

NORTH HERTFORDSHIRE LOCAL PLAN

EXAMINATION HEARINGS

Matter 7: Countryside and Green Belt

**The Green Belt Review and the Approach to
Safeguarded Land**

Statement by Jed Griffiths MA DipTP FRTPI

For Knebworth Parish Council

November 2017

The Parish Council's Regulation 19 submissions (in particular see Representation ID 257) are concerned with the removal of areas from the Green Belt. Details of individual sites will be covered in Matter 11 – this statement addresses the strategic issues as requested by the Inspector.

In the justification for Policy SP5, the Council clearly considers that “exceptional circumstances” exist for the release of land from the Green Belt. In the view of the Parish Council, this process has not been followed through. Protection of the Green Belt is a national policy aim – housing needs in themselves do not constitute exceptional circumstances for the release of land from the Green Belt.

In his footnote to the questions in paragraph 7.1 of his note, the Inspector appears to be referring to the Calverton Court case and the criteria set out in the judgement for assessing whether exceptional circumstances exist. In view of the fact that the Council have over-provided for their objectively-assessed housing needs, it could be argued that the acuteness of the needs is low.

No strategic assessment has been made on the effects of the proposed changes to the Green Belt. Any assessment should be based on a consideration of the overall purposes of the Green Belt in this part of Hertfordshire. A map of the Green Belt in the county is attached, and shows the relationship of its coverage in North Hertfordshire to the rest of Hertfordshire. The Green Belt is part of the London Metropolitan Green Belt – thus, its primary purpose is to contain the outward spread of the capital. Of the other purposes, the most important in Hertfordshire terms is that which seeks to prevent the merger of towns with one another – this has been successful and has helped to preserve the individual identity of settlements in the main route corridors. Green Belt policy has also been successful in protecting the countryside from development.

In reaching its decision to meet all of its development needs, the Council have not taken into account fully the key purposes of the Green Belt. This is clear from the brief explanation in paragraph 4.53 of the Council's Housing and Green Belt Background Paper of 2016. The Green Belt Review is based on a detailed assessment of individual parcels of land, but does not provide the strategic overview which is required – it fails to reflect on the fundamental aims of the policy.

Question 7.3 asks whether altered boundaries have been considered having regard to their intended permanence. In the Parish Council's view, too many of the smaller site allocations have boundaries which have been taken directly from the SHLAA. There seems to be little consideration of their long-term permanence, and there are justifiable fears that extensions to these sites will be sought at the next review of the Plan.

There is only one area of safeguarded land – the Parish Council’s comments on this area are contained in the statement on Matter 5. To satisfy the requirements of the NPPF (paragraph 85), the Council should be identifying more areas of safeguarded land to meet longer term needs beyond the plan period. At the same time, a more rigorous assessment of the capacity of existing sites within the towns and larger villages should be undertaken.