

Examination of the North Hertfordshire District Council Local Plan 2011-2031

Hearing statement by Save our Green Belt in Rural North Hertfordshire (SOGB) on Matters Related to the Countryside and Green Belt

Matters 5, 7, 9 & 15

Specifically:

- **Issues 5.1 (f) - Influence of Green Belt constraints**
- **Matter 7 - Countryside and Green Belt: The Green Belt review and the approach to safeguarded land (Policy SP5)**
- **Matter 9.2 (a) - Site selection methodology**
- **Matter 15 - Countryside and Green Belt: the policy approach to the Green Belt, Rural Areas beyond the Green Belt and Urban Open Land (Policy SP5)**

1. Save Our Green Belt in rural North Hertfordshire (SOGB) is an unincorporated association comprising the following groups or parishes all affected by the proposed release of Green Belt for housing, including: Save Rural Codicote, Ickleford Parish Council, Graveley Parish Council, Wymondley Parish Neighbourhood Plan Forum, Knebworth Parish Council, Offley Parish Council, including the village of Cockernhoe. SOGB is supported by a number of members of the public across North Herts. Each objector has raised concerns about Green Belt release in their individual objections. Given the overlap of issues affecting their localities, they have come together to make their case that the release of the Green Belt for housing is not justified, and therefore the proposed plan is not justified and unsound.
2. It is clear from the emphasis given in the Inspector's Matters and Issues for the Examination that the focus will be on Green Belt release and provision of new so-called "compensatory" Green Belt and that approach is absolutely fundamental to the entire proposed spatial strategy. Green Belt issues impact on the Housing Strategy (Matter 5; Issue 5.1(f) "*Has the Green Belt, and any other constraints, influenced the distribution of housing...*").
3. It is also at the heart of Matter 9, the basis for the housing allocations and the settlement boundaries (Matter 9; Issue 9.2 "*Has information from the SHLAA formed the starting point, then the outputs from the SA and the Green Belt review considered, along with an assessment of suitability, availability and achievability?*") followed by the Inspector's request at 9.2 that "*the Council clearly and precisely explains the site selection process/methodology, including all of the criteria considered. A flow chart may assist.*"
4. These questions lie at the heart of the communities' concerns about a policy based on Green Belt release and Compensatory Green Belt to "fix matters" and naturally require close scrutiny through this EiP. What the Council says in response to the specific issues raised in the Matters and Issues Report needs to be carefully considered, and there may be a need to supplement this note once the Council's response is circulated and considered. In the meantime SOGB submit a short note by Hutchinsons Planning and Development

Consultants to explain how Green Belt in Hertfordshire has historically functioned by way of background to the questions SOGB has about how the Council has arrived at its proposed Green Belt release basis to meet future housing needs. The salient findings emphasise how important the Council's response to the Hearing Issues will be to understanding and assessing whether this proposed future housing strategy, based in large part on Green Belt release, is justified.

5. Green Belt in Hertfordshire helps to check the unrestricted sprawl of Greater London along the main route corridors in Hertfordshire and was introduced in 1979 in the Hertfordshire County Structure Plan (see Knebworth Parish Council objection, para 1).
6. As the Hutchinsons report records the boundaries of the current Green Belt were set in the 1996 Local Plan and remained such during the 1981 Local Plan. The move to modify the Green Belt within the District initiated in September 2007 [AH: 2.2] and sought to provide "compensatory" Green Belt along with a 2008 strategic review which identified land around Stevenage and North Hertfordshire. [AH: 2.2-2.3]. *"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."*
7. The first Green Belt review was done in 2013/2014 and as Hutchinsons records:

"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"

8. A second Green Belt review followed in 2016 which revised the position in the 13/14 Review. Hutchinsons notes that areas identified in 2013/14 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).
9. However Hutchinsons raises concerns with the 2016 Green Belt review noting *"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."* These concerns are echoed in specific consultee responses, which will be explored in greater detail in Matter 11. But by way of example:

(a) Ickleford Parish Council (IPC) objected to removal of Green Belt land (sites IC1, IC2, IC3) noting in its objection that the July 2016 Green Belt review "misrepresents the value of Ickleford Green Belt in preventing the merging of neighbouring town; this is given a low ranking of 1. However the Ickleford Green Belt plays an important role in preventing the merger of Hitchin and Letchworth, and also that of Hitchin and Henlow/Stondon." (IPC submissions dated 29/11/16)

(b) Knebworth Parish Council points out that sites within its parish are

considered to make a significant contribution to Green Belt without clear explanation why these sites are now being removed from the Green Belt.

10. Section 3 of the Hutchinsons Report discusses how the 2016 Green Belt report assessed the provision of compensatory Green Belt.
11. Section 4 addresses the issues of Sites within the Compensatory Green Belt Area.
12. In short Hutchinsons conclude that the two Green Belt reviews of 2013/2014 and 2016 do not address the fundamental question of how much Green Belt should be released or should be provided.

Matter 7 - Do exceptional circumstances exist to justify removal of land from the Green Belt

13. In relation to the principal issue of availability of non-Green Belt land your attention is drawn to the Wymondley Parish Neighbourhood Plan Forum objection at para 1(a) where reference is made to the land east of Baldock - land which was originally identified as a potential garden city in 1911 by Ebenezer Howard. This site is outside of the Green Belt and is now the subject of the North Hertfordshire New Settlement Study by Mott Macdonald published by the Council in April 2016. The proposal is for a settlement of at least 5,000 new dwellings and new employment land and associated infrastructure.
14. SOGB urges close scrutiny of Council's view that the settlement in this location is required but cannot be delivered within the current plan period. For example do the reasons why the Council consider delivery is not possible withstand scrutiny in a circumstance where the alternative is large swaths of Green Belt release? SOGB consider this scrutiny necessary to meet the exceptional circumstances test since the Council accepts that the proposed settlement would avoid the need to make the significant Green Belt modifications now being proposed.
15. Finally SOGB consultees have raised concerns with the lack of a comprehensive "call for sites" given the importance of testing the need to release Green Belt land.

Matter 15 - SP5

16. SOGB urge modifications to SP5 to time delay formal removal of land from the Green Belt as a last resort after non-Green Belt development has come forward. The justification for this modification to SP5 is to enable the Council to progress the North Hertfordshire New Settlement, which could remove the need to modify extant Green Belt boundaries. The specific SP5 text should be reworded:

"a. Have conducted a comprehensive review of the Green Belt. Land ~~has been~~ will be removed from the Green Belt only at such time after non Green Belt sites have come forward for development consent and only after the Council completes its work on the North Hertfordshire New Settlement Study."

17. Further, or alternatively, the Council should commit to an early review of the

Plan to determine whether the land released from the Green Belt should remain released or added back in, in light of the availability non Green Belt sites at that time.

Submitted by Richard Buxton Environmental and Public Law on behalf of SOGB

3 November 2017