

EAST HERTS LOCAL PLAN
HEARING STATEMENT
Matters and Issues Part 2
By R F Norgan

Having missed the first stage the Inspector has kindly allowed me to make some general statements on the Green Belt issue which is relevant to several sites considered in **Matters and Issues, Part 2, Chapters 5 - 12**

The Plan is unsound as policies BISH1 – BISH12, BUNT1 – BUNT3, HERT1 – HERT7, SAWB1 –SAWB5, WARE1 –WARE3, GA1- GA2 are not consistent with government policy.

The Plan proposes to alter Green Belt boundaries in the above sites in such a way as to de-designate land previously designated as Green Belt.

This action is disallowed by para 79 of the NPPF which states:-

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently** open; the essential characteristics of Green Belts are their openness and their **permanence**.*

Nowhere in the NPPF are circumstances described which possess authority to overturn the permanence of the Green Belt.

(para 83 allows an alteration of boundaries under exceptional circumstance but when considered in conjunction with the over-riding para 79 it follows that boundaries may only be changed in order to designate as Green Belt previously undesignated land).

The Plan does not reflect the fundamental aim of Green Belts to prevent urban sprawl by keeping land permanently open as required by para 79 of the NPPF.

In fact it totally contravenes and offends those requirements in all the sites mentioned above.

The Plan also offends para 80 in the first four of the purposes of the Green Belt in the sites mentioned above.

Furthermore, in **para17** of the NPPF the 5th core principle requires the protection of Green Belts.

Furthermore the Plan contravenes the first, second, third and the fourth purpose of the Green belt as laid out in para 80 of the NPPF in all the sites listed above..

Thus the Plan contravenes the NPPF in these regards and is therefore **unsound** being **inconsistent with government policy**.

Notwithstanding the above argument that Green Belt boundaries may not be altered so as to de-designate Green Belt land the **exceptional circumstances** do not exist to justify the alteration of Green Belt boundaries.

The circumstance of increased housing need is not exceptional as it has occurred regularly going back over two centuries.

Mr Justice Jay suggested that an acute housing need might justify the alteration of Green Belt boundaries. One interpretation of the word 'acute' in this context might be a historically high housing need . The question is how large and compared to what.

ONS data for 2016 (DCLG tables 401 and 101, ONS Total number of households by region and country of the UK, 1996 to 2016) shows that the number of houses in the UK is 1.2 million in excess of the number of households.

This figure is at an historic high so there is no shortage of empty houses although their availability is a pertinent question.

Should the magnitude of the East Herts OAN figure be considered acutely high, and therefore possible evidence for the 'exceptional circumstance' required by para 83, according to Mr Justice Jay, then it follows that the accuracy of that figure must first be justified.

In that regard it should be noted that the DCLG household projections (on which the OAN is based) show an average growth of 250,000 households per annum for the UK for 10 years forward from 2017 during a period of less net immigration (a government commitment) where-as actual growth over the last 8 years (during a period of high net immigration of 250,000 per annum) has been just 152,000 (ONS Total number of households by region and country of the UK, 1996 to 2016).

Thus actual household growth is just **61%** of the DCLG projections even without taking an expected much lower net immigration into account..That UK degree of error is presumably roughly relevant to the regions and to local government areas such as East Herts.

Thus the Plan OAN figure is in serious doubt as to its accuracy and therefore to its acuteness.