

Statement of Philip Skinner,

Examination of North Hertfordshire Local Plan 2011 – 2031

Matter 23 – the Green Belt review work and the site selection process.

Site KB4: Land to the east of Knebworth

I would refer to the section on KB4; Land east of Knebworth village in my representations and Objections to the NHDC Local Plan 2011- 2031, dated 15 November 2016, where I set out my objections in detail to the removal of this land from the Green Belt and to its proposed development. My objections remain.

I have read ED172 NHDC's reply to the Inspector's 9th July 2019 letter and do not consider that NHDC have made sufficient justification for Site KB4 being removed from the Green Belt and included for development in the Plan.

I would like my statement to be considered as part of the Inspector's Schedule of Further Matters, Matter 23 – the Green Belt review work and the site selection process.

Whilst I accept that some development on Green Belt land is necessary if the housing figures put forward by NHDC are correct, there are non-Green Belt sites, and sites of limited and moderate Green Belt value within the District which have been considered and rejected by NHDC, as unsuitable for development, for reasons that appear to be weak when compared to NHDC proposing KB4 as suitable for development, when NHDC consider site KB4 to make a significant contribution to the Green Belt.

In trying to justify removing this site from the Green Belt and allowing development, the Council's response ED 172, Paper B: Green Belt, states in the last point of paragraph 4 that the Plan 'allows for these largest settlements to grow proportionately'. The proposed increase in housing for Knebworth if KB4 is included in the Plan is over 30%, which is well in excess of the proposed percentage increases for Hitchin and Baldock.

In paragraph 16 of ED 172 the Council claim to have judged non-Green Belt sites in other areas to be unsuitable as they would result, in the Council's view, in disproportionate levels of additional housing in a single village. Sites in neighbouring Codicote that have been rejected, refer to 'a reasonable maximum of development for this settlement' in the summary reasons (Table B SHLAA ref 30 and 205N).

Whether Knebworth is considered with the larger towns or with the villages, NHDC do not appear to be applying the same standards of proportionality to Knebworth.

Removing KB4 from the Plan would go some way to redressing the proposed planned proportional overdevelopment of Knebworth village.

I note that in 'ED127 Table A Green Belt sites considered unsuitable' NHDC have given the following reasons for SHLAA ref. 211 being unsuitable as;

'erode the gap between Knebworth and Stevenage.... And has no physical boundary to north (Sic)'

Exactly the same reasons apply to KB4, developing this site would close the gap between Knebworth and Stevenage, and the site also has no physical boundary to the north-east of the site. The relevant Green Belt considerations listed apply to both sites.

NHDC state that they have followed the relevant Green Belt considerations (NPPF) in deciding whether Green Belt sites are unsuitable for development.

These include;

The essential characteristics of the Green Belt are their openness.

To assist in safeguarding the countryside from encroachment

To prevent neighbouring towns from merging into one another.

KB4 is part of open countryside with no physical boundary until the Hertford branch line which is the current boundary of built-up Stevenage. By including KB4 for development in their Plan NHDC have ignored the first two points above and set a precedent that erodes the last point.

The NPPF 2019 states in paragraph 133, that "the essential characteristics of Green Belt are their openness and their permanence". It further states in paragraph 136, that the Green Belt boundaries should only be altered "where exceptional circumstances are fully evidenced and justified". One would therefore assume that developing land that makes a significant contribution to the Green Belt (the highest value category) in preference to available non-green belt land and land of limited green belt value would require extremely exceptional circumstances. NHDC have in my opinion failed to show any exceptional circumstances for including KB4 in their Plan.

I would contend that in this instance this site KB4 is included as an easy option to help meet the NHDC's housing needs irrespective of the effect on the Green Belt and the burden this additional housing will put upon the infrastructure and services of Knebworth.

NHDC's argument (ED172 Para. 46) that many of the objectors were against any development on Green Belt land, but didn't specifically object to developing Green Belt land of significant value such as KB4 is meaningless. It is presumptuous of NHDC to say they "...do not believe that the regrading of some of these sites to 'significant' is likely to substantively alter cases already put to the examination by many objectors". I suspect that had these objectors been told that developing some Green Belt land was unavoidable many would have chosen to protect the sites of significant Green Belt value in preference to land of limited Green Belt value.

ED172 Paragraph 22 sets out criteria that NHDC appear to use to justify their decision to build houses on land of significant Green Belt value.

Criterion 1, 3 and 4 are factual and relate to KB4

To satisfy criterion 5, the part of KB4 north of Watton Road is proposed to be allocated in the NHDC Plan as a possible site for new secondary school. However I understand that Hertfordshire County Council, the local Education Authority have no plans to build a school, preferring to site any new secondary school, if required, north of Stevenage.

I have no idea how NHDC satisfy criterion 6. The people who would occupy the proposed new housing would put extra pressure on the village services and bring more car traffic and rail commuters, exacerbating the existing problems of congestion on the roads and trains.

If meeting these criteria is accepted as NHDC's method for deciding to develop Green Belt of significant value it would set a very dangerous precedent. Would NHDC allow further development of the Green Belt land between Knebworth and Stevenage if the land is made available, and the developer can build more than 200 houses within 5 years, and offers up some land for a lesser density use, such as a school, whether it is needed or will ever be built?

In conclusion, I contend that the Plan can be made sound in relation to Knebworth by the removal of site KB4 as a potential development site from the Plan and retaining this land, which NHDC consider to be a significant contribution to Green Belt, within the Green Belt.

Removing KB4 from the Plan would go some way to redressing the proposed planned proportional overdevelopment of Knebworth village and preserve this Green Belt land of significant value.