

**North Hertfordshire Local Plan Examination  
ED79 - Matter 7**

**Note to the Inspector**

**Note to Inspector on the Exceptional Circumstances and other matters justifying the proposed alteration to the existing Green Belt boundary by adding land to the Green Belt.**

**1. The Existing Designation of Green Belt in this Location**

- 1.1. The existing area of Metropolitan Green Belt was originally designated to restrict expansion along the growth corridors of the A1M and the M1. This aim has largely been secured, but in the intervening 45 years development pressures and accessibility have evolved such that undesignated land between these corridors is vulnerable to development pressure and incremental change.
- 1.2. There is no evidence associated with the designation of Green Belt in North Hertfordshire to explain why the central area between the two strips of Green Belt was not originally included in the designated area. More specifically, there is no evidence to support how the boundaries for the current Green Belt were identified. In some areas, the boundary runs along a road (such as the B656 to the west of Stevenage) whilst in other places it follows field or woodland boundaries, such as to the south west of Hitchin or between Ley Green and Lilly Bottom road; or it uses footpaths such as to the west of Codicote and south of Kimpton (see ED44a Current GB boundary and ED44b Proposed GB boundary). Many of these boundaries are neither substantial nor permanent.
- 1.3. The Green Belt is typically less than 2.5 miles wide along the eastern edge of Luton edge, and in places less than 0.75 miles wide directly adjoining Stevenage. Given the scale of the London Metropolitan Green Belt, the exclusion of the strip of land between two large settlements (whose settlement edges are around 6 miles apart) is therefore inconsistent with designation elsewhere and, more widely, the strategic nature of the Metropolitan Green Belt.
- 1.4. Across the Metropolitan Green Belt, the only other comparable area in terms of size which is enclosed by surrounding Green Belt is the area to the north of Hemel Hempstead. However, this land is part of the Chilterns AONB and therefore has an inherently high level of protection from development.

**2. Proposed Revised Extent of the Green Belt**

- 2.1. As well as North Hertfordshire's requirement for sites within the Green Belt to provide land for its own housing need, significant change is proposed in the

adjacent settlements of Luton and Stevenage. Part of this change involves development in the Green Belt within North Hertfordshire District to facilitate the growth of Luton and Stevenage which will further erode the already narrow band of Green Belt containing these substantial towns.

- 2.2. The proposal to provide new Green Belt between Luton and Stevenage to join the two existing strips will allow for a stronger, more rational Green Belt boundary that will endure beyond the current plan period.
- 2.3. 3.The Green Belt Review [CG1} section 6 pp.137-150, sets out the analysis of the contribution of this land to Green Belt purposes. Part of the conclusion to the Review (para 96 p.150) notes that: *“The areas of non-Green Belt land assessed form a narrow corridor between the existing bands of Green Belt along the eastern edge of Luton and the western edge of Stevenage/Hitchin. Although not directly adjoining 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 Stevenage could perform a key role in maintaining the separation of these towns.”*
- 2.4. The existing strip of non-Green Belt land ranges from just over a mile wide between Kimpton and Kimpton Mill to nearly three miles wide at Whitwell. Creating a new outer boundary for the Green Belt within this narrow area would be illogical and would lead to the creation of meaningless fragments of non-Green Belt land. Therefore, the only reasonable long-term planning solution is to include all the land between the two existing Green Belt strips between the A505 in the north and the District boundary in the south. This will create a more robust and logical area of Green Belt that also joins with the existing Green Belt area in neighbouring districts to create a more consistent and enduring area of Green Belt which strengthens the policy protection between Stevenage and Luton.
- 2.5. The A505 dual carriageway is a logical northern boundary for two reasons: first, it is a robust border with a significant degree of permanence; and second, the Chilterns AONB lies to the north of the A505 dual carriageway stretching from beyond the District boundary in the west to the current Green Belt boundary along the western edge of Hitchin.

### **3. Meeting the Requirements of the NPPF, including Exceptional Circumstances**

- 3.1 The proposed new area of Green Belt is an opportunity to create a more logical and robust area of Green Belt that would contribute to guiding development towards more sustainable locations in the surrounding towns and villages and would serve the purposes of the green belt. In particular it would serve a key role in maintaining the separation between the settlements of Hitchin and Luton. In doing

so, a clear basis for the strategic planning of settlement form can be established. Designation would not, nor is intended to, represent compensation *per se* for the loss of Green Belt as part of the proposed allocation of strategic development sites and safeguarded land, although the loss of existing green belt land weakens its existing function and contribution to green belt purposes.

- 3.2. The NPPF (para 82) sets out various tests in respect of proposals for designating new areas of Green Belt. The rationale for designating the proposed area of Green Belt against these criteria is as follows:

<b>NPPF Requirement</b>	<b>How the Requirement is Met</b>
<i>Demonstrate why normal planning and development management policies would not be adequate</i>	Other policies within the Local Plan, in particular Development Management policy CG1: Rural Areas beyond the Green Belt, provide some policy protection, but cannot be as stringent or consistent as Green Belt policy in their application. This is particularly the case for the land which lies between Hitchin/Stevenage and Luton which, as a strategic gap between these towns, is effectively performing a Green Belt role. As such policy which ensures the effective control of development is required to ensure that, over the long term, the purpose of strategic separation is considered. This can only be done in a consistent fashion through the use of Green Belt policy extending across the whole of the land to the south of the A505.
<i>Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary</i>	The Council's evidence base identifies a requirement for 13,800 new homes within North Hertfordshire over the period 2011-2031. This scale of development is clearly of an order not contemplated when the original green belt boundary was set and constitutes a major change in circumstances since that time. It is considered that the OAN for 13,800 homes within North Herts can be described as both 'acute' and 'intense'. Less than half of the homes, 6,343 (46%) can be delivered on non-Green Belt sites in North Hertfordshire over the plan period. Therefore, there will be significant housing shortfalls both within North Hertfordshire and across the wider housing market area without using Green Belt land. Release of Green Belt land reduces the area of Green Belt land around settlements and will place greater pressure on those areas remaining. Increasing the depth and overall integrity of the Green Belt will ensure that the openness and permanence of the wider Green Belt in this locality is strengthened.
<i>Show what the consequences of the proposal would be for sustainable development</i>	The designation of additional Green Belt in North Hertfordshire is part of a clear strategic approach to directing development to the towns and larger villages inset with the Green Belt, with appropriate Green Belt release, to help secure more sustainable development. Designation of Green Belt in this location is therefore complementary to the allocation of development land, and part of a planning framework for the plan period and beyond which seeks to balance the need for development with countryside protection. Thereby

NPPF Requirement	How the Requirement is Met
	ensuring that development is sustainable and sustainably located.
<i>Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas</i>	<p>The Green Belt in North Hertfordshire was last amended in 1996. The need for housing and existence of tight Green Belt boundaries around settlements has necessitated the review of the Green Belt and its purpose in containing settlements and protecting the openness of the countryside. The proposed allocations (and attendant need to revise Green Belt boundaries) reflect the fulfilment of obligations under the Duty to Co-operate between North Hertfordshire and adjoining Councils to provide for development. As such, the proposed designation of Green Belt is an essential part of this strategic approach to planning in this locality which has been advocated in the County Structure Plan and the Regional Plan as a logical planning approach.</p>
<i>Show how the Green Belt would meet the other objectives of the Framework.</i>	<p>The proposed designation of Green Belt will make an important contribution to the fulfilment of a variety of objectives of the NPPF, notably:</p> <p><i>Section 2. Ensuring the vitality of town centres</i> – by helping to steer development towards sustainable locations which include the surrounding towns.</p> <p><i>Section 4. Promoting sustainable transport</i> – by helping to steer development towards sustainable locations where the opportunities for sustainable transport can be best secured.</p> <p><i>Section 6. Delivering a wide choice of high quality homes</i> – through balancing the need to provide development land in sustainable locations complemented by the appropriate protection of the wider countryside in a consistent fashion.</p> <p><i>Section 8. Promoting healthy communities</i> – Green Belt land constitutes an important recreational resource within reach of urban areas. The extension of the Green Belt in this locality will provide consistent protection of the land as a countryside resource in an area accessible to a large number of urban residents (both existing and new) to the east and west. In addition (and as advocated in para 81 of the NPPF), there is the opportunity to plan positively to enhance the beneficial use of the Green Belt in terms of recreational, landscape and biodiversity, across an extensive tract of land.</p> <p><i>Section 9. Protecting Green Belt land</i> – by creating a coherent area of Green Belt with robust boundaries which will endure beyond the Plan period and complement proposals for growth in surrounding settlements.</p> <p><i>Section 11. Conserving and enhancing the natural environment</i> – by providing the basis for the consistent protection of the countryside in this locality, whilst also helping to protect the setting of the Chilterns AONB to the north of the A505 (Position Statement – Development affecting the setting of the Chilterns AONB, June 2011).</p>

3.2 In responding to these Exceptional Circumstances, designation of Green Belt in this location would fulfil criteria set out in the NPPF (para 85), namely:

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *[Ensure] that Green Belt boundaries will not need to be altered at end of the development plan period; and*
- *Define boundaries clearly, using features that are readily recognisable and likely to be permanent.*