

Inspector's Further MIQs

These comments are restricted to the Inspector's MIQs and more specifically to Matter 23 – the Green Belt Review work and the site selection process - paragraph 23.1 b).

The Inspector asks if the Council's approach is reasonable, adequately robust and consistent with national policy?

In his letter of 9 July 2019, the Inspector asks, in paragraph 14

“I am not clear from this, or from the previous hearing sessions, precisely how the exercise of reviewing the Green Belt has affected the site selection process. In particular, I am struggling to understand how, or indeed whether, the contribution - whether it be moderate, significant, or whatever- made to the Green Belt by any individual parcel of land has influenced its selection or rejection. Put simply, I cannot see how the conclusions of the Green Belt review exercise have informed the selection of sites.”

The response from NHDC (Paper B: Green Belt) in paragraph 4 was that “The evidence before the examination is clear that NHDC cannot meet its objectively identified development needs without development in the Green Belt”

My understanding of the remainder of paragraph 4 (although I was unable to unearth all the references quoted by the Council) is that the fact that they could not meet their development needs without resorting to Green Belt comprises exceptional circumstances in relation to its development needs.

I refer the Inspector back to my earlier representation – Representation - Number 542. In this Representation I pointed out that national policy as expressed by Government Ministers was as follows:

The Department for Communities and local Government stated last year [2014] that:

The planning policy framework “allows development in the greenbelt in most cases only in very special circumstances” – **The Times Friday August 7th 2015**

and

“Ministers have repeatedly been clear that demand for housing alone will not justify changing greenbelt boundaries”. – The Guardian Monday April 25th 2016.

In addition, I advised Louise St John Howe in an email I sent on 3rd July 2017 that that day’s Guardian had stated that the Prime Minister had told Parliament in February that the Government was “very clear that the Green Belt must be protected”.

It seems clear therefore that the Council’s reliance on the argument that it cannot meet its development needs without development in the Green Belt and that this therefore comprises exceptional circumstances, is not consistent with national policy.

If the Council seeks to justify development of the Green Belt sites that it has identified because of exceptional circumstances then, to be consistent with national policy, it will have to provide a reason other than simply that it could not meet its development needs without such development.

N.B. The paragraph above sets out how the Plan can be made sound and explains the precise change that is being sought. I would also add that, as I set out in Representation Number 542 and my written statement responding to the matters and issues raised by the Inspector which I submitted on 10 October 2017, in my view, there are clearly no “very special circumstances” which would justify development at HT2, which comprises Green Belt land north of Pound Farm.

Michael Lott

14th February 2020