

North Herts District Council Local Plan EIP Statement

Statement from Graveley Parish Council

Matter 15 – Countryside and Green Belt: the policy approach to the Green Belt, Rural Areas beyond the Green Belt and Urban Open Land (Policies SP5, CGB1, CGB2, CGB3, CGB4 and CGB5)

Statement Graveley Parish Council

15.4 Is Policy CGB2 justified? Is it effective?

1. The below should be read in conjunction with our comments to the Submission Consultation (commencing page 13).
2. The combination of CGB2 and HS2, 8.17 seeks to remove safeguards elsewhere within the Local Plan to ensure balanced and appropriate development in keeping with the locality and National Planning Policy to protect communities / residents from inappropriate development. In doing so it discriminates against the communities / residents so affected compared with other non-affected North Herts communities / residents.
3. The combination of CGB2 and HS2, 8.17 is contrary to NPPF 17 “protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”
4. Planning decisions / outcomes are required to focus on planning issues and not property values. These proposals seek to exclude policies requiring new development be well integrated into settlements: respect local distinctiveness: lower housing densities on the edges of development. As such they seek to prefer the interests of Developers by the allocation of Affordable Housing to the edges of developments, minimising the location of Affordable Housing in close proximity to market housing thereby improving the marketability of market housing and potentially its premium pricing compared to what might be achieved with an even distribution throughout the site.
5. Conversely concentration of Affordable Housing on the edge of developments next to village communities / residents, is likely to accentuate the negative impact of such a strategic development on the local community and its character as well as the property values of residents.
6. The issue is not one of whether or not affordable housing should be permitted on the periphery of developments but one of balance to prevent the risk of concentration and to ensure that the development is in keeping with the locality. The combination of these two clauses is to pre-empt the balance which a sustainable plan should seek to establish and remove the ability of the villages affected by such proposals to be able to effectively object and therefore is contrary to one of the government’s primary policy objectives in its commitment to the philosophy of localism.

7. Residents are entitled to equal treatment before the law. The effect of CGB2 and HS2, 8.17 is to subordinate the rights of individual residents in preference to supporting the profitability of developers. Interpretation of “the presumption in favour of sustainable development” (NPPF 14) cannot extend to overriding citizen’s rights enshrined in Common Law.

Recommendation: *Wording should be included within CGB2 to prevent the concentration of Affordable Housing on the edges of Strategic Sites adjoining Category A Villages.* Paragraph 8.17 of HS2 should be deleted.

Graveley Parish Council, October 2017.