

## **Transition Town Letchworth Submission Relating to 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.

a) Have I understood the approach taken correctly?

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

c) 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?

23.2 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?

*Note: These questions are explicitly about the change in the assessment and what that means for the Local Plan. Written and verbal statements must address this point only.*

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Transition Town Letchworth’s focus is on Letchworth and its environs so we have only considered the green belt review in relation to how the 2018 update has affected Letchworth. Area 22a has now been downgraded to moderate importance when it was seen as providing a significant contribution in the 2016 review but the rationale for this change is not clear. With the growth of Fairfield Park, which is close to this parcel of land it might be thought that maintaining Area 22a as green belt is even more significant if Letchworth is not to merge across the Bedfordshire border into Fairfield Park at some point in the future.

It appears that area 22b is still categorised as of significant green belt importance, but this has made no difference to its selection as a site; which begs the questions what is the purpose of the green belt, and why go to the effort of reviewing the green belt at regular intervals?

North Hertfordshire District Council now have quite outdated town centre strategies. We consider that the local planning process did not properly consider future opportunities for housing in redeveloped Town Centres as highly sustainable locations. We believe that until Town Centre reviews are complete, the housing allocation for LG1 and other sites encroaching on significant green belt land should not be finalised. The North Herts Local Plan needs to address the issue of ‘out-dated’ national guidance on retail development with some innovative thinking for Letchworth. In particular, vacant units and land on the periphery of the existing town centre could be utilised for

sustainable homes, which would then be located near the shops, schools and public transport. This would reduce the amount of housing required on the green belt LG1 site. The local plan could then set aside green belt land for industrial / retail uses to meet national guidance requirements, with a high probability that this land would never need to be built upon (which seems highly likely as the local plan fails to tackle the area's social inequalities which lead to greater shopping, for instance, in Hitchin). Overall this approach would have the potential to reduce the erosion of green belt land and place housing in a more sustainable location.

The Oxford to Cambridge corridor, which includes a new train line, has now been finalised to route slightly to the north of Hertfordshire. This corridor will offer exciting growth and employment opportunities and new housing should ideally be located to allow North Herts residents easy and sustainable access to this corridor. The optimum location for this housing should not require any encroachment on North Hertfordshire's designated green belt. Limiting house building on the green belt and starting again with a new plan which takes into account the Oxford – Cambridge corridor would provide better opportunities for local people and save the green belt. For example, the latter could provide for a new town within walking distance of Ashwell and Morden station. We would suggest that it is better that NHDC deliver a plan for sustainable development by say 2035 rather than a plan for unsustainable development, which erodes areas designated as 'significant' green belt, by 2031.

If green belt is to be encroached on we would suggest that any housing numbers for these sites should be applied as a maximum, and if either the demand for housing in North Herts is not as high as predicted, or future windfalls on brown field sites are greater than predicted, the opportunity should be taken to reduce the volume of housing built on green belt sites. This would help keep towns compact, sustainable and separated and leave the maximum area of land available for agriculture (i.e. to include farming, horticulture and allotments).

TTL would like to see the green belt's role in providing wildlife corridors acknowledged in green belt reviews. A strip of land may not be wide, it may not give panoramic views, but if it provides wildlife with a corridor for movement and feeding it should be acknowledged and protected.