

**Response to NHDC Local Plan Examination Matter 30**  
**By R F Norgan 17 Jan 2021**  
**Statement**

**Q30.5** The question is what effect the removal of a site for 140 houses at Barkway would have on the supply of land for housing within the Plan as a whole.

In order to answer the question the supply of land within the Plan must first be known.

But the supply of land depends upon the housing requirement, particularly when many of the proposed sites are within the Green Belt (9800 homes).

Should the Councils figure of 13,000 for the housing requirement be considered in excess of the true need by the Inspector this would constitute a material change of circumstances (Aireborough NDF v Leeds) such that the exceptional circumstances to support the release of up to 9800 homes worth of Green Belt could disappear.

Thus to answer Q30.5 requires knowledge of the true housing requirement.

The NPPF 2012 states in para 158 (Plan making section)

158. Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The most up-to-date and relevant evidence on housing need comes from the Economic Statistics Centre of Excellence (ESCOE) published 14<sup>th</sup> Jan 2021. The study is called Estimating the UK Population during the Pandemic <https://www.escoe.ac.uk/estimating-the-uk-population-during-the-pandemic/>

and gives the change in the UK population from July to September 2020 compared to that period of 2019.

The study shows a drop of 1.35 million in the UK population.

Employing the average UK household size of 2.4 this population fall indicates a drop in the UK house number of 563,000 houses.

Pro rata according to population this indicates a drop in North Herts of c 1130 houses over the 12 months whereas the Council suggest an increase of 360 (ORS study based on 2018 ONS 10yr trend data) – a difference of 1490 over the 12 months.

In fact all of the five 2018 ONS variants of household projections seriously conflict to various degrees with the 2021 ESCOE data.

Thus the Planning Practice Guidance to base the OAN on the latest ONS household projections seriously conflicts with the requirement of 2012 NPPF para 158.

Planning Policy must surely prevail over Guidance.

Thus the Plan is Unsound.

This conclusion follows logically from the attempt to answer Q30.5 which cannot presently be answered.

(The solution would seem to be that the Plan is put on hold until ONS post-covid household projections become available.)