

Herefordshire Council's note on CLG 2012-based household projections : Consultation

Madam,

Thank you for inviting comments from those who attended your Hearings regarding the Council's response they have made to your Note No 3. This Note requested that the Council should consider what effect the February 2015 DCLG 2012-based household projections might have on the submission Core Strategy (CS) calculations for the Objectively Assessed Need (OAN) and all relevant housing figures. **We understand that the submission CS calculations were based on the GL Hearn Local Housing Requirements Study Update (March 2012) and therefore we anticipate that the Council will no longer cite these March 2012 figures when revising the CS.**

We comment as follows:

1. The 'Note on New Projections' provided to the Council by GL Hearn (18 03 15) indicates that the 2012-based Household Projections equate to a housing need of 14,200 homes over the plan period, 2011-2031.
2. It is generally accepted that the housing figures are a minimum, and not a cap on development.
3. The Council has, historically, found it difficult to deliver the housing growth targets to which they have agreed, and they indicate in their trajectory that the delivery of homes will have to be 'back-loaded' because of uncertainties about delivery at the beginning of the plan period.
4. As already indicated in their Response to the 5 year Housing Supply Consultation, Here for Hereford fears that these uncertainties will continue throughout the plan period, and will not be limited to the earlier period.
5. Rather in keeping with the proposed County Durham Plan, (where the Inspector in his February 2015 Interim Report judged its vision for a successful local economy to have incorporated unrealistic assumptions), the Herefordshire Council Core Strategy makes unfounded assumptions about economic growth. There is no tangible evidence that this will make a substantial difference to the GL Hearn forecast OAN of 14,200 over the plan period. As mentioned in #2 above, the housing figure targets are 'minimum' so were economic growth to take off towards the end of the plan period, then the targets could be exceeded, provided the test of 'sustainable development' were met.
6. Taking into account the comments above, Here for Hereford recommends to you, Madam Inspector, that you **request the Council to revise their housing figures to accommodate the 14,200 total quoted in #1 above. In doing this, the Council would thus be conforming with NPPF # 14, and this is something, surely, that all parties would prefer.**

Electronic signature : *Victoria Wegg-Prosser* pp Here for Hereford

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