

## North Herts District Council

### Local Plan

#### Schedule of Further Matters, Issues and Questions

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

#### Statement by J Rigg (16632)

##### ***23 a) Have I understood the approach taken correctly?***

Yes.

##### ***b) Is the approach taken reasonable, adequately robust and consistent with national policy?***

No.

Throughout the assessment process references to the Green Belt (GB) status of Strategic Sites have been merely as an acknowledgement. The emphasis of the discussion has centred on the site's contribution to the overall OAN target, rather than the context of its locality and GB functionality.

The Council through ED172, point 6 has sought to justify its approach as a "series of balanced planning judgements" whereas the methodology limitations detailed in paragraphs 2.3 – 2.5 ED 161A are designed to specifically circumvent the impact and importance of the GB criteria detailed in NPPF.

In particular assessment on an "As Is Basis" is designed to ignore the impact of known / intended future planned / anticipated development such as for NS1. This rationale is in contrast to ED172, para22 where the Council seeks to justify allocation of NS1 on the basis that it adjoins Stevenage. For further comments on ED161A 2.5 please see my previous response, point 6.

ED 161A reviewed the categorisation of harm to the GB but did not take the opportunity to assess if the underlying assumptions for allocation in the first place remained relevant / correct.

ED 161B, page 296 identified NS1 as making a significant contribution to preventing Unrestricted Sprawl and Safeguarding against Encroachment, two of the most important functions of GB and vital to maintaining a sense of visual and physical openness. The Council however dismissed these functions as not being a fundamental constraint to development (ED 172, para 36, point 5, page 18). If that is the case what is the point of assessing GB?

Given the original CG1 Report was flawed in its methodology, it also raises questions as to the accuracy of the original SHLAA site selection process and conclusions regarding sites where the decision was taken not to proceed.

This inevitably resulted in a greater emphasis / reliance, intentionally or unintentionally, being placed on Green Belt Strategic Sites, which in turn was used to support the case that exceptional circumstance existed to warrant the release of these sites for development, particularly around Stevenage and Luton.

***c) The Sustainability Appraisal is not influenced by the degree to which land does or does not contribute to the purposes of including land in the Green Belt. Should it be?***

Yes.

The focus of the appraisal is very much on the economic / social / community impact of the proposed plan and does not sufficiently value of the opportunity / benefits to the individual to escape from built up areas to the open countryside, much of which in North Herts is Green Belt.

Governing legislation seeks the assessment of the economic / social / community impact of the proposed plan but does not require any economic value to be attributed to green field / GB. However as the issue of climate change and increasing concerns over pollution gathers pace this is likely to engender a greater appreciation of the benefit and economic value attributable to open countryside.

23.2

***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?***

Yes.

***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?***

As noted in my response to ED 161 A&B, point 3, I consider CG1 to be fundamentally and deliberately flawed. This led to a significant number of the proposed Strategic Sites being rated as only making a moderate contribution rather than the subsequently assessed significant contribution to the Green Belt.

The Council have argued that only a modest number of sites were regraded, in order to down play the contribution/ importance of those sites to housing numbers under the plan.

As can be seen in Appendix 1 (Data Sheet) there were 20 sites which were regraded, 11 were increased to Significant, including West of Stevenage (5,093 houses), 11 decreased of which 8 were proposed development sites (201 houses) and 1 (300 houses) which, was increased to Significant, was in respect of a site not taken forward.

Strong local opposition to the Local Plan has existed from the outset, both among residents (8,000 objections were received to the initial consultation) and NHDC Councillors. A number of Councillor's eventually voted for adoption of the Plan, stating erroneously that "The Inspector" would suggest an improved plan. At no point did planners or David Levitt at the Public Council Meeting approving the Plan seek to correct this misunderstanding as to the Inspector's role in examining the plan. Likewise David Levitt encouraged residents not to duplicate objections to the plan, again to reduce the level of apparent opposition.

Underestimating the contribution of the GB sites detailed in ED 161A, Table 6, page 35, is a further example of this strategy to minimise the perceived extent of harm of the plan to the North Herts in general and those sites in particular.

As noted in 23, 1 b), paragraph 4, the fact that the Green Belt review required updating raises questions the accuracy of the original SHLAA site selection process and possible alternate sites.

Had the strategic sites regraded as making a significant contribution to the GB been correctly rated as such at inception it is highly likely that there would have been much stronger opposition from both residents and councillors. In not rating the site as significant the Council sought to discourage opposition to the plan.

**Attachment: Appendix 1**

(Spreadsheet detailing amended classifications of Green Belt sites)