest ONS household projections indicate that the population and housing growth should be lower than that proposed by Herefordshire Council. The latest ONS household projections for 2011 to 2031 published on 27 February 2015 are 13,715. (ONS and GL Hearn Para 5). All household projections are a minimum build out rate and so Local Plans always have the flexibility to increase housing delivery should circumstances change and the proposals be “sustainable”.

Herefordshire Council are continuing to pursue a level of housing growth that is considerably higher than that required by an objectively assessed need for housing. This was already admitted in the Core Strategy May 2014 para 3.37 *“Whilst affordable housing is a priority for the county, the need for new infrastructure to help economic growth is another priority.”*

Herefordshire Council then reaffirmed that the housing growth is higher than the OAN in its report on the 5 year Housing Land Supply Report February 2015 (para 4.3 ) *“The Herefordshire Core Strategy covers the period 2011-31 and provides for a minimum 16,500 homes. This target exceeds the objectively assessed need identified for between 15,400-16,200 homes over this period by 2% - 7% (300-1,100 homes).”* This calculation was done without considering the latest ONS projections (Feb 2015) which further downgraded the level of housing growth proposed for Herefordshire over the period of the plan. This means that the housing target now exceeds the OAN by more than 7% with no evidence to support the reason for such an excess figure.

Nowhere is there evidence that there is a need for *“new infrastructure to help economic growth”*. If anything the economic growth assumptions should require housing growth to be scaled back further as the economic growth assumptions, in particular for the Rotherwas/Hereford Enterprise Zone, were unrealistic and overly optimistic. Note the minutes of the Hereford Enterprise Zone Executive board on 21<sup>st</sup> October 2014 *“It was also noted that although **the Zone jobs target appeared to be optimistic**, DTZ, in their modelling work for Enterprise Zones, were citing Leeds and Hereford as zones where ‘things are happening’* (Para 6 Managing Directors Report). This is further supported by the article in the Hereford Times 5<sup>th</sup> March 2015, which highlights that many of the jobs being created on the Enterprise Zone arise from local businesses relocating from elsewhere in the County. Thus the Enterprise Zone is only creating a much lower level of completely new jobs in the County than previously forecast

[\(http://www.herefordtimes.com/news/business/11835987.Expanding\\_businesses\\_on\\_Hereford\\_Enterprise\\_Zone\\_focus\\_on\\_job\\_creation/\)](http://www.herefordtimes.com/news/business/11835987.Expanding_businesses_on_Hereford_Enterprise_Zone_focus_on_job_creation/)

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The comment by GL Hearn (para 2 page 3 Feb 2015 Household Projections) *“The higher end of the range for OAN described in the LHRs was based on the potential that higher housing provision might be needed to support economic growth, based on a higher growth scenario for Herefordshire’s economy. It would be reasonable to assume that there is still some upside (from 15,000 homes) associated with achieving higher economic growth”*. No evidence has been provided to support the rationale for a higher level of economic growth than that proposed in the Core Strategy May 2014 and if anything evidence exists to the contrary.

On 15th October 2014 Herefordshire Council published a press release *“Following recent changes to the way affordable housing is allocated, the number of people registered to be rehoused across the county has reduced dramatically from over 5,000 to below 1,000.”* This indicates that housing need is lower than that previously forecast in the 2014 Core Strategy, but this does not seem to have been taken into account in the Herefordshire Council housing growth figures included in the latest housing projection. This is confirmed in the GL Hearn conclusion (Feb 2015) *“The Core Strategy is based on delivering 16,500 homes over the 2011-31 plan period. It thus continues to be more than meeting the full objectively assessed need for housing.”*

My conclusion is that Herefordshire Council is not in accord with the NPPF Para 14 which states *“ At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development,.....*

- **Local Plans should meet objectively assessed needs**, with sufficient flexibility to adapt to rapid change, unless:
  - **any adverse impacts of doing** so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - *specific policies in this Framework indicate development should be restricted.”*

I believe that the Inspector should draw the same conclusion on the Herefordshire Council household projections, as those drawn by the Planning Inspector, Mr Harold Stephens on 18<sup>th</sup> February 2015, in respect of the County Durham Plan Interim View *“The objective assessment of housing needs is too high because the Council’s vision for a successful local economy incorporates unrealistic assumptions about jobs growth and associated in-migration.”*

(EXAMINATION OF THE COUNTY DURHAM PLAN - INSPECTOR’S INTERIM VIEWS ON THE LEGAL COMPLIANCE AND SOUNDNESS OF THE SUBMITTED COUNTY DURHAM PLAN Harold Stephens – Development Plan Inspector. Para 4 ).

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The Local Housing Requirements Study Update 2012, on which the original 16,500 homes was based, assumed average annual net migration to be 1,333 persons p.a. over the plan period (para 2.28). However, the February 2015 ONS figures include an average annual net migration at 1,200 persons p.a. over the 20 years which is 10% less.

By continuing to pursue a level of housing growth of 16,500 new homes, Herefordshire Council and GL Hearn seem to ignore the fact that higher housing growth in Herefordshire ignores the natural constraints (River Wye SAC, NMP, higher than average proportion of high grade agricultural land than many other counties) and the lack of infrastructure (transport and hospital capacity) within the County.

As per NPPF para 14 consideration should be given to the adverse impacts arising from the proposed housing growth figures:-

1. Much of the housing growth is concentrated around Hereford City mostly on the highest grades of agricultural land. The NPPF para 112 clearly states *“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”*. Herefordshire Council Core Strategy does not appear to have applied para 112 and so the adverse impacts are greater than would be if para 112 had been properly considered. Likewise, reducing the housing growth figures to the OAN figures would help address the negative impact and reduce the loss of high grade agricultural land. High grade agricultural land is nationally a scarce resource. This loss of high grade land should be given some weight and this has recently been reinforced by the Secretary of State in [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415114/15-03-19\\_DL\\_IR\\_Earls\\_Barton\\_Wellingborough\\_2213617.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415114/15-03-19_DL_IR_Earls_Barton_Wellingborough_2213617.pdf)

APPEAL BY J M BEATTY, I S CLARK AND REDROW HOMES SOUTH MIDLANDS:-

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APPLICATION REF: WP/2013/0457/OM Secretary of State Decision 19.03.2015 para 21

*“the Secretary of State considers that there is a strong possibility of some loss of grade 3A land which the Framework seeks to protect. The Secretary of State gives this potential loss some weight in the planning balance.”*

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2. The lack of infrastructure to accommodate the housing growth and the impact this will have on the River Wye SAC.

In its continued adherence to a housing growth of 16,500 homes over the period of the plan Herefordshire Council is being biased and not objective in determining its level of housing growth and is seeking to deliver a plan that is contrary to the NPPF.