

**Standing up for Hertfordshire's countryside**

Christine Thorby (Inspector)  
East Hertfordshire District Plan Examination  
C/o Louise St John Howe (Programme Officer)  
PO Services, PO Box 10965  
Sudbury  
Suffolk  
CO10 3BF

Our Ref:

Your Ref:

6 April 2018 (by email)

Dear Inspector Thorby,

**Examination of the East Hertfordshire District Plan (2011 - 2033)**

I am writing to request that you arrange for a further Examination Hearing session for the above Plan before completing your consideration of the Council's proposed Main Modifications to the Plan and formal Representations on those Modifications, closing your Examination and preparing your Report to the Council.

I copied our first email, attaching Representations on the Modifications to the Council on 28 March 2018, to your Programme Officer on that date. I indicated that I was doing so because CPRE Hertfordshire was asking you to hold a further hearing session to consider the implications for the Council's proposals as modified, of the latest evidence on the scale of housing development taking place, and likely to take place over the Plan period in the District, in excess of the number assumed by the Council when preparing the Pre-submission District Plan.

The context for this request is set out in the letter of 6 December 2017 that we sent to you asking you to clarify your undated Post Hearing Note about 'Next steps and Main Modifications' posted on the Examination website on 29 November 2017 and in particular the text of that Note, on item 1: 'The way forward for OAN and housing land supply' as set out under your heading 'Objectively Assessed Need (OAN) and housing supply.'

We were informed by the Programme Officer on 4 January 2018 that you did not consider our letter to be 'the right time to put forward representations' and that you 'would not be accepting our letter', which at that time was only asking for clarification of statements in your Note to the Council.

It is clear to us from the proposed Modifications, that the Council has interpreted your Note as feared when we wrote to you, and that this has resulted in proposed Modifications to the Plan that are even less consistent with national planning policy as set out in the NPPF than the Pre-submission Plan that we objected to and presented our case to you about during the Hearings.

You will see our formal representations on the proposed Modifications in due course, and those on MM/3/01, MM/3/15, MM/3/16 and MM/3/19 are directly relevant to this issue.

The principal inconsistency with the NPPF revolves around the number of new houses that can be justified in the existing Metropolitan Green Belt in the District, in the light of the evidence on need and supply. We believe that the latest evidence on the supply side changes the balance between the need for the amount of new housing proposed, and protection of Green Belt land from development, explicit in the wording of paragraph 14 of the NPPF.

The parties concerned about this aspect of the Plan should, in our view, be given an opportunity to inform you of what they consider to be the current situation in terms of the soundness of the Plan, and what further Modifications might be necessary to make the housing requirement and target figures in the Plan sound, before you reach your own conclusions about this and advise the Council on specific proposals in the Plan that flow from it.

We therefore urge you to hold a further hearing session on the above matters once you have had an opportunity to review the responses to the Main Modifications consultation.

We look forward to hearing from you.

Yours sincerely,



Steve Baker  
Planning Manager