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NORTH HERTS LOCAL PLAN 2011 – 2031

SUBMISSION DRAFT

GREEN BELT

**Notes on North Herts approach to its Current Green Belt
policy and designation.**

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1 INTRODUCTION

- 1.1 The following note has been produced for Save our Green Belt group to provide information on the proposals within the Submission North Herts Local Plan to remove a number of sites and areas from the current Green Belt and to provide compensatory Green Belt. The note provides a summary of the current position in the existing adopted Local Plan and then considers how the Council has arrived at its proposed policy and its reviews of the Green Belt.

Existing Local Plan – District Local Plan No.2 With Alterations 1996

- 1.2 Policy 2 sets out the policy on Green Belts and largely reflects the guidance on Green Belt then set out in the 1988 PPG2 (quoted in the supporting text at para 2.5). The supporting text at paragraphs 2.6 to 2.12 confirms that the LPA looked at the boundaries during the course of preparation of the Plan. In respect of the general area of the Green Belt to the east of Luton, the Council looked at the factors which would define the outer boundary, including the roles of settlements in the area around Luton. The LPA considered that Kimpton village was linked with Luton as a workplace and its size and shape were such that development opportunities were confined to the current village area. The Council concluded that Kimpton should be surrounded by the Green Belt but be an 'excluded village' itself.
- 1.3 The Council also stated that it took account of the long-term development needs of the settlements within the Green Belt and of the District as a whole and that it considered the boundaries around the towns could not be altered any further without contradicting the purposes of the Green Belt. The 1996 Plan proposed relatively few changes to the boundaries first defined in 1981 and in the previous Local Plan.

2 REVIEWS OF GREEN BELT

Chronology

- 2.1 The boundaries of the current Green Belt are therefore set in the 1996 Local Plan and as stated above, were not significantly altered to accommodate development from the 1981 Local Plan.

Core Strategy Preferred Options Paper

- 2.2 Prior to the preparation of the current draft Local Plan, the Council had undertaken work on preparing a Core Strategy and published a Core Strategy Preferred Options Paper in September 2007. That document indicated that draft Core Strategy Policy C8 Housing Provision and Distribution gave guidance on where reviews would be necessary to enable adequate housing provision paragraph 5.18. The preferred policy wording following the paragraph allowed for compensatory green belt to be provided. Paragraph 5.18 also advised that reviews may also be necessary at the villages referred to in policy C5 on Settlement Hierarchy to define village boundaries. The Preferred Options gave no indication of the locations where Green Belt reviews were to take place other than in general areas. It also gave no real reasons for the need for compensatory green belt but it is understood that the draft Core Strategy was prepared in anticipation of the emerging East of England Plan.
- 2.3 The Core Strategy Preferred Options Paper was accompanied by the Development Policies Preferred Options Paper but that gave no further indication of the Council's proposed Green Belt review and compensatory designation.

East of England Plan

- 2.4 The East of England Plan adopted in May 2008, set out a general endorsement for reviewing the Green Belt and for providing compensatory Green Belt at Policy SS7 – Green Belt. The policy stated that:

'The broad extent of green belts in the East of England is appropriate, and should be maintained. However, strategic reviews of green belt boundaries are needed in the following areas to meet regional

development needs at the most sustainable locations'

2.5 One of the areas included was the Stevenage area, involving land in Stevenage and North Hertfordshire. RRS Policy SS7 also stated that *'The reviews at Harlow and Stevenage should identify compensating strategic extensions to the green belt in East Hertfordshire and North Hertfordshire respectively.'*

2.6 The explanatory text to the Plan advised: *The reviews will result in significant change locally but can be made without eroding the principles and overall functioning of the green belt. The potential for more co-ordinated management of the countryside throughout the green belts in the region should be investigated and consideration given to preparing joint strategies to enhance landscape character, recreational access and habitats.*

2.7 And that :

Policy 5 of the 1998 Hertfordshire Structure Plan described the general area of a green belt extension between Stevenage and Luton in North Hertfordshire District. While no longer part of the Development Plan, the provisions of that policy still provide a sound basis for redefining boundaries in that area. The extensions between Stevenage and Luton and to the north of Harlow will increase the overall area of green belt in the region, taking account of the releases in line with Policy SS7 and at Luton.

North Hertfordshire Housing Growth Targets 2011 to 2031

2.8 In February 2012 the Council published its consultation on Housing Growth Targets 2011 to 2031. The consultation document indicated that the Council had identified 8 possible growth options (A to H) ranging from the 15,800 extra homes identified in the Review of the East of England Plan to 2,500 but that, following initial consultation with stakeholders, the Council had decided that its preferred option was for 7,000 extra homes. None of the options included growth on the edge of Luton as the Council stated that given the distance between the main towns of North Hertfordshire and Luton, it believed there was no apparent justification for development east of Luton in the Green Belt.

2.9 The options are listed and include a list of positive and negative effects. Options

A to D (15,800 dwellings to 11,000 dwellings) all indicated that the level of development would require significant development of greenfield and green belt land. Options E and F (7,700 -7,000 dwellings) would require some development of greenfield and green belt land whilst the last two options did not require green belt land but would not provide enough affordable housing.

- 2.10 Option A reflected the East of England review target of 15,800 dwellings of which 9,600 dwellings were to be within the district on the edge of Stevenage and 6,200 in the rest of North Herts. Options B, C and D all relied upon the significant, but reducing, levels of growth on the edge of Stevenage.
- 2.11 Option E, the preferred strategy, excluded the completions at Great Ashby on the edge of Stevenage as the Council considered that Gt Ashby was originally justified as meeting the needs of Stevenage rather than North Herts. However, the paper indicated that trying to deliver 7,700 dwelling without any development on the edge of Stevenage would necessitate using nearly all the sites that the Council had assessed in its SHLAA around Hitchin, Letchworth Garden City, Baldock, Royston and the villages and included Green Belt land.
- 2.12 The paper was accompanied by a Sustainability Appraisal of Growth Options which considered the impact on greenfield sites but did not address Green Belt land and the impact/loss of such land.

Housing Options Growth Levels and Locations 2011 – 2013

- 2.13 The Council arrived at different housing targets in its Housing Options Growth Levels and Locations 2011 – 2013 which was published the following year in February 2013 following the publication of the NPPF. That document related to an increased proposed housing target of 10,700 dwellings, derived from the 2012 SHMA, and confirmed that some of the identified potential strategic sites would need to be used as there were insufficient 'non-strategic sites' to meet the target. The document contained an assumption that any new settlement would be likely to require a large scale of development, that it would consume a huge amount of countryside and that the time to work up such a major scheme is such that it would not contribute to many dwelling sin the plan period up to 2031. (paragraph 1.48). Therefore the consultation looked at seven strategic sites which have been promoted through the SHLAA. All seven sites consulted on are

located in the Green Belt.

- 2.14 The document also identifies the various non-strategic sites within the district which include on the edge of Baldock and Royston as well as the villages.
- 2.15 There is no mention of the implications on Green Belt policy and no assessment of suitability of taking land out of the Green Belt or compensatory green belt.

North Hertfordshire Green Belt Review

- 2.16 The Council carried out its first green belt review since 1996 in 2013/14 and published its report North Hertfordshire Green Belt Review in May 2014. The review was to assess *'the contribution of Green Belt land within North Hertfordshire to the functions of Green Belt as set out in paragraph 80 of the National Planning Policy Framework (NPPF)'*. The review is set out in two parts - Part 1 is a strategic level review of the current Green Belt and a more detailed assessment of potential development sites; and Part 2 is an assessment of countryside beyond the Green Belt which could have the potential to be designated as Green Belt as well as the identification of a future Green Belt boundary.
- 2.17 The Part 1 document is available on the Council's website and confirms that the last time the Green Belt had been reviewed was in 1992. The report confirms that only the area to the west of the district between Luton and around Stevenage/Hitchin was assessed as the northern area of non-greenbelt was deemed to have lower development pressures.
- 2.18 The review concludes that existing areas of green belt in areas 3 (Peters Green), 4 (Porters End), 5 (Codicote) & 7 (Old Knebworth) all provide a limited contribution to Green Belt purposes but that they do safeguard the countryside from encroachment. Areas 2 (Lilley Bottom) and 9 (Langley) make a moderate contribution to the Green Belt, whilst Areas 6 (Pottersheath) and 8 (Knebworth) make a significant contribution to the Green Belt.
- 2.19 Although the report refers to a Part 2 assessing the countryside beyond the green belt which has the potential to be designated as green belt, the document does not form part of the published review and there is no record of its

publication on the Council's website.

Green Belt Review

- 2.20 The Council produced the Green Belt Review in 2016 which states that it brings together in one place Green Belt Review documents previously consulted upon by the Council and incorporates amendments made in the light of those consultations. The 2014 Part 1 report is carried forward but has been subject to review with some of the conclusions on the areas being revised. As a consequence, those areas considered previously to provide a limited contribution to the Green Belt (Areas 3, 4, 5 and 7) are now considered to make a moderate contribution together with Areas 2 and 9 whilst Areas 6 and 8 continue to be significant (Table 2.4 Strategic Assessment of Existing Green Belt).
- 2.21 Table 6.5 of the Report provides a more refined view of the Green Belt by subdividing the respective areas considered in Table 2.4. The table and the explanatory text appear to create some anomalies if compared to the overall function of the areas set out in Table 2.4 and referred to in the previous paragraph. For instance, the two areas for Codicote – 5a and 5b both now make moderate contributions by locally helping to contain the growth of Codicote and contributing to the separation of the neighbouring settlements of Codicote and Welwyn (5a) and Codicote and Potters Heath (5b) and their contribution to safeguarding the countryside from encroachment has been increased from a combined assessment of moderate to individual ones of significant.
- 2.22 The report also considers the possibility of inseting some of the villages that are currently located within the Green Belt (section 4) and carries out an analysis of potential development sites in the Green Belt.
- 2.23 The report makes no assessment of the suitability of taking sites out of Green Belt in terms of whether very special circumstances exist to justify their development.

3 COMPENSATORY GREEN BELT

- 3.1 Part 2 of the Green Belt Report 2016 relates to the Assessment of Countryside beyond the Green Belt and again breaks down the area into segments with each part assessed in Table 6.5 against the 5 purposes of the Green Belt. All the areas except the northernmost one at Pirton are considered to be able to make a moderate overall contribution to Green Belt purposes. Pirton is considered to be limited in its contribution.
- 3.2 The Reports concludes that parcels A, B, C, D, E and F could be added to the Green Belt in order to substantiate its role in this location based on potential encroachment of built development into this relatively accessible open countryside. The case for parcels G and H which also lie within the Chilterns AONB is less strong.
- 3.3 The report also confirms that the Council would take account of the allocation of large strategic development sites on the eastern edge of Luton and the western edge of Stevenage as well as the growth of Hitchin. The addition of these parcels is seen as providing a more durable and defensible area of Green Belt that is necessary to keep permanently open between the three settlements. It would be proposed to 'cut out' boundaries to the existing small village settlements which are found within the new areas of Green Belt.
- 3.4 In making this recommendation, the report refers to consideration being given to the need to identify safeguarded land for meeting development needs in the longer term and that this function would be met by the removal of the west Stevenage strategic site and employment land at Baldock from the Green Belt. A consequence of removing the west Stevenage area from the Green Belt is that only a very small section of existing Green Belt between the site and the B656 would remain. This is seen as providing further justification for the inclusion of parcels C, D and E within the Green Belt moving forward.
- 3.5 The report argues that, in the interests of providing clearly defined boundaries which will be recognisable and permanent, it is considered appropriate to include parcels A, B and F as well. Parcel A is located in a small gap in the south of the district between the villages of Kimpton and Codicote. This area would also

adjoin the existing Green Belt area within St Albans City and District Council area.

- 3.6 Omission of parcel B was seen as producing an incoherent Green Belt boundary and it is therefore recommended that it be included within the revised Green belt boundary. The inclusion of parcel F was also justified in order to provide a strong northern boundary to the Green Belt in this part of the District in the form of the A505 dual carriageway. The report states that; *'Having regard to these considerations it is proposed to include these areas as both compensation to the removal of existing Green Belt for sustainable development growth in the District and also in the interests of maintaining the overall value of the Green Belt in North Hertfordshire as a measure for maintaining the separation of towns and the openness of the countryside.'*

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'.

- 3.7 The report also advises that the three villages proposed to be included within the Green Belt (Great Offley, Preston and Whitwell) should be inset.

4 SITES WITHIN THE COMPENSATORY GREEN BELT AREA

- 4.1 During the course of the preparation of the Local Plan, several sites have been identified for development in the villages that are now being proposed to be included within the Compensatory Green Belt area. In the early stages of the plan, the Housing Options and Growth Levels listed all the sites being advanced for development and provided the Council's assessment of their merits. This resulted in most of the sites being advanced in these villages being considered to be unsuitable or at best, moderately acceptable (Priority 2). As with Royston, (and Codicote) a later site seems to have emerged in St Pauls Walden (Whitwell) in the 2015 New Sites Document and SHLAA update 2016.
- 4.2 Prior to that, the sites identified in the Housing Options Growth Levels and Locations: February 2013:
- Kimpton - Three sites totalling 96 dwellings. The largest site (69 dwellings) was assessed to be unsuitable whilst the other sites were considered to be possibilities (Priority 2).
 - Offley - two combined sites = 62 dwellings were considered to be acceptable (Priority 2) and were located within the village.
 - Preston – total of 102 dwellings – all the sites were deemed to be unsuitable.
 - St Pauls Walden (Whitwell) – two sites totalling 111 dwellings. 44 = Priority 2 and 67 dwelling site = Priority 3 and therefore unsuitable.
- 4.3 The Housing Additional Locations Options July 2013 identified some additional sites in Offley and Preston. None were significant sites.
- 4.4 None of the site previously identified for Offley and Preston have been followed through and no sites are proposed to be allocated in these villages in the Submission LP.
- 4.5 One site small infill plot at Kimpton has been identified as a proposed allocation in the Submission LP. At St Pauls Walden (Whitwell), a site emerged in the

2015 New Sites consultation – Site 348 Land between Horn Hill and Bendish Lane, Whitwell for 60 dwellings. This site has been carried through as a proposed allocation site (SP2) into the Submission LP but is proposed for 41 dwellings and the site excluded from the proposed new Green Belt.

4.6 There are no other sites put forward in these villages of any significant size such that they would justify allocations.

5 CONCLUSIONS

- 5.1 The principle of compensatory Green Belt appears to have been introduced in the East of England Plan as there was no suggestion before this time that any significant review of the Green belt was required or that compensatory Green Belt should be provided. Although the RSS has been revoked, its policies formed the basis of North Hertfordshire's emerging policy in its draft Core Strategy which in turn has formed the basis of its latest policies in the recent Submission Local Plan. The documents that have been published seem to carry on the assumption that development in the Green Belt will take place and that compensatory Green Belt will be provided. The reports and reviews that have been prepared on behalf of the Council and which are available, appear to start with this surmise rather than examining whether there are any special circumstances to support the removal of sites from the Green Belt and the need for additional land to be provided as Green Belt. There appears to be no attempt to quantify how much Green Belt is required to compensate for that which is proposed to be lost or even, if compensatory Green Belt is the correct approach.
- 5.2 It is noted that the Inspector has raised a number of questions regarding Green Belt which the Council will need to address. Once the Council's papers are available, some of the shortfall in information should be addressed. That information however, may generate additional queries which the Group may wish to raise. Those matters are likely to have to be addressed at the EIP as the timescale for submissions will have passed.