

**NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: MATTER 10:
HOUSING ALLOCATIONS AND SETTLEMENT BOUNDARIES: TOWNS:
STEVENAGE (GREAT ASHBY)**

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 Policy SP18 (GA2) and Site Allocation Policy GA1, which still apply, and seeks to address the Inspector's questions as set out in his Schedule of Matters and Issues 10.21 – 10.23.
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 GA1 and GA2 (SP18) identified in the Inspector's Schedule, because exceptional circumstances have not been demonstrated, and these objections do not therefore need to be repeated for both allocations.

STRATEGIC HOUSING SITE - Policy SP18: Site GA2 – Land off Mendip Way, Great Ashby & LOCAL HOUSING ALLOCATION – Policy GA1 – Land at Roundwood

Introduction

6. CPREH considers that the allocation of sites GA1 and GA2 (SP18) would have a significant adverse impact on the purposes of the Green Belt that neither the Local Plan nor the Council's Green Belt Review has adequately addressed their removal from the Green Belt.
7. Both Sites including Policy SP18 and paragraphs 4.209 – 4.218 and all related references to them should be deleted from the Plan

Question 10.21: Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

8. There is very little discussion of the likely impacts of the development of the sites north east of Stevenage. The North Hertfordshire Green Belt Review 2016 includes an assessment of the two development sites (ref 226 & 323) that make up GA2 (SP18) and the land referred to as NES3, which is effectively GA1. The review also provides an assessment of the two parcels of land, which relate to these housing sites in relation to Green Belt. The only consideration of the impact on the countryside is a brief description in the Landscape Assessment
9. The Summary Landscape Assessment (CG16) for North East Stevenage describes the area as rural, quiet and remote. The landform is a gently sloping plateau with parkland and woodland that would be vulnerable to the further extension of Stevenage beyond the existing limits of Great Ashby. A development of 930 new homes would have a large impact on the countryside, despite the sensitivity of the area being categorised in the Landscape Assessment as moderate.
10. In addition, it is moderately likely that the land north of Great Ashby 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 the (BMV) agricultural land and seek to use areas of poorer quality land when significant development is required.

11. In addition, despite local facilities being provided in the existing edge of town settlement of Great Ashby, the extension of Stevenage further north still brings in to question the sustainable transport issues of being located so far from Stevenage Town Centre and the railway station.
12. The northern edge of Stevenage is already a detractor in the landscape. The individual housing allocations are not justified in the Plan or in the supporting documents. CPREH concludes that they are not appropriate because a full assessment of likely impacts has not been carried out.

10.22 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

13. 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 allocations to the north east of Stevenage are the most appropriate option compared with other Green Belt releases.
14. 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 land 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).
15. However, paragraph 66 of the section on methodology in the analysis of potential development sites, of the Green Belt Review 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 are 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 east of Stevenage.

16. CPREH concludes that given the evidence, it is impossible to tell whether the proposed allocations north east 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.

10.23 Sites GA1 and GA2 comprise of land in the Green Belt.

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

17. 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.

18. 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.

19. 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.

20. 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.

21. 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.
22. CPREH concludes that if exceptional circumstances exist which warrant the allocation of sites GA1 and GA2 (SP18) 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?

23. Potentially this allocation and the new Green Belt boundary drawn around these sites would completely undermine the purposes of the Green Belt. In particular, the revised Green Belt boundary of GA2 (SP18) has been drawn along the route of a public right of way, which cannot be considered to be a strong Green Belt boundary. The Council’s justification for Policy SP18 includes pointing out that parts of the new boundary cut across open fields and that new structural planting will be necessary to provide visual containment, where none exists at the moment.
24. 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.

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?

25. In relation to Local Housing Allocation GA1, the site specific criteria are very general and non-specific. They mention retention and sensitive treatment of woodlands, mitigation for wildlife and the sensitive design and landscaping

around northern and western peripheries to minimise impacts upon the wider landscape. The only amelioration for this site is that there is a strong boundary in the form of roads and existing development together with woodland to the north and west around the site.

26. The two development sites that comprise GA2 (SP18) have no physical boundary. The policy criteria are more detailed and include the vital requirement of the preparation of a masterplan but these do not ameliorate or reduce the impact on Green Belt purposes.
27. Both sites are assessed in the Green Belt Review as making a moderate contribution to Green Belt, however, the development of GA1 would narrow the gap between Stevenage and the towns of Baldock and Letchworth. Site GA2 (SP18) would expand the northern edge of Stevenage towards the village of Weston.
28. 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. This interpretation of national policy was accepted by all parties at the recent 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.

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?

29. 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.
30. The loss of Green Belt at the scale proposed for these two sites would certainly undermine the function of the Green Belt, which is to keep the area of the proposed site allocations 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 around site GA2 in particular.

31. The particular risk to the Green Belt from the removal of sites GA1 and GA2, 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.
32. The development of these sites erodes the gap between Stevenage and the towns of Baldock and Letchworth and between Stevenage the village of Weston. A gap would still remain but the purpose of preventing merging of settlements would be weakened. The loss of these sites from the Green Belt would be encouraging the urban sprawl of Stevenage northwards.
33. Allowing these sites 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

34. The Council has failed to assess the impact of the Green Belt or the countryside as a whole or provide an adequate explanation of why these sites were chosen in comparison to other potential options in their attempt to meet their full OAN.
35. 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.
36. The Submission Plan is not justified and is not consistent with national policy in relation the Strategic Site Allocation GA2 (SP18) or Local Site Allocation GA1 and both should be removed from the Plan.
37. CPREH accordingly asks the Inspector to find the Plan's proposals for the removal of GA1 and GA2 (SP18) from the Green Belt to the north east of Stevenage unsound.