

**North Hertfordshire Local Plan
Examination in Public**

Written Representation



On behalf of Warden Developments Limited

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

1. Warden Developments Limited (WDL) have been engaged with the Local Plan process throughout and have submitted representations at each relevant stage.
2. WDL are the promoters of 'Land south of Cowards Lane' in Codicote which is proposed for allocation under Policy CD1. Separate representations are being prepared in response to the individual site assessment issues.
3. This short statement responds to the more strategic level issues of Green Belt release.

Response to the Inspectors Issues & Questions

7.1 Paragraph 83 of the National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances. In broad terms:

a) Do the exceptional circumstances necessary exist to warrant the proposed alterations to Green Belt boundaries, in terms of both removing land from and adding land to the Green Belt?

4. Yes, the exceptional circumstances do warrant alterations to Green Belt boundaries.
5. The Council has undertaken a detailed review of the districts brownfield land capacity. In this regard we draw the Inspectors attention to paragraphs 4.21 to 4.40 of the examination document HOU1, 'Housing and Green Belt Background Paper.
6. This makes clear that based upon the preparation of a detailed Strategic Housing Land Availability Assessment (SHLAA) and taking into account completions, permissions, windfalls and broad locations, a maximum of 6,343 homes could be delivered on non-Green Belt sites in North Hertfordshire over the plan period.

7. This represents less than half (46%) of the District's objectively assessed needs for housing. This is considered a conservative estimate of Green Belt need as it assumes that all identified permissions and windfalls occur on non-Green Belt land and that all non-Green Belt sites identified in the SHLAA will come forward regardless of potential constraints.
8. The Green Belt is a key tenant of planning policy and a very important tool for protecting the countryside around our towns and villages. However, and whilst such boundaries are designed to endure for the longer term, the planning system recognises that there will inevitably be a need to review these boundaries on occasion in order to meet the needs of a growing population.
9. It is a simple reality that the tightly defined Green Belt boundaries in North Hertfordshire has led to constrained housebuilding and so severe affordability problems.
10. We draw the Inspectors attention to the Savills 'Hertfordshire Residential Development Spotlight' report attached as Appendix 1 to this representation.
11. This highlights that Hertfordshire house prices have now risen to 48.9% above their previous peak in 2008, (according to Land Registry data).
12. Prices in the County rose by 11.7% over the past year alone, compared to 7.7% nationally.
13. The result is that house price affordability in the area is poor. The ratio of average earning to average house prices in North Hertfordshire is close to ten times salary against a national average of approximately eight times salary.
14. This poor level of affordability in the district is a key reason why the Council should ensure that housing targets are reached by building in the flexibility discussed above
15. In short, the exceptional circumstance which justifies the Green Belt releases in the plan is that without this the Council would fail to meet over 50% of the Objectively Assessed Need for housing in the District.
16. Such a position would only serve to exacerbate current affordability problems and would render the Local Plan wholly unsound.

Appendix 1

'Hertfordshire Residential Development Spotlight'

(Prepared by Savills)