

ED143 : NHDC Final response to Inspector’s Actions arising out of the Hearing Sessions

Matter 7 – Countryside and Green Belt : the Green Belt Review and approach to safeguarded land		
Action	Date on which Action Completed	Examination Doc Reference No.
NHDC to propose amendment to Sustainability Appraisal to include sentence referring to time delay for new settlement	Amendment to be incorporated into final version of SA prior to adoption of the plan	
NHDC to provide previous iterations of the SA to be included as Examination Documents	November 2017; Not re-provided in this document	OLP7
NHDC to provide comprehensive justification for proposed addition of land to the Green Belt	January 2018; Enclosed as Appendix M7-1	ED79
NHDC to respond in writing to legal submissions on the openness of the GB submitted by Andrew Parkinson on behalf of Save Our Green Belt.	Enclosed as Appendix M7-2	ED143, ED161
NHDC to confirm to Ms Cheryl Peers the number of the sites allocated in the draft LP which are in the GB as currently defined and inform the Inspector when this has been done.	20.02.2018; Enclosed as Appendix M7-3	ED110 ED110a
NHDC to prepare draft schedule of main modifications. NHDC to screen the draft main modifications as to whether a modified SEA is necessary.		
NHDC to prepare a supplementary paper to HOU1 Housing and GB Background Paper explaining the reasons why it maintains there are exceptional circumstances justifying the safeguarding of the land west of the A1(M) at Stevenage.	Enclosed as Appendix M7-4	ED143

Appendix M7 – 1

ED79: Note on Exceptional Circumstances and other matters justifying proposed additional Green Belt

**North Hertfordshire Local Plan Examination
ED79 - Matter 7**

Note to the Inspector

Note to Inspector on the Exceptional Circumstances and other matters justifying the proposed alteration to the existing Green Belt boundary by adding land to the Green Belt.

1. The Existing Designation of Green Belt in this Location

- 1.1. The existing area of Metropolitan Green Belt was originally designated to restrict expansion along the growth corridors of the A1M and the M1. This aim has largely been secured, but in the intervening 45 years development pressures and accessibility have evolved such that undesignated land between these corridors is vulnerable to development pressure and incremental change.
- 1.2. There is no evidence associated with the designation of Green Belt in North Hertfordshire to explain why the central area between the two strips of Green Belt was not originally included in the designated area. More specifically, there is no evidence to support how the boundaries for the current Green Belt were identified. In some areas, the boundary runs along a road (such as the B656 to the west of Stevenage) whilst in other places it follows field or woodland boundaries, such as to the south west of Hitchin or between Ley Green and Lilly Bottom road; or it uses footpaths such as to the west of Codicote and south of Kimpton (see ED44a Current GB boundary and ED44b Proposed GB boundary). Many of these boundaries are neither substantial nor permanent.
- 1.3. The Green Belt is typically less than 2.5 miles wide along the eastern edge of Luton edge, and in places less than 0.75 miles wide directly adjoining Stevenage. Given the scale of the London Metropolitan Green Belt, the exclusion of the strip of land between two large settlements (whose settlement edges are around 6 miles apart) is therefore inconsistent with designation elsewhere and, more widely, the strategic nature of the Metropolitan Green Belt.
- 1.4. Across the Metropolitan Green Belt, the only other comparable area in terms of size which is enclosed by surrounding Green Belt is the area to the north of Hemel Hempstead. However, this land is part of the Chilterns AONB and therefore has an inherently high level of protection from development.

2. Proposed Revised Extent of the Green Belt

- 2.1. As well as North Hertfordshire's requirement for sites within the Green Belt to provide land for its own housing need, significant change is proposed in the

adjacent settlements of Luton and Stevenage. Part of this change involves development in the Green Belt within North Hertfordshire District to facilitate the growth of Luton and Stevenage which will further erode the already narrow band of Green Belt containing these substantial towns.

- 2.2. The proposal to provide new Green Belt between Luton and Stevenage to join the two existing strips will allow for a stronger, more rational Green Belt boundary that will endure beyond the current plan period.
- 2.3. 3.The Green Belt Review [CG1} section 6 pp.137-150, sets out the analysis of the contribution of this land to Green Belt purposes. Part of the conclusion to the Review (para 96 p.150) notes that: *“The areas of non-Green Belt land assessed form a narrow corridor between the existing bands of Green Belt along the eastern edge of Luton and the western edge of Stevenage/Hitchin. Although not directly adjoining the major urban settlements they do play a role in preserving the openness of the countryside. In particular, the parcels to the south of the A505 Luton to Hitchin dual carriageway which are directly between the towns of Hitchin and Luton and Stevenage could perform a key role in maintaining the separation of these towns.”*
- 2.4. The existing strip of non-Green Belt land ranges from just over a mile wide between Kimpton and Kimpton Mill to nearly three miles wide at Whitwell. Creating a new outer boundary for the Green Belt within this narrow area would be illogical and would lead to the creation of meaningless fragments of non-Green Belt land. Therefore, the only reasonable long-term planning solution is to include all the land between the two existing Green Belt strips between the A505 in the north and the District boundary in the south. This will create a more robust and logical area of Green Belt that also joins with the existing Green Belt area in neighbouring districts to create a more consistent and enduring area of Green Belt which strengthens the policy protection between Stevenage and Luton.
- 2.5. The A505 dual carriageway is a logical northern boundary for two reasons: first, it is a robust border with a significant degree of permanence; and second, the Chilterns AONB lies to the north of the A505 dual carriageway stretching from beyond the District boundary in the west to the current Green Belt boundary along the western edge of Hitchin.

3. Meeting the Requirements of the NPPF, including Exceptional Circumstances

- 3.1 The proposed new area of Green Belt is an opportunity to create a more logical and robust area of Green Belt that would contribute to guiding development towards more sustainable locations in the surrounding towns and villages and would serve the purposes of the green belt. In particular it would serve a key role in maintaining the separation between the settlements of Hitchin and Luton. In doing

so, a clear basis for the strategic planning of settlement form can be established. Designation would not, nor is intended to, represent compensation *per se* for the loss of Green Belt as part of the proposed allocation of strategic development sites and safeguarded land, although the loss of existing green belt land weakens its existing function and contribution to green belt purposes.

- 3.2. The NPPF (para 82) sets out various tests in respect of proposals for designating new areas of Green Belt. The rationale for designating the proposed area of Green Belt against these criteria is as follows:

NPPF Requirement	How the Requirement is Met
<i>Demonstrate why normal planning and development management policies would not be adequate</i>	Other policies within the Local Plan, in particular Development Management policy CG1: Rural Areas beyond the Green Belt, provide some policy protection, but cannot be as a stringent or consistent as Green Belt policy in their application. This is particularly the case for the land which lies between Hitchin/Stevenage and Luton which, as a strategic gap between these towns, is effectively performing a Green Belt role. As such policy which ensures the effective control of development is required to ensure that, over the long term, the purpose of strategic separation is considered. This can only be done in a consistent fashion through the use of Green Belt policy extending across the whole of the land to the south of the A505.
<i>Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary</i>	The Council's evidence base identifies a requirement for 13,800 new homes within North Hertfordshire over the period 2011-2031. This scale of development is clearly of an order not contemplated when the original green belt boundary was set and constitutes a major change in circumstances since that time. It is considered that the OAN for 13,800 homes within North Herts can be described as both 'acute' and 'intense'. Less than half of the homes, 6,343 (46%) can be delivered on non-Green Belt sites in North Hertfordshire over the plan period. Therefore, there will be significant housing shortfalls both within North Hertfordshire and across the wider housing market area without using Green Belt land. Release of Green Belt land reduces the area of Green Belt land around settlements and will place greater pressure on those areas remaining. Increasing the depth and overall integrity of the Green Belt will ensure that the openness and permanence of the wider Green Belt in this locality is strengthened.
<i>Show what the consequences of the proposal would be for sustainable development</i>	The designation of additional Green Belt in North Hertfordshire is part of a clear strategic approach to directing development to the towns and larger villages inset with the Green Belt, with appropriate Green Belt release, to help secure more sustainable development. Designation of Green Belt in this location is therefore complementary to the allocation of development land, and part of a planning framework for the plan period and beyond which seeks to balance the need for development with countryside protection. Thereby

NPPF Requirement	How the Requirement is Met
	ensuring that development is sustainable and sustainably located.
<p><i>Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas</i></p>	<p>The Green Belt in North Hertfordshire was last amended in 1996. The need for housing and existence of tight Green Belt boundaries around settlements has necessitated the review of the Green Belt and its purpose in containing settlements and protecting the openness of the countryside. The proposed allocations (and attendant need to revise Green Belt boundaries) reflect the fulfilment of obligations under the Duty to Co-operate between North Hertfordshire and adjoining Councils to provide for development. As such, the proposed designation of Green Belt is an essential part of this strategic approach to planning in this locality which has been advocated in the County Structure Plan and the Regional Plan as a logical planning approach.</p>
<p><i>Show how the Green Belt would meet the other objectives of the Framework.</i></p>	<p>The proposed designation of Green Belt will make an important contribution to the fulfilment of a variety of objectives of the NPPF, notably:</p> <p><i>Section 2. Ensuring the vitality of town centres</i> – by helping to steer development towards sustainable locations which include the surrounding towns.</p> <p><i>Section 4. Promoting sustainable transport</i> – by helping to steer development towards sustainable locations where the opportunities for sustainable transport can be best secured.</p> <p><i>Section 6. Delivering a wide choice of high quality homes</i> – through balancing the need to provide development land in sustainable locations complemented by the appropriate protection of the wider countryside in a consistent fashion.</p> <p><i>Section 8. Promoting healthy communities</i> – Green Belt land constitutes an important recreational resource within reach of urban areas. The extension of the Green Belt in this locality will provide consistent protection of the land as a countryside resource in an area accessible to a large number of urban residents (both existing and new) to the east and west. In addition (and as advocated in para 81 of the NPPF), there is the opportunity to plan positively to enhance the beneficial use of the Green Belt in terms of recreational, landscape and biodiversity, across an extensive tract of land.</p> <p><i>Section 9. Protecting Green Belt land</i> – by creating a coherent area of Green Belt with robust boundaries which will endure beyond the Plan period and complement proposals for growth in surrounding settlements.</p> <p><i>Section 11. Conserving and enhancing the natural environment</i> – by providing the basis for the consistent protection of the countryside in this locality, whilst also helping to protect the setting of the Chilterns AONB to the north of the A505 (Position Statement – Development affecting the setting of the Chilterns AONB, June 2011).</p>

3.2 In responding to these Exceptional Circumstances, designation of Green Belt in this location would fulfil criteria set out in the NPPF (para 85), namely:

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *[Ensure] that Green Belt boundaries will not need to be altered at end of the development plan period; and*
- *Define boundaries clearly, using features that are readily recognisable and likely to be permanent.*

Appendix M7 – 2

NHDC response to legal submissions on behalf of Save our Green Belt

**North Hertfordshire District Council Local Plan Examination
Note to the Inspector**

Legal submissions on the openness of the Green Belt

1. Following the hearing sessions for Matter 7 (Green Belt), the following action was specified:
 - NHDC to respond in writing to legal submissions on the openness of the GB submitted by Andrew Parkinson on behalf of Save Our Green Belt.
2. Following consideration of these submissions and relevant case law, the Council has produced an update to the Green Belt Review (Examination Library reference CGB1) which was submitted alongside the Local Plan in June 2017.
3. This update has been published as a standalone Examination Document (ED161) and should be referred to for further information.

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ED110: NHDC response to Ms Cheryl Peers re ED53

ED110a: List of sites within the Green Belt appended to NHDC response to Ms Peers re ED53

From: Nigel Smith
Subject: NHDC Local Plan Examination - query re. sites in the Green Belt
Date: 20 February 2018 at 10:25:22 GMT
To: Cheryl Peers
Cc: "'Louise St John Howe'" <louise@poservices.co.uk>

Ms Peers,

Our list of actions arising from the current Local Plan examination (as detailed at <https://www.north-herts.gov.uk/planning/planning-policy/local-plan/local-plan-examination/examination-actions>) includes the following in relation to the Matter 7 session on Green Belt:

“NHDC to confirm to Ms Cheryl Peers the number of the sites allocated in the draft LP which are in the GB as currently defined and inform the Inspector when this has been done.”

In response to this matter:

- 70 sites are allocated for housing-led development in the draft Local Plan. 34 of these use land which is in the Green Belt as currently defined. A full list of the 34 sites is attached.
- 3 sites are allocated for new employment development in the draft Local Plan. 1 of these uses land which is in the Green Belt as currently defined. This is site BA10 at Baldock which is currently partially within the Green Belt.
- 6 sites are allocated for retail-led development in the draft Local Plan. None of these use land which is in the Green Belt as currently defined.

Please note that the figures above count the proposed strategic site to the East of Luton as three (3) separate allocations as shown on the draft policies map as sites EL1, EL2 and EL3. One site at Baldock (BA4) lies partially within the Green Belt as currently defined and partially outside the Green Belt. This is included in the 34 Green Belt sites quoted above.

I have copied this email to Louise St John Howe, the Programme Officer, so that the Inspector may be informed that this action has been completed.

I trust this answers your query.

Regards

Nigel

Nigel Smith

Principal Strategic Planning Officer

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Sites in the submitted North Hertfordshire Local Plan using land within the Green Belt as currently defined

Site ref	Site name
BA1	Land north of Baldock
BA2	Land west of Clothall Road
BA3	Land south of Clothall Common
BA4 (part)	Land east of Clothall Common
CD1	Land south of Cowards Lane
CD2	Codicote Garden Centre, High Street
CD3	Land north of The Close
CD5	Land south of Heath Lane
GR1	Land at Milksey Lane
HT1	Land at Highover Farm
HT2	Land north of Pound Farm
HT3	Land south of Oughtonhead Lane
HT5	Land at junction of Grays Lane & Lucas Lane
HT6	Land at junction of Grays Lane and Crow Furlong
IC1	Land at Duncots Close
IC2	Burford Grange, Bedford Road
IC3	Land at Bedford Road
KM3	Land north of High Street
KW1	Allotments west of The Heath, Breachwood Green
KB1	Land at Deards End
KB2	Land off Gypsy Lane
KB4	Land east of Knebworth
LG1	Land north of Letchworth
LG3	Land east of Kristiansand Way and Talbot Way
EL1	Land east of Luton
EL2	Land east of Luton
EL3	Land east of Luton
SI1	Land south of Waterdell Lane
SI2	Land south of Stevenage Road
GA1	Land at Roundwood
GA2	Land north-east of Great Ashby
NS1	Land north of Stevenage
WE1	Land off Hitchin Road
WY1	Land south of Little Wymondley

Appendix M7 – 4

ED143: Note on proposed Safeguarded land west of Stevenage

North Hertfordshire District Council Local Plan Examination Note to Inspector

Proposed safeguarded land west of Stevenage

1. The Inspector has requested that North Hertfordshire District Council (NHDC) provide further information to the Examination with regard to the submitted plan's approach to safeguarded land.
2. Following the hearing sessions for Matter 7 (Green Belt), the following action has been specified:
 - NHDC to prepare a supplementary paper to HOU1 Housing and GB Background Paper explaining the reasons why it maintains there are exceptional circumstances justifying the safeguarding of the land west of the A1(M) at Stevenage.

Submitted plan and national policy

3. The submitted plan, at Policy SP8(e) (LP1, p.48), seeks to provide long-term certainty over housing provision by safeguarding land to the west of the A1(M) for development in the period beyond 2026, subject to a future review of the plan.
4. Further explanation is contained at paragraph 4.104 of the plan (LP1, p.50):

Land to the west of the A1(M) at Stevenage within North Hertfordshire has long been identified as a sustainable location for a substantial urban extension of the town. Given the history of this site, it is considered there is sufficient justification to remove this site from the Green Belt now and safeguard it for future use. No development will be permitted until a plan review determines that the site is requirement to meet long-term needs and remains (part of) the most appropriate solution.

5. The case for safeguarding is set out further in the Council's Housing and Green Belt Background Paper (HOU1) and the Council's Matter 7 statement.
6. Paragraph 85 of the National Planning Policy Framework (NPPF) states that, when defining Green Belt boundaries, local planning authorities should, where necessary, identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period.
7. At the Matter 7 hearings, it was agreed that a proposal to remove land from the Green Belt for safeguarding must demonstrate *exceptional circumstances* in the same way as sites being proposed for allocation.

8. The hearings and the Inspector's questions in relation to Green Belt have proceeded on the basis of the *Calverton* judgement and the 'tests' set out in paragraph 51 of the same¹. The remainder of this note considers the proposals to safeguard land against these criteria.

Acuteness/intensity of the objectively assessed need

9. The Council's objective assessment of housing need (HOU3) covers the period to 2031 for the authority areas of both North Hertfordshire and neighbouring Stevenage.
10. The submitted plans of both North Hertfordshire (LP1) and Stevenage (ORD6) seek to meet objectively assessed needs for housing in full over this time.
11. As both plans cover the period to 2031, there is presently no formal assessment of North Hertfordshire's housing needs for the period beyond this. However, it is possible to review existing information to ascertain potential needs beyond the current plan period.
12. HOU3 identifies (paragraph 5, p.2) that the 'starting point' estimate for objectively assessed housing needs are the Government's 2014-based household projections. These cover the period to 2039.
13. The projections show that, for North Hertfordshire, household growth in the period 2031-39 is anticipated to continue at an average rate of 680 per year. This converts to a requirement of approximately 700 homes per year. Both figures suggest a broad continuation of housing need at the same average rate identified over the 2011-2031 period currently being planned for (690 homes per year).
14. The evidence submitted to the examination sets out the Council's position that the current OAN can be considered as 'acute' and 'intense' (HOU1, paragraph 4.21, p.14). It is logically consistent to suggest that a continuation of housing requirements beyond 2031 at a similar rate would result in the same assessment.
15. In September 2017, the Government launched a consultation on standardising the approach to calculating local authorities' housing need². The data accompanying the consultation shows that application of the suggested methodology would result in a requirement for North Hertfordshire of 996 dwellings per annum³.

¹ *Calverton Parish Council v Nottingham City Council & Ors* [2015] EWHC 1078 (Admin) (21 April 2015), as set out in HOU1, pp.13-14

² <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

³ The indicative figures released for the consultation cover the period 2016-2026. No figures were published for the period beyond 2026.

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16. This is an uplift of 44% on currently assessed housing needs and, if implemented, would similarly be capable of being considered an acute and intense level of housing need.
17. The issue of housing need is not restricted to North Hertfordshire alone. Paragraph 47 of the NPPF is clear that local plans should seek to meet needs in the relevant housing market area insofar as is consistent with other policies of the framework.
18. Evidence submitted to the examination shows the significant majority of North Hertfordshire, and the entirety of the land to the west of Stevenage, lying within the Stevenage Housing Market Area (HMA) (LP1, Figure 3, p.17).
19. This HMA encompasses the whole of neighbouring Stevenage as well as parts of Welwyn Hatfield, Central Bedfordshire and East Hertfordshire. The emerging plans of all these authorities make the case that *exceptional circumstances* exist to justify the release of Green Belt over their respective plan periods.
20. Table 1, below, summarises current assessments of objectively assessed housing needs for all of the authority areas in the Stevenage HMA, alongside consideration of household projections for the period beyond 2031 and the proposed standard methodology. For all authorities in the Stevenage HMA, the proposed standard methodology would result in higher housing requirements.

Table 1: Current housing needs and potential long-term requirements

Authority	Emerging Plan period	Annual average housing requirement		
		Current OAN	CLG h'hold projections from end of plan period to 2039	Proposed standardised methodology
North Hertfordshire	2011-2031	690	680	996
Stevenage	2011-2031	380	390	443
Central Bedfordshire	2016-2036	1,600	1,440	2,553
East Hertfordshire	2011-2033	745	690	1,111
Welwyn Hatfield	2013-2032	800	620	877

21. It can be seen that, based on present information, housing requirements in the wider HMA are likely to remain high beyond current plan periods.

Inherent constraints on the supply and availability of land suitable for sustainable development

22. North Hertfordshire's submitted plan relies on significant releases of Green Belt land if objectively assessed housing needs over the period to 2031 are to be met.

23. The submitted plan recognises (LP1, paragraph 4.100, p.50) that, in the longer term, a strategy of continual incremental additions to existing settlements may not be the best solution.
24. It is likely that, by the time of a future review, further opportunities will be identified within or on the periphery of existing settlements. However, professional judgement at this point in time suggests these sources are likely to be finite. The nature of towns in North Hertfordshire means there is not a large stock of (e.g.) historic industrial land or other substantial regeneration opportunities.
25. The evidence supporting the current plan estimates that less than half of the District's Objectively Assessed needs for housing can be met on non-Green Belt sites in the current plan period (HOU1, paragraph 4.23, p.14).
26. As set out in the plan, the Council is committed to fully exploring new settlement options in the District. However, the Council's evidence suggests that – even if an appropriate site(s) were to be found and pursued – realistic delivery assumptions are unlikely to exceed 300 new homes per year per settlement (HOU6, Figure 3.1, p.19).
27. Ultimately, it will not be possible to make a full judgement on this matter until future assessments of both housing need and potential housing supply (including any potential new settlements) are completed. However, for North Hertfordshire alone, the current evidence suggests there may well be constraints on the supply of land without recourse to the west of Stevenage site.
28. A similar position emerges when looking at other authorities in the Stevenage HMA and considering whether North Hertfordshire may be requested to assist with future housing needs under the Duty to Co-operate (or any successor arrangements).
29. Stevenage is an 'underbounded', single town authority where the built limits of the urban area are already built up to or across the administrative boundary in a number of places. Stevenage's own plan suggests that, although it can meet objectively assessed needs over the currently proposed plan period to 2031, this is likely to leave only limited development opportunities within their own administrative area (ORD6, paragraph 8.11, p.94).
30. Welwyn Hatfield's plan, as submitted, does not provide sufficient housing development proposals to meet the Council's assessments of housing needs. This is, in part, due to Green Belt restrictions. The examination of the Welwyn Hatfield plan is currently ongoing. The Inspector has requested that Welwyn Hatfield carry out further work to ensure that development opportunities within the Green Belt have been robustly assessed⁴. This work is ongoing. However, it is evident that Welwyn Hatfield consider there are inherent constraints on the supply of land for their current

⁴ Inspector's Note following Stages 1 and 2 of hearing sessions: Green Belt Review, <http://www.welhat.gov.uk/article/6938/Examination-Documents>, document reference EX39, accessed 5 March 2018.

emerging plan period. In this context, it would be reasonable to suggest that similar constraints are likely to be found in any future plan roll-forward.

31. East Hertfordshire have only identified a single land allocation within their current plan within that part of their authority within the Stevenage HMA. This is land to the east of Stevenage. The Memorandum of Understanding between North Hertfordshire and East Hertfordshire identifies that a significant quantum of new housing on the edge of, but just outside, this HMA was granted on appeal in advance of the plan and that this provides extenuating circumstances that mitigate against the 'shortfall' (MOU1, paragraph 5.7, p.3). However, the lack of identified opportunities might again be used to suggest that East Hertfordshire may consider the land situation within their part of the Stevenage HMA to be constrained at the point of any future plan review.

32. Central Bedfordshire have recently consulted upon their Proposed Submission Plan. This identifies a requirement for almost 40,000 new homes over the plan period. The plan recognises the need for clarity and / or investment in key infrastructure in the A1 corridor area in order to support current growth proposals as well as any additional growth associated with improved east-west connectivity (ORD10, pp.35-36).

33. Ultimately no decision can, or will, be made on the extent to which development within North Hertfordshire might be able to contribute to needs arising in other parts of the HMA until such time as longer-term assessments of needs and capacity are completed by all the affected authorities. However, it is considered reasonable to suggest that at least some of the authorities above who, based on current evidence, are considered to lie within a shared HMA are likely to face difficulties in identifying sufficient opportunities in the periods beyond those currently being planned for.

Consequent difficulties in achieving sustainable development without impinging on the Green Belt

34. As with the sections above, it is not presently possible to make a definitive statement on this element of the *Calverton* judgement without further assessments of future housing need and supply.

35. However, national policy recognises that the supply of new homes can sometime be best achieved through planning for larger scale development, such as extensions to existing towns that follow the principles of Garden Cities (NPPF, paragraph 52).

36. Current advice on Green Belts similarly advises that, when drawing up or reviewing Green Belt boundaries, authorities should take account of the need to promote sustainable patterns of development. This includes considering the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary (NPPF, paragraph 84).

- 37. Stevenage is the largest settlement in northern Hertfordshire. As a planned new town, it provides a sustainable mix of land uses. Due to the way in which the town has historically developed, any future development to the west of Stevenage would be in relatively close proximity to the town’s main employment area as well as the station and town centre (NHDC Matter 7 statement, paragraph 59).
- 38. The Council’s SHLAA already recognises the proposed safeguarded land as a suitable location for potential development (HOU9, p.48, site ref WSN).
- 39. The site has a long history of being identified through the statutory plan-making process as a suitable location for future development. This includes the Hertfordshire Structure Plan Review 1991-2011 (1998) and the East of England Plan 2001-2021 (2008) (NHDC Matter 7 statement, paragraph 57).
- 40. Any future review of the plan would, under current planning guidance, need to consider reasonable alternatives before settling upon a final strategy. However, based upon the factors above, it is considered likely that development to the west of Stevenage would perform well in any comparative sustainability analysis.

The nature and extent of harm to this Green Belt

- 41. The strategic land parcel to the west of Stevenage, which includes the land proposed for safeguarding, was assessed as making a moderate contribution to the purposes of the Green Belt by the 2016 Green Belt Review (CG1, Figure 2.8, p.31). However 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.
- 42. The assessment found that the contribution of the land to the west of Stevenage was significant for two of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.117 assessed as site reference WS).
- 43. These results are summarised in Table A below.

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

- 44. The Council consider that any future development of this site would therefore result in moderate harm to the purposes of the Green Belt.

Extent to which the consequent impacts on the purposes of Green Belt may be ameliorated or reduced to the lowest possible extent

- 45. Although it is proposed to remove this land from Green Belt for safeguarding, there would be no impact from this proposal in the current plan as permission for the

permanent development of the land should only be granted following a Local Plan review which proposes the development (NPPF, paragraph 85).

46. For other sites identified for development at this examination, the submitted plan seeks to mitigate Green Belt impacts through a variety of measures including:

- Avoiding development on areas of the site(s);
- Boundary treatments / reinforcements; and
- Compensatory provision

47. For the first two of these, any such measures would be specified in policy at the time of any future local plan review which proposed development of the west of Stevenage site.

48. Such measures could, as with the current plan, be informed by any further landscape assessments, sustainability appraisal or similar used to inform that review. At this point it is considered sufficient to acknowledge that such measures exist and would be available as policy tools to ameliorate harms at the relevant time.

49. The Council's case for compensatory additional Green Belt provision in the Plan has regard to the proposed safeguarding of land to the west of Stevenage. It identifies that a consequence of removing the west of Stevenage area from the Green Belt would leave only a small section of existing Green Belt. This was considered a contributory factor to the Plan's proposal to designate additional Green Belt (CG1, p.150). These points are reinforced in the Council's note further justifying the proposed additions to the Green Belt (ED79).

Conclusions

50. Having regard to the factors above, which consider the key issues raised in the *Calverton* judgement, it is considered that the necessary *exceptional circumstances* exist to support the removal of land west of Stevenage from the Green Belt and the safeguarding of it for future development. In summary:

- Current evidence suggests that acute and intense housing needs are likely to persist beyond the current plan period to 2031. Significant levels of future need are also anticipated within other authorities in shared housing market areas (as currently defined);
- North Hertfordshire is already facing significant pressures in identifying development sites for the current plan period. Other authorities are similarly likely to face constraints in identifying opportunities in any future review;
- The site adjoins the largest town in northern Hertfordshire and is considered a sustainable location for potential future development;

- Development of the site would result in moderate harm to the purposes of the Green Belt but policy tools exist to assist ameliorate the potential impacts. These can be applied at the appropriate time.

51. It is not presently possible to provide definitive answers against some of the matters discussed as they are reliant on future assessments of need and / or supply as well as future decisions by other authorities in shared housing market areas. However, it is equally recognised that the proposed safeguarding of additional land accords with relevant advice in national policy to ensure housing needs can be met beyond the current plan period whilst any future development of the land would need to be proposed through a future review of the North Hertfordshire Local Plan.