



North Hertfordshire Local Plan 2011 - 2031

Green Belt Review

Update 2018

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Notes

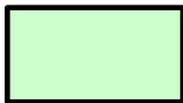
1. Unless otherwise stated, the main report uses the following colour coding in its tables and maps:



Site or parcel makes a **significant contribution** to Green Belt purpose(s)



Site or parcel makes a **moderate contribution** to Green Belt purpose(s)



Site or parcel makes a **limited contribution** to Green Belt purpose(s)

2. The revised National Planning Policy Framework (NPPF) was published in July 2018. Paragraph 214 states that the policies in the previous (March 2012) Framework will apply for the purpose of examining plans submitted on or before 24 January 2019. References to the NPPF in this document (including paragraph numbers) are therefore references to the March 2012 version.
3. This report uses Ordnance Survey mapping data reproduced under licence. © Crown copyright and database rights 2018 Ordnance Survey 100018622

1 Introduction

- 1.1 This report has been prepared as an update to the Green Belt Review (Examination Library reference CGB1) which was submitted alongside the North Hertfordshire Local Plan (the Plan) (LP1) in June 2017.
- 1.2 Green Belt is one of the oldest and best-known planning policies. The balance to be struck between meeting development needs and preservation of the Green Belt is central to the emerging Local Plan of North Hertfordshire, as well as the emerging plans of many other Green Belt authorities.
- 1.3 The National Planning Policy Framework (NPPF) is clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with essential characteristics of Green Belt being openness and permanence¹.
- 1.4 Notwithstanding this advice, the NPPF does allow for changes to Green Belt boundaries to be made through Local Plans. However, it also states that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”².
- 1.5 The Green Belt Review assessed the ‘performance’ of strategic land parcels, sub-parcels and sites being considered for development in the Plan against the purposes of Green Belt set out in national policy. In turn, this Review helped inform the overall strategy of the Plan and the selection of sites for allocation. It assisted in supporting the Council’s view that the necessary *exceptional circumstances* exist to support a review of Green Belt boundaries in the emerging Plan.
- 1.6 This position is set out in the Plan itself³ as well as in the supporting Housing & Green Belt Background Paper (Examination Library Reference HOU1⁴). This position was reinforced in statements and evidence submitted to the Examination by NHDC which considered the harm to the Green Belt of the proposed allocations in the Plan on a case-by-case basis. In line with the principles of relevant case law, this evidence also considered the extent to which these harms might be ameliorated to the fullest reasonable extent should sites be developed.
- 1.7 The adequacy of the Green Belt Review and the Council’s overall approach to the release of land from the Green Belt has been challenged by some representors through the Examination process. This includes written legal submissions submitted by *Save our Green Belt*⁵.
- 1.8 Since the methodology was adopted and the fieldwork informing the Green Belt Review (CGB1) was completed, the Court of Appeal in *Samuel Smith Old brewery –v-North Yorkshire County Council [2018] EWCA Civ 489* has established that an assessment of (potential) development on the openness of the Green Belt includes consideration of the impact of that (potential) development upon the visual dimension of openness as well as the spatial dimension of openness.

¹ Paragraph 73 of the National Planning Policy Framework (NPPF).

² Paragraph 83 of the NPPF

³ See, in particular, Policy SP5 and associated supporting text (LP1, p.41).

⁴ Paragraphs 4.12 to 4.58 (pp. 13-19), 4.93 to 4.101 (pp.24-25) and Appendix 2 (pp.56-65)

⁵ Examination Document ED87

- 1.9 There are already references within the existing Review which relate to both the 'spatial' and 'visual' dimensions of the openness of the Green Belt, and these considerations have informed the assessment of the extent to which the existing Green Belt meets the five purposes of Green Belt in the NPPF.
- 1.10 Therefore by implication, the fact that the impact of development upon both the visual and spatial dimensions of the existing Green Belt is already considered in the existing Review this is in all probability sufficient to satisfy the tests for assessment of the impact of development on the Green Belt as stated by the Court of Appeal.
- 1.11 However, in light of the fact that objectors have made representations that the Green Belt Review is inadequate in this respect and in light of the recent Court of Appeal decision, it is considered prudent to produce this update to the original review in order to explicitly take account of the effect of proposed development on the visual dimension of openness as well as the spatial dimension.
- 1.12 Part One of this report presents the findings of the Update to the existing Green Belt Review, together with a comparative analysis of these findings against the original Green Belt Review to identify those parts of the Green Belt where the Update leads to differing conclusions from those presented in CGB1.
- 1.13 Part Two of this report then considers the implications of any differences within the Update for the emerging Plan. This includes consideration of the wider planning judgements which are necessary in arriving at the development strategy in the Plan. It reaches a conclusion on whether it is appropriate to suggest any main modification to the plan as a result.
- 1.14 The fieldwork informing this review was completed between June and August 2018.

Part One: Green Belt Review Update

2 Refined methodologies

- 2.1 Green Belt Review methodologies inevitably evolve and have been refined since the original Green Belt review was undertaken. A current 'best practice' methodology is reproduced in Appendix 1. In particular, this ensures explicit and consistent evaluation of the matter of the openness of the Green Belt, both physically and visually.
- 2.2 This update has used this latest best practice methodology to consider the strategic parcels, sub-parcels and sites defined in the original Green Belt Review. This methodology explicitly takes into account the visual dimension of openness in considering the purpose of the Green Belt and the effect of development upon it. This allows for comparison with the results of CGB1 in order to determine whether applying the latest methodology would have made a material difference to the conclusions reached in developing the spatial strategy in the Plan. In undertaking the comparison, a distinction is made between the two differing elements of the Green Belt Review:
- 2.3 The analysis of **strategic parcels** and **sub-parcels** is based upon the assessment of the situation 'as is'. Green Belt is evaluated based upon the current levels of physical and visual openness without any consideration of any potential future Plan-led development.
- 2.4 In this context, the revised assessment considers the visual and physical openness of the parcel and the quality of parcel boundaries. However, in evaluating the contribution of the land parcels towards Green Belt purposes, only the contribution of the parcel to the purpose of 'safeguarding the countryside from encroachment' has been specifically evaluated against the refined assessment methodology.
- 2.5 This is because the analyses of sprawl, merging of neighbouring towns and preserving the setting of historic towns within CGB1 are considered sufficiently robust; the narrative descriptions of these could clearly be applied to both physical and visual dimensions of openness and the contributions made to these Green Belt purposes.
- 2.6 The conclusions on the overall contribution of strategic parcels and sub-parcels to Green Belt purposes in this report are therefore a hybrid of the original analysis and the revised consideration of openness in respect of the Green Belt purpose related to safeguarding the countryside from encroachment.
- 2.7 By contrast, the revised analysis of **sites** necessarily gives consideration to impacts upon Green Belt should the site be developed in future. It therefore implicitly considers the introduction of (potentially significant quanta of) additional built form into the existing landscape which could have the effect of changing physical and visual perceptions of the site when considered against the current state.
- 2.8 In this context, the visual impacts of prospective development are potentially of relevance to all four of the purposes considered in the Update.
- 2.9 The potential visual and physical impacts of future allocation and development are therefore considered in the Update against all four Green Belt purposes and in the overall conclusions.

- 2.10 For the purposes of this Update, those potential Green Belt housing sites which passed the three key tests of 'suitability', 'availability' and 'achievability' in the Council's Strategic Housing Land Availability Assessment (SHLAA) (HOU9) and were not ruled out from further consideration as a result of the subsequent updates in Chapter 3 of HOU1 have been assessed.
- 2.11 For the purposes of this Update, there was only one potential Green Belt employment site which passed the three key tests of being suitable, available and achievable, as summarised in the Employment Background Paper (E5).
- 2.12 The reason for this approach is that it was made clear through the Examination hearing sessions that it was the sites that met the tests of suitability, availability and achievability – both within and beyond the current Green Belt – that were considered the 'reasonable alternatives' for the purposes of developing the spatial strategy in the Plan.
- 2.13 CGB1 assessed a wider pool of potential sites, as the GB Review was carried out in parallel to the SHLAA process and / or informed by sites considered in earlier iterations of the SHLAA or other site analysis exercises. However, for the reasons set above, there was little purpose in conducting the revised assessment on sites no longer considered to be reasonable alternatives.

3 Revised assessment results

Strategic Parcels

3.1 The full assessment forms for the Strategic Parcels of existing Green Belt are contained in Appendix 2. A summary of the assessment results is shown in Table 1 overleaf.

Safeguarding the Countryside from Encroachment

3.2 All parcels assessed under the methodology perform either a significant role or make a moderate contribution to the purpose of safeguarding the countryside from encroachment. This is detailed in Figure 4.1 below.

Figure 4.1: Safeguarding the countryside from encroachment

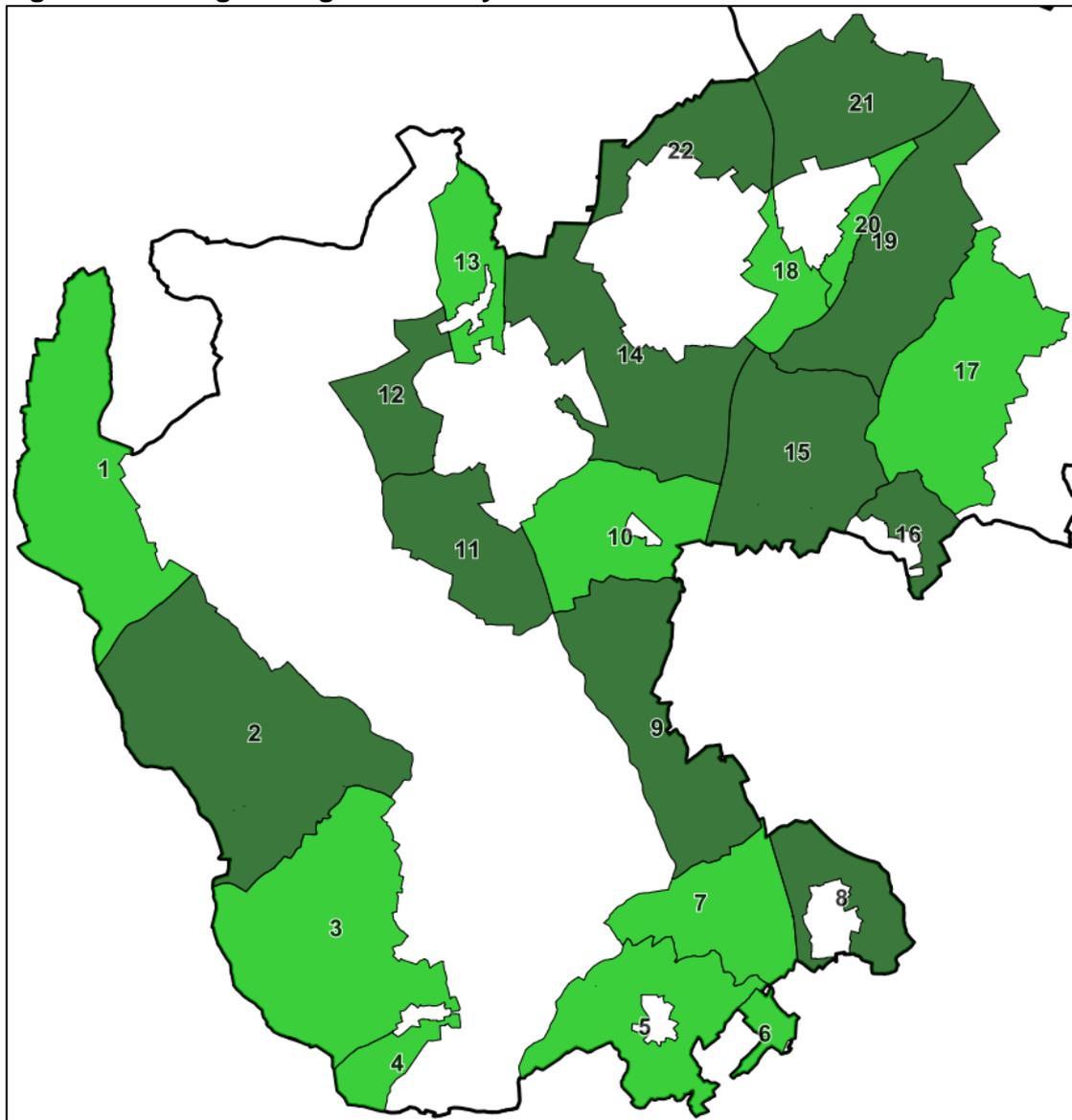


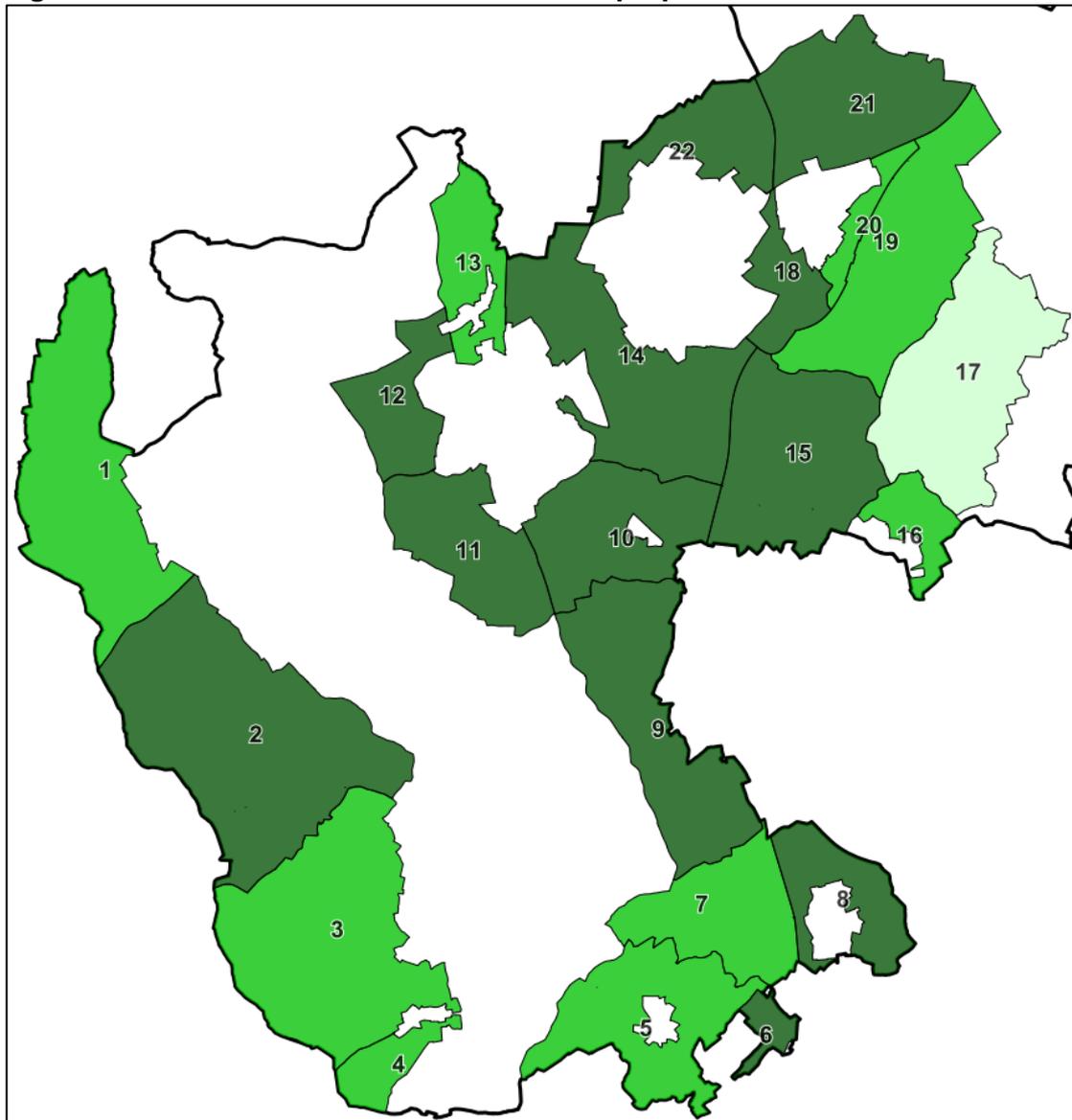
Table 1: Summary revised assessment of Strategic Green Belt parcels

Strategic Parcel	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
1 Lilley	Mixed	Mixed / High	Moderate	Moderate
2 Lilley Bottom	Mixed / High	Mixed / High	Significant	Significant
3 Peters Green	Mixed	High	Moderate	Moderate
4 Porters End	Mixed	Mixed	Moderate	Moderate
5 Codicote	Mixed / High	Mixed	Moderate	Moderate
6 Pottersheath	Low	Low	Moderate	Significant
7 Old Knebworth	Mixed	Mixed	Moderate	Moderate
8 Knebworth	Mixed	Mixed	Significant	Significant
9 Langley	Mixed	Mixed / High	Significant	Significant
10 Little Wymondley	Mixed	Mixed	Moderate	Significant
11 Gosmore	Mixed	Mixed / High	Significant	Significant
12 Oughtonhead	High	Mixed / High	Significant	Significant
13 Ickleford	Mixed	Mixed / High	Moderate	Moderate
14 Willian	Mixed / High	Mixed / High	Significant	Significant
15 Jack's Hill	Mixed / High	Mixed / High	Significant	Significant
16 Warren's Green	Mixed	Mixed / High	Significant	Moderate
17 Weston	Mixed	Mixed / High	Moderate	Limited
18 Baldock Gap	Low / Mixed	Low / Mixed	Moderate	Significant
19 Weston Hills	High	Mixed / High	Significant	Moderate
20 Baldock East	Mixed / High	Mixed	Moderate	Moderate
21 Bygrave	Mixed / High	High	Significant	Significant
22 Radwell	Mixed / High	Mixed	Significant	Significant

Overall contribution to Green Belt purposes

- 3.3 Different parts of the North Hertfordshire Green Belt contribute differently to its overall function. Those parcels most closely associated with the main urban areas and / or the gaps between them are those making the most significant contributions. All parcels make at least a moderate contribution with the exception of Parcel 17 (Weston). This is the only strategic land parcel in the District considered to make only a limited contribution to Green Belt purposes. This is detailed in Figure 4.2 below.

Figure 4.2: Overall contribution to Green Belt purposes



Sub Parcels

- 3.4 The full assessment forms for the Sub Parcels of existing Green Belt are contained in Appendix 3. A summary of the assessment results is shown in Table 2 overleaf.

Safeguarding the Countryside from Encroachment

- 3.5 With the exception of one sub-parcel, all Green Belt land performs either a significant role or makes a moderate contribution to the purpose of safeguarding the countryside from encroachment. This is detailed in Figure 4.3 below.
- 3.6 The exception is the northernmost wedge of land between Letchworth and Baldock which is subject to existing urban influences and only has limited interaction with the wider countryside to the north and south of the two towns.

Figure 4.3: Safeguarding the countryside from encroachment

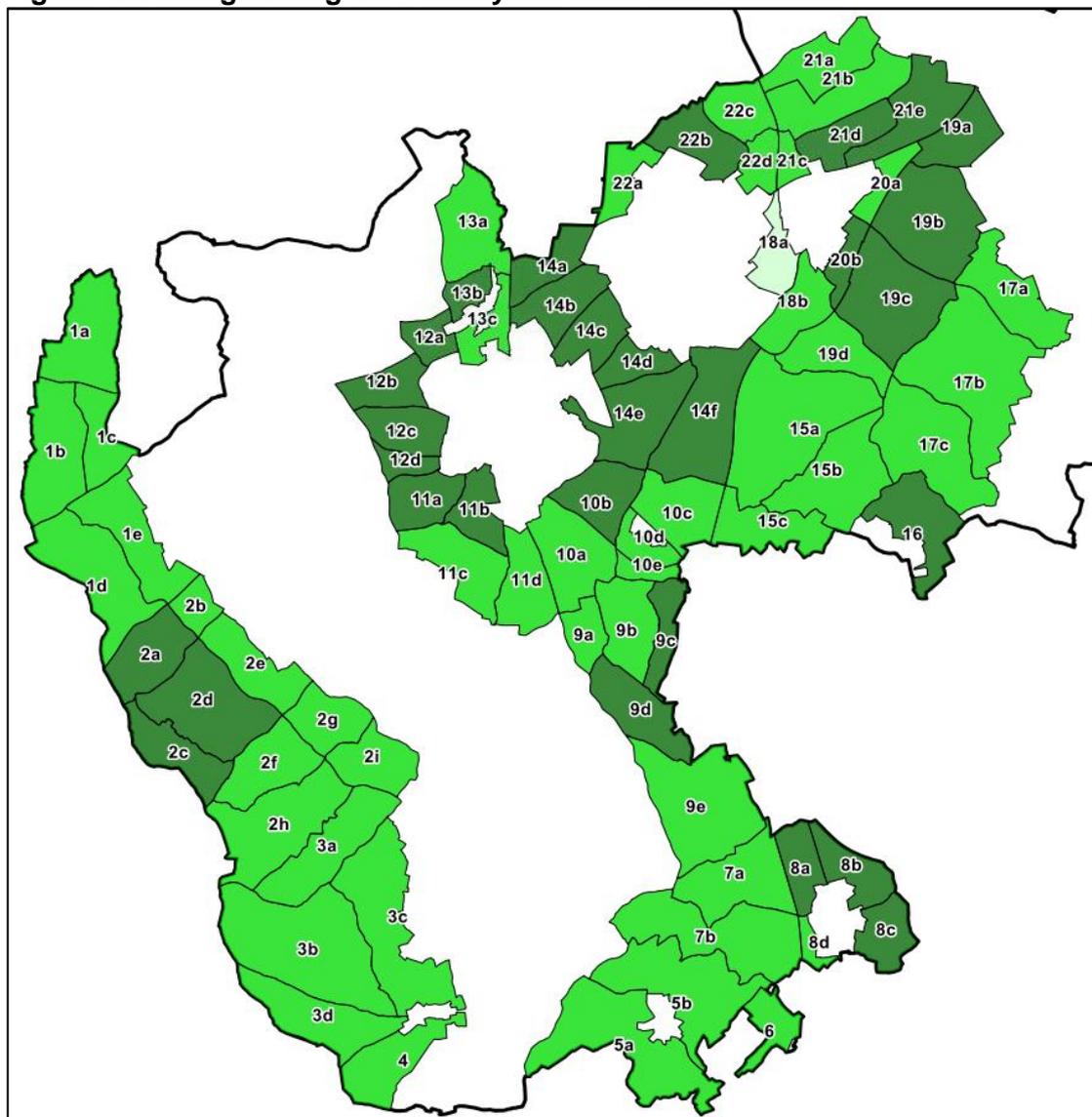


Table 2: Summary revised assessment of Green Belt sub-parcels

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
1a Northern boundary defined by district boundary and southern boundary by Barton Road / Hitchin Road.	Mixed / High	Mixed	Moderate	Limited
1b East of Lilley Road between Hitchin Road and Icknield Way Trail.	Mixed	Mixed / High	Moderate	Moderate
1c West of Lilley Road between Barton Road and Icknield Way Trail.	Mixed	High	Moderate	Moderate
1d West of Hexton Road, between Icknield Way Trail and A505.	Mixed	Mixed / High	Moderate	Moderate
1e East of Hexton Road between Icknield Way Trail and A505.	Mixed	Mixed	Moderate	Moderate
2a Land immediately to east of settlement edge of Luton, south of the A505, west of Lilley Bottom and north of the byway.	Mixed	Mixed	Significant	Significant
2b South of A505, east of Lilley Bottom, north of Luton White Hill and west of byway.	Mixed	Mixed / High	Moderate	Moderate
2c Area bordering Luton's eastern boundary between Stoney Lane in south and Putteridge Road in north and Brick Kiln Road in east.	Low / Mixed	Mixed	Significant	Significant
2d Area west of Lilley Bottom, between Stoney Lane in south, byway in north and Brick Kiln Lane to west.	Mixed / High	Mixed / High	Significant	Significant
2e Land east of Lilley Bottom between Luton White hill and Stoney Lane. Borders Westbury wood to east.	Mixed	Mixed / High	Moderate	Moderate
2f West Lilley Bottom Road between Stoney lane in north and Darley Road in south.	Mixed	Mixed	Moderate	Moderate
2g East of Lilley Bottom Road, south of Stoney Lane, north of Church Road and west of Whitehall Road.	Mixed	High	Moderate	Moderate
2h Land at eastern end of Luton Airport runway, west of Lilley Bottom Road between Darley Road in north and Lye Hill/Lower Road in south.	Mixed	Mixed	Moderate	Moderate

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
2i East of Lilly Bottom Road, south of Church Road, west of Whitehall Road.	Mixed	Mixed / High	Moderate	Moderate
3a Bounded by Lilley Bottom Road, Lye Hill/Lower Road, and Wandon Green to south.	Mixed	Mixed / High	Moderate	Moderate
3b Land bounded by Kimpton road to south, Whiteway Bottom Lane to east, road through Diamond End to north.	Mixed	Mixed / High	Moderate	Moderate
3c Land to east of Whiteway Bottom Lane, Bendish in the north, abuts northern edge of Kimpton with eastern boundary a mix of footpaths.	Mixed	Mixed	Moderate	Moderate
3d Land bounded by Kimpton Bottom to south, Kimpton Road to north and district boundary to west.	Mixed	Mixed	Moderate	Moderate
4 Land to south of Kimpton bounded by Kimpton Bottom to north, district boundary and Blackmore End to south and Hall Lane and Kimpton settlement to east.	Mixed	Mixed	Moderate	Moderate
5a Land south of Codicote bounded by district boundary to south, Whitwell Road to north and Kimpton Mill to west.	Mixed	Mixed	Moderate	Moderate
5b Land to north of Codicote bounded by district boundary to east, and Drivers End Lane/Sally Deards Lane to the north and High Heath farm to west.	Mixed / High	Mixed	Moderate	Moderate
6 Area bounded to the east by district boundary.	Low	Low	Moderate	Significant
7a Land on west side of A1(M), bounded by Newton Woods to north and Park Lane/ Hitchin Road to south.	Mixed	Mixed	Moderate	Moderate
7b Land to west of A1(M) bounded by Park Lane/ Hitchin Road to north, Three Houses Lane to west and Drivers End Lane/Sally Deards Lane to the south .	Mixed	Mixed	Moderate	Moderate
8a Land between A1(M) and ECML railway abuts northern edge of Knebworth and research centre to north.	Mixed	Mixed	Significant	Significant

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
8b land between ECML and local railway line and Watton Road abuts north-east edge of Knebworth.	Low / Mixed	Mixed	Significant	Significant
8c Land lying between eastern edge of Knebworth and the district boundary, south of Watton Road	Mixed	Mixed / High	Significant	Significant
8d Land between A1(M) and western edge of Knebworth bounded by Park Lane to north and district boundary to the south.	Low / Mixed	Mixed / High	Moderate	Significant
9a Area to east of B656 London Road, north of White Lane and south of Little Almshoe.	Mixed	High	Moderate	Moderate
9b Land south of Stevenage Road west to Almshoe Bury and south to bridleway.	Mixed / High	High	Moderate	Moderate
9c Land to east of A1(M) extending south to Dyes Lane, north to Lower Titmore Green and west to bridleway.	Mixed	Mixed / High	Significant	Significant
9d Area lying between Kitching Lane in east and B656 to west, extending to Dyes Lane in south and White Lane in north.	Mixed	Mixed	Significant	Significant
9e Area lying between A1(M) to east and B656 to west extending to southern boundary of newton Woods and north to Dyes Lane.	Low / Mixed	Mixed	Moderate	Moderate
10a Abuts the southern edge of Hitchin bounded by London Road and A602 Stevenage Road.	Mixed	Low / Mixed	Moderate	Significant
10b Abuts the southern edge of Hitchin bounded by A602 Stevenage Road, Arch Road and Hitchin Road.	Mixed	Mixed	Significant	Significant
10c North side of east coast mainline railway, bounded by northern edge of Stevenage, A1(M) and Graveley Road.	Mixed	Mixed	Moderate	Significant
10d Area to the north of A602 Wymondley bypass, between Stevenage edge, east coast mainline railway and Arch Road.	Low / Mixed	Low / Mixed	Moderate	Significant
10e South of A602 Wymondley bypass bounded by Blakemore End Road, Stevenage Road and Stevenage and Todd's Green.	Low / Mixed	Low / Mixed	Moderate	Significant

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
11a Abuts the south-west edge of Hitchin south of A505 Offley Road bounded by Hoar's Lane and Charlton Road.	Mixed	Mixed	Significant	Significant
11b Abuts the south-west edge of Hitchin bounded by Charlton Road, Maydencroft Lane and Gosmore Road.	Mixed	Mixed	Significant	Significant
11c Area to south-west of Gosmore bounded by Maydencroft Lane, Temple Close and Preston Road.	Mixed	Mixed	Moderate	Significant
11d Abuts the southern edge of Hitchin bounded by London Road, and road opposite Little Almshoe farm.	Mixed	Mixed	Moderate	Significant
12a Abuts the northern edge of Hitchin and eastern edge of Ickleford bounded by A600 Bedford Road, Hambridge Way and Mill Way.	Mixed / High	Mixed	Significant	Significant
12b Area abuts western edge of Hitchin bounded by Icknield Way, Hitchin Road and Oughtonhead Lane.	Mixed / High	Mixed / High	Significant	Significant
12c Abuts western edge of Hitchin bounded by Oughtonhead Lane, Hitchin Road and Pirton Road.	High	Mixed	Significant	Significant
12d Abuts western edge of Hitchin bounded by Pirton Road, Carters Lane and A505 Offley Road.	Mixed / High	High	Significant	Significant
13a Area between A600 Bedford Road and district boundary along River Hiz bounded by Snailswell Lane and tributary of River Hiz.	Mixed / High	Mixed / High	Moderate	Moderate
13b Abuts the northern edge of Ickleford between A600 Bedford Road and Snailswell Lane.	Mixed	Mixed	Significant	Moderate
13c Area lies between northern edge of Hitchin and southern edge of Ickleford bounded by A600 Bedford Road and east coast railway line.	Low	Low / Mixed	Moderate	Significant
14a Area between east coast railway line, Icknield Way Trail, western settlement edge of Letchworth and the district boundary.	High	Mixed / High	Significant	Significant

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
14b Area bounded by settlement eastern edges of Hitchin and Letchworth lying between Ickniel Way Trail and local railway line.	Mixed / High	Mixed	Significant	Significant
14c Area bounded by settlement edges of Hitchin and Letchworth between local railway line and A505.	Mixed	Mixed	Significant	Significant
14d Area bounded by settlement edges of Hitchin and Letchworth between A505 and Willian Road.	Low / Mixed	Mixed	Significant	Significant
14e Abuts the eastern edge of Hitchin bounded by Willian Road, Wymondley Road and Hitchin Road.	Mixed	High	Significant	Significant
14f Abuts the southern edge of Letchworth, bounded by A1(M), Graveley Lane and Wymondley Road.	Mixed / High	Mixed / High	Significant	Significant
15a Area lies to east of A1(M) bounded by Hitchin Road and Bridleway.	Mixed / High	Mixed / High	Moderate	Significant
15b Area to north of Stevenage lying between Church Lane, Friends Lane and bridleway.	Mixed	Mixed / High	Moderate	Significant
15c Abuts northern administrative edge of Stevenage between A1(M) and Church Lane.	Mixed / High	Mixed	Significant	Significant
16 Area abuts north-east edge of Stevenage bounded by Warrengreen Lane and the district boundary.	Mixed	Mixed / High	Significant	Moderate
17a Land north of Clothall Road bounded by Warren Road and Kingswoodbury Tributary.	Mixed	Mixed / High	Moderate	Limited
17b Bounded by Fore Street, Clothall Road, Maiden Street and eastern edge of Green Belt	Mixed	Mixed / High	Moderate	Moderate
17c Area bordered by Maiden Street, Warrengreen Lane, Friends Green and Bridleway.	Mixed	Mixed	Moderate	Moderate
18a Wedge between settlement edges of Letchworth and Baldock.	Low	Low	Limited	Significant

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
18b Abuts southern edge of Letchworth and Baldock bounded by A505 and Baldock Lane.	Low / Mixed	Mixed	Moderate	Significant
19a Area south of A505 Baldock bypass between Wallington Road and Bygrave Lodge farm.	High	Mixed / High	Significant	Moderate
19b Land south of A505 Baldock bypass between Clothall Road and Wallington Road.	High	High	Significant	Moderate
19c Land south of A505 Baldock bypass between hatch Lane and Clothall Road and Fore Street.	Mixed / High	Mixed / High	Significant	Moderate
19d Area lying between the A505, Hitchin Road, Hatch Lane and the western edge of Weston.	Mixed	Mixed / High	Moderate	Moderate
20a Strip of land between south-east edge of Baldock and Baldock bypass, north of Clothall Road A507.	Mixed / High	Low / Mixed	Moderate	Moderate
20b Strip of land between south-east edge of Baldock and Baldock by-pass, south of Clothall Road A507 and north of Chalk Hills.	Mixed / High	Mixed / High	Significant	Significant
21a East side of A1(M) between Newnham Road in north and local footpath to south.	Mixed	High	Moderate	Moderate
21b East side of A1(M) between local footpath and local track extending towards Bygrave.	Mixed / High	High	Moderate	Moderate
21c Abuts northern edge of Baldock between the A1(M) and A505 south of Norton Mill Lane.	Low	Mixed	Moderate	Significant
21d Abuts northern edge of Baldock and Bygrave Road.	Mixed / High	Mixed	Significant	Significant
21e Bounded by railway line to south and Bygrave Road to north.	Mixed / High	Mixed	Significant	Significant
22a Lies between north-west edge of Letchworth and district boundary along Stotfold Road.	Mixed	Mixed	Moderate	Moderate
22b Lies between northern edge of Letchworth and Norton Road up to the district boundary.	High	Mixed / High	Significant	Significant

	Openness		Contribution to Green Belt purposes	
	Visual	Physical	Safeguarding countryside	Overall
22c Lies between Norton Road and the A1(M) and between Norton Bury Lane and the district boundary.	Mixed	Mixed	Moderate	Moderate
22d Lies between the A1(M), Norton Bury Lane, Norton Road and north-eastern edge of Letchworth.	Low / Mixed	Low / Mixed	Moderate	Significant

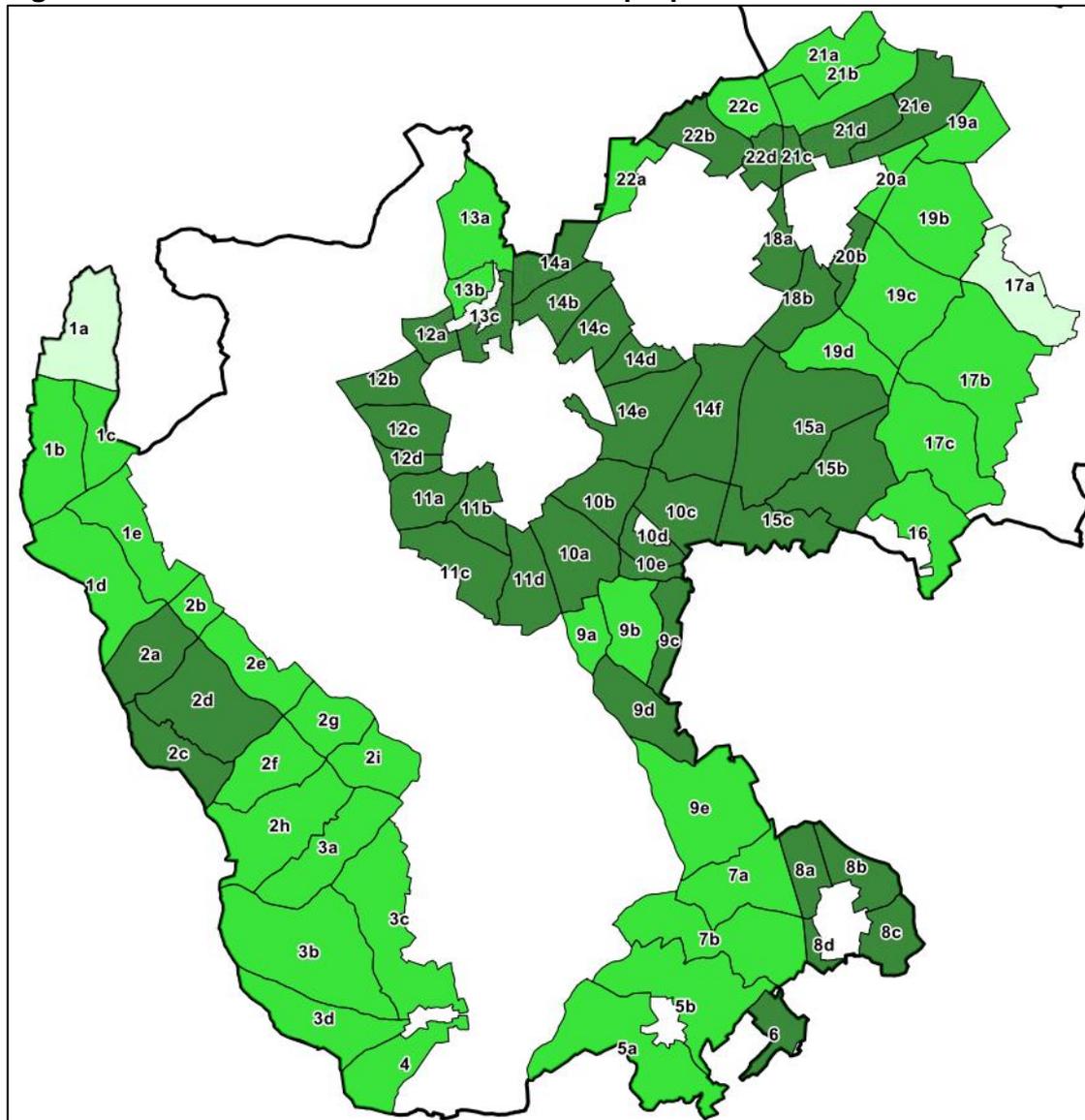
3.7 Those areas assessed as making significant contributions towards this purpose are generally:

- Those with a close association to the existing urban edge; and / or
- Plateau or elevated landscapes – particularly to the north of Letchworth and south of Baldock – which provide expansive, open views over surrounding countryside.

Overall contribution to Green Belt purposes

3.8 As with the analysis of strategic parcels, different parts of the North Hertfordshire Green Belt contribute differently to its overall function. Those parcels most closely associated with the main urban areas and / or the gaps between them are those making the most significant contributions. This is detailed in Figure 4.4 below.

Figure 4.4: Overall contribution to Green Belt purposes



- 3.9 All parcels make at least a moderate contribution with the exception of sub-parcels 1a (north of Hexton) and 17a (north of the A507 beyond Clothall). Both of these sub-parcels lie at the outer edges of the Green Belt. It is understandable that a more limited contribution is noted here, where land immediately beyond has historically not been judged to satisfy the necessary requirements to be designated as Green Belt.

Sites

- 3.10 As set out above, it is important to remember that the analysis of sites differs slightly in its purpose from the analysis of existing parcels; the purpose is to consider the impact that the (theoretical) introduction of additional built form through development might have within that specific area. It is therefore perfectly reasonable and rational for the assessment of individual sites to come to different conclusions than the assessment of the surrounding (sub-) parcel and such outcomes should not be equated with a limitation of either the methodology or the assessment process.
- 3.11 By way of example, a relatively small and contained site within an area that otherwise performs important functions might make a lesser contribution to individual and / or overall Green Belt purposes than the 'parent' (sub-) parcel within which it resides.
- 3.12 The full assessment forms are contained in Appendix 3. A summary of the revised site assessment results is set out in Table 3 on the following pages and the subsequent maps (Figures 4.5 to 4.10).
- 3.13 A range of results are recorded. A number of sites are assessed as having potentially significant Green Belt impacts. This includes (but is not limited to) some of the largest sites considered for inclusion in the Plan. This is perhaps unsurprising as these would, by definition, introduce the largest volumes of additional built development into the countryside.
- 3.14 Similarly, the sites considered to have more limited impacts were they to be developed are generally smaller in nature.

Table 3: Summary revised assessment of potential Green Belt development sites

Site ref	Address	Settlement	Parcel	Openness		Contribution to Green Belt purposes				
				Visual	Physical	Sprawl	Merge	Countryside	Historic	Overall
Housing sites										
212a	Land north east of Luton	Luton (adjoining)	2a	Mixed	Mixed / High	Significant	Moderate	Significant	Limited	Significant
340	Dancote, Cockernhoe Green, Cockernhoe	Luton (adjoining)	2c	Low	Mixed	Limited	Limited	Limited	Limited	Limited
ELW	Luton East (west)	Luton (adjoining)	2c	Mixed / High	Mixed / High	Significant	Moderate	Significant	Limited	Significant
ELE	Luton East (east)	Luton (adjoining)	2d	Mixed	High	Significant	Moderate	Significant	Limited	Significant
49	Allotments south of Colemans Road, Breachwood Green	King's Walden	2h	Mixed / High	High	Limited	Limited	Moderate	Limited	Moderate
51	Allotments west of The Heath, Breachwood Green	King's Walden	2h	Low	Mixed	Limited	Limited	Limited	Limited	Limited
29	Land south of Cowards Lane	Codicote	5a	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
30	Land at Codicote House, Heath Road	Codicote	5a	Low	High	Limited	Limited	Limited	Limited	Limited
31	Land south of Heath Lane	Codicote	5a	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
313	Land south of Heath Lane	Codicote	5a	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
32	Land north east of The Close	Codicote	5b	Low / Mixed	High	Limited	Limited	Limited	Limited	Limited
315	Mansells Farm (B)	Codicote	5b	Mixed	Mixed / High	Limited	Limited	Moderate	Limited	Moderate
205N	Codicote Garden Centre, High Street (north)	Codicote	5b	Low / Mixed	Low / Mixed	Limited	Limited	Moderate	Limited	Moderate
205S	Codicote Garden Centre, High Street (south)	Codicote	5b	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
52	Land at Deards End	Knebworth	8a	Mixed	High	Moderate	Moderate	Moderate	Limited	Moderate
335	Land rear of Redwood, Deards End Lane	Knebworth	8a	Low / Mixed	Mixed	Limited	Limited	Limited	Limited	Limited
58	Land north of Watton Road	Knebworth	8b	Mixed / High	Mixed / High	Moderate	Significant	Significant	Limited	Significant
55	Land north of Old Lane	Knebworth	8c	Mixed	High	Moderate	Significant	Moderate	Limited	Significant
57	Land south of Swangley's Lane	Knebworth	8c	Mixed	High	Moderate	Limited	Moderate	Limited	Moderate
336	Land east of Old Lane	Knebworth	8c	Mixed	High	Moderate	Limited	Moderate	Limited	Moderate
53	Land at Gypsy Lane	Knebworth	8d	Low / Mixed	High	Moderate	Moderate	Moderate	Limited	Moderate
WSN	Stevenage West	Stevenage (adjoining)	9a - 9e	Mixed / High	High	Significant	Moderate	Significant	Limited	Significant
98	Land north of Pound Farm, London Road (St Ippolyts parish)	Hitchin	10a	Low / Mixed	High	Moderate	Moderate	Moderate	Limited	Moderate
SI/r3	Land south of Stevenage Road	St Ippolyts	10a	Low / Mixed	High	Limited	Limited	Limited	Limited	Limited
225	Land west of Hitchin Lane (St Ippolyts parish)	Hitchin	10a / 11d	Mixed	High	Moderate	Limited	Moderate	Limited	Moderate
110*	Oakfield Farm, Stevenage Road (A602) (St Ippolyts parish)	Hitchin	10b	Mixed / High	High	Significant	Moderate	Significant	Limited	Significant
121	Land north of Stevenage Road, Little Wymondley	Wymondley	10d	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
122	Land within Wymondley Bypass	Wymondley	10d	Mixed	Mixed	Limited	Moderate	Moderate	Limited	Moderate
232	Land south of Little Wymondley	Wymondley	10d	Low / Mixed	Mixed / High	Limited	Moderate	Moderate	Limited	Moderate
221N	Land south of Waterdell Lane (north)	St Ippolyts	11d	Mixed	High	Limited	Limited	Moderate	Limited	Limited
40	Burford Grange, Bedford Road	Ickleford	12a	Low / Mixed	Mixed	Moderate	Significant	Moderate	Limited	Moderate
H/r14	Land at junction of Grays Lane and Crow Furlong	Hitchin	12c	Mixed / High	High	Moderate	Limited	Moderate	Limited	Moderate
H/r25	Land at junction of Grays Lane & Lucas Lane	Hitchin	12c	Mixed	High	Limited	Limited	Limited	Limited	Limited
H/r30	Land south of Oughtonhead Lane	Hitchin	12c	Mixed	High	Limited	Limited	Limited	Limited	Limited

Site ref	Address	Settlement	Parcel	Openness		Contribution to Green Belt purposes				
				Visual	Physical	Sprawl	Merge	Countryside	Historic	Overall
329	Arnolds Farm, Chambers Lane	Ickleford	13b	Mixed	Mixed	Limited	Limited	Limited	Limited	Limited
330	Land at Bedford Road	Ickleford	13b	Mixed	Mixed	Limited	Limited	Moderate	Limited	Moderate
41	Land off Duncots Close	Ickleford	13c	Mixed	High	Limited	Limited	Limited	Limited	Limited
39	Highover Farm, Stotfold Road	Hitchin	14c	Mixed	Mixed / High	Moderate	Significant	Moderate	Limited	Significant
326	North of Highover Farm	Hitchin	14c	Mixed	Mixed / High	Moderate	Significant	Moderate	Limited	Significant
228	Land off Hitchin Road	Weston	15a	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
351	Land off Hitchin Road	Weston	15a	Mixed	High	Limited	Limited	Moderate	Limited	Moderate
NES3	Stevenage North East (Roundwood)	Stevenage (adjoining)	15b	Mixed / High	High	Significant	Moderate	Significant	Limited	Significant
208N	Land at Milksey Lane (north)	Graveley	15c	Mixed	Mixed	Limited	Limited	Moderate	Limited	Moderate
NS	Stevenage North	Stevenage (adjoining)	15c	High	High	Significant	Significant	Significant	Limited	Significant
226	Land off Mendip Way, Great Ashby	Stevenage (adjoining)	16	High	High / Mixed	Significant	Limited	Significant	Limited	Significant
323	Land north east of Great Ashby	Stevenage (adjoining)	16	High	High / Mixed	Significant	Limited	Significant	Limited	Significant
14	Land west of Weston Way	Baldock	18b	High	High	Significant	Significant	Significant	Limited	Significant
202	Land east of Clothall Common (Clothall parish)	Baldock	20a	Mixed	High / Mixed	Limited	Limited	Moderate	Limited	Moderate
B/r12	South of Clothall Common (Clothall parish)	Baldock	20a	Mixed / High	High	Moderate	Limited	Moderate	Limited	Moderate
B/r04	Land off Clothall Road (Clothall parish)	Baldock	20b	Mixed / High	High	Moderate	Limited	Moderate	Limited	Moderate
B/r11a	Land north of Bygrave Road (Bygrave parish)	Baldock	21d	High	High	Moderate	Limited	Significant	Limited	Significant
B/r23	Land at North Road (Bygrave parish)	Baldock	21d	Mixed	Mixed	Limited	Limited	Moderate	Limited	Moderate
200	Land north of Baldock (Bygrave parish)	Baldock	21d / e	High	Mixed / High	Significant	Limited	Significant	Moderate	Significant
B/r01a	Land at Bygrave Road	Baldock	21d / e	Mixed	Mixed	Limited	Limited	Moderate	Limited	Moderate
201	Land south of Bygrave Road (Bygrave parish)	Baldock	21e	Mixed / High	Mixed	Significant	Limited	Significant	Limited	Significant
B/r02a	Land south of Bygrave Road (Bygrave parish)	Baldock	21e	Mixed / High	Mixed / High	Moderate	Limited	Moderate	Limited	Moderate
D (part)	Eastern part of area D, north of Baldock	Baldock	21e	High	Mixed / High	Significant	Limited	Significant	Moderate	Significant
310	Land south of Bygrave Road, Baldock (Bygrave Parish)	Baldock	21e	Mixed	Mixed	Limited	Limited	Moderate	Limited	Moderate
NL	Letchworth North	Letchworth	22a / b	Mixed / High	Mixed / High	Significant	Moderate	Significant	Limited	Significant
L/r13	Land east of Kristiansand Way	Letchworth	22d	Mixed	High	Limited	Moderate	Moderate	Limited	Moderate
Employment sites										
B/e02	Land at Royston Road	Baldock	20a	Mixed / High	High	Moderate	Limited	Moderate	Limited	Moderate

Figure 4.5: Overall assessment of Green Belt sites (Luton, Cockernhoe and Breachwood Green)

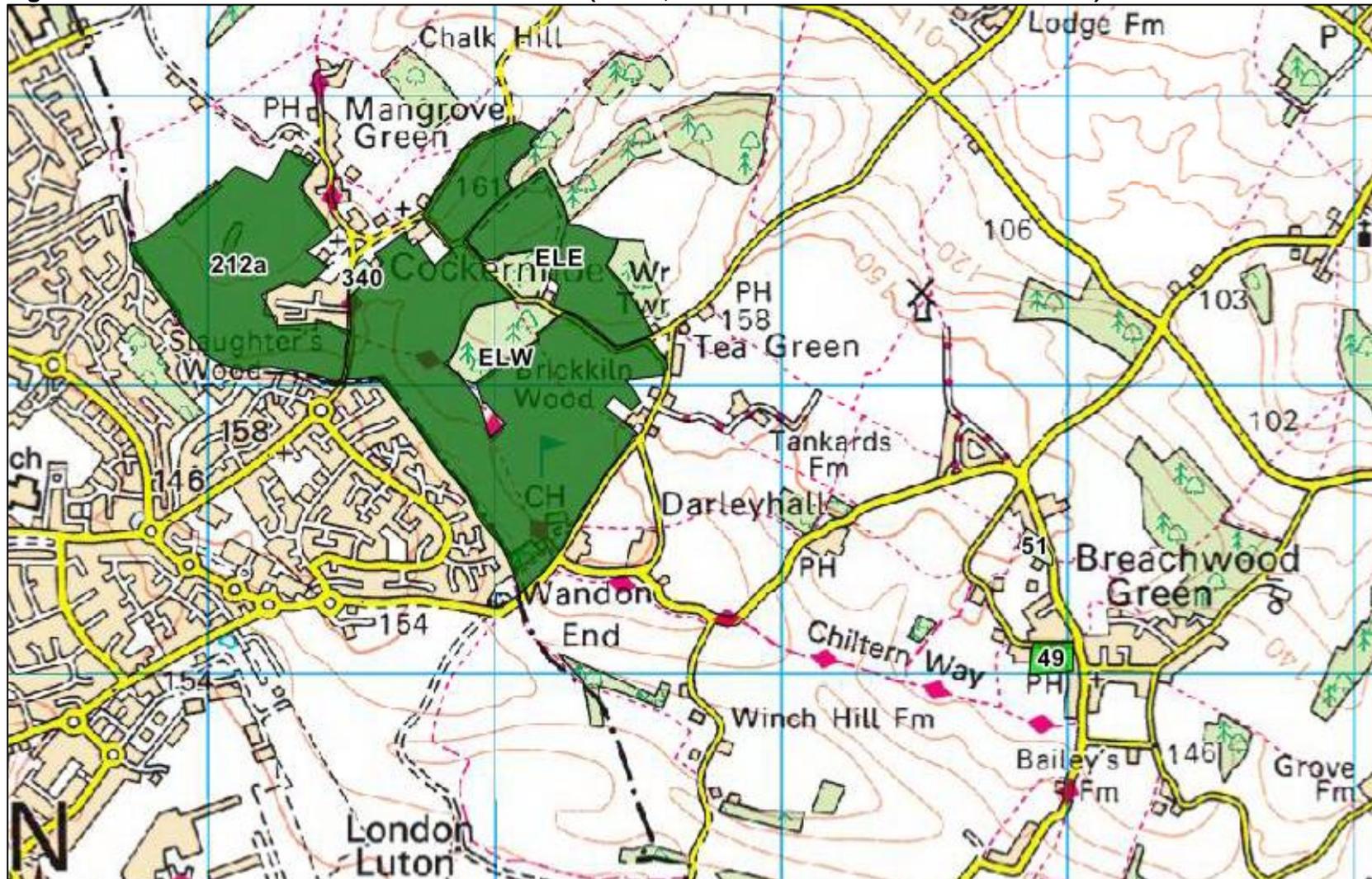


Figure 4.6: Overall assessment of Green Belt sites (Knebworth and Codicote)

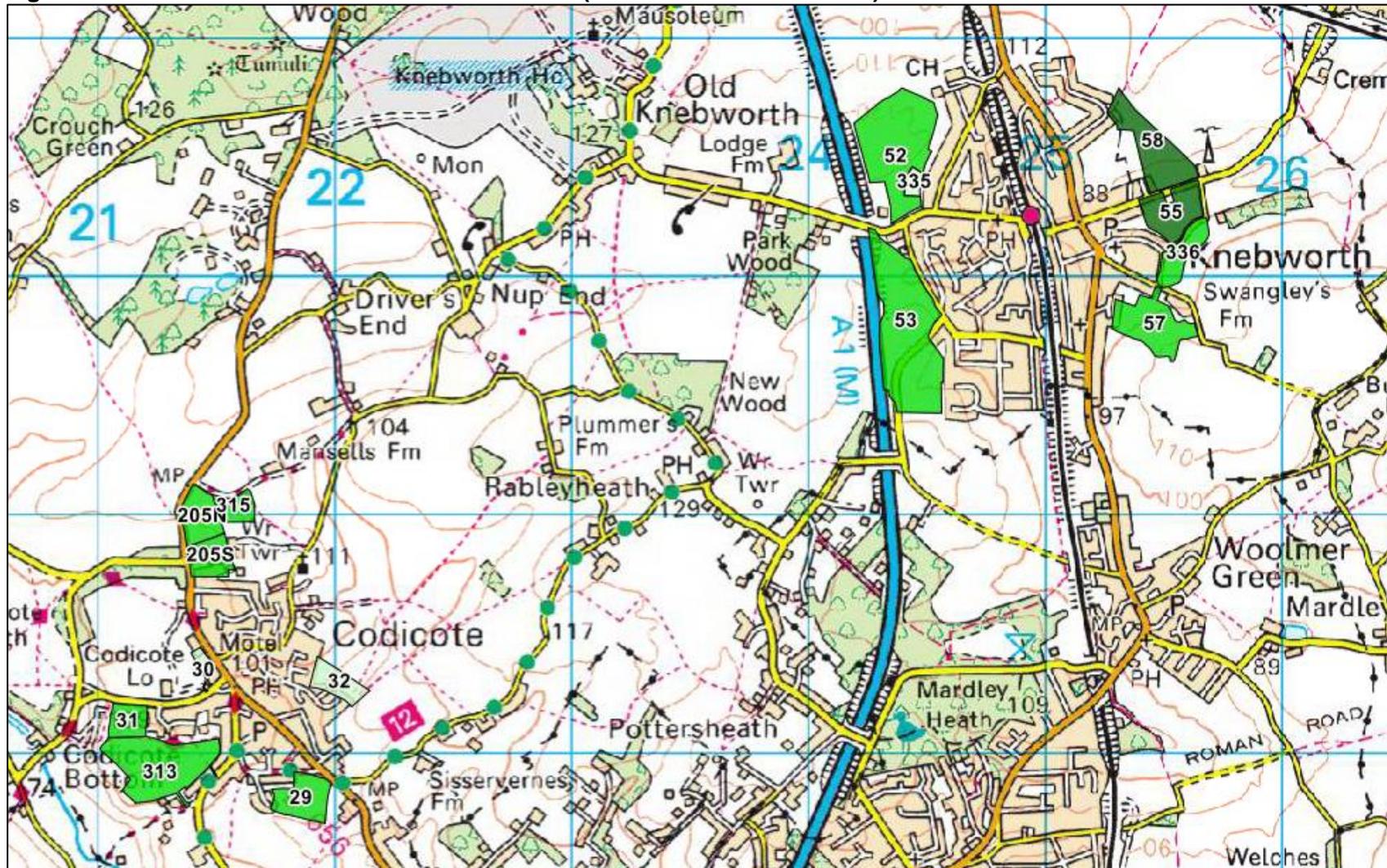


Figure 4.7: Overall assessment of Green Belt sites (Ickleford and Hitchin (north))



Figure 4.8: Overall assessment of Green Belt sites (Hitchin (south), St Ippolyts and Wymondley)

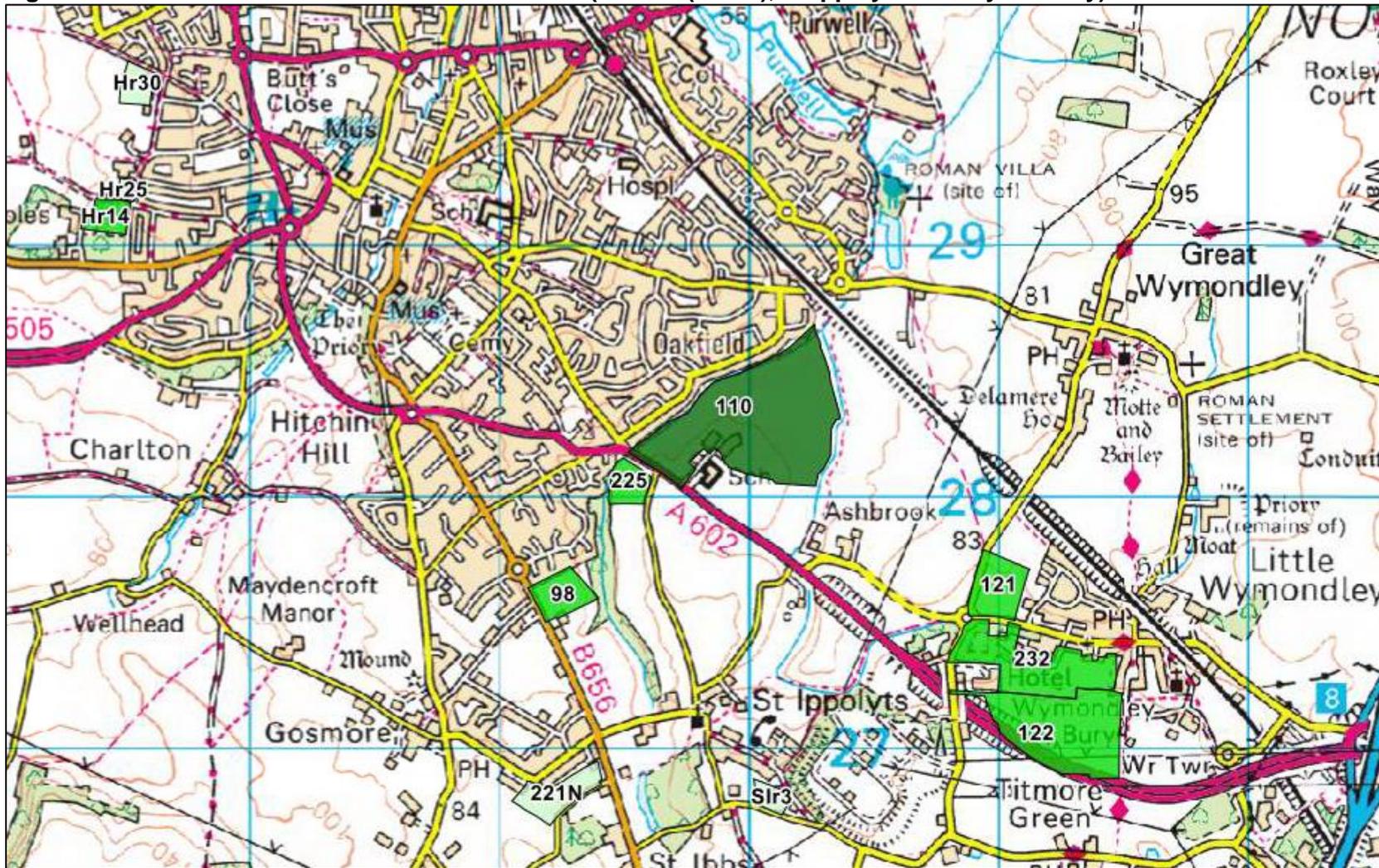


Figure 4.9: Overall assessment of Green Belt sites (Graveley, Great Ashby and Weston)

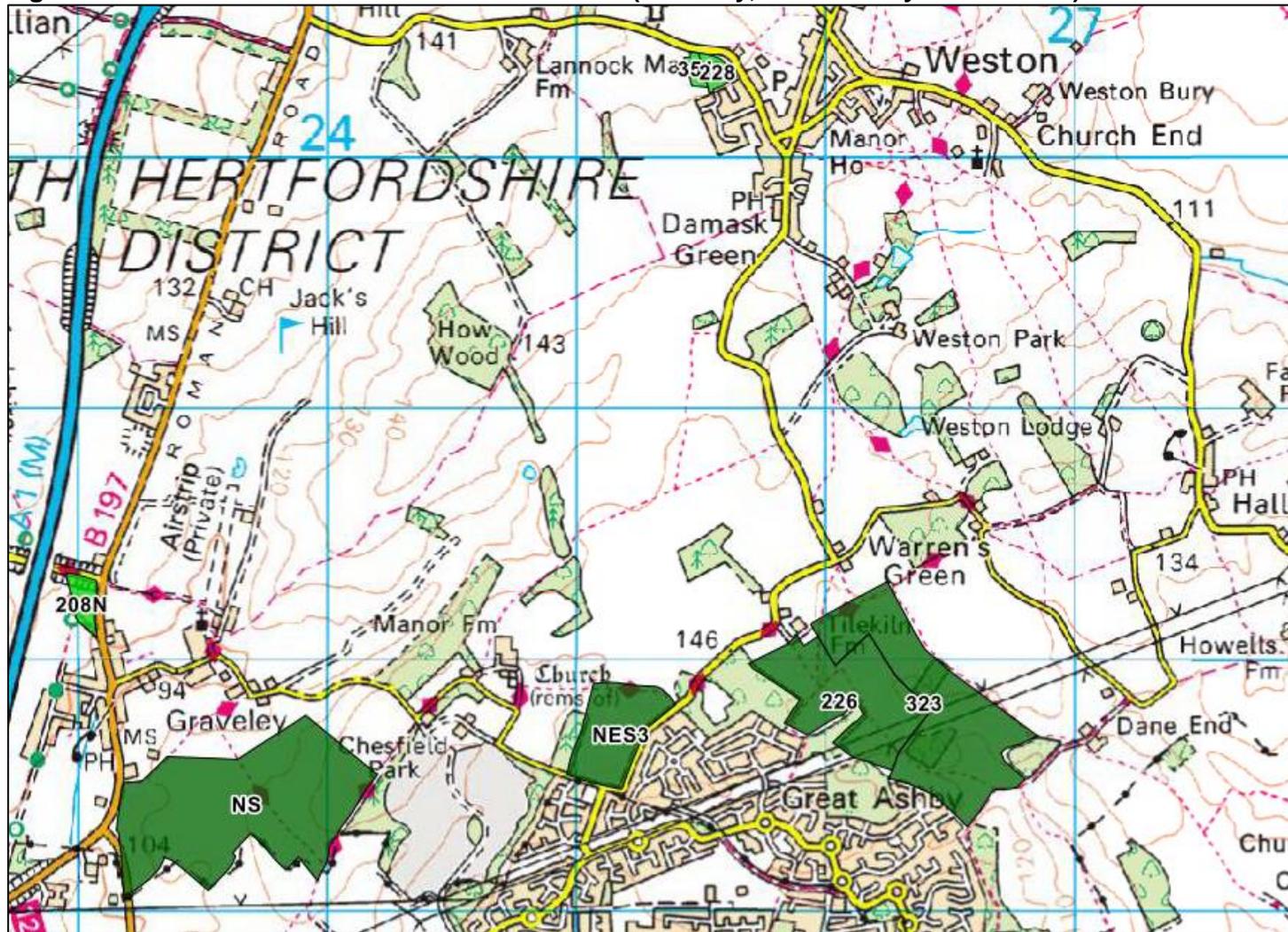
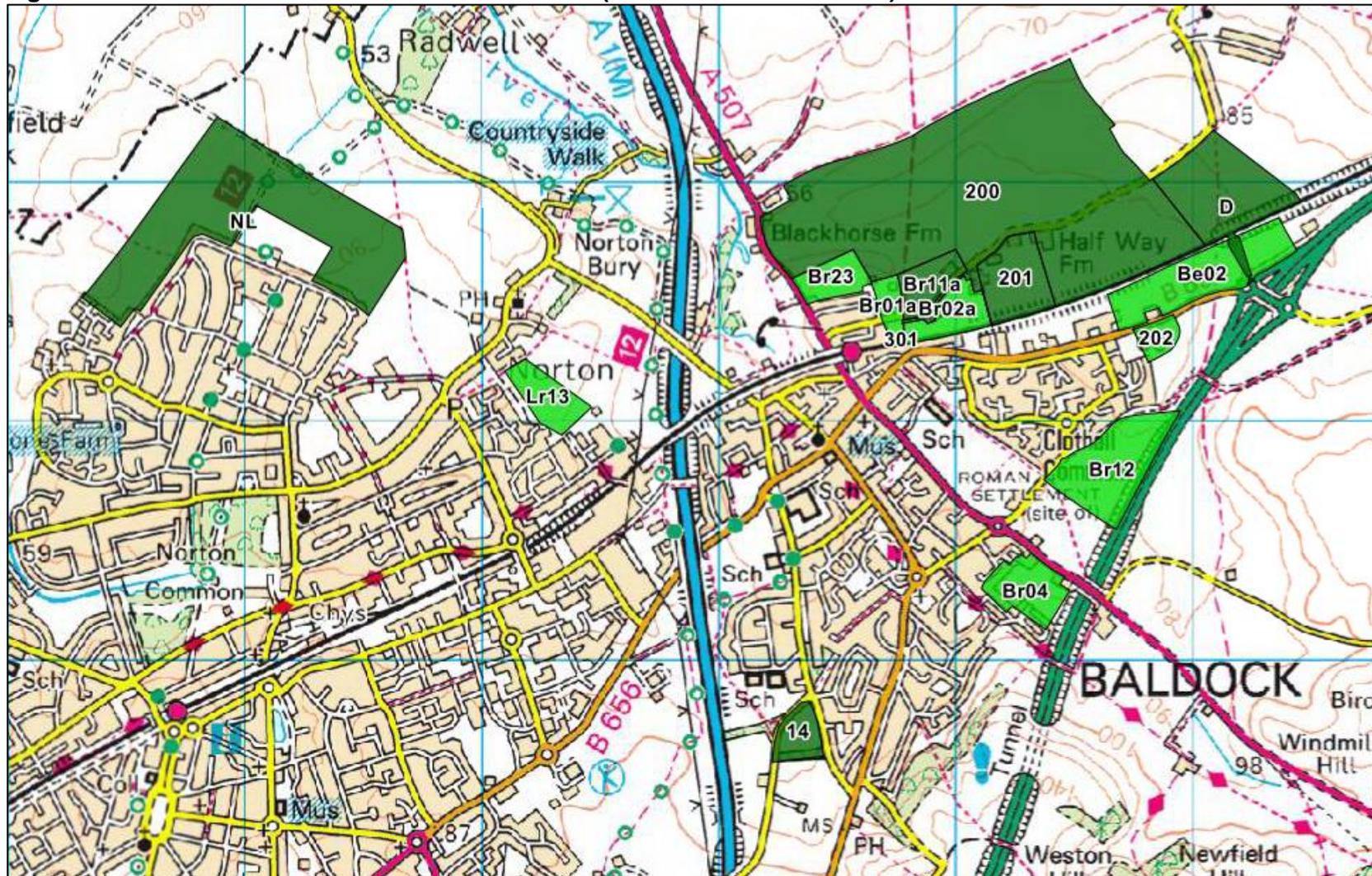


Figure 4.10: Overall assessment of Green Belt sites (Letchworth and Baldock)



4 Comparative analysis against CGB1

Strategic Parcels

- 4.1 Under this update to the original report, three strategic Green Belt parcels are judged to make a more important contribution to overall Green Belt purposes in comparison to the originally submitted Green Belt Review. This information is summarised in Table 4 below.

Table 4: Comparative analysis of overall contribution of Strategic Parcels to Green Belt purposes

Strategic Parcel	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
1 Lilley	Moderate	Moderate	No
2 Lilley Bottom	Moderate	Significant	Increase
3 Peters Green	Moderate	Moderate	No
4 Porters End	Moderate	Moderate	No
5 Codicote	Moderate	Moderate	No
6 Pottersheath	Significant	Significant	No
7 Old Knebworth	Moderate	Moderate	No
8 Knebworth	Significant	Significant	No
9 Langley	Moderate	Significant	Increase
10 Little Wymondley	Significant	Significant	No
11 Gosmore	Significant	Significant	No
12 Oughtonhead	Significant	Significant	No
13 Ickleford	Moderate	Moderate	No
14 Willian	Significant	Significant	No
15 Jack's Hill	Significant	Significant	No
16 Warren's Green	Moderate	Moderate	No
17 Weston	Limited	Limited	No
18 Baldock Gap	Significant	Significant	No
19 Weston Hills	Moderate	Moderate	No
20 Baldock East	Moderate	Moderate	No
21 Bygrave	Moderate	Significant	Increase
22 Radwell	Significant	Significant	No

- 4.2 Parcels 2 (Lilley Bottom), 9 (Langley) and 21 (Bygrave) are judged to make a significant overall contribution to Green Belt purposes, compared against a moderate contribution in the submitted Green Belt review.
- 4.3 No strategic parcels are judged to make a lesser overall contribution; the remaining 19 strategic land parcels achieve the same results under both approaches.

Sub Parcels

- 4.4 The analysis considers 79 Green Belt sub-parcels. The results are summarised in Table 5 below.

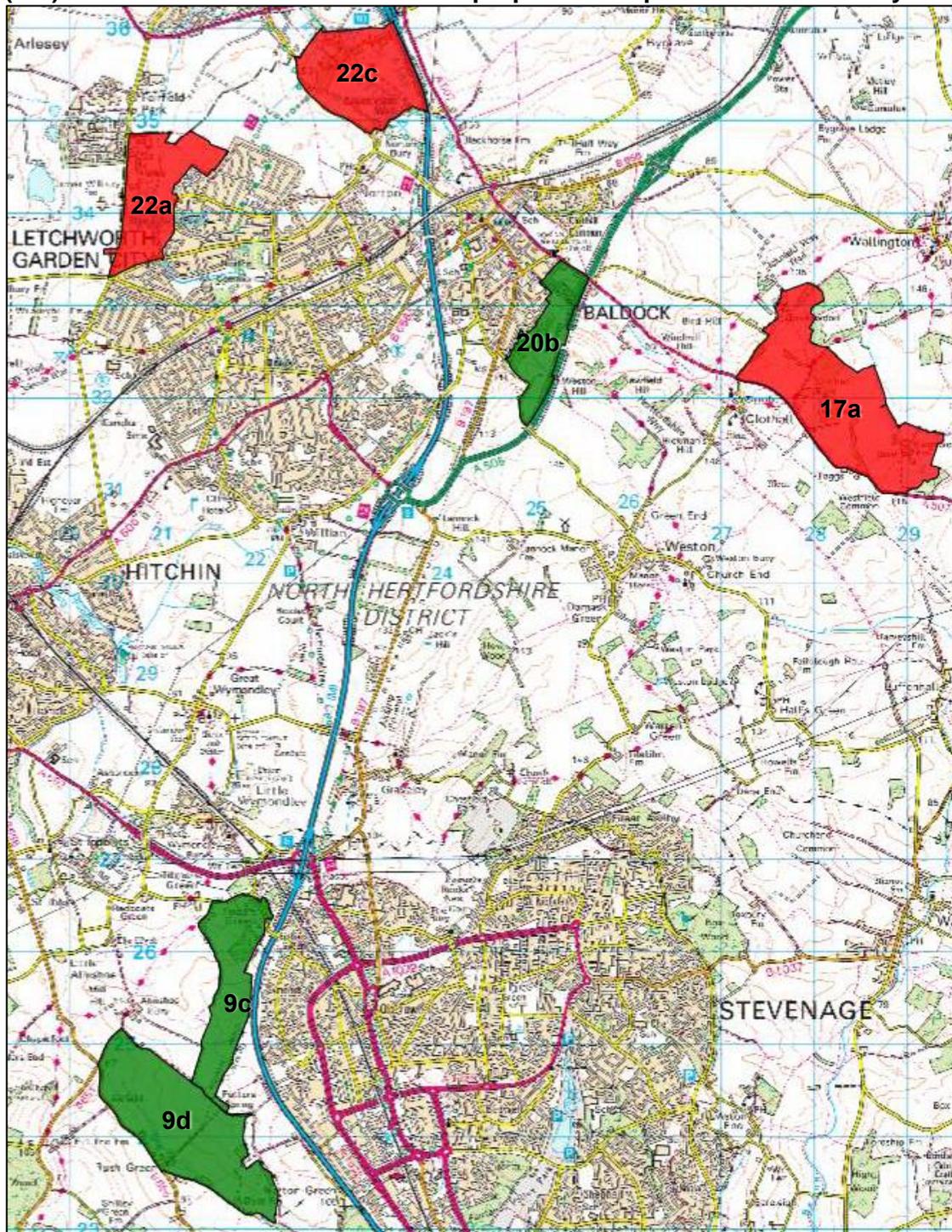
Table 5: Comparative analysis of overall contribution of Sub Parcels to Green Belt purposes

Sub-parcel	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
1a	Limited	Limited	No
1b	Moderate	Moderate	No
1c	Moderate	Moderate	No
1d	Moderate	Moderate	No
1e	Moderate	Moderate	No
2a	Significant	Significant	No
2b	Moderate	Moderate	No
2c	Significant	Significant	No
2d	Significant	Significant	No
2e	Moderate	Moderate	No
2f	Moderate	Moderate	No
2g	Moderate	Moderate	No
2h	Moderate	Moderate	No
2i	Moderate	Moderate	No
3a	Moderate	Moderate	No
3b	Moderate	Moderate	No
3c	Moderate	Moderate	No
3d	Moderate	Moderate	No
4	Moderate	Moderate	No
5a	Moderate	Moderate	No
5b	Moderate	Moderate	No
6	Significant	Significant	No
7a	Moderate	Moderate	No
7b	Moderate	Moderate	No
8a	Significant	Significant	No
8b	Significant	Significant	No
8c	Significant	Significant	No
8d	Significant	Significant	No
9a	Moderate	Moderate	No
9b	Moderate	Moderate	No
9c	Moderate	Significant	Increase
9d	Moderate	Significant	Increase
9e	Moderate	Moderate	No
10a	Significant	Significant	No
10b	Significant	Significant	No
10c	Significant	Significant	No
10d	Significant	Significant	No
10e	Significant	Significant	No
11a	Significant	Significant	No
11b	Significant	Significant	No

Sub-parcel	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
11c	Significant	Significant	No
11d	Significant	Significant	No
12a	Significant	Significant	No
12b	Significant	Significant	No
12c	Significant	Significant	No
12d	Significant	Significant	No
13a	Moderate	Moderate	No
13b	Moderate	Moderate	No
13c	Significant	Significant	No
14a	Significant	Significant	No
14b	Significant	Significant	No
14c	Significant	Significant	No
14d	Significant	Significant	No
14e	Significant	Significant	No
14f	Significant	Significant	No
15a	Significant	Significant	No
15b	Significant	Significant	No
15c	Significant	Significant	No
16	Moderate	Moderate	No
17a	Moderate	Limited	Decrease
17b	Moderate	Moderate	No
17c	Moderate	Moderate	No
18a	Significant	Significant	No
18b	Significant	Significant	No
19a	Moderate	Moderate	No
19b	Moderate	Moderate	No
19c	Moderate	Moderate	No
19d	Moderate	Moderate	No
20a	Moderate	Moderate	No
20b	Moderate	Significant	Increase
21a	Moderate	Moderate	No
21b	Moderate	Moderate	No
21c	Significant	Significant	No
21d	Significant	Significant	No
21e	Significant	Significant	No
22a	Significant	Moderate	Decrease
22b	Significant	Significant	No
22c	Significant	Moderate	Decrease
22d	Significant	Significant	No

- 4.5 Under this revised assessment, 73 achieve the same outcome as CGB1 in terms of their overall contribution to Green Belt purposes.
- 4.6 Of the remaining six sub-parcels, three are judged to make a more important contribution to overall Green Belt purposes. This first of these is sub-parcel 20b to the south of Baldock. The other two are to the west of Stevenage abutting land proposed to be developed in both their adopted and emerging Plans. The revised assessment judges that, having regard to Stevenage Borough's intention that this land be developed, these parcels make a significant contribution against the purpose of 'safeguarding the countryside from encroachment'.
- 4.7 In all three instances, this has the effect of raising the assessment of overall contribution from moderate to significant.
- 4.8 Three sub-parcels are judged to make a lesser contribution to Green Belt purposes than the analysis in CGB1. These are:
- **Parcel 17a** – This lies at the very outer edge of the Metropolitan Green Belt. It is located to the north of the A507 which acts as the key containing feature along the southern boundary of this sub-parcel. It is judged in this revised assessment as making only a limited contribution to Green Belt purposes, compared to a moderate contribution in CGB1;
 - **Parcel 22a** – This lies at the north-west Letchworth in the gap between the urban edge and the Stotfold Road. The revised analysis judges that this site makes a moderate contribution to the purpose of safeguarding the countryside from encroachment resulting in a lower overall assessment of a moderate contribution; and
 - **Parcel 22c** – This lies to the north-east of Norton Road beyond the outer edge of Letchworth. As with parcel 22a, the revised analysis judges that this site makes a moderate contribution to the purpose of safeguarding the countryside from encroachment resulting in a lower overall assessment of a moderate contribution.
- 4.9 The locations of these six parcels are shown in the map on the following page.

Figure 5.1: Sub-parcels assessed as having increased (green) or decreased (red) overall contribution to Green Belt purposes compared with 2016 study



Sites

- 4.10 Table 6 and the maps on the following pages detail any difference in the assessed overall contribution of the potential development sites to Green Belt purposes as a result of the revised assessment in comparison to the results of CGB1.
- 4.11 It can be seen that the majority of sites (38) achieved the same overall outcome under both approaches.
- 4.12 Eleven sites are judged to make a lesser overall contribution to Green Belt purposes under the revised assessment in this report. It is notable that these are concentrated in two distinct clusters or typologies:
- West of Hitchin where the relatively small and contained nature of three potential sites sees them assessed as making only a limited overall contribution to Green Belt purposes, in comparison to a judgement of 'moderate' in CGB1;
 - Generally small sites around the peripheries of villages where their small and contained nature results in a judgement of limited contribution; and
- 4.13 Set against this, twelve sites are judged to make a higher overall contribution to Green Belt purposes under the revised assessment in this report. In all instances they have been judged as making a significant overall contribution, in comparison to a moderate contribution in CGB1.
- 4.14 These sites all relate to potential development locations around the main towns in or adjoining the District:
- Three are to the east of Luton;
 - Five are around the edges of Stevenage;
 - Two lie to the north of Baldock;
 - One lies south-east of Hitchin; and
 - One lies to the north of Letchworth
- 4.15 In all cases, these sites form (part of) potential strategic-scale development sites and, having regard to the potential impacts of such development on the visual and physical openness of the Green Belt, are judged by the revised assessment to have potentially significant impacts on the purpose of 'safeguarding the countryside from encroachment'. The majority (9) are additionally assessed as having potentially significant impacts on the purpose of checking 'the unrestricted sprawl of large built-up areas'.

Table 6: Comparative analysis of overall contribution of potential development sites to Green Belt purposes

Site ref	Settlement / Parish	GB Sub-parcel	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
Housing					
212a	Luton (adj.)	2c	Moderate	Significant	Increase
340	Luton (adj.)	2c	Moderate	Limited	Decrease
ELW	Luton (adj.)	2c	Moderate	Significant	Increase
ELE	Luton (adj.)	2d	Moderate	Significant	Increase
49	King's Walden	2h	Moderate	Moderate	No
51	King's Walden	2h	Moderate	Limited	Decrease
29	Codicote	5a	Moderate	Moderate	No
30	Codicote	5a	Moderate	Limited	Decrease
31	Codicote	5a	Moderate	Moderate	No
313	Codicote	5a	Moderate	Moderate	No
32	Codicote	5b	Moderate	Limited	Decrease
205N	Codicote	5b	Moderate	Moderate	No
205S	Codicote	5b	Moderate	Moderate	No
315	Codicote	5b	Moderate	Moderate	No
52	Knebworth	8a	Moderate	Moderate	No
335	Knebworth	8a	Moderate	Limited	Decrease
58	Knebworth	8b	Significant	Significant	No
55	Knebworth	8c	Significant	Significant	No
57	Knebworth	8c	Moderate	Moderate	No
336	Knebworth	8c	Moderate	Moderate	No
53	Knebworth	8d	Moderate	Moderate	No
WSN	Stevenage (adj.)	9a - 9e	Moderate	Significant	Increase
98	Hitchin	10a	Moderate	Moderate	No
SI/r3	St Ippolyts	10a	Moderate	Limited	Decrease
225	Hitchin	10a / 11d	Moderate	Moderate	No
110*	Hitchin	10b	Moderate	Significant	Increase
121	Wymondley	10d	Moderate	Moderate	No
122	Wymondley	10d	Moderate	Moderate	No
232	Wymondley	10d	Moderate	Moderate	No
221N	St Ippolyts	11d	Moderate	Limited	Decrease
40	Ickleford	12a	Moderate	Moderate	No
H/r14	Hitchin	12c	Moderate	Moderate	No
H/r25	Hitchin	12c	Moderate	Limited	Decrease
H/r30	Hitchin	12c	Moderate	Limited	Decrease
329	Ickleford	13b	Moderate	Limited	Decrease
330	Ickleford	13b	Moderate	Moderate	No
41	Ickleford	13c	Moderate	Limited	Decrease
39	Hitchin	14c	Significant	Significant	No
326	Hitchin	14c	Significant	Significant	No
228	Weston	15a	Moderate	Moderate	No
351	Weston	15a	Moderate	Moderate	No
NES3	Stevenage (adj.)	15b	Moderate	Significant	Increase
208N	Graveley	15c	Moderate	Moderate	No

Site ref	Settlement / Parish	GB Sub- parcel	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
NS	Stevenage (adj.)	15c	Moderate	Significant	Increase
226	Stevenage (adj.)	16	Moderate	Significant	Increase
323	Stevenage (adj.)	16	Moderate	Significant	Increase
14	Baldock	18b	Significant	Significant	No
202	Baldock	20a	Moderate	Moderate	No
B/r12	Baldock	20a	Moderate	Moderate	No
B/r04	Baldock	20b	Moderate	Moderate	No
B/r11a	Baldock	21d	Moderate	Significant	Increase
B/r23	Baldock	21d	Moderate	Moderate	No
200	Baldock	21d / e	Significant	Significant	No
B/r01a	Baldock	21d / e	Moderate	Moderate	No
201	Baldock	21e	Moderate	Significant	Increase
B/r02a	Baldock	21e	Moderate	Moderate	No
D (part)	Baldock	21e	Moderate	Significant	No
310	Baldock	21e	Moderate	Moderate	No
NL	Letchworth	22a / b	Moderate	Significant	Increase
L/r13	Letchworth	22d	Moderate	Moderate	No
Employment					
B/e02	Baldock	20a	Moderate	Moderate	No

Figure 5.2: Sites assessed as having increased (green) or decreased (red) overall contribution to Green Belt purposes compared with 2016 study (North)



Figure 5.3: Sites assessed as having increased (green) or decreased (red) overall contribution to Green Belt purposes compared with 2016 study (south)



Part Two: Implications of the Update for the Plan

5 Implications of the update for the Plan

- 5.1 Having conducted the analysis above and compared with the results in the Green Belt Review as submitted to the Examination in June 2017, it is necessary to consider any implications for the Plan.
- 5.2 In doing so, it is important to remember that the Green Belt Review (including the Update in Part One of this report) is not, in itself, a decision-making document. It is part of a wider suite of evidence which, taken together, informs the spatial strategy set out in the Plan. Being assessed as making only a limited contribution to Green Belt purposes does not necessarily mean that a site or land should or will be released from the Green Belt. Similarly, any sites or parcels considered to make a significant contribution are not automatically 'ruled out' from consideration for future development.
- 5.3 This section gives consideration to these wider issues also having regard to the findings of the Update.
- 5.4 It can be seen from the commentary in Part One that the use of a revised assessment methodology, in line with current best practice, results in no overall change from the assessment of Green Belt contribution set out in CGB1 in the significant majority of instances. This is true for all three component parts of the assessments: strategic parcels, sub-parcels and sites.
- 5.5 When comparing the results of the two, there are some variances in planning judgements made on contributions to individual Green Belt purposes and a relatively small number of cases where this is an alteration to the overall outcome. This is summarised in the table below:

Table 7: Summary of outcomes of alternate assessment vs CGB1

Parcel type	No of sites / parcels assessed	Overall alternate assessment vs CGB1		
		No change in assessed outcome	Increase in assessed importance	Decrease in assessed importance
Strategic	22	19	3	0
Sub-parcel	79	73	3	3
Sites	61	38	12	11
Total	162	130	18	14

- 5.7 However, it is notable that, even with these differences, there is no clear trend towards either a general upgrading or downgrading of assessment results under the Update assessment when compared to CGB1.
- 5.8 In broad terms, it can therefore be concluded that the conclusions drawn from the submitted Green Belt Review, and the evidence discussed at the scheduled hearing sessions are not fundamentally flawed or undermined by the results presented in the revised Green Belt assessment contained in this update.
- 5.9 In this regard, the conclusion in Chapter 4 of the Housing and Green Belt Background Paper (HOU1, paragraphs 4.93 to 4.101, pp.24-25) remains valid; namely that, as a matter of general principle, it is considered that the necessary *exceptional circumstances* do exist to justify the release of land from the Green Belt in North Hertfordshire.

- 5.10 This broad conclusion had regard to the general principles of *Calverton*⁶. The assessment against the first three points of Calverton are unaffected by this Update, summarised as:
- The acuteness and intensity of the objectively assessed need;
 - The inherent constraints on the supply and availability of land; and
 - The consequent difficulties in achieving sustainable development without use of Green Belt land.
- 5.11 These factors are largely considered against wider elements of the evidence base, such as the assessments of development needs and land availability (both within the District and in wider market areas) and are not directly impacted upon by the assessments in CGB1 and this document.
- 5.12 Similarly, although there are some changes in assessment results at a site-specific level, particularly in relation to some of the proposed housing allocations, it is not considered that these lead to a need to alter the spatial strategy set out in the Plan.
- 5.13 In light of the Green Belt Review (CGB1), the Plan proposes development on sites assessed as having a range of harms. In particular it is noted that a number of sites proposed for allocation in the Plan are judged by CGB1 as having the potential to cause significant harms to the purposes of Green Belt, as set out in that document and in the individual statements submitted for Matters 10, 11 and 13 of the Examination.
- 5.14 In this regard, carrying forward the same suite of sites under the results of the revised assessment would not result in the Council suggesting development that would result in a level of assessed harm to Green Belt purposes that was previously considered unacceptable. This might not have been case if, for example, the Plan had drawn a 'red line' at the inclusion of sites with potentially significant harms and that threshold would be breached having regard to the results of the revised assessment.
- 5.15 The Plan and associated evidence recognised that the best approach to be taken, and decisions on whether or not to allocated individual parcels of land, would need to be considered on a site-by-site basis having regard to the benefits and harms of those decisions⁷.
- 5.16 Table 8 below contains a comparison of the assessed Green Belt harms for sites proposed in the Plan⁸.
- 5.17 For those sites where there is no difference in outcome between the two assessments, the factors influencing the justification for their allocation remains unchanged and there is no requirement for further analysis.
- 5.18 For those sites where this update assesses a decreased overall contribution to Green Belt purposes, the Plan and the existing evidence base has already made a judgement based upon a presumed heightened impact on Green Belt purposes compared to results in this update and can reasonably be viewed as representing a 'worst-case scenario'.

⁶ As set out in Paragraph 4.19, pp.13-14 of that document.

⁷ See Paragraph 4.101 and Appendix 2 of HOU1

⁸ Appendix 2 of HOU1 provides full cross-referencing of SHLAA / Green Belt Review site references to proposed Local Plan allocation references.

Table 8: Comparative analysis of the contribution of proposed Local Plan allocations to Green Belt purposes

Local Plan site (for housing unless otherwise stated)	Overall contribution (CGB1)	Overall contribution (Update)	Difference in outcome?
BA1	Moderate / Significant	Moderate / Significant	Increase*
BA2	Moderate	Moderate	No
BA3	Moderate	Moderate	No
BA4 (part)	Moderate	Moderate	No
BA10 [employment]	Moderate	Moderate	No
CD1	Moderate	Moderate	No
CD2	Moderate	Moderate	No
CD3	Moderate	Limited	Decrease
CD5	Moderate	Moderate	No
EL1	Moderate	Significant	Increase
EL2	Moderate	Significant	Increase
EL3	Moderate	Significant	Increase
GA1	Moderate	Significant	Increase
GA2	Moderate	Significant	Increase
GR1	Moderate	Moderate	No
HT1	Significant	Significant	No
HT2	Moderate	Moderate	No
HT3	Moderate	Limited	Decrease
HT5	Moderate	Limited	Decrease
HT6	Moderate	Moderate	No
IC1	Moderate	Limited	Decrease
IC2	Moderate	Moderate	No
IC3	Moderate	Moderate	No
KB1	Moderate	Moderate / Limited	Decrease*
KB2	Moderate	Moderate	No
KB4	Moderate / Significant	Moderate / Significant	No
KW1	Moderate	Limited	Decrease
LG1	Moderate	Significant	Increase
LG3	Moderate	Moderate	No
NS1	Moderate	Significant	Increase
SI1	Moderate	Limited	Decrease
SI2	Moderate	Limited	Decrease
WE1	Moderate	Moderate	No
WY1	Moderate	Moderate	No
Policy SP8 [safeguarded land West of Stevenage]	Moderate	Significant	Increase

*Change recorded in some constituent sub-areas assessed individually in Green Belt Review and Update

- 5.19 For those sites judged as having an increased contribution to Green Belt purposes, the reasons supporting their proposed allocation have been reviewed. With the exception of Site GA1, all of the sites recording an increased contribution to Green Belt purposes under this update are classified as Strategic Sites in the Plan. These are the largest sites of 500+ homes in the Plan. Taken together, the Strategic Sites account for more than 50% of future planned supply.
- 5.20 These sites are therefore fundamental to the Plan's strategy. As previously set out in evidence and statements to the Examination, Paragraph 52 of the NPPF recognises that the supply of new homes can sometimes be best achieved through planning for larger-scale developments.
- 5.21 These sites represent the best opportunities for strategic-scale development within the District adjoining the main towns. The conclusions in Appendix 2 of HOU1 regarding the significant positive opportunities afforded by these sites being considered to outweigh the harms are still considered valid, even if the heightened contribution towards Green Belt purposes found in the revised analysis in this Report are applied.
- 5.22 Although slightly smaller in scale at a proposed 330 homes, site GA1 is recognised as making a "substantial contribution to overall housing numbers achievable and [being] critical to achievable levels of five-year delivery"⁹. As set out in the Council's Statement to the relevant Matter 10 session, a planning application for this site was submitted in July 2016 and is awaiting determination pending, in part, the outcome of the Plan's Examination. Similarly, the conclusions of HOU1 with regard to this site are considered to remain valid.
- 5.23 In all instances, proposed policy criteria to ameliorate Green Belt harms to the fullest reasonable extent are set out in the Plan (LP1, Policies SP14 to SP19, pp.61-72) and / or subject to additional strengthening pursuant to the proposed modifications contained in the Council's Examination Statements and / or the actions arising from the hearing sessions (as set out in ED95, ED96 and ED128).
- 5.24 In reaching the conclusions above, it is also important to have regard to those sites not taken forward in the Plan and the reasons for this to demonstrate that these alternatives would (still) not represent better opportunities under the revised assessment. The alternatives within the Green Belt not taken forward for proposed allocation are summarised in Table 9 below. It can be seen that, of the ten possibilities, four have a changed outcome under the alternate assessment in this update. One site, on the edge of Hitchin, sees its assessed contribution to Green Belt purposes increase. The original site selection process still rejected this site even when a lower level of perceived harm was taken into account. This was primarily due to the presence of areas of flood risk within the site.
- 5.25 Three sites see their assessed contribution to Green Belt purposes decrease. These are all small sites in village locations. These, along with the three other village sites seeing no change (Sites 49, 205N and 315) would by definition, be considered less sustainable locations for development than the sites discussed in paragraphs 5.19 to 5.23 above.

⁹ Appendix 2 of HOU1

5.26 Further, it is notable that five of the sites were discounted for reasons not including Green Belt considerations. These sites would not be capable of replacing the quantum of development that would be lost through removal of the above sites. It is not considered that any of these sites would now be judged as more appropriate, alternative development sites in light of the revised analysis in this Report.

Table 9: Sites not taken forward for proposed allocation (Green Belt)

Site ref	Settlement / parish	Overall contribution (Update)	Change?	Green Belt influence on reasons for non-allocation?
340	Offley	Limited	Decrease	No - Within proposed Cat A village; impacts best considered as windfall
49	King's Walden	Moderate	No	Part - Alternate site in village considered a better opportunity
30	Codicote	Limited	Decrease	Part - Other sites in village considered a better opportunity
315	Codicote	Moderate	No	Part - Other sites in village considered a better opportunity
205N	Codicote	Moderate	No	Part - Other sites in village considered a better opportunity
225	Hitchin	Moderate	No	No - Area of flood risk requiring sequential test
110*	Hitchin	Significant	Increase	No - Area of flood risk requiring sequential test
121	Wymondley	Moderate	No	No - Area of flood risk requiring sequential test
329	Ickleford	Limited	Decrease	No - Heritage impacts
14	Baldock	Significant	No	Part - Other sites in town considered a better opportunity

5.27 Similarly, it is necessary to consider those alternatives for development beyond the Green Belt not carried forward. A review of the commentary in Appendix 2 of HOU1 shows that, with one exception, the sites not carried forward for allocation in areas presently beyond the Green Belt were village locations. As a matter of planning judgement, these sites would still not be considered better options for development. They would not be capable of providing an equivalent replacement level of new homes if taken forward instead of the sites identified above.

5.28 The one alternative site within a town was the site of Royston Football Club. This was discarded as its allocation as development would be contingent upon the relocation or replacement of the existing use. No alternative sites have been identified through the plan-making process. This site would also not be capable of providing an equivalent level of new homes (either in isolation or in concert with the other alternatives above).

6 Conclusion

- 6.1 Having regard to the analysis above, it is concluded that application of an revised methodology to the Green Belt Review in line with current best practice, and having regard to the latest legal authority which makes it clear that the visual dimension as well as the spatial dimension of openness needs to be considered, would not result in any change to the proposed spatial development strategy in the Plan.
- 6.2 Having regard to a refined assessment methodology compliant with current case law, there are some differences in the assessed contribution of strategic parcels, sub-parcels and sites to the purposes of Green Belt compared to the analysis presented in CGB1. However, there is nothing in this update to suggest that CGB1 either consistently overplays or underplays potential Green Belt impacts or has led to erroneous decisions or conclusions.
- 6.3 The analysis in this Update demonstrates that, as a matter of planning judgement, the sites put forward for development in the Plan remain, in Green Belt terms, the most appropriate.

Appendices

Appendix 1 – Site survey pro-forma with guidance notes

Appendix 2 – Site assessment forms – Strategic Parcels

Appendix 3 – Site assessment forms – Sub-parcels

Appendix 4 – Site assessment forms – Potential development sites