

EAST HERTFORDSHIRE DISTRICT PLAN (2011 – 2033)

PUBLIC EXAMINATION

HEARING STATEMENT BY JED GRIFFITHS MA DipTP FRTPI

ON BEHALF OF STOP HARLOW NORTH

Matter 5: The Development Strategy – Green Belt

Question 1...Where is the land that the Plan would release from the Green Belt?

The Plan and the Policies Maps are very clear as to which land would be released from the Green Belt. There is no compensatory allocation of additional Green Belt land to off-set the losses proposed. For example, the proposals for the Gilston area would reduce the Green Belt to a very narrow sliver of land along the River Stort.

Question 2...What is the link between the amount of land released from the Green Belt and the housing requirement, the need to direct development to sustainable locations and the localised need for housing? Where is the evidence that broadly justifies the amount of land to be released?

SHN considers that the amount of land released from the Green Belt in the Gilston area is unjustified in terms of the housing requirement, as there are other options in and around Harlow which have not been fully explored by East Herts and the other three local authorities. As explained above, under Matter 2, this should be fully explored by means of a joint DPD which would examine the case for development to the south of Harlow, beyond the Green Belt. The Gilston area is not a sustainable location. The Timms Hertfordshire Housing Report was clear on this, stating that development north of Harlow “is unlikely to be sustainable and could have serious consequences for housing growth and development.”

Question 3...Where can it be demonstrated that the Council has examined all other reasonable options?

The options were examined for East Herts Council in the East Herts Green Belt Study, produced by Peter Brett Associates in 2015. The detailed analysis in the report found that the Green Belt to the north of Harlow were “paramount” in safeguarding the countryside from development. Despite these conclusions, the Council has opted for the removal of most of the Green Belt to the north of Harlow. The land was of low suitability for development in Green Belt terms. As SHN has pointed out, the selection of the Gilston area is based more on land ownership than Green Belt criteria.

Question 4 Are there exceptional circumstances to justify the Plan's alterations to the existing adopted GB boundaries?

In terms of the NPPF (paragraph 83), the District Plan has not shown exceptional circumstances for the proposed alterations to the Green Belt boundaries. The changes have been made mainly on the basis of housing allocations. SHN in their submissions have referred to a letter (dated 7th June 2016) from the former Minister for Planning, Brandon Lewis MP. In the letter, the Minister states very clearly that housing needs alone would not change Green Belt boundaries. This is reinforced in Planning Practice Guidance (paragraphs 044 and 045) which states that Green Belt boundaries are a constraint which may limit the ability of local authorities to deliver their own objectively-assessed housing needs.

Question 5...NPs cannot alter Green Belt boundaries which the National Planning Policy Framework advises can only be carried out as part of the local plan. What options are there to address this and to ensure that the Plan complies with national policy?

It is accepted that Neighbourhood Plans cannot alter Green Belt boundaries. Thus any amendments in East Hertfordshire can only be carried out as part of the District Plan. Thus, the Neighbourhood Plan Group for Hunsdon, Eastwick and Gilston will have no real say in the detailed amendments for the Gilston area.

There are a number of Neighbourhood Plans being prepared in East Hertfordshire. Only two have passed the examination stage. Any amendments to Green Belt boundaries will have to be proposed where appropriate in Neighbourhood Plans, but the detailed proposals can only be delivered in the District Plan and its subsequent reviews. There are no current problems with this approach.

Question 6...Is the site selection/Green Belt review process robust?

As detailed above, SHN considers that the site selection and Green Belt review process has been far from robust. In terms of the Gilston area, it has been related mainly to land ownership. There has been little relationship between the selection of the site for major development and the NPPF policies on Green Belt.

Question 7...Are the boundaries appropriately defined having regard to Green Belt purposes and the need to use readily recognisable physical features that are likely to be permanent?

The proposals in the Plan would lead to the emaciation of the Green Belt, particularly in the Stort Valley. The history of the Green Belt and the definition of the boundaries is set out in the previous submissions by SHN, but the outer boundaries were determined according to recognisable physical features. In particular, the extent of the Green Belt to the north of Harlow was determined by a ridge line above the Stort Valley.

With the proposals described in Chapter 11 of the Plan, the extent of the Green Belt is confined to the valley floor and makes little sense in terms of the functions set out in the NPPF. In particular, its key function, in protecting the countryside from encroachment, will be diminished. It is difficult to envisage how this smaller extent of Green Belt will help to prevent coalescence between Harlow and other settlements in the Stort Valley,

The Green Belt to the north of Harlow marks an important development threshold. Once breached, it is difficult to envisage where development would end without Green Belt protection. Developers have in the past put forward proposals for the development of up to 25,000 dwellings in the areas around Harlow. The next threshold to the north is the A120 – without Green Belt protection, the implications for the long term are serious.

The Plan does not suggest any compensatory designations of Green Belt land to off-set the proposed removal of areas. In the Gilston area and other locations, the outer boundary of the Green Belt has been removed. This must be re-considered the outer edge of the Green Belt is the most important element of the designated area. Beyond the outer edges of the proposed development areas, the Plan gives no consideration to the appropriate limits to the Green Belt and its possible extension.