

**Statement on behalf of Picture srl**

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**Examination of North Hertfordshire District Council  
Draft Local Plan 2011-2031**

**In respect of Matter 23 – The Green Belt Review work and the site  
selection process**

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**Contents**

Submission document

Appendix 1 Photograph of ridge at north-east boundary

Appendix 2 Indicative masterplan

**Extract from ED180 matters and issues:**

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.*

- Picture is the owner and promoter of strategic allocation GA2.
- **This statement is submitted to provide further elements in support of the Council’s position** to confirm this strategic allocation despite the change in the assessment of the site contribution to Green Belt purposes.
- Reported below is a summary table which includes the main conclusions reached by the Green Belt Review Update conducted in 2018 in assessing the site’s contribution to Green Belt Purposes.
- To clarify the different denominations shown in the table, GA2 is included in the area referred to as Warrens Green, also referenced number 16. Sites n.226 and 323 together form part of the GA2 allocation.

| <b>Table Number</b>  | <b>Area Name/Relevant land parcel</b> | <b>Conclusion</b> |
|--|---------------------------------------|-------------------|
| Table 1 ‘Summary Revised Assessment of Strategic Green Belt Parcels’                               | Ref. 16 Warrens Green                 | Moderate          |
| Table 2 ‘Summary Revised Assessment of Green Belt Sub-Parcels’                                     | Ref. 16                               | Moderate          |
| Table 3 ‘Summary Revised Assessment of potential Green Belt Development Sites’                     | Site Ref 226 and 323                  | Significant       |
| Table 4 ‘Comparative Analysis of overall contribution of Strategic Parcels to Green Belt purposes’ | Warrens Green                         | Moderate          |
| Table 5 ‘Comparative Analysis of overall contribution of Sub Parcels to Green Belt purposes’       | Ref. 16                               | Moderate          |

|   |                      |             |
|---|----------------------|-------------|
| Table 6 'Comparative Analysis of overall contribution of potential Green Belt Development Sites to Green Belt Purposes' | Site Ref 226 and 323 | Significant |
| Table 8 'Comparative Analysis of the contribution of proposed Local Plan allocation to Green Belt Purposes'             | Site GA2             | Significant |

- As shown in the summary table, table 1, 2, 4 and 5, **the relevant area** Warrens Green or Ref 16, **considered in its current undeveloped state**, has been assessed as having a **moderate** contribution to Green Belt Purposes.
  - **When the impact of the future planned development is taken into account** in tables 4, 6 and 8, **the assessment changes to significant** in accordance with the new criteria adopted by the Council on the basis of which **all strategic-scale development sites** are judged by the revised assessment to have a significant impact on certain purposes of the Green Belt, without weighing the specific situation of each site.
  - Whilst we are not intending to contest the outcomes of the Green Belt Review Update conducted by the Council, we would like to add below **some key considerations specific to site GA2's contribution to the five main purposes of the Green Belt** under the NPPF.
- a) To check the unrestricted sprawl of large built-up areas:
- Whilst the area in which GA2 is situated ideally serves to contain the further growth of Stevenage to the north-east, **this purpose is purely theoretical in this instance since the subject area has been historically identified and promoted by the two neighbouring planning authorities NHDC and SBC to accommodate the further expansion of the town in this specific direction.**
  - Since the 1980s, a number of Green Belt releases have been made on the eastern and northern fringes of Stevenage, firstly to accommodate the Poplars and Chells Manor developments and, more recently, in the 1990s the Great Ashby development.
  - Land to the north-east of Stevenage has been promoted continually over the last 15+ years for development and growth, seeking to expand Great Ashby.
  - In 2007 Stevenage Borough Council and North Hertfordshire District Council published a consultation document seeking to highlight key issues and options for development around Stevenage.
  - The aim was to prepare a Stevenage and North Herts Action plan, the project became known as SNAP.
  - SNAP arrived at the Preferred Options stage, which included the identification of a housing development area on the north-eastern periphery of the town

spanning several hundreds of hectares well beyond the current boundaries of the GA2 allocation.

- Albeit the scheme was subsequently scrapped as part of the abolition of Regional Spatial Strategies in 2011, the logic of this Regional Plan allocation endures.
- As a further testament of the strategic importance given by the planning authorities to this area, it is worth recalling that a substantive part of the GA2 site was granted full planning permission in 2010 for building an 18 hectare secondary school project (the relocation of the Thomas Alleyne School from its previous site in central Stevenage) promoted by Hertfordshire County Council.
- The project was subsequently aborted following the revocation of the Building Schools for the Future plan and related funding.
- Following the 2011 adoption of the Localism Bill, in the context of the preparation of the new Local Plan by NHDC and as a result of extensive coordination with Stevenage Borough Council (joint approach to planning pursuant to the duty to cooperate), this area was immediately identified as one of the preferred options for expansion, leading to the current proposed allocation in the Local Plan.
- In conclusion, the GA2 proposed allocation, rather than being perceived as uncontrolled or unintended urban 'sprawl', comes as a result of several decades of strategic long-term planning for the organic expansion of Stevenage in an attractive area which benefits from all the required infrastructure and allows for sustainable development.

(b) to prevent neighbouring towns merging into one another:

- The Green Belt Review conducted by NHDC has concluded that **this part of the Green Belt does not bear any relevant impact on this specific purpose.**
- The next substantive town is Royston, several miles north-east of the allocation.
- The village of Weston is 1.1 miles north and will be sheltered by the revised Green Belt boundary which comprises substantial and permanent physical boundaries and natural barriers (which will be addressed in the points below).

(c) to assist in safeguarding the countryside from encroachment:

- The natural character of this area had been irreparably encroached by an unsightly 60-metre wide corridor of high voltage electricity pylons built in the 1950s crossing the site in a south-west/north-east axis.
- The north-east boundary of GA2 is formed by the transition from contoured land to plateau, separated by a marked ridge (see photograph attached at Appendix 1).
- The topography of the site also enables optimal visual containment in that the proposed housing will be developed on land gently sloping towards the existing Great Ashby settlement with farmland and vegetation on the outer perimeter avoiding encroachment into the broader countryside.

- Substantial ancient woodland around and beyond Warrens Green Lane further protect wider views into the open countryside.
- The revised Green Belt boundary has been drawn along the routes of a public right of way. Structural planting here will reinforce the new boundary as well as providing visual containment of the development. Picture has the land control to implement advance planting to reinforce this new Green Belt boundary ahead of development.
- These features combined make the site relatively concealed from the wider landscape, significantly reducing the impact of development on the openness of the adjacent Green Belt.
- In conclusion, topographical features, existing ancient woodland and additional structural planting buffers along the allocation boundaries will minimise landscape impacts and ensure optimal visual containment (see indicative masterplan attached at Appendix 2) as well as representing readily recognisable physical features which would ensure that the revised Green Belt boundary will be permanent and defensible in the long term.

(d) to preserve the setting and special character of historic towns:

- The Green Belt Review conducted by NHDC has concluded that **this part of the Green Belt has no contribution to the setting of historic towns.** (Table 2.4 and Table 3.1 of the North Hertfordshire Green Belt Review ref CG1 Examination Library).

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- The evidence before the examination is clear that NHDC cannot meet its objectively identified development needs without development in the Green Belt.
- **North Herts and Stevenage have taken every opportunity in their Local Plans to develop urban in-fill sites, and allocating GA2 adjacent to Stevenage will not in any way threaten those urban developments.**
- The above considerations lead us to conclude that the extent of the harm of releasing site GA2 from the Green Belt will be relatively limited in that:
  - **The revised Green Belt boundary will include substantive physical features which make it readily recognisable and likely to remain permanent;**
  - **The adjacent/surrounding Green Belt will continue to serve the main purposes of the Green Belt set by the NPPF.**
- Having illustrated **the above factors** which in our view **significantly mitigate the impact of releasing the site from the Green Belt, we remain of the view that the Local Plan is sound in that any residual harm to the Green Belt has been justified by the existence of exceptional circumstances which have been successfully evidenced by the Council.**

A summary of the site-specific exceptional circumstances is included in the NHDC response to Inspector 9 July Letter – Paper B (Green Belt).

For site GA2: Land off Mendip Way, Great Ashby (600 homes) (Policy SP18):

- Critical to overall numbers achievable and also represents an opportunity to contribute to housing land supply within five years of plan adoption
- Immediately adjoins the largest town in northern Hertfordshire and is therefore located in a sustainable location to address housing needs
- Allows for development to be masterplanned to ensure good placemaking principles are applied
- Allows for development at a scale consistent with NPPF Paragraph 52 that can deliver a coherent new neighbourhood (rather than isolated development) to the north-east of existing tree belts around Great Ashby
- Includes infrastructure provision, notably land for secondary education, on site at a scale that significantly exceeds the requirements generated by the site itself and would help address existing deficits at Great Ashby (Policy SP18(c), NHDC Matter 10 Great Ashby Statement, pp.2-3, paragraphs 13 and 17)
- No other, non-Green Belt issues that would be considered a fundamental constraint to development (NHDC Matter 10 Great Ashby Statement, pp.5-6, paragraphs 39 to 43);
- Along with site GA1 provides one of only two reasonable alternatives for the expansion of Stevenage beyond its current limits to the north-east (NHDC Matter 10 Great Ashby Statement, p.7, paragraph 50)
- Contains mitigation-based policy criteria to maintain key woodland blocks and provide new structural planting to reinforce revised Green Belt boundary and minimise impacts upon wider landscape (Policy SP18(g) and (i)).

Extensive evidence to support the existence of each one of the above listed exceptional circumstances can be found in the Local Plan and supporting documentation and in the representations and statements submitted in the context of Regulation 19 representations (rep ID 4138) and ahead of the hearing session on Matter 10 held on 26 February 2018.