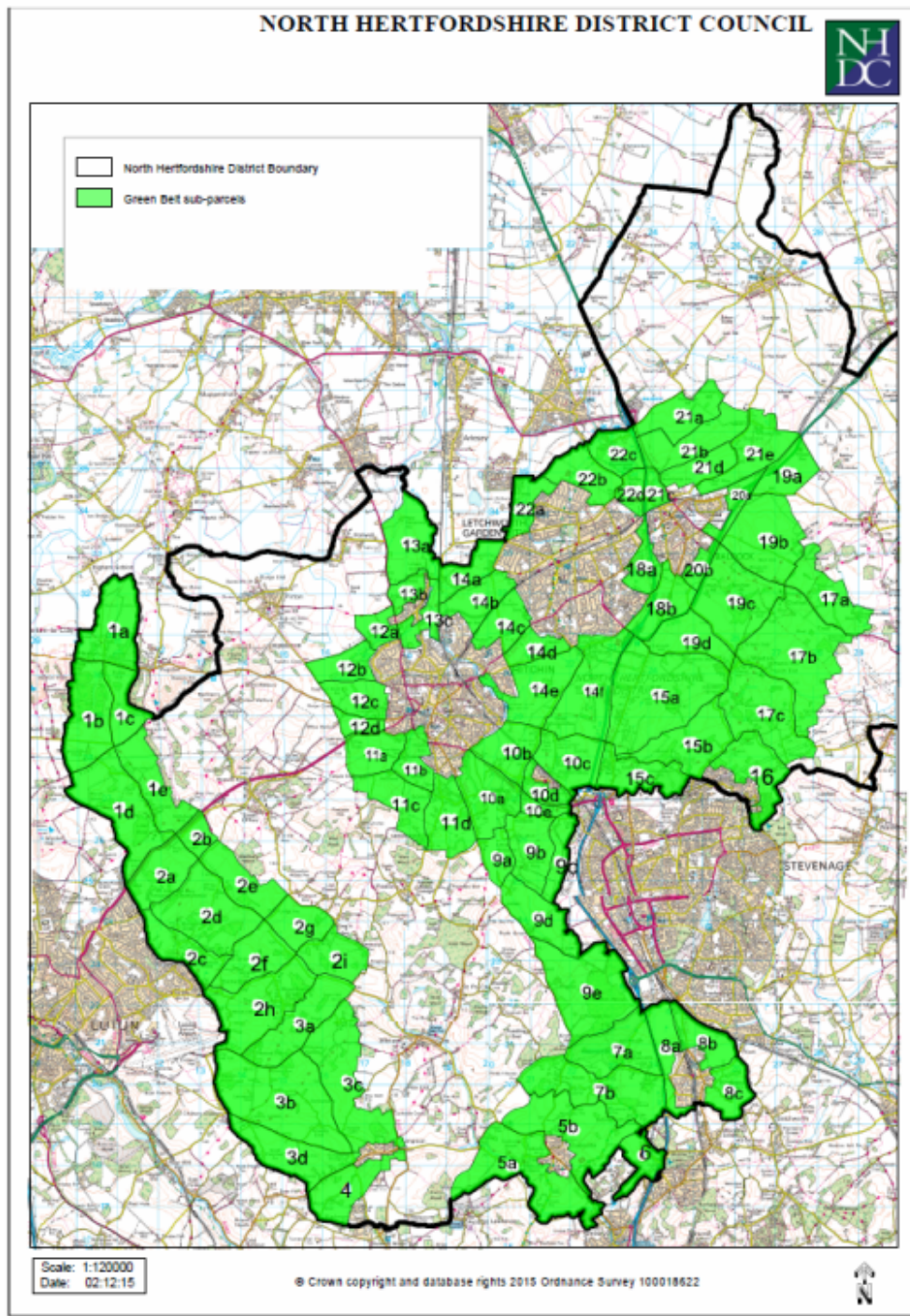


## **Appendix IPC7 – Flaws in NHDC Green Belt Review (CG1)**

The Review takes a reasonable approach to determining the contribution of the designated Green Belt (GB) land in North Herts to the various purposes of GB. However, the way the parcels of land have been divided to allow these assessments is deeply flawed, with unjustified, adverse consequences for Ickleford.

Fig 3.1 on p33 identifies the sub-parcels which are aggregated to form the parcels. 'Ickleford' is determined as being parcel 13, and is adjacent to parcel 14 (Willian).

Figure 3.1: Sub-parcels for Review



Ickleford is a large village with a population of 1,833; Willian is a small village with a population of 326, but the size of the Willian parcel is about three times that of Ickleford. Moreover, the Willian parcel has been drawn to encompass all the Green Belt between Hitchin and Letchworth, despite Willian village (situated south of Letchworth) being some distance from much of its parcel. Importantly, sub-Parcels 14a and 14b abut the Parish of Ickleford, and are significantly closer to Ickleford (0.51 and 0.49 km respectively; village centre to the sub-parcel's closest boundary) than they are from Willian (3.01 and 2.43km respectively).

This is not an academic issue; this flawed drawing of boundaries is then used to suggest in Table 2.4 (p22) that 'Ickleford' makes only a moderate overall contribution to GB purposes, whereas the contribution of 'Willian' is significant. This evaluation is defective. As indicated above, a strong case can be made for 14a and b being aligned to Ickleford, and reclassified as 13d and e. This reasonable and appropriate adjustment significantly alters the GB assessments for the parcels. For example, the 'new' Ickleford GB parcel includes an arc which separates north Hitchin from west Letchworth, and, de facto, plays an important role in preventing merger of neighbouring towns (see 14a and b, Table 3.1, p51). We contest that the real contribution which the Ickleford GB makes to overall GB purposes is significant, and as such placing 199 new dwellings on such land is detrimental. **In any case, the GB review of the NHDC Local Plan cannot be said to have been prepared with a proportionate evidence base.**

Table 3.1 (p50) evaluates, and Fig 3.6 (p66) shows the overall contribution of the sub-parcels to GB purposes. Two key sub-parcels in and around Ickleford, 12a and 13c, are correctly determined as making a significant overall contribution to the Green Belt, and yet NHDC proposes building IC2 and IC1 respectively on these.

The importance of maintaining the narrow boundary between Ickleford and Hitchin is acknowledged elsewhere by NHDC. On p36 of the SHLAA (HOU9), plot 325 (Ickleford Bury) was considered not suitable:

'Given the relatively narrow gap between Hitchin and Ickleford, the River Oughton provides a clear defensible Green Belt boundary to the southern edge of Ickleford which has not been breached and would be undesirable in policy terms to do so with a residential allocation and site considered unsuitable on these grounds'.

It seems perverse, therefore, for the Local Plan to include IC2 for development as it sits in a very similar 'narrow gap' on the southern edge of Ickleford.

It seems remiss that a village analysis for Ickleford has not been completed in section 4 (p67-97). This is particularly the case when the Local Plan proposes adding 319 dwellings to our village, with 199 on GB land.

### **Other issues with the Green Belt Review.**

Para 30 (p16): 'The Green Belt was sub-divided into 22 parcels for analysis. The boundaries of the parcels are defined by roads, other clearly visible physical features in the landscape and the existing Green Belt boundary. These 22 areas were each assessed against the first four of the five purposes of Green Belt.'

However, the Review does not state specifically on what basis the subdivisions were made. For example, the East Coast Main Line is used to delineate 13 (Ickleford), but cuts through the middle of 10 (Wymondley). Likewise, 'A' Roads are sometimes used as boundaries. For example, A505 separating 11 (Gosmore) and 12 (Oughtonhead), and 1 (Lilley) and 2 (Lilley Bottom), while A602 runs through 10 (Wymondley) and A505 runs through 14 (Willian). These examples can be clearly seen in Fig 2.3 on p15.

In addition to the lack of logic in the definition of the 'Ickleford' and 'Willian' parcels mentioned above, there are other anomalies in the classifications around Hitchin, namely 10

(Wymondley) and 11 (Gosmore). Parcel 10 includes St Ippolyts which has no real connection with Wymondley – being separated by the A602. Conversely, St Ippolyts and Gosmore are in the same parish yet are in different parcels in the GB Review. Sub-parcels 10a and 11d should, therefore, have been considered, in a single, additional parcel, with the remainder of parcel 11 considered separately as ‘Charlton’. It is apparent that local knowledge has not been brought to bear in this Review.

Para 31 (p16): ‘Within the Green Belt there are a number of settlements. The largest of these are the excluded settlements of Codicote, Ickleford, Kimpton, Knebworth and Little Wymondley. Development within these settlement boundaries may be possible without impacting on Green Belt purposes.’

However, the LP has had to modify the settlement boundaries – i.e. ‘cannibalise’ the Green Belt – to accommodate the developments proposed in the Local Plan.

Para 35 and Table 2.4 (p17-25) set out the assessment of the existing Green Belt by purposes, and provide an overall evaluation of their contribution based on these purposes.

However, the GB Review does not detail how the ‘overall evaluation’ was determined. It is unclear whether this is subjective, or achieved by summing the assessment ‘scores’ (1 = limited; 2 = moderate; 3 = significant) against the first four NPPF GB criteria. This is of major importance, as the overall value which the parcels of GB provide should have been used by NHDC to determine whether developments on those parcels could be justified against GB purposes.

Para 49 (p32): ‘The areas which contribute most to the purposes of Green Belt are those around the periphery of, and between, the existing settlements of Hitchin, Letchworth and Baldock, as well as in the south of the district around Stevenage, Knebworth and Welwyn.’

This is a reasonable conclusion – but NHDC seems to have ignored this in their choice of developments in key settlements around the periphery of, and between, those towns.

Para 51 (p33): ‘In order to help provide a more detailed context for the evaluation of proposed development sites and the Green Belt more generally, a refined assessment of the strategic parcels has been undertaken.’

Para 52 (p33): ‘Each of the 22 parcels of land in the current Green Belt was subdivided into sub-parcels and each sub-parcel (Figure 3.1) assessed in the same way as the original larger parcel and assigned a score depending on the degree to which it met each of the Green Belt purposes. An assessment of the contribution of the sub-parcels to Green Belt purposes was then made (Table 3.1).’

It appears that the GB Review has been a two-stage process: first, divide the North Herts GB into 22 parcels (arbitrarily, as mentioned above) and second, further subdivide those 22 parcels into sub-parcels and re-score those. It would have made more sense to do the latter first, and then use the scores thus generated to define the contributions of the larger parcels.

Moreover, there are numerous anomalies in the classifications within Table 3.1 (p34-61). For example:

- Codicote comprises two sub-parcels, 5a and 5b. Both sub-parcels score 2 (‘moderate contribution’) for ‘check unrestricted sprawl’, but the overall assessment for

Codicote in this category is 1 ('limited contribution'). The same holds true for 'prevent merging of neighbouring towns'; the two sub-parcels are scored higher than Codicote as a whole. Likewise, both sub-parcels are rated 3 ('significant contribution') against 'safeguard countryside from encroachment', but the aggregate rating of Codicote in this category is only 'moderate'. This is clearly flawed, and exemplifies the criticism made above that the sub-parcels should have been assessed first, and this used to determine the overall rating of the parcels of which the sub-parcels are formed.

- Two of the sub-parcels which make up parcel 12 (Oughtonhead) provide a limited contribution to 'preserve setting and special character of historic towns'; the remaining two provide a moderate contribution. However, parcel 12 as a whole provides a significant contribution to this GB purpose.
- There are questionable determinations of 'overall evaluation and contribution to Green Belt purposes'. Sub-parcel 11d has an aggregate score of 7 from the four categories, but is determined as providing 'significant contribution' overall. Other sub-parcels which also have an aggregate score of 7 (e.g. 13b) are only rated as having a 'moderate contribution' overall. Worse, some sub-parcels also only rated as having a 'moderate contribution' overall have higher aggregate scores (e.g. 8 for sub-parcels 5a, 5b, 19c, 19d, and 9 for sub-parcel 9c).
- Many of the sub-parcel assessments against individual GB purposes could be challenged. For example, 14f has a moderate contribution to the preservation of the setting of historic towns because it is 'part of the southern context of Letchworth'. However, 22a and b, which are a similar distance, but to the north of Letchworth, make only a limited contribution to this category even though they could justifiably be determined as being part of the *northern* context of Letchworth. Conversely, the reason given for 22a and b only providing a limited contribution to the preservation of the setting of historic towns is 'due to landform resulting in limited views of Letchworth to the south.' However, 14f also has a landform which results in limited views of Letchworth, but, in this case, to the *north*. 22a and b make a moderate contribution to preventing merger of neighbouring towns because they contribute 'to the separation of Letchworth and Stotfold which is beyond the Green Belt.' However, 13a and b only make a limited contribution to this aspect of the GB despite contributing to the separation of Hitchin and Henlow/Stondon which are beyond the Green Belt. There is abundant evidence of lack of consistency in the ratings used in the GB Review which render it irretrievably flawed.

Para 70 and Table 5.3 (p103-124) set out the assessment of the contribution to Green Belt purposes of all sites within the Green Belt submitted to the Council.

As with the other assessments in the GB Review, it is not clear how the overall assessment of 'Contribution to Green Belt' has been determined. Additionally, there are issues with the way this has been conducted. For example:

- The site assessment criteria scoring system in table 5.2 (p100-101) makes it impossible to compare the town and village sites. In the 'Preventing neighbouring

towns merging' category, the maximum score for town sites is 3, but only 2 for village sites. This seems perverse, as many of the villages in North Herts sit between urban developments and, de facto, have a pivotal role in preventing the merger of towns. The villages are disadvantaged by the approach taken

- Accepting the above anomaly, the assessment has not applied this correctly. SHLAA references 54-56 (p115) are in the village of Knebworth, but these sites have been scored as 3 for 'Preventing neighbouring towns merging', whereas the maximum score that a village site can achieve according to the Review's criteria is 2.
- There is a lack of internal consistency within the review which is highlighted in this site assessment. For example, sub-parcel 12a has a significant overall contribution to GB purposes (Figure 3.6), but SHLAA site 40 – which is a major component of sub-parcel 12a – is rated as providing only a moderate overall contribution (p112). One could argue that 12a needs to be considered 'in the round' to achieve a rating of 'significant', but one is then dependent on the size of arbitrarily-defined sub-parcels – which vary widely. Additionally, one could be in the absurd position, were the whole of 12a to be offered for development in several plots, that each of the latter would only provide a moderate GB contribution, but if 12a were to be developed as a single plot, it would play a significant GB contribution. This is illogical.
- The approach taken, while not wholly unreasonable, throws up spurious results. For example, SHLAA plots 59 and 60 ('Green Belt Review Site Assessment – Baldock and Letchworth East', p125 and Table 5.3, p117), adjacent to the Letchworth recycling centre, are felt to make a significant contribution to the GB primarily because they are within 2km of Baldock. The boundary between Letchworth and Baldock in this location is essentially defined only by the A1(M) and, to a lesser extent, the Kings Cross to Cambridge railway line. Many would assert that development of plot 59 and/ or plot 60 would have only a minor impact on the GB and certainly not, in reality, a significant impact as determined by this assessment.

In conclusion, there are too many mistakes, misinterpretations, inconsistencies and flaws within the Green Belt Review. These make it a weak document on which to base important Local Plan decisions.