## PUBLIC INQUIRY

**PROPOSED SOLAR ARRAY**

**GRAVELEY LANE, GREAT WYMONDLEY, HERTFORDSHIRE**

**Reference APP/X1925/V/23/3323321**

**PROOF OF EVIDENCE**

**By JED GRIFFITHS MA DipTP FRTPI**

**On Behalf of**

**Wymondley Joint Objectors Group**

### August 2023

#### Introduction

1. My name is Jed Griffiths. .I is a chartered town planner and a Fellow of the Royal Town Planning Institute. I am a Past President of the Institute. I hold a Master’s Degree in Geography from the University of Durham and a Diploma in Town Planning from the University of Newcastle upon Tyne.
2. I have lived and worked in Hertfordshire for over 50 years. A summary of my qualifications and experience is set out in Appendix 1. Today, I am presenting evidence to this Inquiry on behalf of the Wymondley Joint Objectors Group (WJOG) which includes the Wymondley Parish Council, the Great Wymondley Village Association and other local residents who have made representations on the planning application.
3. In this statement I will elaborate on the planning policy framework, both at the national and local level, and how it applies to the determination of this application. I will focus on the issues relating to Green Belt, the loss of agricultural land, and the impact on landscape character and appearance. On each topic, I will present my professional views on the elements of policy which, in my opinion, are critical to the determination of this case. As the Inquiry will hear, others will be presenting statements on biodiversity, the historic environment, and community impact. I have tried not to duplicate what they have to say.

#### The National Planning Policy Framework

1. Government policy is set out in the National Planning Policy Framework (NPPF), which was last updated in July 2023. At paragraph 11, there is a presumption in favour of sustainable development, subject to certain criteria, including Green Belt (see my paragraph 13 below).Section 11 of the NPPF concerns the effective use of land. I would question whether the change of use from best and most versatile agricultural land, over a period of 40 years, is a truly effective use of this site.
2. The aim of successive governments to protect Green Belt land is elaborated in Section 13 of the NPPF. This is a key issue for the Inquiry – my detailed views are set out in paragraphs 20-35 below). The applicant and the District Council have stressed the contents of the NPPF Section 14 and how the proposed development can help to meet the needs of climate change. As one who has for many years supported the principles of sustainable development, I can fully understand the arguments for low carbon developments. This should not, however, be at the expense of valuable assets which are components of a sustainable future. Conservation of these assets is a theme of both Sections 15 and 16 of the NPPF. In this proof, I will focus on the need to conserve landscape character and appearance.

#### National Planning Practice Guidance

1. As stated above, Section 14 of the NPPF makes it clear that the government supports renewable energy sources so as to combat the challenges of climate change. More specific guidance is set out in National Planning Practice Guidance (NPPG). In the section on Planning for Low Carbon and Renewable Energy, it is stated that the promotion of renewable energy “….does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities.” (Paragraph 003 Reference ID: 5-003-20140306). Paragraph 5 also notes that “local planning authorities will need to take into account…..crucially, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.” ((Reference ID: 5-005-20150618).
2. On solar farms, NPPG is more specific, noting that “cumulative impacts require particular attention, especially the increasing impact that …. large scale solar farms can have on landscape and local amenity as the number …. of solar arrays in an area increases.” (Paragraph 007: Reference ID: 5-007-20140306).
3. The guidance also notes the significance of topography in assessing impacts on landscape, as follows: “local topography is an important factor in assessing whether….large-scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominantly flat landscapes as in hilly…areas.” In addition, it notes that “proposals in Areas of Outstanding Natural Beauty (AONB) and in areas close to them… will need further consideration.”
4. NPPG expressly notes that “protecting local amenity is an important consideration which should be given proper weight in planning decisions.” It also states that the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.” (Paragraph 013: Reference ID 5-013-20150327). It adds that “particular factors a local planning authority will need to consider include…. encouraging the effective use of land by focussing large-scale solar farms on previously-developed land on non-agricultural land.”
5. The essence of the guidance is also reflected in Ministerial Statements and in the draft National Policy Statement on Renewable Energy (September 2021), which contains policy advice on solar photovoltaic generation. In Sections 2.47 – 2.54, it notes factors that should influence site selection by applicants. It states that “where possible, ground-mounted solar PV projects should utilise previously developed land, brown field land, contaminated land, industrial land, or agricultural land, preferably of classification 3b, 4, and 5. (Paragraph 2.48.13).

#### North Hertfordshire Local Plan

1. The appropriate development plan policies are contained in the North Hertfordshire Local Plan, which was formally adopted by the District Council on 8th November 2022. The planning strategy strongly reflects the national government commitments to sustainable development as set out in the NPPF. Thus, policy SP1 has a presumption in favour of sustainable forms of development.
2. For a predominantly rural district, there is a strong commitment to the protection of the countryside and the Green Belt. In policy SP5, the Council states its support for the principles of the Green Belt and recognition for the intrinsic value of the countryside. The supporting text notes the extensive review of Green Belt boundaries which was undertaken as part of the Local Plan. The results were controversial and generated a considerable level of debate during the public examination.
3. The Local Plan (paragraph 4.61) is clear that proposals for future development within the Green Belt will be considered against national policy. Thus, policy SP5(c) states that the Council “will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated.” As I indicate in paragraph 20 below, it is common ground that the proposed solar array is inappropriate development. WJOG strongly believes, however, that very special circumstances have not been demonstrated.
4. The Council is clearly committed to meeting the challenges of climate change. Thus, in Local Plan policy SP11 (a), there is support for proposals for renewable and low carbon energy development in appropriate locations. As a planning professional I empathise with the principles, but this proposal is in the wrong location. I agree with the view (Local Plan paragraph 4.144) that “a balance needs to be struck between the beneficial outcomes of renewable energy, and any adverse impacts produced by the development itself.”
5. On policy SP12 there is a clear commitment to protecting and enhancing the natural environment. In particular, the Council will ”consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty.” In terms of landscape, this policy is complemented by policies NE2 Landscape and NE3 Chilterns AONB. The former states that planning will only be granted for development that respects the sensitivities of the relevant landscape character area and does not cause unacceptable harm to the character of the surrounding area. In my view, as I have stated below in paragraphs 42-49, the development of the solar array would cause a considerable degree of harm to the landscape. In respect of policy NE3, I believe that there would be damage to the setting of the Chilterns AONB.
6. Finally, policy NE12 deals specifically with renewable and low carbon energy development, including solar farms involving the best and most versatile agricultural land, which will be dealt with in accordance with national policy (see above). Nevertheless, it is clear from both the policy and the supporting text that proposals for low carbon energy generally will only be permitted subject to an assessment of various impacts, which are listed in the policy. These criteria include landscape and other environmental assets. My views on the landscape impact are set out below in paragraphs 42-49. Others will consider the effects on environmental assets and the historic environment.

#### Neighbourhood Plan

1. The proposal also needs to be determined against the policies in the Wymondley Neighbourhood Development Plan, which was “made” by the District Council on 26th September 2019. It is part of the development plan for the area and has been added to the list of Core Documents for the Inquiry.
2. A number of policies are relevant in terms of the Green Belt, landscape, and the environment. Policy NHE1 requires that planning applications should be accompanied by an assessment of the impact on landscape character. This is fulfilled by the applicant’s LVIA. Similarly, NHE2 requires that proposals, where appropriate, be accompanied by a biodiversity action plan. On landscape, policy NHE8 expects that in landscaping schemes appropriate native species are used and that benefits to biodiversity are maximised. Policy NHE9 covers historic character and heritage assets, but is also concerned with the natural environment. It the WJOG view, which I share, that the proposal is significantly in conflict with the criteria set out in this policy. It would cause irreparable damage to the natural and historic environment and the rural character and intimate scale of Wymondley Parish.
3. The importance of the Green Belt is stressed in Chapter 7 of the Neighbourhood Plan, summarised effectively at paragraph 7.9. The role of the Green Belt in protecting the historic character and heritage of the Parish is cites, particularly around Great Wymondley. This is reflected in the wording of policy GB1.

#### Green Belt

1. I have studied the Planning Statement produced by the developers in support of the original planning application and the agenda papers which were tabled at the meeting of the North Hertfordshire District Council Planning Control Committee on 17th November 2022. From these documents, it is clearly accepted that the proposed solar array is inappropriate development in the Green Belt, as stated in paragraph 147 of the National Planning Policy Framework (NPPF). It is contended by the developers, however, that “very special circumstances” exist to outweigh the potential harm to the Green Belt which would result from the proposal.
2. I acknowledge that the NPPF contains a presumption in favour of sustainable development which is set out in paragraph 11 of the Framework. For decision-makers, this means that *“where there are no relevant development plan policies, or where the policies for determining the application are out-of-date, granting permission, unless:*
3. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
4. *any adverse effects of doing so would significantly and demonstrably. outweigh the benefits when assessed against the policies in this Framework, taken as a whole.”*

It is clear from footnote 7 of the NPPF that land designated as Green Belt is an area of particular importance in terms of government policy.

1. The commitment of the government to the protection of the Green Belt is elaborated in Chapter 13 of the NPPF. The essential characteristics of Green Belts are their openness and their permanence, as stated in paragraph 137 of the Framework.
2. Five purposes of the Green Belt are set out in paragraph 138, as follows:
3. *To check the unrestricted sprawl of large built-up areas:*
4. *To prevent neighbouring towns from merging into one another;*
5. *To assist in safeguarding the countryside from encroachment:*
6. *To preserve the setting and special character of historic towns, and:*
7. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

In my submission, the first three of these purposes are relevant to the determination of this case.

1. Historically, Green Belt has been a key component of the planning system in Hertfordshire. In terms of the first purpose, the primary function of the Green Belt is to control the outward spread of London, as part of the London Metropolitan Green Belt. Designation of the Green Belt in the southern part of the county occurred in the context of MHLG Circulars 42/55 and 50/57 and was shown in the Hertfordshire County Development Plan First Review 1963. In the1970’s, it was extended as part of the Hertfordshire County Structure Plan, to cover over55% of the land area of the county.
2. I refer to Appendix 2 of my proof, which is a map showing the extent of the Green Belt in Hertfordshire in 2004. Its shape, of a “grasping hand”, reflects the fact that the influence of Greater London extends along the main transport corridors leading northwards from the capital. Thus in North Hertfordshire, this primary function is exercised along the route of the A1 Great North Road, the A1 (M), and the East Coast main line railway. At the same time, the second purpose of the Green Belt is fulfilled in that it protects the gap between Stevenage and the towns to the north, as well as maintaining the gaps between Hitchin, Letchworth, and Baldock.
3. The Green Belt designation is also of critical importance in this part of North Hertfordshire in that it protects the countryside and safeguards it from encroachment by the proliferation of built development. This function was discussed extensively in the recent public hearings into the examination of the submitted North Hertfordshire Local Plan. Despite numerous local objections, several areas of Green Belt were lost for housing developments – these are shown in the map which I attach as Appendix 3.
4. The Local Plan evidence base included the North Hertfordshire Green Belt Review 2016 which described a two-stage assessment of parcels of land against the purposes of the Green Belt. The first stage was a broad brush strategic assessment of the Green Belt, which was divided into 22 parcels. The area covered application site was split between Parcels 10 Little Wymondley and 14 Willian. In the summary at Table 2.4 of the Review, it is shown that both parcels were assessed as making a significant contribution to the purposes of the Green Belt.
5. Later a more refined review was undertaken, which divided the units into sub-parcels. Thus the application site was split between sub-parcels 10b and 14f, to the south and north of Graveley Lane respectively. The results of the assessment, summarised in Table 3.4 of the Review, confirmed that both the sub-parcels made a “significant” contribution to the Green Belt. In my view, the results of both these assessments show how development of the solar array would make a fundamental difference to the integrity of the Green Belt in this sensitive area to the north of Stevenage.
6. The applicants and the District Council contend that the proposed development would not compromise the aims and purposes of the Green Belt. In their view “very special circumstances” do exist, sufficient to outweigh the harm which would be caused to the Green Belt. I disagree fundamentally with their position. Ground-mounted solar installations are not constrained to this particular location as they require only direct sunlight. It is neither necessary nor appropriate to consider their development on land designated as Green Belt.
7. The principle of openness has been a key test in a number of legal cases in recent years, including Lea Valley Regional Park vs Epping Forest District Council and Samuel Smith vs North Yorkshire County Council. In the case of this appeal I believe that the openness of the Green Belt would be severely compromised by the solar panels, fencing, transformers, and other bulky and unsightly equipment associated with the proposal. It would create an industrial landscape.
8. Compared to other similar applications for solar arrays, the proposal is extremely large and would cover an area of 88 hectares. (218 acres or 108 football pitches). In addition to the solar panels, there would be at least four dozen metal buildings resembling shipping containers, including 22 transformer stations, 22 battery storage buildings, and other structures. The dimensions of these .metal buildings range from up to four metres high, five metres wide, and eleven metres long.
9. The plans also show 7.2 Km of galvanised two metre high deer fencing around much of the site, and 40 CCTV cameras mounted on four metre high poles. There would be 150,000 to 160,000 glass and metal photovoltaic panels, on metal support frames, each panel being 2.8 metres high. The posts supporting the frames would be in piling to a depth of 1.5 metres – there would likely be at least 500,000 of these posts. The submitted plans also show 2.1Km of internal roads. The cumulative effect would result in a considerable industrialisation of the rural landscape.
10. In my view the industrial nature of the solar installations and associated structures will change the open nature of the Green Belt in this critical location for at least a generation and probably permanently. Ground-mounted solar energy installations should not be permitted anywhere in the Green Belt where they would cause considerable harm to its overall aims and purposes.
11. The Council states that, if planning permission were granted, the application site would not be removed from the Green Belt. I would argue that, if the development were to go ahead, the public perception would be that the Green Belt designation would have ceased. An essential characteristic of the Green Belt is its permanence (NPPF paragraph 137). To introduce an inappropriate development into an open area of Green Belt for 40 years is in contradiction to the aims of national policy. The Council seem to have accepted that 40 years is temporary, but in recent appeal cases, Inspectors have not agreed (see paragraph 40 below).
12. The applicant has referred to cases where developments for solar arrays have been permitted in Green Belt locations. There is not an automatic presumption in favour of development, however. I would refer the Inquiry to a recent example of an application for a solar farm which was refused by Thurrock District Council (Reference 21/01635/FUL) on grounds of impact on the Green Belt. in that case, no very special circumstances were shown.

#### Agriculture

1. The site of the proposed development is currently in use for agriculture, predominantly for the growing of cereal crops. The NPPF , at paragraph 174(b) states that planning policy and decision-making should contribute to and enhance the natural and local environment by “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems services – including the economic and other benefits of the best and most versatile agricultural land.”
2. For clarity, the NPPF includes the definition of best and most versatile agricultural land as being Grades 1, 2, and 3a of the Agricultural Land Classification. In this context, I would emphasise that NPPG advises that solar PV development proposals should be focussed on the lower grades 3b, 4 and 5 (see paragraph 7 above).
3. 1t is clear from the applicant’s documentation that the proposed solar farm would be located on an area of best and most versatile agricultural land. Altogether, the site is divided between 32% grade 2 and 67.8% grade 3a. The whole area is a valuable asset and has been used consistently for the growing of cereal crops for generations. In this respect, I would remind the Inquiry that grade 2 is the best land in Hertfordshire – there is no grade 1 left in the county.
4. I share the concerns of others that the grazing of sheep on the site would be a very poor substitute for the high value activity of growing crops. It is becoming increasingly clear that the climate emergency is raising concerns about national food security, exacerbated by the global effects of the war in Ukraine of grain supplies. The development is described as “temporary” by the applicants, but 40 years is beyond a generation. At the point of de-commissioning, the site would no longer be suitable for the growing of high value crops. Other presentations to this Inquiry will show how it will be difficult to restore the productivity of the soils after 40 years.
5. I refer the Inquiry to a recent appeal case into a proposal for a solar array on farmland to the north of Lullington, Swadlincote, Derbyshire (Reference APP/P1040/W/22/3313316). The appeal was dismissed clearly because of the potential loss of best and most versatile agricultural land. In his concluding paragraph 51, the Inspector stated “While collectively, the benefits arising from the appeal scheme are significant, the harm that would be caused by allowing the development of just below 50% of the site’s hectarage over a period of 40 years would be of greater significance.” (I emphasise the words “just below”)
6. Loss of BMV land was also included in the reasons for refusal of a planning application for a solar farm at Land East of Pelham Sub-station, Manuden, Essex (Reference s62A/2022/0011). The application was made to the Planning Inspectorate, as the local planning authority, Uttlesford District Council, had lost its planning powers. In my view, this was a significant case because the site was located on the Essex/Hertfordshire border, an area of similar agricultural importance to much of North Hertfordshire.

#### Landscape Character

1. It is acknowledged that the proposed development would have a harmful impact on the local landscape and its open character. The characteristics are shown in the series of photographs and video presentations produced by the WJOG. I note that in the report to the Planning Control Committee on 17th November 2002, the effect was described as “moderate”. The applicant’s Landscape and Visual Assessment (LVIA) considered that the effects of the development could be mitigated over time by hedgerow planting and other landscaping measures.
2. I have reservations about the Council’s position on this issue, which seems to contradict previous assessments of landscape character. I refer the Inquiry to the North Herts Landscape Study 2011, which was used as part of the evidence base for the Local Plan. The study divided the district into a number of Landscape Character Areas (LCA) – the application site is located within LCA 216 Arlesey – Great Wymondley
3. The LCA is described generally as a rolling agricultural landscape of large-scale fields. In visual terms, it is concluded that “the area as a whole has a low-moderate sensitivity due to relatively open views which would be sensitive to the introduction of further urbanisiing influences” The Visual and Sensory analysis of the LCA is moderate, with a need to “conserve and improve.” In more detail, the historic settlement of Great Wymondley is cited as a prominent feature of the historic landscape pattern. It is also stated that the sense of enclosure is “open” and that the area is widely visible from the outside. Views of the countryside from the settlements are an important feature of the LCA. Expansive views from higher ground create a sense of space and openness – this can clearly be seen in the photographs produced by WJOG and can be clearly seen from site visits.
4. Although the LCA as a whole is considered to have a low landscape value, its capacity to accommodate development was limited according to the evaluation by the Landscape Partnership in 2011. It was concluded that large-scale open uses would not be in keeping with the rural character of the area and be very likely to be open to view and introduce new elements that would conflict with existing characteristics. Furthermore, “new utilities developments would have an impact on the more intimate scale and rural character associated with the south of the character area, particularly adjacent to Great Wymondley. This conclusion is contrary to the view in paragraph 4.5.117 of the Committee Report which categorised the proposal as “other types of development.”
5. I have noted the conclusions of the LVIA and the review which was undertaken by the Landscape Partnership on behalf of the Council. In response to the review and consultation responses, the applicant submitted further amendments to the plans. Nevertheless, the Council’s consultants remained of the view that there would still be significant adverse effects at a local and site scale on landscape character. The officer’s report to Committee concluded that there would be no conflict with Local Plan policy NE2, which seeks to avoid unacceptable harm to landscape character and appearance. I disagree – the insertion of a solar array covering up to 88 hectares is surely unacceptable.
6. The LVIA focusses on the public viewpoints from the immediate area around the site, and the landscaping proposals too are concentrated on the concealment of the development from public view. I would suggest that the analysis does not fully take into account the impact on the wider landscape setting of the site. I attach Appendix 4 which is a photograph taken from Offley Hill, looking to the east. Superimposed on the photograph is the view of the site, which shows that the development, with its solar glare, would be seen from within the Chilterns AONB.
7. In these circumstances, I would argue that the development should be assessed against Local Plan policy NE3, which states that planning permission for any proposal, not only within the AONB but also affecting the setting of the AONB will only be granted provided that it is appropriate in scale, having regard to national policy. Under the Wildlife and Countryside Act 2000, he Council does have a duty of regard which applies to developments outside but which would affect the AONB. In this case, this should apply to the effect on important views from within the AONB.
8. From a review of case examples, it is clear that the potential impact on landscape character has been a constant factor. I refer the Inquiry to a recent appeal at Land North West of Hall Farm, Church Street, Alfreton, Derbyshire, against the refusal of planning permission for a 49.9MW solar park and associated infrastructure. The appeal was dismissed, because, I the words of the Inspector…”in the overall balance, the harm caused to landscape character and visual amenity is decisive.”

# SUMMARY AND CONCLUSIONS

1. It is acknowledged that the proposed development constitutes inappropriate development in the Green Belt. The applicant submits that “very Special circumstances” exist, which were accepted by the Council at the Planning Control Committee on 17th November 2022. . The officer’s report to Committee argued that the planning balance should be struck in favour of the provision of renewable energy in accordance with national policy on tackling climate change.
2. The Committee resolution was made in the face of considerable opposition to the proposal, the nature of which will be presented by WJOG and others at this Inquiry. This is no ordinary application – the proposal covers a very large area of Green Belt and would involve the loss of high grade agricultural land. It was right that the Secretary of State has determined that his decision should be informed by this Public Inquiry.
3. It is my firm view that “very special circumstances” have not been demonstrated. In terms of the sheer size and industrial nature, the proposal would have a significantly harmful impact on the openness of the Green Belt contrary to the aims and purposes of the Green Belt which are set in the NPPF and endorsed in the recently adopted North Hertfordshire Local Plan and the Wymondley Neighbourhood Development Plan.
4. The proposed development would remove from production a large area of the best and most versatile agricultural land. I do not accept that the period of 40 years would be “temporary”. It would not be an effective use of the land contrary to the NPPF and the need for food security in the light of the climate emergency and international conflicts.
5. It is accepted that the proposal would have a harmful effect on the landscape character and appearance of the area on and around the application. The applicant’s LVIA shows how these effects could be mitigated over a period of time. In my opinion, the landscaping proposals cannot completely conceal the harmful effects of a very large expanse of solar panels on this open rural area. It would be contrary both to the Local Plan and Neighbourhood Plan policies which seek to protect the landscape, including the setting of the Chilterns AONB.
6. For the reasons I have set out in this proof, I urge the Inspector and the Secretary of State to reject this application.

Jed Griffiths MA DipTP FRTPI

Hertford

15th August 2023

# APPENDIX 1

**JED GRIFFITHS MA DipTP FRTPI**

**QUALIFICATIONS AND EXPERIENCE**

**JED GRIFFITHS MA DipTP FRTPI: A BRIEF CV**

Jed Griffiths is the principal of Griffiths Environmental Planning, based in Hertford. He has a BA (Hons) and an MA from the University of Durham. After two years as a schoolteacher in County Durham, he entered the planning profession in 1966 as a graduate trainee in his home City of Plymouth, before embarking on the DipTP course in Newcastle. From graduating in 1970, he moved to Hertfordshire County Council, where he served for 21 years, mostly as a group leader in the planning service. He worked on the Hertfordshire County Structure Plan and was closely involved in the Stansted Airport Inquiry and the urbanisation strategy associated with the expansion of the airport. In 1991, he moved to East Sussex County Council as Chief Strategic Planner, before setting up his practice in 1994. During his service in local government, Jed was involved in a number of nationally-significant working parties and groups, including the London and South East Regional Planning Conference (SERPLAN) and the County Planning Officer’s Society (Planning in the Urban Fringe). He was a member of the Government Working Party which reviewed and updated Green Belt policy for England.

Jed was a member of the Royal Town Planning Institute (RTPI) General Assembly (previously the Council) for 26 years and was President of the Institute in 1995. He has also chaired the RTPI East of England Branch (1986) and was President of the Planning Summer School from 1997 – 2000. For several years, Jed was a member of the Institute’s Sustainable Development Think Tank and campaigned successfully for the establishment of sustainable development as a core element of the RTPI’s New Vision. He was closely involved with the work of the Institute on climate change policy and chaired the Institute Working Party on the development of marine spatial planning. He has also served on the RTPI England Policy Panel.

As a consultant, Jed has been involved in a wide variety of projects, mainly in the public sector. He was a Senior Associate of Trevor Roberts Associates Limited (TRA), before the firm ceased trading as a result of the 2020 pandemic. For 25 years, Jed ran TRA training programmes in planning, both for officers and councillors of local authorities all over Great Britain. Assignments as a consultant have included a review of the Cheltenham Green Belt and supporting the Royal National Orthopaedic Hospital in its successful bid to redevelop its site at Stanmore, North London. In Hertfordshire, Jed has advised the STOP Harlow North campaign, for which he appeared at the East of England Plan Examination. He has been actively engaged with CPRE Hertfordshire in promoting neighbourhood planning. He has worked with a number of Parish Councils in the completion of Neighbourhood Plans (Cleeve Prior in Worcestershire, Standon, Walkern, Thundridge, and Hunsdon Parishes in Hertfordshire). In recent years, Jed has also been engaged by CPRE, Parish Councils, and other local groups in preparing responses to eight Local Plans in Hertfordshire, appearing at many Examination Hearings.

As at January 2023

# APPENDIX 2

**HERTFORDSHIRE GREEN BELT 2004**

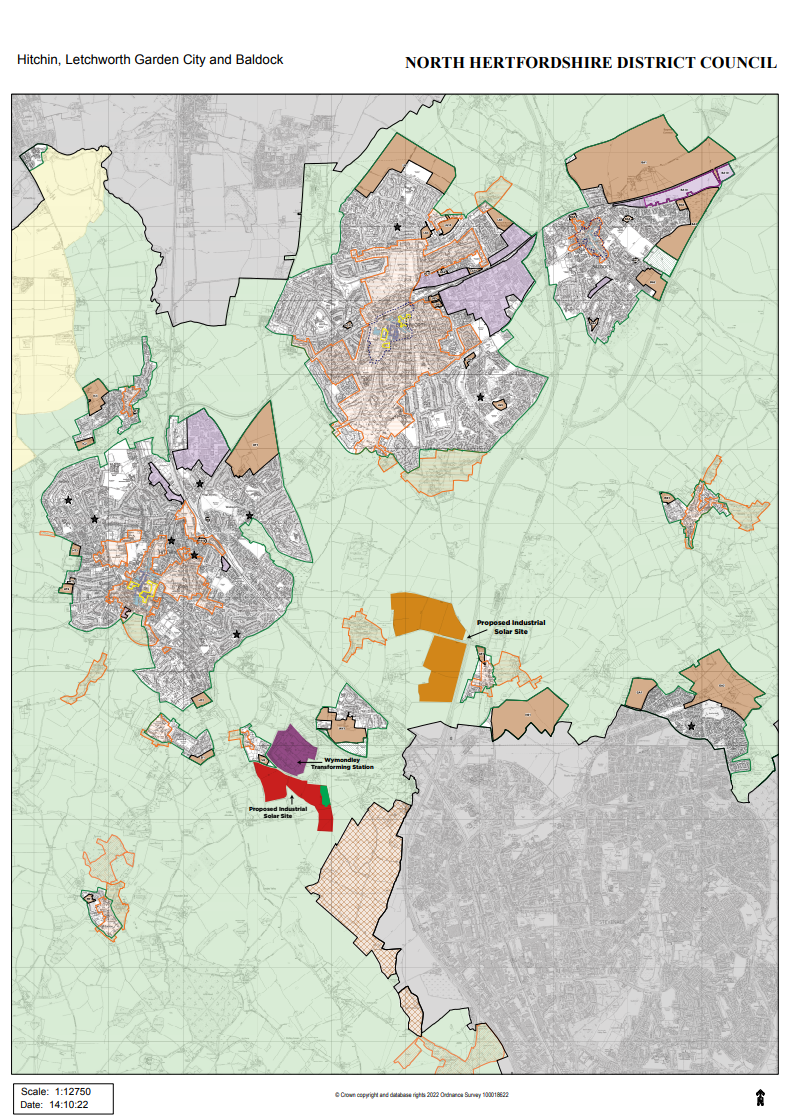
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# APPENDIX 3

**NORTH HERTFORDSHIRE LOCAL PLAN**

**POLICY MAP**

**AREA NORTH OF STEVENAGE**

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# APPENDIX 4

**PHOTOGRAPH**

**Looking Eastwards from Offley Hill**

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