

## **North Herts District Council Local Plan EIP Statement**

### **Statement from Graveley Parish Council**

#### **Matter 7 Countryside and Green Belt: the Green Belt review and the approach to safeguarded land (Policy SP5)**

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***7.1 Paragraph 83 of the National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances. In broad terms:***

***c) What is the capacity of existing urban areas to meet the need for housing and employment uses?***

**Comment:** As noted in our original consultation submission the 2012 SHLAA detailed 2,042 Brownfield sites, whereas only an estimated 741 (*HOU9, Table 4: Specific sites passing the SHLAA tests by type, p15*) are being developed under the current plan. This lack of prioritisation of brownfield sites is contrary to NPPF 17.

Such Brownfield land as have been identified have been limited to NHDC's direction of search rather than proactively seeking to identify and prioritise Brownfield sites across the whole of the North-Herts district before falling back on green field and Green Belt sites.

As NHDC is required to publish a Register of Brownfield sites from January 1<sup>st</sup> 2018, it would be helpful if NHDC Planners could provide information to be contained in this register to the Inspector during the examination.

***(v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.***

**Comment:** Currently the plan calls for the site West of Stevenage (WoS) (currently green belt) to be safeguarded for future development beyond 2026. No further clarification is provided on this proposal but reference to MOU11, point 4.10 references Hertfordshire Structure Plan and the East of England Plan both of which identified this site as suitable to support the future expansion of Stevenage. Reserving this site for future Stevenage expansion is inappropriate given the scale of green belt development proposed by NHDC.

The WoS site should be used to offset other green belt sites around Stevenage as noted in our consultation response page 9 (Policy SP8 (e)(ii) and 4.104 4.105).

As regards future housing requirements for NHDC or Stevenage, these should be met through the development of a new town, the work for which should be well advanced by 2026. Utilisation of this site to meet current NHDC housing requirements would help focus NHDC's efforts on the creation of a new town to meet the HMA's future housing needs.

## **7.2 Is the Green Belt review based on a robust assessment methodology?**

1.1 CG1 is based on incorrect methodology. Table 2.2 Green Belt Assessment Criteria, second assessment criteria is “To prevent neighbouring towns merging into one another”.

This is incorrect and conflicts with a Parliamentary response given by Nick Bowles (Parliamentary Under-Secretary of State for Communities and Local Government (Hansard 13 May 2014: Column 238WH) who stated

“To return to green-belt protections, the national planning policy framework is clear on the importance of those protections, the permanence of green-belt land and its role in preserving the openness of the countryside and in **preventing settlements from merging** (emphasis added)”.

Please refer to our consultation response on page 11, “Coalescence with Stevenage is contrary to National Policy (NPPF)” for the detailed response.

1.2 **CG1 Section 5. Assessment of Potential Development Sites** : Table 5.3 (p 109) sets out the assessment of the contribution to Green Belt purposes of all sites within the Green Belt submitted to the Council.

Sites NS and 353, the latter proposed as the new boundary to NS1, are described as making a Moderate Contribution to green belt whereas in assessing existing green belt sites under section “**3.1 Green Belt Review Assessment Matrix – existing Green Belt sub-parcels**”, page 53, sub-parcel 15 containing these sites was adjudged to make a Significant Contribution.

This difference in rating is attributable to the lower weighting given in the assessment to villages compared to towns under Site Assessment Criteria 2 applied to potential development sites under 5.2 Methodology. Sites less than 2 km from a town receive 3 points (“A higher score denotes a stronger fulfilment of the Green Belt purpose”) whereas for villages the score is limited to 2. Again the methodology fails to recognise that the intent of the NPPF legislation in preventing the merging of settlements with towns or other settlements.

### **3. The assessment criteria employed in the analysis of the contribution of villages in the green belt to the green belt detailed in CG1 Sections 4.3 and 4.4 are incorrect.**

**1. Table 4.20: Graveley - Analysis of Contribution to Green Belt Purposes.** In response to the urban generation question, Graveley is described as “part of land which helps to contain and thereby assist the regeneration of Stevenage” whereas for the question “To check the unrestricted sprawl of large built-up areas” it does not receive sufficient recognition for its central position as the first settlement north of Stevenage on the B197 and is only assigned a Contribution rating.

2. The criteria “To preserve the setting and special character of historic towns” for their contribution to Green Belt purposes fails to recognise that given the merger criteria should

also apply to Settlements then equally in applying the test of preserving “the setting and special character” this should also apply to historic villages. The failure to do so resulted in a “Limited Contribution” rating (CG1 page 92).

3. The assigned rating fails to recognise that Graveley itself is a 1,000 year old village mentioned in the Domesday Book and due the number of listed buildings benefits from a conservation area. The village itself is located in an area adjudged by CG1 to make a “Significant Contribution” to Green Belt (CG1 page 53 : NB area incorrectly described as Jack’s Hill, a small Park Home development) whereas the effect of the above criteria is that the village itself is only deemed to make a “Contribution to Green Belt”

**Graveley Parish Council, October 2017.**