

## Examination of the North Hertfordshire Local Plan 2011-2031

### Statement of Stevenage Borough Council

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

*7.3. Have the altered Green Belt boundaries been considered having regard to their intended permanence in the long term? Are they capable of enduring beyond the plan period?*

1. Stevenage Borough Council (SBC) supports the appropriate release of Green Belt land by NHDC, to accommodate development to meet identified housing and employment needs.
2. The Borough Council also welcomes the creation of new, compensatory, Green Belt. However, we are concerned by the large scale of this and the lack of justification for such a large designation of new Green Belt land.
3. Green Belt boundaries are required to have permanence in the long term (NPPF, para.83), and must be capable of enduring beyond the plan period. The Borough Council does not believe that this longer term future has been considered fully and would argue that some of the land being designated as Green Belt may be required in the future to meet increased housing needs. It is not clear that needs beyond the plan period have been calculated or considered in making these proposals. SBC would question how the view has been arrived at that the West of Stevenage safeguarded land provides sufficient capacity to accommodate future growth beyond the plan period, including taking into account the needs of SBC?
4. The NHLP intends to remove in the order of 1,000ha and the Stevenage Borough Local Plan (SBLP) (ORD6) is proposing the removal of around 90ha from the Green Belt, for various developments. NHDC are proposing an addition to the Green Belt in excess of 4,000ha. It is not clear whether such a large addition to the Green Belt has been demonstrated to be necessary.
5. Beyond the 2031 plan period of the emerging SBLP, there are likely to be very limited suitable, available and achievable sites on which to meet any future development needs within Stevenage. Indeed SBC are already relying on NHDC to provide over 11ha of employment land, as insufficient land was found within the Borough to meet all of our development needs. Designating such a large swathe of land as new Green Belt within NHDC, would significantly limit the opportunities for NHDC to help in terms of meeting any future needs under the Duty to Co-operate.
6. Whilst the Green Belt Review (CG1) suggests that the parcels of land to be added fulfil most of the Green Belt purposes, to some extent (and some were also promoted for addition within the Stevenage Green Belt Review (ORD5)), it could be argued that a smaller area of new Green Belt [that did not necessarily fill the entire gap between

Whitwell and Great Offley] would equally well, or better, fit the criteria of restricting sprawl and preventing the merger of Stevenage/Hitchin and Luton.

7. **SBC would argue that no evidence exists to demonstrate that the future needs of both NHDC and SBC, beyond the plan period, have been fully considered and, as such, the addition of such a large area of new Green Belt land cannot be justified.**
8. In reference to our Matter 6 statement on Secondary School provision, if the site at Chesfield Park/Back Lane is proposed during the examination process as an alternative site to meet secondary education needs, SBC would strongly object to this on the grounds that the most appropriate Green Belt boundary for this area had not been properly considered.

*7.4. The Plan identifies one area of safeguarded land, to the West of the A1(M) at Stevenage.*

- a) What has been the Council's overall approach to safeguarded land?*
- b) Is it necessary to identify safeguarded land more widely in order to meet longer term development needs stretching well beyond the plan period? Without the identification of further safeguarded land, what reassurance is there that longer-term development needs can be met without further review of the Green Belt?*
- c) What is the justification for safeguarding the area identified to the west of the A1(M)?*

9. SBC welcomes the identification by NHDC that land to the west of Stevenage has the potential to provide a significant number of new homes in the future, and its release from the Green Belt.
10. However, SBC are concerned about the lack of reference to this land being safeguarded to meet the longer term housing needs of Stevenage, as was previously stated in the 2014 iteration of the NHLP. The change to this undertaking has not been discussed or agreed with the Borough Council.
11. Without this commitment, it is difficult to see the reasoned justification for removing land from the Green Belt on the edge of Stevenage in order to meet the future housing needs of North Hertfordshire, rather than in other locations elsewhere in North Hertfordshire District.

12. **SBC would request wording is added to criterion e. of Policy SP8 in order to clarify this point, as follows:**

**“ii) safeguarding land to the west of the A1(M) at Stevenage, as shown on the Proposals Map, for up to 3,100 dwellings in the period beyond 2026, to meet the future housing needs of Stevenage Borough Council, subject to a future review of this Plan.**

13. Subsequently, if NHDC believe they require further Green Belt release beyond 2026 to meet **their** needs, SBC would argue that it would be necessary to identify safeguarded

land more widely, or else to significantly reduce the level of new Green Belt land being designated within the Borough, as discussed in response to question 7.3.

14. SBC has not seen any evidence to demonstrate that the West of Stevenage safeguarded land, alone, provides sufficient capacity to accommodate future growth (housing and other uses) beyond the plan period, including taking into account the needs of SBC. As demonstrated within our Matter 13 statement, SBC are already relying on NHDC to meet a shortfall in employment land supply against existing needs. This is likely to be exacerbated when the SBLP is reviewed, due to the nature of SBC as a predominantly urban area, with very little land available to meet any further development needs.
15. There is also limited evidence to demonstrate that the significant infrastructure work required to enable the development of the NHDC part of this site can/will be resolved. Until this is demonstrated, additional options should be explored more fully in order to ensure future needs are met.