

Examination of the North Hertfordshire Local Plan (2011-2031)

Examination hearing sessions

Statement of North Hertfordshire District Council

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

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?

1. Yes. The case of exceptional circumstances is developed at length in HOU1.

Removing Land from the Green Belt

2. In terms of removing land from the Green Belt for housing, HOU1 gives specific regard to the five criteria identified by the Inspector in his Matters and Issues (ED10, pp.6-7, italic text). These are taken from the *Calverton* judgement¹ which identified five factors that an authority might reasonably be expected to consider in demonstrating 'exceptional circumstances'.
3. The scale of objectively assessed need for housing (OAHN) can reasonably be described as acute having regard to both the size of the existing housing stock and historic housing delivery rates (HOU1, paragraph 4.21, p.14).
4. A maximum of approximately 6,300 homes could be delivered on non-Green Belt sites over the plan period (HOU1, paragraph 4.23, p.14)². This included capacity from urban areas and on identified non-Green Belt rural land. This represented an 'inherent constraint' on land availability when compared to the scale of the OAHN.
5. A review of surrounding authorities and housing market areas shows this situation is not isolated to NHDC. A consistent policy of Green Belt constraint across the wider Metropolitan Green Belt north of London would result in a shortfall of tens of thousands of homes (HOU1, paragraphs 4.26 to 4.36, pp.15-16).
6. Consequently, there would be difficulties in achieving the social and economic roles of sustainable development in particular (HOU1, paragraphs 4.37 & 4.38, pp16).

¹ *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin), Jay J

² This total is subject to certain caveats set out in paragraph 4.24 of the same document.

7. The National Planning Policy Framework recognises (paragraph 52) that the supply of new homes can sometimes be best achieved through planning for larger scale development, including extensions to existing villages and towns. The District is highly constrained by Green Belt and many of the most sustainable locations for new development are within or adjacent to existing higher order settlements.
8. Without use of any Green Belt land, the (remnants of the) housing strategy would be significantly imbalanced. Growth in Baldock, Letchworth Garden City and Hitchin would be constrained to capacity from within existing Green Belt limits. It would not be possible to contribute towards unmet housing needs from Luton. Royston would be the only town where it would be possible to focus significant additional development on surrounding rural land.
9. Detailed consideration of the nature and extent of harms, and the extent to which consequential impacts may be mitigated will be considered on a site-specific basis in relevant statements for Matter 10 and 11.
10. Notwithstanding this point, a broad overview of the findings of the Green Belt review and the (potential) harms to the Green Belt are considered in paragraphs 4.48 to 4.52 of HOU1 (pp.17-18). It is noted that the majority of Green Belt sites passing the SHLAA tests are judged to make a moderate contribution to Green Belt purposes. Three sites / areas are identified as making a significant contribution and HOU1 identifies that any decision to allocate these sites within the plan in particular will require clear justification.
11. HOU1 identifies that potential mitigations take one of two forms: site-specific measures and compensatory provision. It is noted that, in setting the strategic context for Green Belt review, it is sufficient to note that such measures exist (HOU1, paragraph 4.55, p.18).
12. The plan contains a range of site-specific Green Belt mitigation measures in order to ameliorate harm to the fullest possible extent. This includes the creation of clear defensible boundaries for the long-term where required.
13. Paragraph 4.58 of HOU1 (p.19) sets out the Council's conclusions in relation to the five criteria of *Calverton*. Paragraph 4.97 (p.24) concludes that, as a general principle, *exceptional circumstances* do exist to justify the release of land from the Green Belt in North Hertfordshire.
14. The overriding *exceptional circumstances* for removing land from the Green Belt for employment at Baldock are also set out in HOU1 (paragraphs 7.1 to 7.3, p.37). In turn, this has regard to the consideration of the housing / employment balance in the SHMA (HOU4, paragraphs 3.26 to 3.35, pp.37-39) and the Employment Background Paper (E5).
15. The case for the release of employment land is intertwined with the case for housing. It is necessary to reach a consistent position on both for a sustainable development strategy to be pursued (HOU1, paragraph 4.47, p.17).

16. Although the approach in North Hertfordshire must be judged on its own merits, the proposed Local Plans of neighbouring East Hertfordshire, Stevenage and Welwyn Hatfield Councils all take the position that exceptional circumstances exist to justify a review of the Green Belt boundaries.

Adding Land to the Green Belt

17. The designation of Green Belt in the northern part of the District in 1971 left a significant area of countryside between the Stevenage/Hitchin corridor and Luton undesignated. In the intervening 45 years, development pressures and accessibility have evolved such that this land is vulnerable to change. Green Belt designation to the south of the A505, effectively filling in the existing gap, would substantiate the existing Green Belt to east (surrounding the west of Stevenage) and west (on the outskirts of Luton). In both cases, proposed removal of land from the Green Belt would be complemented by the designation of Green Belt land³.
18. The Green Belt Review (section 6 pp.137-150) set out the analysis of the contribution of this land to Green Belt purposes, Part of the conclusion to the review (para 96 p.150) notes that: *“The areas of non-Green Belt assessed form a narrow corridor between the existing bands of Green Belt along the eastern edge of Luton and the western edge of Hitchin/Stevenage. Although they do not directly adjoin the major urban settlements they do play a role in preserving the openness of the countryside. In particular, the parcels to the south of the A505 Luton to Hitchin dual carriageway which are directly between the towns of Hitchin and Luton and Luton and Stevenage could perform a key role in maintaining the separation of these towns.”*
19. The exceptional circumstances which justify the addition of the land to the south of the A505 to the wider Green Belt thus rest on the scale and nature of development activity and accessibility over the past 45 years, along with proposed Green Belt release. This is an opportunity to refine the Green Belt using a clear northern boundary which would in turn help to steer development to appropriate locations. In responding to these exceptional circumstances, designation of Green Belt in this location would fulfil the criteria set out in the NPPF (para 85), namely:
- “Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - Not include land which it is unnecessary to keep permanently open;
 - Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of

³ Non-Green Belt areas in this part of North Hertfordshire were identified previously through the East of England plan as appropriate locations for compensatory strategic Green Belt extensions in the light of proposed growth of Stevenage.

safeguarded land should only be granted following a Local Plan review which proposes the development;

- Satisfy themselves that Green Belt boundaries will not need to be altered at end of the development plan period; and
- Define boundaries clearly, using features that are readily recognisable and likely to be permanent.”

20. In terms of adding new land to the Green Belt the proposal to allocate sites to the east of Luton and safeguarding land to the west of Stevenage diminishes the Green Belt buffer between these large towns and places additional strain on the remaining Green Belt. The need to utilise Green Belt land for development has been set out and the requirement to ensure that Green Belt boundaries are robust and will endure beyond the plan period. The most enduring boundaries are the district boundary where it meets Green Belt in adjoining districts and the A505 which also forms the southern boundary of the Chilterns AONB in this location.

(b) What relationship, if any, is there between the exceptional circumstances leading to the alterations proposed to the Green Belt and the proposed spatial strategy/distribution of new housing?

21. There is a close relationship between the two.

22. HOU1 first establishes that *exceptional circumstances* exist as a matter of general principle (paragraph 4.97, p.24). It then recognises that the best approach to be taken must be considered on a site-by-site basis (paragraph 4.101, p.25). This must be informed by a balanced judgement of the harms and benefits of each site in the broader context of the housing situation (paragraph 5.9, p.27).

23. The general principles behind the site selection approach are set out in paragraphs 5.30 to 5.34 of HOU1 (pp.29-30) with summary reasons on a site-by-site basis provided in Appendix 2 of the same document.

24. The Council's overall approach to the identification and selection of housing sites is expanded upon further in its Matter 9 statement. Further justification of the site selection will be set out on a site-by-site / settlement-by-settlement basis in the Council's statements to Matters 10 and 11.

(c) What is the capacity of existing urban areas to meet the need for housing and employment uses?

25. Indicative capacity for **4,607** homes has been identified within existing urban areas. This information is summarised in Table A below.

Table A: Capacity of existing urban areas to meet the need for housing

Source of supply	No. of homes	Source of figure
Completions	1,994	ED3, Table 1, Line 1, Column C
Permissions	747	ED3, Table 1, Line 2, Column C <u>excluding</u> specific greenfield schemes ⁴
Windfall allowance	990	ED3, Table 1, Line 3, Column C
Broad locations	50	Letchworth Town Centre (see Matter 4, paragraph 26)
Allocated sites within existing urban limits (including greenfield sites)	828	LP1, subject to updates specified in ED3 ⁵
Total	4,607	

26. For the purposes of this answer and simplicity the following assumptions have been made:

- ‘Urban areas’ is taken to include the existing policy limits of all of the District’s towns and villages.
- All completions from the start of the plan period to 31 March 2017 are included. Although a proportion of these have occurred outside of existing policy limits, they have already been implemented and it would be unreasonable to deduct these from the estimate;
- All anticipated windfalls will be delivered within existing urban areas;
- All small site (<10 unit) permissions are within existing urban areas;

27. The last two bullet points will not be true in reality. The tightly constrained nature of existing settlement boundaries have focussed most development to date within existing urban areas though there have and will be exceptions. This might include use of previously developed land in rural areas, exception sites or small-scale greenfield schemes which are otherwise considered sustainable. However, any potential over-estimate of capacity arising from this approach can be offset by the fact that a cautious approach has been taken in setting windfall allowances (see the Council’s Matter 4 statement).

28. An employment land supply of **7 hectares** from within existing urban areas has been identified (ED5, Table 6, p.11)⁶.

⁴ The following schemes listed in full in Appendix 2 of ED3 have been deducted: Royston (for 330 homes), Pirton (78 homes), Hitchin (27 homes), Reed (12 homes) and Knebworth (70 homes)

⁵ Sites BA4 (part – 48 homes), BA5, BA6, BA7, BK2 (part – 6 homes), HT8, HT10, KB3, LG4, LG5, LG6 (for 27 homes), LG8, LG9, LG10, LG13, LG14, LG15, LG16, LG17 (for 32 homes), LG18, RY7 & RY8

(d) Is there any non-Green Belt rural land which could meet all or part of the District's housing and employment needs in a sustainable manner (having regard to any other significant constraints)?

29. A number of non-Green Belt, rural sites are allocated in the plan.

30. There are no substantial, alternate deliverable or developable rural sites identified in the evidence base that could be used to deliver a significantly different spatial strategy in a sustainable manner.

31. Appendix 2 of HOU1 shows that some potential housing sites in the rural area and villages identified in the SHLAA have not been carried forward for allocation. The reasons for these decisions are considered sound (see the Council's Matter 5 statement). In any event, allocating these sites would still not obviate the need for Green Belt development in the District if the Council was to even come close to reaching its OAHN.

32. A number of representors have suggested that the Council's housing needs could be better met by a new settlement⁷. The location of any such settlement is generally unspecified but there are some suggestions that this should be in locations beyond the Green Belt.

33. No specific site(s) or landholdings capable of accommodating a new settlement are being promoted through the Examination by landowners or their agents as an alternative to the strategy in the plan.

34. NHDC's position in relation to a new settlement is set out in Policy SP8 and its supporting text and also in the Delivery chapter of the plan. In summary, LP1 recognises:

- The long-term nature of new settlement planning (paragraph 4.101, p.50 as *informed by HOU6*);
- That initial investigatory work has been conducted and continues to be progressed (paragraphs 4.101 and 14.35, p.50 and p.224);
- The need to work with relevant agencies to identify new settlement options that may contribute to housing supply in the period after 2026 (Policy SP8(e)(i), p.48); and
- That the outcomes of the new settlement process will be reflected in a future full review of the plan to be completed by the mid-2020s at the latest (paragraph 14.37, p.224).

35. The issue of a potential future new settlement in NHDC has been considered and reflected in the plan as far as it realistically can for the time being. There is no

⁶ Sum of existing supply and site LG12.

⁷ Representation IDs: 144, 222, 249, 271, 274, 295, 491, 645, 729, 1680, 2143, 2405, 2845, 3503, 3565, 3573, 3587, 3722, 4139, 4160, 4246, 4384, 4411, 4435, 4468, 4475, 4522, 5134, 5137, 5286, 5345, 5474, 5602, 5603, 5606, 5635, 5640, 5641, 5643, 5683, 5728, 5729, 5730, 5735, 5925, 6057, 6141, 6241, 6348.

reasonable prospect of a new settlement in NHDC making any substantive contribution to housing requirements prior to 2026 and this will require a future review of the plan (see also the Council's Matter 4 statement).

36. The plan identifies currently undeveloped, non-Green Belt land at Royston for future employment development (LP1, Policy SP3(c)(iii), p.35; Site RY9, p.203)). No other rural land opportunities were considered in the evidence base.

37. There is further undeveloped land at Royston adjoining RY9. This is proposed as Urban Open Land in the plan. If the further undeveloped land adjoining RY9 was allocated for employment, this could lead to an imbalance between the location of proposed employment and proposed housing (see the Council's Matter 13 and Matter 15 statements).

e) What is the justification for excluding Category A Villages from the Green Belt?

38. The Green Belt Review (section 4) conducted a detailed assessment of the relationship between villages and their Green Belt context as required by the NPPF (para. 86).

f) What is the justification for excluding Blackmore End from the Green Belt?

39. Blackmore End is a relatively dense development of housing where the overall layout creates a spacious character. However, there is no open space and it is not located near to any town. The Green Belt Review (Section 4 p.72 and pp.86-87) found a limited contribution being made by the settlement to all purposes of the Green Belt, in particular having no immediate connection in respect of openness or contribution to its character. Consequently (and as per paragraph 86 of the NPPF⁸), there is, against Green Belt criteria, no reason to include the settlement within the Green Belt. The inseting of other villages (Breachwood Green, Graveley, St Ippolyts and Weston) was also recommended as part of the Green Belt Review, for different combinations of reasons.

⁸ *"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt"*

7.2 Is the Green Belt review based on a robust assessment methodology? In particular:

a) Does it reflect the fundamental aim of Green Belts, being to prevent urban sprawl by keeping land permanently open?

40. The Review determines the role of the Green Belt in respect of the complementary roles of preventing urban sprawl and maintaining openness (i.e. a general absence of built development)⁹. The Review tests the contribution of the Green Belt against the purposes set out in the NPPF (para 80), using clear criteria (Table 2.2 pp.16-17) to determine degree to which the overall openness of the Green Belt is protected. The specific analysis of Green Belt's contribution to preventing sprawl and maintaining openness by preventing encroachment is recorded in Table 2.4 pp.18-25 and Table 3.1 pp.34-61 for the strategic scale analysis and Table 5.3 pp.103-124 for potential development sites. In respect of the site assessment, the methodology at section 5.2 pp.99-101 sets out the basis for the consideration and sprawl and openness.
41. The Review uses the established technique of identifying and grading individual parcels identified at a strategic scale (Figure 2.3 p.15 and sections 2.5-2.11 pp.17-32), and subsequently at a more refined scale (Figure 3.1 p.33 and section 3.1 pp.34-66). Both scales of assessment aid the analysis of the relationship between urban areas and their rural hinterland in specific locations, where land can be subdivided for more detailed scrutiny whilst retaining the strategic context which allows for rounded decision-making.

b) Does it reflect the essential characteristics of Green Belts, being their openness and their permanence?

42. The role of openness and permanence of boundaries is considered at all stages of the analysis: in the identification of strategic and local parcels for analysis (Table 2.1 p.13) and in particular with regard to the assessment of the likely effect on the Green Belt of potential development sites (sections 5.1, 5.2 and 5.3). For the strategic analysis, the use of parcels which are defined by clear boundaries such as roads and other physical features, emphasises the quality of permanence (i.e. boundaries which could in principle contain development), whilst openness is determined by the existence of a general (but not exclusive) absence of built development. Potential effects on

⁹ **Sprawl** – spread out over a large area in an untidy or irregular way (Oxford Dictionary online). This includes **Ribbon development** which is development along a main road, especially one leading out of a town or village (Oxford Dictionary Online). This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads.

Encroachment– a gradual advance beyond usual or acceptable limits (Oxford Dictionary online). **The countryside** – open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry.

Openness – absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland / hedgerow cover).

openness (i.e. the broad absence of built development) are central to the assessment of the contribution of the Green Belt to the purposes of checking sprawl and safeguarding the countryside from encroachment as recorded in Table 2.4 pp.18-25 and Table 3.1 pp.34-61

43. The consideration in Section 4 pp. 67-98 of whether villages currently washed over by Green Belt should be inset into the Green Belt (as required by the NPPF at para 86) is a practical example of the determination of the balance between built development and its wider context, and in turn whether the quality of openness has become compromised by the extent and density of development (either before or subsequent to the designation of the Green Belt).

c) Does it reflect the five purposes that Green Belts serve, set out in paragraph 80 of the National Planning Policy Framework?

44. The Green Belt Review takes the five purposes of Green Belts as its reference point in the analysis of the role of Green Belt at strategic and local levels (para 12 p.9 and section 2.4 pp. 13-17). These purposes are considered individually through a desk and site-based review and professional judgement used to determine the relative contribution of specific land parcel to each (Table 2.4 pp. 18-25 and Table 3.1 pp. 34-61). To assist with the interpretation of these individual assessments, a judgement is made on the overall contribution of parcels to the fulfilment of Green Belt purposes which is recorded in the assessment tables (Table 2.4 and Table 3.1) and in the maps (Figure 2.8 p.31 and Figure 3.6 p. 66).

d) has account been taken of the need to promote sustainable patterns of development?

45. The sustainable development context for the undertaking of the Green Belt Review is noted at para 22 p.13, where the need to consider development sites in the Green Belt is stated. The Green Belt Review serves as one part of the evidence base for the Local Plan and through the analysis of individual sites (Section 5 and Table 5.3) identifies matters which are important in the wider consideration of sustainable development. The analysis in the Green Belt Review sets out the contribution of specific sites to Green Belt purposes, strategically and in detail, as a factor to be weighed as part of a broader judgement on whether release is appropriate in a particular location and the determination of the relative sustainability of proposed development sites in the Submission Local Plan¹⁰. The likely effect on the openness and permanence of the Green Belt are key judgements in this balancing exercise, informed by the Green Belt Review. It is a particular strength of the nested approach used in the Green Belt

¹⁰ Sustainability Appraisal of North Hertfordshire Local Plan Submission Version (CAG 2016) Appendix 3 and Appendix 13 and The Housing and Green Belt Background Paper

Review (i.e. strategic parcels, refined parcels and proposed sites) which can determine both strategic and local effects of potential development in the Green Belt.

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?

46. The Green Belt boundaries are considered to be capable of enduring beyond the plan period. The Green Belt Review (Section 5 and Table 5.3) considered boundaries when assessing parcels of land and individual sites to ensure that where possible any proposed boundaries were capable of permanence. Where new boundaries have been proposed they have been based on permanent features such as roads or other features which give a clearly defined edge. Where villages have been inset their boundaries have been considered to ensure that future sites, within the settlement boundary, are able to come forward.

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?

47. The Council's overall approach to safeguarded land is set out in the Housing and Green Belt Background Paper (HOU1, paragraphs 5.41-5.46, pp.30-31).

48. This recognises the approach set out in national policy but also that this approach needs to be carefully and pragmatically applied in the context of North Hertfordshire:

- The SHLAA (HOU9) has not identified significant areas of additional potential Green Belt land which are not already being allocated in the plan¹¹; while
- It is most appropriate to allow other processes that will inform the 'reasonable alternatives' for future plan reviews to run their course - most notably in relation to the potential for a new settlement(s) within the District.

49. In this context, this plan does not propose to safeguard significant additional tracts of Green Belt land.

50. Notwithstanding this general approach, the plan does safeguard a significant area of land to the west of Stevenage. The SHLAA (HOU9, Appendix 4, pp 47) and Plan (LP1, Policy SP8(e)(ii), p.48) identifies that this land has the potential to accommodate

¹¹ The SHLAA / HOU1 make clear that some of the Green Belt sites which have not been carried forward as allocations in the plan are located in areas of flood risk and would only be suitable opportunities in the event that a sequential approach and exceptions test demonstrated they were needed.

approximately 3,100 homes. The Council's answer to question 7.4(c) addresses this point in further detail.

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?

51. It is not considered appropriate to identify significant additional safeguarded land at this point.
52. The Plan recognises that, in the longer-term, a future strategy focused on continual incremental additions to existing settlements may not be the best solution (LP1, paragraph 4.100, p.50)
53. The review and release of land undertaken as part of this plan would extend a number of the District's towns¹² and villages to their logical maximum in a number of directions. This is expanded upon under relevant Matter 10 statements for individual sites and settlements. There are limited further strategic-scale opportunities that it is reasonable to foresee at this time as being available within the limits of Green Belt policy, current infrastructure capacity or other planning constraints.
54. It is presently anticipated that alternative options for accommodating growth in future plan periods are likely to first necessitate exploration of a new settlement approach and the operation of the Duty to Co-operate rather than pursuing further expansion of settlements located within the Metropolitan Green Belt.
55. However, each settlement will need to be assessed for further expansion capacity to inform this process and the above should not be taken as an absolute assurance that longer-term development needs can be met without any further review of the Green Belt.

c) What is the justification for safeguarding the area identified to the west of the A1(M)?

56. The justification for the safeguarding of land to the west of the A1(M) is summarised in paragraphs 5.45 and 5.46 of HOU1 (p.31).
57. This site has a long history of being identified through the statutory plan-making process as a suitable location for future development. This includes the Hertfordshire Structure Plan Review 1991-2011 (1998) and the East of England Plan 2001-2021 (2008).

¹² As identified in Policy SP2. This includes towns (currently) neighbouring or located substantively outside of the District.

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58. In 2009, following a call-in Inquiry, planning permission was granted for 3,600 homes on land straddling both North Hertfordshire and Stevenage, including a substantial part of the land now proposed for safeguarding. This permission was subsequently quashed in 2011.
59. The site is located in relative proximity to Stevenage's town centre, railway station and main employment area. On a pure 'suitability' analysis (i.e. excluding any consideration of availability and achievability), this site would perform at least comparably with the other major urban extensions in the plan.
60. However, the SHLAA recognises that delivery of this site requires a new crossing point over [or under] the A1(M) to allow integration with the remainder of the town. This would be a major cost to development. In the absence of a viable, pro-actively promoted scheme, this factor is likely to delay development until external assistance is secured to assist in delivery. This results in the SHLAA identifying a 'refined dwelling estimate' within the plan period of just 500 homes (HOU9, Appendix 2, p.48, Site ref WSN).
61. Safeguarding this land is intended to provide a catalyst for NHDC, SBC and other parties to further explore the issues which preclude the site from being identified as a deliverable allocation at this point in time. This is reflected in the agreements reached with both SBC (MOU11, paragraphs 4.10 to 4.12) and the Hertfordshire Local Enterprise Partnership (MOU9, paragraph 4.8).
62. SBC's emerging plan allocates the land within their own administrative area for development over the plan period. This is necessary to ensure any development within North Hertfordshire contributes to a logical, coherent and well-planned extension to the town.
63. For the reasons above, the Council does not agree with a number of representations to the plan which suggest this site can and / or should be used now as an alternative to a number of sites or locations in the plan¹³.
64. Notwithstanding this point, the potential for the proposed safeguarded land to make a contribution to housing requirements in the period after 2026, and following a future review of the plan, is one of the factors supporting the 'broad location' allowance in the Council's housing figures (see Matter 4 Statement on Issue 4.2(d)).
65. The Council equally does not accept the position of SBC that the safeguarded land should be reserved for the Borough Council's future needs. The two authorities agree that SBC's current plan meets its objectively assessed needs in full (MOU11, paragraph 4.8).

¹³ Representation IDs 288, 505, 779, 1228, 2854, 3574, 3580, 3859, 4169, 4309, 4468, 4474, 4475, 4479, 4522, 5138, 5142, 5143, 5345, 5487, 5728, 5730, 6057, 6141,

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66. Until such time as SBC updates its assessments of need and supply for the period after 2031, it is not possible to quantify any future housing shortfall that may arise within the Borough.
67. Similarly, until NHDC conducts a similar exercise, and also takes account of any requests from any other local authorities to assist in meeting future housing needs under the Duty to Co-operate (or any successor arrangements), it is not possible to determine the extent to which NHDC may be able to assist in meeting any future unmet needs from SBC. These are all matters for a future plan review to consider.