

**NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: MATTER 11:
HOUSING ALLOCATIONS AND SETTLEMENT BOUNDARIES: THE CATEGORY
'A' VILLAGES: GRAVELEY (INCLUDING NORTH OF STEVENAGE SITE NS1)
(POLICY SP16)**

Statement from CPRE Hertfordshire

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, Planning Consultant for Campaign to Protect Rural England Hertfordshire (CPREH).
2. This statement supplements our original representations on Chapter 4 of the Proposed Submission North Hertfordshire Local Plan (the Plan), including on site NS1 (Policy SP16) and the removal of Graveley Village from the Green Belt, which still apply, and seeks to address the Inspector's questions as set out in his Schedule of Matters and Issues 11.22 – 11.24.
3. CPREH's statement on Matter 3, and our original representations on Policy SP8 are also directly relevant to this issue, because the demonstration of the existence of exceptional circumstances for releasing land from the Green Belt in principle is a pre-requisite for each specific site allocation in the Green Belt and for any consequent alterations to Green Belt boundaries.
4. In our statement on Matter 3 we showed that the Council has failed to demonstrate that all of the identified 'housing need' is either acute or intense. In our original representations on Policy SP5 and paragraph 4.53 of the Pre-Submission Plan we showed that the Council relies entirely on the assumption in its Green Belt Background Paper, that all of the identified 'housing need' is acute or intense, as this must be shown if the Calverton judgement is used to assess whether exceptional circumstances exist in principle for removal of sites from the Green Belt.
5. Our statement on Matter 7 is also relevant to this issue in relation to excluding Category A Villages, in this case Graveley, from the Green Belt. The demonstration of exceptional circumstances is equally relevant and necessary for the removal of villages from the Green Belt i.e. reclassifying them as inset from the Green Belt.

6. Consequently our objection in principle applies to the Strategic Housing Site Allocation NS1 for 900 homes (Policy SP16) and the combined effect of Policy SP5, which removes adjacent village of Graveley from the Green Belt, identified in the Inspector's Schedule.

GRAVELEY (INCLUDING NORTH OF STEVENAGE NS1) (POLICY SP16)

Introduction

7. CPREH considers that the allocation of site NS1 (Policy SP16) and the removal of Graveley Village from the Green Belt would have a significant adverse impact on the purposes of the Green Belt and that neither the Local Plan nor the Council's Green Belt Review has adequately addressed this matter.
8. Site NS1 including Policy SP16 and paragraphs 4.195 – 4.201 plus all references to a new village boundary for Graveley creating an inset in the Green Belt should be deleted from the Plan.

Inspector's Issues and Questions

Question 11.22: Is the proposed housing allocation justified and appropriate in terms of the likely impacts of the development?

9. There is very little discussion of the likely impacts of site NS1 (SP16) to the north of Stevenage. The North Hertfordshire Green Belt Review 2016 includes an assessment of the two development sites (ref NS & 353) that make up NS1 (SP16).
10. The Summary Landscape Assessment (CG11) for North of Stevenage. The site is in two Landscape Character Areas (LCA), with the Arlesey – Wymondley LCA being considered to be of low landscape value. However, the other LCA, Baldock Gap, is of moderate landscape value and highly sensitive to development. A development of approximately 900 new homes would have a major impact on this countryside.
11. In addition, it is highly likely that the land north of Stevenage falls into the category of the Best and Most Versatile (BMV) Agricultural Land. The comprehensive development of this site would be contrary to paragraph 112 of the NPPF that advises local planning authorities to consider the benefits of (BMV)

agricultural land and seek to use areas of poorer quality land when significant development is required.

12. In addition the text (paragraph 4.195) refers to the proposed development of land in the adjoining area of Stevenage, without pointing out that the proposal was highly controversial, heavily opposed, and yet to be approved following the intervention of the Secretary of State following the Plan's Examination and Inspector's Report. Instead the text describes the opportunity of a coherent extension to the north of the town.
13. The combination of an additional 800 homes (Policy HO3 in the Stevenage Borough Local Plan) between the northern built boundary of Stevenage and this site NS1 for 900 homes would cause extensive harm to local landscapes of particular value, that have not been adequately addressed by either the Local Plan or the Council's Green Belt Review.
14. CPREH strongly disputes the findings of the Inspector in the Report on the Examination of the Stevenage Borough Local Plan 2011-2031 to Stevenage Borough Council dated 18 October 2017. She concluded that open land would remain between HO3 and the nearest settlement (Graveley), whilst also being aware that this open land was subject to a housing site allocation of a similar size in North Hertfordshire Local Plan. In paragraph 82 of the Inspector's report she stated that the gap between the allocated site in North Hertfordshire's emerging Plan and the nearest village of Graveley would prevent the coalescence of this village with Stevenage.
15. CPREH is concerned that the Inspector had not been provided with any evidence about the NHLP, now available to this Examination, on which to base such an opinion, and it is one that CPREH strongly disagrees with.
16. The impact of site NS1 (SP16) will be much greater when considered in conjunction with site HO3 in the Stevenage Local Plan and the Plan's proposal to remove Graveley from the Green Belt, making the issue of settlement merger even more relevant.

Question 11.23: Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

17. CPREH considers that in the absence of a full assessment of the impact of the site allocations in the plan, it is impossible to consider whether the allocation to the north of Stevenage is the most appropriate option compared with other Green Belt releases.
18. CPREH considers that insufficient attention was given by the Council to the option of concentrating a greater proportion of development within the district's principal towns and villages, to include regeneration and redevelopment of underused land, and encouragement for change of use of suitable land for residential purposes, as a way of reducing the amount of greenfield land needed for housing, and in particular to minimise the amount of land that should be taken out of the Green Belt. A key Green Belt purpose is to 'assist in urban regeneration, by encouraging the recycling of derelict and other urban land' (NPPF paragraph 80, CPREH emphasis).
19. However, paragraph 66 of the Green Belt Review in the section on methodology of the analysis of potential development sites, admits that it did not consider the fifth Green Belt purpose, assisting in urban regeneration by encouraging the recycling of derelict and other urban land, as the other four purposes were all deemed to contribute to urban regeneration. Failure to fully acknowledge the likely scale of windfall development, and capacity of existing previously developed land, risks the unnecessary loss of countryside and Green Belt to the north of Stevenage.
20. CPREH concludes that given the evidence, it is impossible to tell whether the proposed allocations north of Stevenage are the most appropriate options given that the alternatives of using brownfield land have not properly been considered and the options have not been properly assessed.

Question 11.24: Site NS1 comprises land in the Green Belt.

a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?

21. National Planning Policy on this matter has been clearly restated on many occasions by the Government of the day since the NPPF was published, and the appendices to our statement on Matter 3, letters from Government between 2014

and last year, all emphasise the importance of the constraint imposed by national policy for the protection of the Green Belt and that housing need and/or demand are not in themselves an exceptional circumstance that would justify the removal of land from the Green Belt.

22. CPREH notes that the Inspector has asked the Council to explain the acuteness of the need for housing and employment land and the other subsequent matters identified by the Court in the Calverton case as being a potential way of addressing whether or not exceptional circumstances exist for changing Green Belt boundaries through a Local Plan.
23. In paragraph 30 of the Calverton judgment, the Court found that one should “take account of the constraints embodied in the policies in the Framework, such as Green Belt, when preparing the local plan, as paragraph 47(1) clearly intends”. That statement, and the NPPF paragraph 14 requirement that Local Plans should meet development needs unless specific policies in the framework indicate development should be restricted (CPREH emphasis), are the starting point when deciding whether it is essential to remove land from the Green Belt to meet some of the District’s development needs. CPREH considers that the Council failed to take proper note of this when setting the Plan’s targets and in drafting Policy SP5.
24. The Council’s explanation in its Housing and Green Belt Background Paper 2016 of how it reached its decision to meet all its development needs despite the constraints that exist, does not reveal precisely how it reached this conclusion, and paragraph 4.53 of the Plan simply states that ‘On balance, it is considered that the relevant circumstances do exist within North Hertfordshire to review boundaries and enable development to meet locally identified needs.’ This is far from meeting the tests required by national policy as clarified by the judge in the Calverton case.
25. None of the Council’s assertions demonstrate that all of the calculated OAN consists of an acute or intense housing need. To do so, the Council would need to show that all elements of objectively assessed need, and the additional provision proposed, are so great that they outweigh national Green Belt policy, including those that are based principally on market demand, rather than genuine housing need.

26. CPREH concludes that if exceptional circumstances exist which warrant the allocation of site NS1 (SP16) for new homes in the Green Belt they have not been proven in the Submission documents for the North Hertfordshire Local Plan Examination.

b) What is the nature and extent of the harm to the Green Belt of removing the sites from it?

27. Potentially this allocation and the new Green Belt boundary drawn around the site would completely undermine the purposes of the Green Belt. In particular, the revised Green Belt boundary of NS1 (SP16) is described in the Assessment of Potential Development Sites in the Green Belt Review as being weak with some hedgerows and in other parts being open fields. This does not represent a defensible boundary for the future. The Council's justification for Policy SP16 includes pointing out that the site includes public rights of way and may impact on the setting of Graveley Conservation Area and the separation of Graveley village from Stevenage.

28. Apart from the unjustified loss of Green Belt land, there is also a risk of further harm resulting from a new and very weak Green Belt boundary that could be further eroded resulting in the merging of Stevenage with Graveley village.

c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

29. The Green Belt Review considered a parcel of land (15c) which is similar to the area of the site allocation NS1 (SP16). Parcel 15c plays an important role in preventing the expansion of Stevenage northwards, separating Stevenage from Letchworth and Baldock and protecting the countryside in the gap between Stevenage and the towns of Letchworth and Baldock. It does not consider its function of preventing the merging of Stevenage with the village of Graveley or indeed the fourth purpose of preserving the setting and special character of Graveley.

30. CPREH is of the view that the longstanding Green Belt purpose of preventing neighbourhood towns from merging applies equally to the merging of towns and villages, even more so in the case of villages excluded from the Green Belt as proposed for Graveley in the Local Plan. This interpretation of national policy was accepted by all parties at the appeal hearing for two applications for a proposed

solar farm near Sawston in neighbouring Cambridgeshire (Appeal references APP/W0530/W15/3012014 and APP/W0530/W15/3013863). The Secretary of State, in dismissing the appeal said that a major contributory factor in his decision was the conflict with this Green Belt 'purpose' as the development would reduce the gap between the villages of Sawston and Babraham.

31. CPREH are also of the view that the importance of preserving setting of Graveley village and its conservation area should have been included in this review as the proximity and size of the urban extension that would result from the combination of site HO3 in the Stevenage Local Plan and site NS1 (SP16) in the North Herts Local Plan could not be ameliorated.

d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?

32. All land in the Green Belt contributes equally to the Green Belt purpose of assisting urban regeneration by encouraging the recycling of urban land, according to its extent, so the Green Belt adjacent to the proposed allocations would continue to contribute to this purpose.
33. The loss of Green Belt at the scale proposed on site NS1 (SP16) would certainly undermine the function of the Green Belt, which is to keep the area of the proposed site allocation permanently open. Furthermore, once the principle is established in a local plan, that an area of Green Belt can be removed from it and developed solely because of housing demand, adjacent areas of Green Belt come under threat from the 'hope value' that landowners will put on the land. This situation will be exacerbated by the lack of a strong new Green Belt boundary, the proximity of the village of Graveley and the proposal to inset the village within the Green Belt.
34. The particular risk to the Green Belt from the removal of site NS1 (SP16), without demonstrating exceptional circumstances for doing so is that the land would be removed without the need to meet an acute or intense development need.
35. The development of this site erodes the gap between Stevenage and the towns of Baldock and Letchworth and between Stevenage the village of Graveley. Only a small gap would remain but the purpose of preventing merging of settlements

would be seriously weakened. The loss of this site from the Green Belt would be encouraging the urban sprawl of Stevenage northwards.

36. Allowing this site to be removed from the Green Belt would therefore undermine not only the Green Belt function of the adjacent land but also the purpose of the Green Belt, which was designated to prevent such proposals.

Summary and Conclusions

37. CPRE considers that this proposal would have a significant adverse impact on the purposes of the Green Belt, and cause harm to local landscapes of particular value, that have not been adequately addressed by either the Local Plan or the Council's Green Belt Review.
38. The Council has failed to assess the impact on the Green Belt and the countryside as a whole or provide an adequate explanation of why this site was chosen in comparison to other potential options in their attempt to meet their full OAN.
39. There is nothing in the Council's evidence to demonstrate the existence of the exceptional circumstances necessary to adjust the Green Belt boundary to the north of Stevenage. Instead, they should be prioritising brownfield sites in existing settlements to fortify the Green Belt.
40. The Submission Plan is not justified and is not consistent with national policy in relation the Strategic Site Allocation NS1 (SP16) or the removal of the village of Graveley from the Green Belt and both proposals should be removed from the Plan.
41. CPREH accordingly asks the Inspector to find the Plan's proposals for NS1 (SP16) and the removal of the village of Graveley from the Green Belt to the north of Stevenage, unsound.