

BARKWAY PARISH COUNCIL

NORTH HERTFORDSHIRE DISTRICT PLAN HEARING STATEMENT

I am Dr Julia Rose Magill MBE, a Councillor with Barkway Parish Council (BPC) with a mandate to represent the Council in respect of Matters 21 and 22

MIQ: Matter 21 – the objective assessment of housing need (the OAN)

b) In the light of the ‘alternative OAN figures’, has there been ‘a meaningful change in the housing situation’?

BPC maintains there has been ‘a meaningful change in the housing situation’

c) If there has been ‘a meaningful change in the housing situation’ should the local plan be modified to reflect it and, if so, how?

BPC maintains that to make the plan sound in the context of this meaningful change in the housing situation, BK3 should not be an allocated site in the LDP and all references to BK3 should be deleted from the plan.

NHDC Revisions to its OAN

In NHDC’s evidence set out in *Paper A: The 2016-based household projections and Objectively Assessed Need*, the following statements are relevant to the unsoundness of the inclusion of BK3 as an allocated site within the proposed LDP:

Para 6: “... identifies that an OAN on the basis of the 2016-based projections would be 12,900 dwellings, a reduction of 900 dwellings on the 2014-based figure.

Para 8: “...all of the most recent official projections suggest a lower rate of growth than was identified by the previous 2012-based and 2014-based figures”

Para 14: This approach shows that an updated OAN based upon the latest projections, the ONS method for household formation and a 10% uplift would be 11,409 dwellings.

Para 15: The report concludes that it is “more appropriate to maintain the original CLG method together with the 10% uplift that the SHMA proposed”

(Paragraph 15). This provides a 2016-based OAN of 12,900 dwellings over the period 2011-2031.

Para 22: ...it would be inappropriate to use the Standard Methodology figures [19,680 over 20 years] in setting the housing requirement for this plan. They can only provide the likely context for a future review.

Para 23: This paper expresses the author's expert opinion that the latest OAN figure represents a reduction of only 6.3% which does not represent a "meaningful change" (Appendix 2, Paragraph 3)."

In other words, NHDC are acknowledging that the OAN in the current LDP proposals is overstated by between 900 and 2591 dwellings depending on whether the CLG or ONS methodologies are deemed robust (if either). This reduction does not take into account the statement in *Paper C: The proposed 'East of Luton' sites* that:

Para 23: It is finally worth re-emphasising that a key influence on the scale of the proposed allocation East of Luton is the requirement for it to be self-sustaining in terms of education provision. This point has already been explained at length to the examination. In NHDC's view, the contribution that this authority makes to Luton's unmet needs will be 1,950 homes or it will be nothing.

This could lead to a further reduction in the OAN, increasing the percentage reduction and its materiality.

The NHDC assumptions concerning migration figures appear not to have been updated since 2017 and so do not take into account the current UK Government's much more restrictive policy proposals for migration which are intended *inter alia* to drive down the number of households required. We have already seen a collapse in migration numbers from the EU. This policy agenda also tends to lead to a material change in the housing situation.

BPC argues that the envisaged reduction in NHDC's revised OAN analysis of the number of households to be delivered is highly material to Barkway. The 140 households proposed in BK3 represented only 1% of the original OAN of 14,000 households and therefore made only a marginal contribution to the overall OAN. However, these 140 households represent a highly material, but inherently unsustainable and totally disproportionate increase in households in Barkway itself of 62% (when compared with the total number of households in the 2011 census).

Even if the lower downward revision of the OAN by 6.3% is considered robust compared with the estimate of a 21% drop put to the Council by the Planning Inspector, this is certainly material in reconsidering the allocation of BK3. A marginal contribution of 1% to the OAN cannot be justified when the BPC maintains that not only is a 62% increase in the number of households in Barkway unsound, but that any development of BK3 is unsound because:

- Barkway has been wrongly categorised as a Category A village when it more closely shares the characteristics of a Category B village and should not, therefore, have been eligible for designation as a Village for Growth.
- NHDC has not undertaken a robust economic appraisal of the impact of BK3 and the LDP is not sound because of their failure to do so. There would be an unacceptable and catastrophic adverse economic impact on the internationally important, multi-million pound, bloodstock business at Newsells Park whose closure would remove the village's principal employer and adversely impact a significant supply chain of local businesses. The BK3 site must be retained undeveloped in its entirety to be an effective buffer between Barkway village and the stud in order to prevent its closure;
- Barkway has very poor public transport and would inevitably lead any new households relying on private cars to access fundamental services including general stores, health services, Job Centres and (apart from Reception and Year 1) education resulting in BK3 being environmentally unsustainable. Reliance on private transport fails to meet the LDP's policies on transport which are predicated on achieving modal shift and reducing the number of journeys made in private vehicles. NHDC has also recently declared a Climate Change Emergency to which BK3 would contribute.

Given that the minimum drop in the OAN envisaged is 900 households and that BPC argues there are a number of factors as set out above putting further downward pressure on the numbers, a reduction of 140 dwellings in Barkway can readily be accommodated. (I will be discussing the implications of housing land supply at tomorrow's hearing.)

For these reasons and because BK3 should not be allocated in any event for the broader reasons I have discussed, in order to make the plan sound, BK3 should be deleted from the LDP as an allocated site.