

NHDC LOCAL PLAN
HEARING STATEMENT
Stage 1 (Weeks 1 and 2) Matters 3, 7, 10,11 and 15
by R F Norgan

The Plan is unsound as it is not consistent with Government policy.

The Inspectors Guidance Notes in the section 'Purpose and scope of the examination part 3' states that, among other requirements the Inspectors role is to consider whether the Plans is sound in accordance with the National Planning Policy Framework. I stress this point as the Planning Practice Guidance (PPG), mentioned in the Matters, is only a guidance to the NPPF and occasionally differs significantly from the NPPF.

Matter 3 (Policy SP8) Objectively Assessed Need (OAN) for housing.

The Plan is unsound as Policy SP8 is not consistent with government policy.

I draw the Inspectors attention to para 158 of the NPPF. It states that a Local Plan should be based on **adequate, up-to-date and relevant evidence** about the economic, social and environmental characteristics and prospects of the area.

3.1 The Plan OAN is based upon the [DCLG household projections 2014](#) for the area (via the North Herts and Stevenage SHMA). The NHDC area projections presumably derive from the England and UK projections. These projections have been in error to a serious degree in the recent past and promise to be in equally serious error in the future.

The [ONS Total number of households by region and country of the UK, 1996 to 2016](#) gives the **actual** number of households present in the UK.

The ONS data shows an average annual real growth from 2008 to 2016 of **152,000**.

However the [DCLG household projections for 2008 to 2016](#) give an average annual household growth of 279,000 -- an error of **84%** above actuality.

Thus on past accuracy the DGLG are seriously at fault and cannot be considered as adequate for predicting household need.

The latest DCLG household projections 2014 predict an average annual household growth for the ten years from 2016 of **250,000**. This is **64.5%** above recent historical actuality of 152,000 which must be considered the best indicator of future household growth in the absence of evidence to the contrary.

The DCLG errors are very significant and demonstrate that the DCLG household projection data cannot be considered adequate, nor indeed relevant. Thus the Plan is **inadequate** and **not relevant** as required by para 158 of the NPPF.

It is not my responsibility to determine the source of the DCLG errors mentioned above. However one source of error seems to be due to the DCLG expectation that the persons per household ratio will fall in the future from 2.35 in 2017 to 2.25 in 2031. As the [ONS Families and Households in the UK, 2016](#) states that this ratio has remained constant at 2.4 for the last decade it would seem reasonable to expect it to remain at 2.4 into the near future in the absence of evidence to the contrary. The DCLG does not supply that evidence.

The consequences of this assumption by the DCLG are as follows:-

The DCLG household numbers and persons per household projection from 2017 to 2031 require that a further **3.432** million households will be created during that period (the calculations are given below).

The 3.4 million houses created must be suitable on average for households averaging 2.25. Thus the new build should be mainly of the two bed type Developers do not want to build such small houses so this scenario is most unlikely to happen.

(Households of just one and two persons might prefer to live in houses of more than one or two bedrooms but it should be remembered that the Plan exists to supply housing need rather than demand. This is particularly relevant if that housing demand were to be satisfied by building on Green Belt land as in this Plan)

On the assumption that the persons per household figure remains constant at **2.4** then **1.34 million** less houses will be required than the DCLG figures suggest.

Thus the DCLG household projections overestimate by **64%**. (the calculations are given below).

This error agrees closely with the previous assumption that household growth will continue at the same rate as in the near past at 150,000 per year in the absence of other significant factors.

DCLG calculations

The DCLG UK households for 2017 are 28030k (k stands for 1000s) with a persons to household ratio of 2.35. For 2031 it is 31462k and 2.25.

Thus the household growth is $31462k - 28030k = 3432k$.

The population in 2017 is $28030k \times 2.35 = 65820k$

The population for 2031 is $31462k \times 2.25 = 70790k$

The growth in population is $70790k - 65820k = 4970k$

The number of households in 2031 if the persons per household remained constant at 2.35 is $31462k \times 2.25/2.35 = 30123k$

Thus the houses needed is $30123k - 28030k = 2093k$

Thus $3432k - 2093k = 1339k$ (1.34 million houses) less.

The DCLG error is $3432/2093 = 1.64$. **A 64% error.**

Adjusting the Plan OAN figure of 13,800 houses by the 64% overestimation in the DCLG data gives an adjusted OAN of **8414** houses (this calculation is a guide only). This creates a **drop of 5386** in housing need, which is very significant, especially for the North Herts Green Belt.

However para 158 of the NPPF also requires the prospects of the area to be considered.

One important and significant prospect is that net immigration is expected to decline going forward .

The average net immigration during the 5 years prior to 2016 (the latest data for actual household numbers) was circa 250,000.

However the Government is committed to bringing net-immigration down to 'tens of thousands' . The event of Brexit is likely to facilitate that commitment.

If the top net immigration figure of 'tens of thousands' (100,000) is taken as a future level it implies that annual net immigration will drop by circa **150,000**.

To turn that figure into a drop in housing requirement we divide by 2.4 (the current persons per household). That implies a need for 62,500 less households per year.

When subtracted from the actual household growth measured by the ONS at 152,000 it suggests a future annual growth of just **89,500** for the UK.

But perhaps **100,000** might be more realistic

In which case and under the above assumptions the DCLG projections are in error by **150%**.

Thus the Plan is **inadequate and not relevant**.

If the Plan OAN is adjusted pro rata (100/250) according to the above prediction the result is just **5520** houses for North Herts (the effect on North Herts will not necessarily be the average for the whole UK, but is beyond the capability of this statement to determine precisely).

Bearing in mind that **4340** houses have already been built or have permission the new resultant future build requirement will greatly differ from the Plan requirement.

3.2 b The OAN for the Luton Plan is equally affected by the above argument. The adjustment may well lead to no unsatisfied need for Luton and hence no requirement for sites **EL1, EL2 or EL3**. Luton Borough should therefore be made aware of these arguments with a view to modifying their Local Plan accordingly if my argument is upheld by the Inspector.

3.2c The OAN for Stevenage Borough is equally affected by the above argument. The adjustment is likely to lead to no unsatisfied need for Stevenage and hence no requirement for sites **NS1, GA1 and GA2**. Stevenage Borough should therefore be made aware of these arguments with a view to modifying their Local Plan accordingly if my argument is upheld by the Inspector.

This error is very significant and demonstrates that the DCLG household projection data cannot be considered adequate nor indeed relevant.

Thus the Plan is **inadequate** and **not relevant**.

Matter 7 – Countryside and the Green Belt etc. (policy SP5)

The Plan is unsound as Policy SP5 is not consistent with Government policy.

Para 155 of the NPPF requires meaningful engagement and collaboration with neighbourhoods and community. This has not occurred. The majority of representations were against building on the Green Belt yet the Plan continues to propose such building. Alok Sharma of the DCLG has iterated many times that in order to build on the Green Belt the local authority must ' **take its local community with it**'. The NHDC has failed to achieve that.

7.1 The Plan proposes to alter Green Belt boundaries in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3** in such a way as to de-designate land previously designated as Green Belt (ie to remove land from the 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 except for para 87 which requires 'very special circumstances' and which are not present in the NHDC Plan.

(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).

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

Thus the Plan contravenes the NPPF in these regards and is therefore **unsound**.

I refer also to my further argument in my original submission **paras 6.09 to 7.05**.

7.1f If the OAN were calculated employing the requirements of the NPPF rather than by using the seriously flawed data of the DCLG household projections as described in Matter 3 above there would be no possible acuteness in the OAN as it would be at least 6000 houses less with the likelihood that there would also be no unsatisfied need from either Luton or Stevenage Borough.

7.2 The question here should not ask whether the Green Belt Review is based on robust assessment methodology alone but also, and most importantly, whether it is in keeping with the requirements of the NPPF.

7.2a The Green Belt Review does not reflect the fundamental aim of Green Belts to prevent urban sprawl by keeping land permanently open.

In fact it totally contravenes and offends those requirements in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3**. Consequently the Plan is **unsound**.

7.2b The Green Belt Review does not reflect the essential characteristics of Green Belts, being their openness and their permanence.

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

I have previously given my argument regarding permanence in 7.1.

The proposal in the Plan to build houses on Green Belt land is inappropriate (paras 87 and 89 of the NPPF).and totally offends these two paragraphs as well as para 79.

Consequently the Plan is **unsound**.

7.2c The Green Belt Review does not reflect the five purposes that Green belts serve as set out in para 80 of the NPPF.

In fact it totally contravenes and offends those requirements.

- The Plan proposes urban sprawl in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3.**
- There is no significant merging of towns yet but the plan is trending towards the merging of towns..
- The Plan does not assist in safeguarding the countryside from encroachment. In fact quite the opposite as sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3** all encroach on the countryside and, indeed on Green Belt countryside.
- The Plan does not preserve the setting and special character of historic towns. In particular it seriously damages Baldock with site BA1 It also offends the guiding principles of the first garden city, Letchworth, by proposing houses, and hence population, beyond the 32,000 determined by Ebenezer Howard when he designed the Garden City
The Plan also proposes to merge the village of Graveley into the borough of Stevenage via site **NS1** And hence destroy the character of that village.
- I make no comment on the fifth purpose.

7.3 I refer to my comments in 7.1 with regard to the permanence of the Green Belt. The question here referring to long term permanence is illogical as there is no such thing as short term permanence and therefore no such thing as long term permanence .

Matters 10 and 11

The arguments expounded under Matter 7 apply equally to matters 10 and 11. In particular to **issues 10-4,9,14,23,28** and **issues 11- 14,19, 24,31, 40, 45, 69, 78.**

11.22 The proposal to build 900 houses on NS1 (Policy SP15) within a quarter mile from the village centre and immediately adjacent to the boundary of the village cricket field and the boundaries of numbers 2 and 4 High St will totally destroy the character of the village. The village consists of 168 houses only.

Matter 15 – Countryside and Green Belt

15.1 SP5 should reflect the full policies of the NPPF with regard to building on the Green Belt. Those policies are para 17 the 5th core principle, para 79, para 80, para 83, para 84, para 87 and para 88.

In particular the meaning of 'inappropriate development' must be made clear under the requirements of the NPPF.

Paras 79 and 89 are totally important overall in this regard.

