

The Friends of the Forster Country



'To preserve for all time the open green space north of Stevenage known as the Forster Country'

North Hertfordshire District Council Examination of the North Hertfordshire Local Plan 2011 – 2031 Hearing Statement by The Friends of the Forster Country (FoFC)

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

FoFC Representation Policy SP5: Countryside and Green Belt

HEARING STATEMENT

Matter 7 - Countryside and Green Belt: The Green Belt review and the approach to safeguarded land

The Plan is unsound as Policy SP5 is not consistent with Government policy.

We consider that NHDS Local Plan is unsound. We consider :-

- It is not positively prepared in that it ignored the advice of its own Green Belt Review.
- It is not justified in that it plans to remove land from the Green Belt on the basis of faulty reasoning.
- It is not consistent with National Policy to remove land from Green belt without exceptional circumstances which we do not believe to be proven.

7.1 The Plan proposes to alter Green Belt boundaries in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3** in such a way as to de-designate land previously designated as Green Belt (i.e. to remove land from the Green belt).

This action is disallowed by para 79 of the NPPF which states:-

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently** open; the essential characteristics of Green Belts are their openness and their **permanence**.*

Nowhere in the NPPF are circumstances described which possess authority to overturn the permanence of the Green Belt. (para 83 allows an alteration of boundaries under exceptional circumstance but when considered in conjunction with the over-riding para 79 it follows that boundaries may only be changed in order to designate as Green Belt previously undesignated land).

Furthermore, in **para17** of the NPPF the 5th core principle requires the protection of Green Belts.

Thus the Plan contravenes the NPPF in these regards and is therefore **unsound**.

We refer also to the further argument in the original submission of R. Norgan **paras 6.09 to 7.05**.

7.1f If the OAN were calculated employing the requirements of the NPPF rather than by using the seriously flawed data of the DCLG household projections as described in Matter 3 above there would be no possible acuteness in the OAN as it would be at least 6000 houses less with the likelihood that there would also be no unsatisfied need from either Luton or Stevenage Borough. Further the need as projected by the DCLG is not acute as the number of people in the UK requiring immediate accommodation because they do not have accommodation at all is far below the projected figures.

7.2 The question here should not ask whether the Green Belt Review is based on robust assessment methodology alone but also, and most importantly, whether it is in keeping with the requirements of the NPPF.

7.2a The Green Belt Review does not reflect the fundamental aim of Green Belts to prevent urban sprawl by keeping land permanently open.

In fact it totally contravenes and offends those requirements in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3**.

Consequently, the Plan is **unsound**.

7.2b The Green Belt Review does not reflect the essential characteristics of Green Belts, being their openness and their permanence.

Again it totally contravenes and offends those requirements in the sites given above. Argument has been given previously regarding permanence in 7.1.

The proposal in the Plan to build houses on Green Belt land is inappropriate (paras 87 and 89 of the NPPF).and totally offends these two paragraphs as well as para 79.

Consequently, the Plan is **unsound**.

7.2c The Green Belt Review does not reflect the five purposes that Green belts serve as set out in para 80 of the NPPF.

In fact it totally contravenes and offends those requirements.

- The Plan proposes urban sprawl in sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3**.
- There is no significant merging of towns – the Plan is trending towards merging of towns. NHDC say they support the principles of Green Belt but one of the main principles is to stop coalescence of communities. This Plan leaves a very narrow corridor between Site NS1 of SP16 and Graveley. It leaves no open space Rights of Way between Graveley and Stevenage. More importantly it effectively blocks off the Green corridor existing between areas either side of the railway and A1 at this latitude.
- The Plan does not assist in safeguarding the countryside from encroachment. In fact quite the opposite as sites **BA1, LG1, NS1, HT1, GA1, GA2, EL1, EL2, and EL3** all encroach on the countryside and, indeed on Green Belt countryside.
- The Plan does not preserve the setting and special character of historic towns. In particular it seriously damages Baldock with site BA1 It also offends the guiding principles of the first garden city, Letchworth, by proposing houses, and hence population, beyond the 32,000 determined by Ebenezer Howard when he designed the Garden City. The Plan also proposes to merge the village of Graveley into the borough of Stevenage via site **NS1** and hence destroy the character of that village as well as destroying Forster Country.
- We make no comment on the fifth purpose.

7.3 We refer to comments in the original submission of R. Norgan para 7.1 with regard to the permanence of the Green Belt.

The question here referring to long term permanence is illogical as there is no such thing as short term permanence and therefore no such thing as long term permanence.

The Friends of the Forster Country



'To preserve for all time the open green space north of Stevenage known as the Forster Country'

This section of the statement reviews the effects of the loss of Green Belt in the specific area referred to as North of Stevenage covering Forster Country. Providing new areas of Green Belt at some distance such as Offley and Whitwell is no compensation for the residents of Graveley and Stevenage Old Town.

The NHDC Green Belt Review's Fig 2.3 shows area 15 called Jacks Hill including area NS1 of Policy SP16

Fig 2.4 shows area 15 makes a significant contribution to checking the unrestricted sprawl of large built-up areas

Fig 2.5 shows Area 15 makes a significant contribution to Preventing Neighbouring Towns Merging into one Another

Figure 2.6 shows Area 15 makes a significant Contribution to Safeguarding the Countryside from Encroachment

Figure 2.8: shows Area 15 makes a significant Overall contribution to Green Belt purposes

In the summary for area 15 they say

- Criterion 1 Plays an important role in restricting growth northwards from Stevenage and strengthens the role of the adjoining Green Belt.
- Criterion 2 Contributes to the wider area which prevents merging of Hitchin with Stevenage and Letchworth and Baldock.
- Criterion 3 Prevents the encroachment of Stevenage into the open countryside
- Criterion 4 Limited contribution to setting of an historic town.
- Criterion 5 A wedge of open countryside between Stevenage and Letchworth/Baldock and part of a link from the countryside reaching in towards Stevenage.
- **Overall [area 15 including site NS1] makes a significant contribution to Green Belt purposes, helping to prevent sprawl and encroachment, and maintaining the separation of towns**

Criterion 4 is the only one where it is not reckoned to be "3 - Land making a significant contribution to Green Belt purpose(s)"

Is Stevenage reckoned not to be an historic town for criterion 4 or is it not important as areas in North Herts. Stevenage goes back centuries. It is mentioned in the Domesday Book and the charter for the annual fair was granted in 1281. It has been an important stopping place on the Great North Road for many centuries until the A1 motorway was built. The 1940s New Town is only 4 decades younger than Letchworth Garden City. Grade 1 listed Rooks Nest House the setting of Howards End is near the authority boundary.

One can only assume that when this study was done the authors assumed the Stevenage Green Belt would remain unchanged; Stevenage BC now plans to build up to the boundary with North Herts.

Only Willian and Baldock Gap score as making a significant contribution on all 5 counts. As equal third in the chart of usefulness this area should not be removed from Green Belt.

In Section 3 of the Green Belt Review where the areas are considered in detail, the area NS1 between Graveley and Hitchin is 15c. It "Abuts northern settlement edge of Stevenage between A1(M) and Church Lane". Again this area is reckoned to make significant contribution on 4 of the 5 counts; see maps of Figs 3.2, 3.3, 3.4

For the 5th criterion Table 3.1 describes the area as "Context for Graveley village and parkland landscape of Chesfield Park. Visual link with northern settlement edge of Stevenage. Links into Green Belt within Stevenage borough. Contains sprawl along B197. Important part of gap separating Stevenage, Hitchin and Letchworth. Significant contribution"

Friends of Forster Country again state that they consider it wrong that Stevenage has not been considered an historic Town.

At the end of fig 3.6 shows area 15c's overall contribution to be "significant".

We would like to know why NHDC have ignored the advice of their own Green Belt Review. The Stevenage Green Belt Review done by a different set of consultants makes a similar strong case for the value of the area of Stevenage abutting SP8.