

**NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: MATTER 10 HOUSING  
ALLOCATIONS AND SETTLEMENT BOUNDARIES: TOWNS: LETCHWORTH**

**Statement from CPRE Hertfordshire**

1. I am Stephen Baker, DMS, BSc, Dip TP, MRTPI, Planning Manager at 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 Policy SP15 and Site Allocation Policy LG1, which still apply, and seeks to address the Inspector's questions as set out in his Schedule of Matters and Issues.
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. Consequently our objections in principle apply to sites LG1 and LG3 identified in the Inspector's Schedule, because exceptional circumstances have not been demonstrated, and these objections do not therefore need to be repeated for each individual allocation.

## Inspector's Issues and Questions

### Site LG1:

#### **Issue 10.2: Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?**

6. This allocation on the northern edge of Letchworth is not justified because of the impact on the Green Belt that is addressed below under Issue 10.14, and because the need for the development does not outweigh the harm to the countryside and the community in and around Letchworth.
7. The site occupies a very large area of open countryside on elevated land to the north of the town, development of which would be prominent in views from the neighbouring areas of Central Bedfordshire, as recognised in the supporting text in the Plan. The Landscape Study (CG16a) states that the area is characterised by 'open, exposed arable landscape', and as having a 'large flat arable landscape'.
8. The more detailed Landscape Sensitivity Study (CG6) states that 'expansive open views are present from the landscape unit to the east, north and north west, where the land slopes away towards Pix Brook and the River Ivel, and across the far sides of the river valleys which rise in the distance to the north.' It also states that the expansive open nature of views 'heightens the landscape's sensitivity to development.'
9. The Study also notes that the site is open to views from Stotfold, which lies on the northern side of the river valley in particular, and that the area 'is relatively tranquil and exposed'. The Study recommendations include the statement that the area's 'strategic function' is as separation between the settlements of Letchworth, Stotfold and Norton which 'should be respected and enhanced.'
10. CPREH considers that this function, closely aligned with Green Belt purposes, is threatened by the proposed allocation.
11. The site is Grade 2 agricultural land quality and within the definition of 'best and versatile agricultural land' that paragraph 112 of the NPPF states Council's should avoid allocating for development in Local Plans (HOU13).
12. In addition to important ecological, cultural and hydrological impacts that would have to be addressed, the addition of over 2,000 more people to the town on this site alone would be likely to cause traffic congestion on local roads because of the additional

development taking place in the nearby settlements in Central Beds and the other major developments proposed in the Plan for the neighbouring towns of Baldock and Hitchin totalling over 6,000 dwellings, or around 14,000 more people within a few miles.

13. CPREH considers that development on the scale proposed at site LG1 is not justified in terms of the adverse local impacts that would arise.

**Issue 10.14: (The site is comprised of land in the Green Belt). a) Do the exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

14. There are no circumstances set out in the Plan or the Council's evidence submitted with the Plan which outweigh the presumption against such development in the Green Belt established by NPPF paragraph 14 and footnote 9, and in the context of the guidance provided by the Calverton court case on the scope of considerations that should be taken into account when seeking to identify such circumstances.

15. The Site Allocation proposal for site LG1 in Policy SP15 and its supporting text make no reference whatsoever of the requirement to demonstrate the existence of exceptional circumstances for removal of the site from the Green Belt, referring only to what is proposed and where, and the Council's perceived beneficial (but not negative) results of the proposed development.

16. It is our understanding that in the absence of evidence of exceptional circumstances for the removal of this site from the Green Belt the proposed allocation is by definition both unjustified and contrary to national policy, and therefore unsound.

17. The only considerations put forward by the Council for the existence of exceptional circumstances for changing the established, permanent Green Belt boundaries in the District, relate to a general conclusion that all boundaries must be reviewed because all of the assessed housing need in the District has to be met in the District and that the locations proposed in the Plan are the most appropriate even if they are in the Green Belt.

18. CPREH has set out in detail why in principle this approach is not consistent with national policy as set out in the NPPF and subsequent Government statements. 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.

**Issue 10.14: b) What is the nature and extent of the harm to the Green Belt of removing the site from it?**

19. The nature of harm in this location would be threefold; the loss of countryside due to encroachment of Letchworth; the further sprawl of the town northwards into that countryside; and the removal of the incentive and pressure for urban regeneration through recycling of land within the towns enclosed by Green Belt in the District and the London Green Belt as a whole.
20. The extent of harm in geographical terms to the first two Green Belt purposes above is very significant because of the size of the proposed allocation, and because of the major reduction of the open land between Letchworth and the settlements just across the nearby local authority boundary with Central Bedfordshire, particularly Stotfold. According to the Green Belt Review (CG1), the physical gap between Letchworth and Stotfold would be reduced to two kilometres, in addition to the reduction in the visual gap.
21. The removal of the regeneration incentive would, of course be Green Belt wide, because it applies to the Metropolitan Green Belt as a whole.
22. In terms of severity of impact, the Green Belt Review states under the 'urban sprawl' criterion that the site is bordered on two sides by development but this is a false statement because the site wraps around Letchworth and is in fact bordered on three sides by open countryside, accentuating the impact on the Green Belt in terms of urban sprawl and loss of countryside.

**Issue 10.14: 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?**

23. The impact on the purpose of assisting urban regeneration cannot be ameliorated, as the development would take place entirely outside the existing urban fabric.
24. The impact on the spread of the town into the countryside would not be ameliorated because the proposed new Green Belt boundary is around the site allocation and the

development would be permanent. None of the site would retain the character or status of, or function as Green Belt.

25. All the Council could achieve in future would be to ensure that there was no further loss of Green Belt status of the adjacent land. Clearly the construction of 900 houses outside the current Green Belt boundary does not improve that current boundary, so attempts to design new defensible boundaries further out into the countryside do not constitute amelioration or impact reduction.

**Issue 10.14: 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?**

26. 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 allocation would continue to contribute to this purpose.

27. The loss of Green Belt on the scale proposed in this location 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 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.

28. Past Planning history from the first round of county development plans included landowners leaving Green Belt land on the edges of towns to degrade without any investment in its management in the hope that planning authorities would allow development in future, and it was only through the resolute defence of the Green Belt by generations of local authority councillors and officers that such pressures were resisted, supported by detailed government policy and guidance.

29. Government policy and guidance is not so detailed or forthright now, but ministers have repeatedly stated that Green Belt policy is effectively unchanged, and that in the local plan context 'exceptional circumstances' must exist for land to be taken out of the Green Belt. North Hertfordshire District Council has failed to demonstrate such circumstances, and allowing this site to be removed and developed would therefore undermine not only the Green Belt function of the adjacent Green Belt land but the wider Green Belt designated to prevent such proposals.

**Site LG3:**

**Issue 10.2: Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?**

30. This proposed allocation is not justified because of the impact on the Green Belt that is addressed below under Issue 10.14, and because the need for the development does not outweigh the harm to the countryside and the community in and around Letchworth and Baldock.
31. The site lies on the edge of the same area of open countryside as site LG1 described as a very large area of open countryside on elevated land to the north of the town (CG16a).
32. The site also abuts the Norton Conservation area and would effectively consolidate development between Letchworth and Norton.
33. The Site Appraisal's evaluation of the site points out the adjacent Conservation Area, the inclusion of an Archaeological Area, the water supply source below the site, and the loss of existing visual screening of the town at this point (HOU13).
34. The site is Grade 2 agricultural land quality according to the Land Classification Map for the East of England, and within the definition of 'best and versatile agricultural land' that paragraph 112 of the NPPF states Council's should avoid allocating for development in Local Plans.

**Issue 10.14: (The site is comprised of land in the Green Belt). a) Do the exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

35. There are no circumstances set out in the Plan or the Council's evidence submitted with the Plan which outweigh the presumption against such developments in the Green Belt established by NPPF paragraph 14 and footnote 9, and in the context of the guidance provided by the Calverton court case on the scope of considerations that should be taken into account when seeking to identify such circumstances.
36. The Site Allocation proposal for site LG3 and the supporting text in the Letchworth part of Chapter 13 in Section Four of the Plan, make no reference whatsoever to the

requirement to demonstrate the existence of exceptional circumstances for removal of the site from the Green Belt, referring only to what is proposed and where.

37. It is our understanding that in the absence of evidence of exceptional circumstances for the removal of this site from the Green Belt the proposed allocation is by definition both unjustified and contrary to national policy and therefore unsound.
38. The only considerations put forward by the Council for the existence of exceptional circumstances for changing the establish permanent Green Belt boundaries in the District, relate to a general conclusion that all boundaries must be reviewed because all of the assessed housing need in the District has to be met in the District and that the locations proposed in the Plan are the most appropriate even if they are in the Green Belt.
39. CPREH has set out in detail why in principle this approach is not consistent with national policy as set out in the NPPF and subsequent Government statements.

**Issue 10.14: b) What is the nature and extent of the harm to the Green Belt of removing the site from it?**

40. The nature of harm in this location would be similar to those set out for site LG1. They are threefold; the loss of countryside due to encroachment of Letchworth; the further sprawl of the town north eastwards into that countryside; and the removal of the incentive and pressure for urban regeneration through recycling of land within the towns enclosed by Green Belt in the District and the London Green Belt as a whole.
41. The extent of harm in geographical terms to the first two Green Belt purposes above is significant because of the scale of the proposed allocation for over 100 dwellings in total, but for the removal of the regeneration incentive would be Green Belt-wide, because this purpose applies to the Metropolitan Green Belt as a whole.
42. In terms of severity of impact, the impact would be incremental, with the site contributing with other sites proposed in the Green Belt at Letchworth, Hitchin and Baldock to a major impact on the Green Belt locally and as a whole.

**Issue 10.14: 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?**

43. As is also the case with site LG1, the impact on the purpose of assisting urban regeneration cannot be ameliorated, as the development would take place outside the existing urban fabric.
44. The impact on the spread of the town into the countryside would not be ameliorated because the proposed new Green Belt boundary is outside the site allocation and the development would be permanent. The site would not retain the character or status of, or function as, Green Belt.
45. All the Council could achieve in future would be to ensure that there was no further loss of Green Belt status of the adjacent land north east of the town. Clearly the construction of 120 houses outside the current Green Belt boundary does not improve the current boundary, so attempts to design a new defensible boundary does not constitute amelioration or impact reduction.

**Issue 10.14: 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?**

46. 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.
47. The loss of Green Belt at this site 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 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.
48. Allowing this site to be removed and developed would therefore undermine not only the Green Belt function of the adjacent Green Belt land but the wider Green Belt, designated to prevent such proposals.