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**EAST HERTFORDSHIRE**

**DISTRICT PLAN EXAMINATION**

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**Matter 5 – The Development  
Strategy: Green Belt**

**Wed 11<sup>th</sup> October 2017**

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**STATEMENT PREPARED BY:**



**On behalf of:**

**Croudace Homes Ltd**



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**SEPTEMBER 2017**

## **Executive Summary**

*Croudace Homes Group owns the 9ha of land to the south of Welwyn Rd and west of Thieves Lane, Hertford, allocated under draft Policy HERT3 (Part III) for 250 dwellings.*

*We support the allocation of the site for housing and consider the general policy approach to be sound, including in relation to the spatial approach to meeting housing needs and the release of land from the Green Belt.*

*A Statement of Common Ground has been prepared with the Council setting out a number of agreed matters in relation to the allocation and future development of the site.*

*We are seeking the deletion of part (c) of the policy on the basis that they we do not intend to make self-build housing plots available on the site.*

### **Green Belt Release – DPS3**

#### **Q1**

***Are there exceptional circumstances to justify the plan's alterations to the existing adopted GB boundaries?***

1. The Council's approach to the Green Belt is set out in TPA/001, TPA/003, the Settlement Appraisals (SS/001 to SSS/010), the Sustainability Appraisal ("SA") (SUB/004) and the Green Belt Review (GRB001).
2. Paragraph 3.4 of TPA/003 is of particular relevance in so far as it summarises the justification for the release of land from the Green Belt, as representing the most sustainable option in seeking to meet identified housing needs.
3. A schedule of sites proposed to be released from the Green Belt is set out at paragraph 3.5 of the Topic Paper.

4. In relation to site specific matters, we support the justification for the allocation of HERT3 as being necessary to meet the identified housing need, as well as suitable given the proximity of the site to local services and the fact that it has been assessed against the tests set out at paragraph 80 of the NPPF as being suitable for development.
5. Section 4 of the Green Belt Topic Paper sets out the exceptional circumstances to justify the release of Green Belt land. Paragraph 4.18 refers to the approach adopted in the example of the Lichfield District Local Plan where the Inspector supported the spatial strategy that provided for a release of land from the Green Belt in preference to less sustainable sites beyond the Green Belt on the basis that it provided the most appropriate strategy in helping to meet identified housing needs. There are obvious parallels with the spatial approach proposed in the East Herts District Plan, which strategy we support.
6. Paragraph 4.22 summarises in greater detail the assessment process undertaken in relation to the proposed release of land from the Green Belt, with the results summarised in Table 4.1. Additional justification for the allocation of the proposed sites is set at paragraph 4.23 of the Topic Paper.
7. We consider that there are exceptional circumstances to justify the release of land from the Green Belt for housing, which need is now greater following publication of ED121 and the need to find land for an additional 2,000 dwellings during the plan period over and above the 16,390 dwellings planned for in the submission version.

**Q6**

***Is the site selection/Green Belt review process robust***

8. Including for the reasons set out above we are of the view that the site selection process is robust. This is particularly the case in relation to the proposed allocation of land to the south of Welwyn Road at Hertford under policy HERT3.
9. In addition to the Council's evidence base, we have undertaken a detailed Green Belt/Landscape assessment of the HERT3 site to the south of Welwyn Road, which findings are set out in the Landscape and Visual Impact Assessment attached as **Appendix A.**

10. The site is not covered by any statutory or local designations for landscape character or quality. An assessment of the visibility of the site as it presently stands has been carried out. Views of the site are limited due to the screening effects of the nearby residential properties and the school buildings to the north and east, and woodland to the south and west.
11. As part of the proposed Masterplan approach, a 15m wide undeveloped buffer is proposed along the southern and western sides of the site. This is the usual provision for development adjoining ancient woodland. While Chesher's Plantation to the south (within Panshanger Park) is not an ancient woodland, a similarly sized buffer here would help to separate the new houses from the registered historic park.
12. As to the inter and intra visibility of the site, it is concluded that although the provision of new dwellings on the site would add some new and taller elements, it would not significantly alter the extent of the area. As a result, it is concluded that the magnitude of change to the local landscape brought about by the proposed development would be low to medium, such that the effects of the proposed development on local landscape character would be no more than slight to moderate adverse.
13. The effects on the landscape of the Registered Park have also been assessed. It has been concluded that there will be no significant effect on the landscape of historic park as a result of the proposed development. The Opportunities and Constraints Plan shows an open area long the southern edge of the site to mitigate the impact of the development on the Park.
14. The LVIA concludes that the site is suitable for housing development. This accords with the assessment of the site made by the East Hertfordshire District Council and their allocation of the site in their draft Local Plan.
15. Whilst there would be some low level harm in respect of general landscape protection policies, but that harm would be minimised by the proposed mitigation measures, and would decline over time. Such harm is a largely inevitable consequence of the development of any greenfield site, and needs to be balanced against the provision of much needed new housing.

16. The limited adverse visual effects which have been identified are no more than would be expected from development of any edge of settlement site, and result chiefly from the appearance of new houses in mainly private views from existing houses, and from the roads around the Site.
17. Including on the basis of the Council's evidence base and the detailed masterplanning work undertaken by Croudace's technical consultant team, development of the site for 250 dwellings would not adversely impact upon the five purposes of the Green Belt as set out at paragraph 80 of the Framework.

**Q7**

***Are the boundaries appropriately defined having regard to GB purposes and the need to use readily recognisable physical features that are likely to be permanent?***

18. We find the revised Green Belt boundary to be appropriately defined (having regard to the tests set out at paragraph 85 of the Framework) in so far as it relates to the southern part of the HERT3 allocation.
19. We have prepared a Development Framework Document for the site (**Appendix B**) which justifies the overall approach to the scheme design having regard to the relevant technical considerations, including landscape/Green Belt.
20. The Framework Document demonstrates how 250 dwellings could be accommodated within the site and the principal issues that will need to be considered in preparing a detailed scheme for the site.
21. The allocation of HERT3 is supported by a substantial body of technical work to justify the suitability of the site for approximately 250 dwellings. The site can be developed in a landscaped setting whilst ensuring an appropriate buffer to the wider countryside and Green Belt beyond. The presence of Panshanger Park, existing trees/woodland and wildlife designations will help to secure the permanence of the Green Belt in this part of Hertford.

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