

**Examination of the North Hertfordshire Local Plan (2011-2031)**  
**Examination hearing sessions**  
**Statement of North Hertfordshire District Council**

**Matter 11 – The housing allocations and the settlement boundaries**  
**The Category A Villages – Weston**

**11.75 Is the proposed housing allocation deliverable? In particular, is it : a) confirmed by all of the landowners involved as being available for the use proposed?**

1. Yes. The landowners of the confirm that they support the allocations and their deliverability for housing – also supported in 2016 SHLAA. Land part owned by NHDC.

***b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?***

2. Yes. No site-specific objections to the allocation have been received from the highway authority. The site provides opportunity to connect into the existing highway and pedestrian footpath networks.

***c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?***

3. Yes. Both the site has been considered through the SHLAA and is considered a suitable location for development having regard to potential constraints (HOU9, site refs 228 and 351 [WE1] See Appendix 3, p.26 and Appendix 4, pp.28 and 48). This is expanded upon in answer to Issue 11.76 below.
4. The site has been subject to consultation with a range of statutory providers. The Infrastructure Delivery Plan (TI1) and Local Plan Viability Assessment Update (TI2) show that these developments are deliverable in infrastructure planning terms and that the development would be profitable such as to support a package of infrastructure measures. The likely significant environmental effects of allocating the site has been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.656-658).
5. HOU9 notes the land is grade 3 agriculture with low flood risk in part of the site. Site-specific infrastructure and / or mitigation measures for these sites are identified as policy measures in the plan (LP1 Policy WE1, pp.212).
6. These measures will be supplemented by the generic development management policy requirements that apply to all sites in relation to issues including (but not limited to) affordable housing, housing mix, transport, design and heritage.

**11.76 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?**

7. Yes. The proposed housing allocation at Western is justified and appropriate. The appropriateness of the allocation is discussed below.
8. In broad terms, the allocation in the plan is justified by (see the Council's Statements on Matters 5, 7 and 9):
  - The need to seek to meet the Objectively Assessed Needs (OAN) for housing as far as is consistent with the policies set out in the NPPF in a district that is currently highly constrained by Green Belt and other considerations;
  - In the Council's view, being able to mitigate or ameliorate identified harms to an extent that the restrictions in Paragraph 14 of the NPPF (and other policies of the framework) would not apply when making a balanced planning judgement on the individual site(s);
  - The significant majority of the deliverable and developable sites identified in the SHLAA (HOU9) being required for allocation if the District is to be able to meet the OAN;
  - No preferable, deliverable alternative sites existing which would allow OAN to be met over the plan period in a substantively different way;
  - There being no reasonable prospect of other authorities in shared housing market areas being in a position to assist under the Duty to Co-operate should North Hertfordshire have resolved not to meet its OAN in full.
9. The proposed allocation at Western would extend the village and represent a green field development opportunity that can be achieved over the plan period minimising impacts on the Green Belt. Site WE1 is currently designated as Green Belt. The justification and impacts in relation to Green Belt are discussed under question 11.78 below. The likely impacts of the development of the site are shown in Table A [from HOU9, Appendix 4, p.48].

**Table A: Impacts of development of allocations at Western**

Site	Name	Impact of Development
WE1	Land off Hitchin Road - 40 homes	Undeveloped plot to north of Weston which slopes down from south to north. Frontage onto Hitchin Road with remaining boundaries well defined by planting. Would require release from the Green Belt. Weston currently 'washed over' by this designation so site needs to be viewed as part of wider consideration of designations and boundaries.

10. The Housing and Green Belt Background Paper summarises the reasons for the selection of site WE1 (HOU1, Appendix 2, p.58). The allocation of this site provides the opportunity to make a contribution to the overall housing requirements identified. The

policy's site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through consultation on the Plan. On balance, the positive opportunities afforded by this site is considered to outweigh the harm.

**11.77 Is the proposed allocation the most appropriate option given the reasonable alternatives?**

11. No additional sites were put forward through the SHLAA process.

**11.78 Site WE1 comprises of land in the Green Belt.**

**a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

12. Yes. Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at WE1. The site provides the only reasonable alternative for the expansion of Western beyond its current built limits.
13. Under the saved policies of the current District Plan, Western is tightly surrounded by the Green Belt. The Council's general case for the existence of exceptional circumstances is set out in its response to Matter 7. The objectively assessed need for housing significantly exceeds the level of development which can be met on development opportunities on brownfield land or contained within existing urban areas or in rural areas beyond the Green Belt.
14. The District is highly constrained by Green Belt and many of the most sustainable locations for new development are within or adjacent to existing higher order settlements as set out in Policy SP2 and supported by Section 4 of the Sustainability Appraisal in (LP4, Technical summary, p. 58-59 pp 4.3 and LP4, Appendix 3, p. 275-280.).
15. The harm to the Green Belt of the potential allocation has been assessed and weighed against the benefits of development in this location. Measures to ameliorate or reduce the consequent impacts to the lowest reasonably practicable extent have been identified.

Site WE1

16. Land on edge of village currently washed over by Green Belt but proposed to be inset providing opportunity to create defensible boundary and support vitality of the village. Site-specific criteria allow for appropriate consideration of potential impacts

**b) What is the nature and extent of the harm to the Green Belt of removing the site from it?**

17. The strategic land parcel 17 covers WE1. This parcel was assessed as making a limited contribution to the purposes of the Green Belt by the 2016 Green Belt Review (CG1, Figure 2.4, p.23). The Green Belt Review also took a fine-grained approach to

the assessment, further dividing the parcels into sub-parcels and also assessing individual sites.

18. The assessment found that the contribution of site WE1 (which is made of two SHLAA sites) was significant for one of the four purposes of Green Belt assessed with an overall 'moderate' contribution (CG1, p.121, assessed as site reference 228 and 351).

19. These results are summarised in Table B below.

**Table B: Contribution of proposed allocations in Western to the purposes of Green Belt**

Site	Green Belt purpose				Overall contribution
	Sprawl	Merge	Countryside	Historic	
Site 228	Significant	Limited	Significant	Limited	Moderate
Site 351	Significant	Limited	Significant	Limited	Moderate

***c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?***

20. The site proposed for allocation at Western consist of well-defined discrete parcels of land which already benefit from defensible Green Belt boundaries in the form of physical features and structural planting which will help to reduce the impacts on the Green Belt to the lowest reasonable practicable extent.

***d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?***

21. It is considered that the adjacent Green Belt to WE1 will continue contribute to the purposes of Green Belt.

22. The assessment of the strategic land parcels and sub-parcels in CG1 shows that land beyond the proposed allocation boundaries already serve Green Belt purposes (CG1, Figure 2.8, p.31 and Figure 3.6, p.66).

***e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?***

23. The extent to which existing settlements might be further expanded in order to meet future need is finite particularly given the dense settlement pattern in existence at the more sustainable locations in the west and central areas of the District.

24. The Plan recognises that, in the longer-term, continual incremental additions to existing settlements may not be the best solution (LP1, paragraph 4.100, p.50). Notwithstanding this point, each settlement within and adjoining the District will need to be properly assessed for further expansion capacity to inform any future local plan review process.
25. However, it is the intention of the plan that the Green Belt boundaries amended by the plan to accommodate growth of settlements will endure beyond the plan period in order to continue to ensure the Green Belt continues to perform its key strategic functions.

***f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?***

26. Green Belt boundaries have been determined with a view to achieving the most sustainable pattern of development. The new Green Belt boundaries have been established in order to accommodate the reasonable maximum of development that can be accommodated within the District at the present time in accordance with the settlement hierarchy.
27. The settlement hierarchy seeks to allocate development to higher order settlements in the first instance in accordance with Policy SP2 (as amended) and supported by the Sustainability Appraisal in (LP4, Section 4). This approach to the distribution of development and the establishment of enduring Green Belt boundaries is supported as the most sustainable approach to achieving the development needs over the plan period.

***g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?***

28. Every effort has been made to clearly define the Green Belt boundaries around allocated sites using physical features such as roads and watercourses that are readily recognisable and likely to be permanent. Or by the creation of physical boundaries through the rounding off of development boundary lines with existing built form.
29. Where no such permanent features exist, or where use of such features would necessitate release of substantial additional land beyond the proposed allocation boundary from the Green Belt, it has been necessary to use semi-permanent existing features such as field boundaries, hedgerows, public rights of way and / or tree belts.
30. WE1 follows the existing built form and hedgerows to the south, the Hitchin Road to the north and east and hedgerows to the west.

**11.70 Is the proposed settlement boundary:**

**a) consistent with the methodology for identifying the settlement boundaries?**

**b) appropriate and justified?**

31. The Council's proposed amendment to the supporting text of Policy SP2 (LP3, amendment to paragraph 4.13, p.2) makes clear that settlements are those areas excluded from the prevailing policy designation of the surrounding rural area.
32. The approach to establishing Green Belt boundaries and therefore the settlement boundary is discussed in the Council's answer to question 11.79 above. Beyond the proposed site allocations, no further alterations are proposed to the Green Belt boundary in this area.
33. A map showing the existing and proposed settlement boundaries for Western are attached to this Statement as Appendix 1 to aid interpretation.

**Appendix 1 - Existing and proposed settlement boundaries for Western**



Weston



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