



Strategic Planning & Research Unit

For and on behalf of
**Linden Homes Strategic Land (Eastern)
New Road (Ashbrook) Ltd. and the Taylor Family**

Examination of North Hertfordshire Local Plan
Representations to Inspector's MIQs Hearings
Matter 7

Prepared by
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Examination of North Hertfordshire Local Plan
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Matter 7: Countryside and Green Belt
Representors ID:5190/5191

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7.0 Matter 7 – Countryside and Green Belt: the Green Belt review and the approach to safeguarded land (Policy SP5)

*The questions concerning **Green Belt** are aimed at the strategic level. Later questions address the issue of exceptional circumstances and other issues in relation to specific sites.*

Q7.1 - Paragraph 83 of the National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances. In broad terms:

a) Do the exceptional circumstances necessary exist to warrant the proposed alterations to Green Belt boundaries, in terms of both removing land from and adding land to the Green Belt?

7.1 Yes.

7.2 Notwithstanding that a part of the District lies beyond the Green Belt, including the town of Royston, and that sites in non-green belt locations should be priorities – as part of a sequence generally described in the White Paper “Fixing our broken housing market” (paragraph 1.39) - in order to meet the OAN in the most sustainable locations (i.e. by way of urban expansions to the largest urban centres), green belt land will be required. Meeting the OAN is of overriding importance.

b) What relationship, if any, is there between the exceptional circumstances leading to the alterations proposed to the Green Belt and the proposed spatial strategy/distribution of new housing?

7.3 Amendment of the Green Belt is as a function of the need to identify sufficient land to meet the full OAN where the duty to co-operate has been exercised only in respect of the provision of land to meet the needs of an adjoining authority – Luton Borough. Amendment to the Green Belt should be sufficient to endure beyond the plan period (Framework paragraph 83). In these circumstances failing to plan for a full OAN based upon up to date evidence, not unduly influenced by the last recession, and not underestimating the impact of London is clearly unsound - our submission on Matter 3 refers.

7.4 The Framework clearly states (paragraph 84) that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development and where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.

7.5 In light of the up to date evidence, Policy SP8 is considered unsound for the following reasons:

- It is not positively prepared – the chosen strategy insufficiently meets objectively assessed housing requirements in a sustainable way which also addresses key infrastructure constraints and delivery issues;
- the future level of planned housing provision has a bearing on the setting of longer term boundaries to the Green Belt.

- 7.6 It is agreed that exceptional circumstances exist to justify Green Belt review however the resulting boundaries should endure for the long term and not require further review at the end of the plan period.
- 7.7 Clearly, the likely housing requirements post the plan period are more uncertain, however projections suggest that the modelled levels could continue. An appropriate response would be for the plan to at least exclude from the Green Belt sufficient land to accommodate a further 5 years' worth of building i.e. some 4600 dwellings – SPRU's Reg19 Objection to Policy SP8.
- 7.8 Assuming a net to gross ratio of 75% and a density of 35 dwellings to the hectare, would suggest a total of some 175 hectares of land.
- 7.9 Notwithstanding this, it is clear that green belt release is an expedient way to meet the current requirement with little consideration for the future – either in terms of meeting the continuing housing need or as a means to address pressing infrastructure issues, specifically the delivery of a south west bypass for Hitchin.
- 7.10 Framework paragraph 14 requires plans to be flexible and able to respond to such changes. As currently drafted, the plan is unable to respond to the most recent DCLG projections let alone the LPEG approach to assessing OAN.
- 7.11 While the provision of safeguarded land outside of the Green Belt maybe a response to this, any increase in the level of housing requirement would require a full plan review which is both costly and time consuming.
- 7.12 The recommended change to the NPPG by LPEG is that plans should allocate reserve sites to accommodate a further 20% of their OAN in order that this test of flexibility be adequately addressed.
- 7.13 This would require Policy SP8 to be amended to identify a further 4,100 dwellings on reserve sites that could be brought forward to meet additional need should it be necessary.
- c) What is the capacity of existing urban areas to meet the need for housing and employment uses?**
- 7.14 We do not consider that there is significant further urban capacity beyond that which is identified or likely to come forward through a windfall allowance.
- d) Is there any non-Green Belt rural land which could meet all or part of the District's housing and employment needs in a sustainable manner (having regard to any other significant constraints)?**
- 7.15 No.
- 7.16 The non-Green Belt parts of the district are either principally AONB in the ridge and valley landscape between Hitchin and Luton (LCA Areas 210, 211, 212) or lie to the east of Baldock at the foot of the north Hertfordshire chalk escarpment (County LCA Areas 227 and 228) where there is comparatively sparse population, save for the small town of Royston.
- 7.17 None of these areas are intrinsically suitable for significant scale development in view of their separation from the principal urban areas, lack of significant settlements,

landscape constraints and limited access to public transport, employment areas or local services.

e) What is the justification for excluding Category A Villages from the Green Belt?

7.18 We have no comment on this question.

f) What is the justification for excluding Blackmore End from the Green Belt?

7.19 We have no comment on this question.

Q7.2 - Is the Green Belt review based on a robust assessment methodology? In particular:

a) Does it reflect the fundamental aim of Green Belts, being to prevent urban sprawl by keeping land permanently open?

7.20 Whilst CG1 provides an analysis of Green Belt on a parcel basis (Fig 2.3), this does not appear consistent or to have had significant bearing on choice of sites. Specifically, the assessment of Green Belt function is inconsistent between parcels, the summary rating based on the assessment of the four contributory criteria is inconsistent and there has been no discernible bearing on the decision to allocate land – for example HT1, LG1 and BA1, plus several of the larger allocations in Category A villages are in Green Belt where the assessment considered parcels to perform a significant overall Green Belt function.

7.21 Whilst we do not take issue with the outcome of this as the Green Belt, although an important national planning policy, has necessarily to be considered in relation to the sustainability of settlements and all other matters. It is demonstrably clear that the non-allocation of sufficient land to meet the full OAN – including for example parts of site 209 - cannot be justified on Green Belt grounds in relation simply to preventing urban sprawl.

b) Does it reflect the essential characteristics of Green Belts, being their openness and their permanence?

7.22 The Plan as submitted does not assure permanent openness as it fails to address the potential for continued growth at the present rate in the period after 2031. Whilst BA1 allows for development in the post plan period – and we consider that other sites may not be completed sufficiently before 2031 – and SP8 e) refers to the potential for a new settlement and expansion west of Stevenage subject to a review of the Plan, the latter is not addressed through consideration of the permanence of the Green Belt and the need to ensure its durability beyond the regular local plan review cycle.

7.23 In this context, this Plan should be making provision for the infrastructure necessary to support longer term growth – the provision for a Hitchin South Est bypass and setting the Green Belt boundary accordingly.

c) Does it reflect the five purposes that Green Belts serve, set out in paragraph 80 of the National Planning Policy Framework?

7.24 We agree that the Green Belt in North Herts does not serve – or no longer serves – to secure urban regeneration.

- 7.25 We question whether the Green Belt function to protect the setting of historic towns is correctly applied in the assessment at CG1 Table 2.4.
- 7.26 It is wholly unclear why parcels 11, 12, 14, 18 and 20 are singled out to be important for the protection of Hitchin, Letchworth and Baldock (where CG1 para 11 has defined them to be historic towns but on no clear evidential basis) whilst others also forming their setting are not. It is clear equally that the historic value identified in the assessment has not been, and should not be, a determining factor in the allocation of land.

d) Has account been taken of the need to promote sustainable patterns of development?

- 7.27 LP4 para 1.2 notes that the strategy is a combination of options a), b), c) and e) where option d) is a new settlement – albeit we have noted in commentary on Matter Q2.1 that the scale of development proposed for Baldock could be construed as tending towards option d) in relative scale and character. It is wholly unclear as to the genesis of that policy option.
- 7.28 With regard to our argument that the Plan fails to take account of the need to promote sustainable patterns of settlement and safeguard land to meet longer term development needs (Reg19 Submission paras 8.12 and 8.18-8.22) the enduring role and needs of Hitchin as the principal town have not been properly accounted for. Inconsistent weight has been attached to Green Belt as a constraint on development to the south west of Hitchin. There is no explained justification which can be weighed against the allocation of land elsewhere subject to similar or more significant Green Belt functions.

Q7.3 -Have the altered Green Belt boundaries been considered having regard to their intended permanence in the long term? Are they capable of enduring beyond the plan period?

- 7.29 We consider that the altered Green Belt boundaries as proposed are potentially durable. However, that durability effectively limits the potential fully to address ongoing future development needs.

Q7.4 -The Plan identifies one area of safeguarded land, to the West of the A1(M) at Stevenage.

a) What has been the Council's overall approach to safeguarded land?

- 7.30 Paragraph 4.57 does not explain why an exception is made to identify land west of Stevenage as a potential future development option at this stage whilst for the reasons of uncertainty it is “not considered appropriate to identify significant areas of safeguarded land at this point”.
- 7.31 It is unclear how NHDC derive their conclusion about permanence where Framework paragraph 85 states that the LPA should be satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period.
- 7.32 If decisions can be made regarding west of Stevenage, it is reasonable to expect decisions to be made which would secure the long terms durability of the Green Belt once reset in this Plan through the exclusion of land south west of Hitchin – which

would send a clear signal of the intent to resolve the critical east-west traffic issue even if this cannot be fully achieved in the term of this Plan.

b) Is it necessary to identify safeguarded land more widely in order to meet longer term development needs stretching well beyond the plan period? Without the identification of further safeguarded land, what reassurance is there that longer-term development needs can be met without further review of the Green Belt?

7.33 Yes.

7.34 This Plan amends a Green Belt boundary that has endured since 1992. Whilst that boundary has demonstrably constrained the ability of the towns to meet their growth needs such that in recent years the district has not been able to demonstrate a five year supply of housing land, and market signals indicate a significant disparity in need and affordability – SPRU Statement on Matter 3 refers. The intention of Government policy is not to encourage quinquennial reviews of the Green Belt but to permit occasional strategic review to allow for the long term balance between meeting local development needs and protecting the Green Belt for its own sake – hence the re-affirmation of a commitment to Green Belt in the 2017 White Paper at paragraph 1.37.

7.35 Without fully addressing the OAN in this Plan, and without proper consideration of the range of sites needed to deliver the total housing requirement within the plan period and importantly, continuing beyond it, the Green Belt cannot be durable as intended. This Local Plan should, at the minimum, be looking to release land to be safeguarded for future development at Hitchin – as the principal and most sustainable town – even if the Council intend to pursue a new settlement as a potential option for post 2026 development: if they can state that as a policy objective then they should, and need to be, capable of ensuring that the Green Belt once reset, fulfils its intended degree of durability beyond the life of this plan and then ones that will follow.

c) What is the justification for safeguarding the area identified to the west of the A1(M)?

7.36 There is no explicit reason and it is not clear whether this is intended to meet a future need for Stevenage rather than specifically to address North Hertfordshire's future housing need.

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