



## **Gladman Developments Ltd**

### **Examination of North Hertfordshire Local Plan 2011- 2031**

#### **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 removing land from and adding land to the Green Belt?**
- 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?**
- c) What is the capacity of existing urban areas to meet the need for housing and employment uses?**
- 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)?**
- e) What is the justification for excluding Category A Villages from the Green Belt?**
- f) What is the justification for excluding Blackmore End from the Green Belt?**

7.1.1 The NPPF advises, in paragraphs 82 to 85, that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation and review of the Local Plan. It also makes clear that new Green Belts should only be established in exceptional circumstances for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;

- set out whether any major changes in circumstances have made adoption of this exceptional measure necessary;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas;
- show how the Green Belt would meet the other objectives of the Framework

7.1.2 Policy SP5 of the Local Plan proposes the removal of Green Belt designation to allow for the allocation of strategic development sites, to enable local development around some of the District's towns and villages and to define boundaries for villages currently washed over by Green Belt. It also proposes the creation of a new area of Green Belt around Offley and Whitwell *"in part to offset the Green Belt releases necessary to meet housing needs, particularly in the Stevenage, Hitchin and Luton area."*

7.1.3 Gladman supports the proposed removal of Green Belt designation proposed in the Local Plan. It considers that the urgent need for housing development in the District, together with the need for that growth to be directed to the most sustainable locations within the District, represent the exceptional circumstances for change to Green Belt boundaries. Gladman considers that the Council has undertaken an appropriate process in determining whether the exceptional circumstances exist for the allocation of sites for housing currently in the Green Belt and it is clear that whilst there are opportunities for additional housing allocations on in sustainable locations on non-Green Belt locations in the District, these are in the main small scale and would not remove the need for large strategic allocations in the Green Belt particularly in the Stevenage HMA.

7.1.4 The proposed new Green Belt area in the vicinity of Offley and Whitwell is not, however, supported by Gladman. The proposed new Green Belt fails to comply with the criteria set out in the NPPF as referred to above. Neither the Plan nor the Housing and Green Belt Background Paper provide an explanation of what the exceptional circumstances are that justify the designation of a new Green Belt area. There does not appear to be any evidence that the development management policies included in the Local Plan would not adequately protect the area in question from inappropriate development. Indeed Policy SP5 also proposes the operation of a *"general policy of restraint in Rural Areas beyond the Green Belt"*. Within the Council's evidence there are no major changes of circumstance identified which justify the establishment of this new area of Green Belt. The creation of a new Green

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<sup>1</sup> Submission Local Plan Para 4.55

Belt in this area will prevent the growth of sustainable rural settlements such as Offley which would be contrary to the aspirations of the NPPF in terms of maintaining the vitality of rural communities.

- 7.1.5 The 2016 Green Belt Review undertaken by the Council fails to identify the exceptional circumstances that are needed to justify the creation of new Green Belt. None of the eight study parcels were found to make a significant contribution to the purposes of the Green Belt. The only significant contribution was in respect of 'assisting in safeguarding the countryside from encroachment'. This can readily be achieved through the application of development management policies for the open countryside.
- 7.1.6 Gladman refer to the Interim Views<sup>2</sup> of the Inspector who examined the Cheshire East Local Plan in which the creation of new Green Belt was originally proposed. In that instance the Inspector considered that *"there seems to be little evidence to suggest that normal planning and development management policies ....would not be adequate"* and that *"having considered all the evidence, factors and discussion on this matter, there seems to be insufficient justification to establish a new Green Belt in this locality."*
- 7.1.7 Gladman considers that the circumstances of the proposed new Green Belt in the North Herts Local Plan are directly comparable with the Cheshire East Local Plan proposals and should be regarded as unsound. In the absence of an adequately researched and justified evidence base to support the proposed new Green Belt for North Herts, this should be deleted from the Plan.

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<sup>2</sup> Inspector's Interim Views 6/11/14 Cheshire East Local Plan EiP Para 92