

## NORTH HERTFORDSHIRE LOCAL PLAN FOR HOUSING 2011-31

### RESPONSE TO INSPECTOR'S MIQs 30.4 c), 30.5

30.4 c) *Would (withdrawal from the Plan of BK3) affect or undermine the demonstration of exceptional circumstances required to release land from the Green Belt....?*

**Yes.** Any loss to the OAN without urgency to make up the numbers elsewhere, and without any suggestion that the reason for the removal is that the proposed new homes are no longer needed, undermines the council's claim that its housing need is "acute and severe", which in turn negates the 'exceptional circumstances' for releasing land from the Green Belt.

30.5 *What bearing, if any, does this have on the supply of land for housing?*

**Possibly it has a bearing.** Given that 30.5 refers to 'supply of land' and not the numbers of the OAN, it is difficult to assess the former without knowing the final decision on the latter. The decrease of 140 houses may well be compounded with other decreases, deemed necessary because the OAN as it stands takes little account of current economic and social conditions, which, by any logic, constitute long-lasting material change (These are: 1. Successive downturns in the rate of household formation signalled in projections by ONS for 2014, 2016 and 2018.); 2. Economic consequences of the pandemic; 3. The population fall of 1.3M, due to the exodus of nonUK-born residents) recently reported by the Economic Statistics Centre of Excellence; 4. The drop of 35.8% in the North Herts OAN if it had been calculated according to the new Standard Method advocated by the Government in the White Paper *Planning for the Future*; 5. Reduced inward migration owing to new border controls occasioned by Brexit.

Such decreases would (and should) be substantial enough to remove some of the sites from the Plan, in which case the abandonment of BK3 would be a contributory factor by virtue of its being a part of such a decrease. *Aireborough NDF v. City of Leeds* gives precedent for the removal of sites by reason of application of more up-to-date data.

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Letchworth