

# **WRITTEN STATEMENT ON BEHALF OF THE LETCHWORTH GARDEN CITY SOCIETY, IN RESPONSE TO THE FURTHER MIQs ISSUED BY THE INSPECTOR ON THE NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN (2011-2031).**

The Letchworth Garden City Society has argued against several sites in Letchworth's Green Belt being allocated for housing development throughout the Local Plan process.

One of these sites LG1, a strategic site, has been found, in the updated assessment, to make a significant contribution to the purposes of including land in the Green Belt.

## **Matter 23- the Green Belt Review work and the site selection process**

**23.2** NHDC say in the Green Belt Review Update, 5.13 and 5.14 that because development on sites judged to have the potential to cause significant harm in CGBI, were proposed for allocation in the Plan, then sites which have been found to have the same potential in the revised assessment should not be seen as unacceptable.

This argument fails on two counts:

1. There has been no judgement yet as to whether the initial proposal for development on sites judged to cause significant harm is acceptable.
2. It seems the entire exercise of scoring the Strategic Sites was a pointless "going through the motions" exercise, as NHDC say in 5.19, 5.20 and 5.21 (in the Green Belt Review Update) that these sites are fundamental to the Plan's strategy and that "*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.*" It is clear that nothing in the analysis of the harm to the Green Belt, of the development of the Strategic Sites, was going to result in any of these sites being rejected.

There is no level of harm which would render these strategic sites not being taken out of the Green Belt and not put forward for development.

Paras. 5.51 and 5.52 in HOU I make it clear, "*the ability of these (Strategic) sites to contribute substantially to both overall housing numbers and also to housing requirements in the first five years following adoption of the plan has been a key determinant in concluding that the necessary exceptional circumstances exist to release these, and other, sites from the Green Belt.*"

With this presumption that these strategic sites were always going to be released from the Green Belt, the exercise which NPPF (2012) says should be undertaken, to 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, cannot take place. This is not consistent with national policy and makes the proposed Local Plan unsound.

**23.1** The argument made by NHDC that the Sustainability Appraisal should not be influenced by the degree to which land does or does not contribute to the purposes of including land in the Green Belt does not sit well with the content in NPPF (2012) in terms of Sustainable Development. This document says in describing the Environmental role in Sustainable development

*"contributing to protecting and enhancing our natural, built and historic environment..."*

Unless NHDC is arguing that sustainability has a different meaning in terms of a SA to that in the NPPF, then the statement in NPPF (2012) on page 5 no 17 under Achieving Sustainable Development, Core Planning Principles, should be incorporated into the SA.

*"take account of the different roles and characters of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them..."*

Paragraphs 6, 84, 85, 126 15, 157, 165 and 169 of NPPF 2012, are also relevant.

In my opinion the SA should have included a specific policy on retention of Green Belt land and the adverse impacts of the development of Green Belt sites assessed against this policy.

The fact that the Sustainability Appraisal is not influenced by the purposes of including land in the Green Belt means that it is not consistent with national policy and is unsound.

There is one further issue which I have raised before but which has not been addressed in terms of complying with national policy and that is that there has not been an assessment of heritage impact prepared for Letchworth, although these have been prepared for the other towns in the Local Plan area. The English Heritage Representation of 6 February 2015 recommended this and went on to say

*"Allocation of this site (LGI) needs to be justified in terms of historic environment impact"*

Paragraph 169 of NPPF 2012 is also relevant to this point.

The omission of this assessment means that that the full impact of the proposed site LGI has not been adequately judged against other sites and this omission makes the Local Plan unsound.

Ellen Barnes Letchworth Garden City Society 20/02/2020