



Gladman Developments Ltd

Examination of North Hertfordshire Local Plan 2011- 2031

Matter 23 – the Green Belt Review work and the site selection process

23.1 Paper B of the Council’s response to my letter of 9 July 2019 explains how the Council’s assessments of the contribution of land parcels to the purposes of including land in the Green Belt has been taken into account through the process of selecting sites for development. As I understand it, and in short summary, this has been a two-stage process:

Stage 1 – an initial ‘sift’ through the Strategic Housing Land Availability Assessment, involving an assessment of the ‘suitability’ of sites including in relation to Green Belt factors

Stage 2 – to assess the contribution that areas and potential development sites make to the purposes of including land in the Green Belt (through the Green Belt Review and the Green Belt Review Update 2018) to help inform the judgement about the existence or otherwise of the exceptional circumstances necessary to warrant the ‘release’ of the land in question from the Green Belt Paper B of the Council’s response also explains how the Sustainability Appraisal has considered matters relating to the contribution land parcels make to the purposes of including land in the Green Belt.

Have I understood the approach taken correctly?

Is the approach taken reasonable, adequately robust and consistent with national policy?

The Sustainability Appraisal is not influenced by the degree to which land does or does not contribute to the purposes of including land in the Green Belt. Should it be?

23.1.1 The Sustainability Appraisal of the North Hertfordshire Proposed Submission Local Plan seeks to provide information on the social, economic and environmental effects of the Local Plan. As stated in the NHDC response to Inspector 9 July 2019 Letter - Paper B (ED172);

23.1.2 Green Belt is a policy designation, not an environmental designation. The fact that land is, or is not, Green Belt does not in itself have environmental implications. The fact that land may

be judged as making a limited, moderate or significant contribution to Green Belt purposes is not in itself an influence upon the outcomes of the appraisal process.

23.1.3 The SA is one part of the wide-ranging evidence base that informs consideration of individual sites in the overall planning balance approach set out above.

23.1.4 It is appropriate for the Sustainable Appraisal, along with the site selection assessment within it, to be separate from any Green Belt Assessment. The Sustainable Appraisal seeks to ensure that decisions are made that contribute to achieving sustainable development. As referenced by North Hertfordshire District Council in their letter to the Local Plan Inspector, any Green Belt policy is not an environmental designation. The assessment of the Local Plan's social, environmental and economic effects should not be impacted by any separate Green Belt designation.

23.1.5 It is for additional evidence by way of a Green Belt Assessment or Green Belt Review to undertake an assessment of locations and their contribution towards the five purposes of the Green Belt.

23.1.6 The Sustainability Appraisal and Green Belt Review undertaken by the Council are two independent pieces of evidence that support the Local Plan. The approach of North Hertfordshire in this regard is correct and reliable.

23.2 The Green Belt Review Update 2018 arrives at some different conclusions to that of the original Green Belt Review. Some sites are now considered to make a significant contribution to the purposes of including land in the Green Belt (which were previously assessed as making a lesser contribution).

a) Should the change in the assessment of these parcels of land (including the safeguarded land to the west of Stevenage) lead to their allocation for development/identification as safeguarded land in the Local Plan being rejected?

b) If so, and bearing in mind the methodology used, why does the change in the assessment render the Local Plan unsound in this respect?

23.2.1 The Green Belt Review Update 2018 sets out a comparison of the overall contribution each proposed Local Plan allocation makes to Green Belt purposes in Table 8. There are 8 proposed allocations identified as having an increased overall contribution when compared to the originally submitted Green Belt Review and 8 proposed allocations with a decreased contribution.

23.2.2 While it is surprising that the revised methodology within the Green Belt Review Update 2018 has resulted in alterations to the overall contributions that these sites make to the Green Belt, the Council set out in Section 2 the refined best practice methodology which leads to these conclusions.

23.2.3 North Hertfordshire Council make clear within paragraphs 5.19 – 5.23 that the sites judged as having an increased contribution to the Green Belt are the Strategic Sites within the plan.

“5.19 For those sites judged as having an increased contribution to Green Belt purposes, the reasons supporting their proposed allocation have been reviewed. With the exception of Site GA1, all of the sites recording an increased contribution to Green Belt purposes under this update are classified as Strategic Sites in the Plan. These are the largest sites of 500+ homes in the Plan. Taken together, the Strategic Sites account for more than 50% of future planned supply.

5.20 These sites are therefore fundamental to the Plan’s strategy. As previously set out in evidence and statements to the Examination, Paragraph 52 of the NPPF recognises that the supply of new homes can sometimes be best achieved through planning for larger-scale developments.

5.21 These sites represent the best opportunities for strategic-scale development within the District adjoining the main towns. The conclusions in Appendix 2 of HOU1 regarding the significant positive opportunities afforded by these sites being considered to outweigh the harms are still considered valid, even if the heightened contribution towards Green Belt purposes found in the revised analysis in this Report are applied.

5.22 Although slightly smaller in scale at a proposed 330 homes, site GA1 is recognised as making a “substantial contribution to overall housing numbers achievable and [being] critical to achievable levels of five-year delivery”⁹. As set out in the Council’s Statement to the relevant Matter 10 session, a planning application for this site was submitted in July 2016 and is awaiting determination pending, in part, the outcome of the Plan’s Examination. Similarly, the conclusions of HOU1 with regard to this site are considered to remain valid.

5.23 In all instances, proposed policy criteria to ameliorate Green Belt harms to the fullest reasonable extent are set out in the Plan (LP1, Policies SP14 to SP19, pp.61-72) and / or subject to additional strengthening pursuant to the proposed modifications contained in the Council’s Examination Statements and / or the actions arising from the hearing sessions (as set out in ED95, ED96 and ED128).”

23.2.4 The Council have fully justified the alterations in contributions and conclusions within the Green Belt Review Update 2018 and Gladman therefore consider that the Council are correct to conclude that the sites put forward as proposed allocations within the plan remain the most appropriate. The change in assessment within the Green Belt Review Update 2018 does not render the Local Plan unsound.