



# **East Herts District Plan**

## **Examination Hearing Statements**

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

## Matter 5: The Development Strategy - The Green Belt

### Issue:

Has the Plan has been positively prepared and is it justified, effective and consistent with national [*policy*] to release land from the Green Belt?

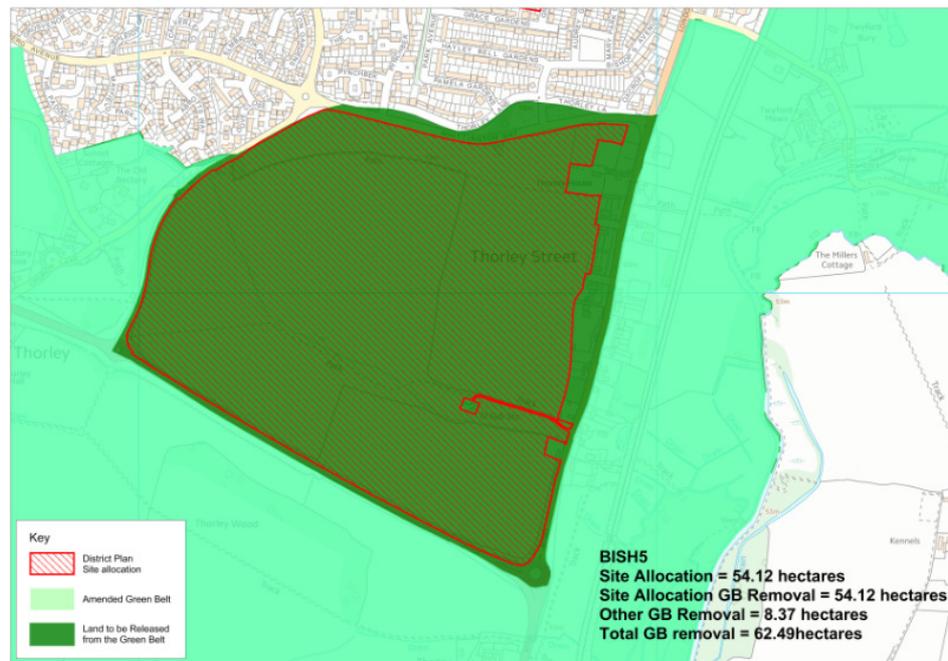
### *Green Belt release*

#### **Question 1**

**Where is the land that the Plan would release from the Green Belt?**

1. The District Plan proposes to release land from the Green Belt to accommodate the following proposed allocations:

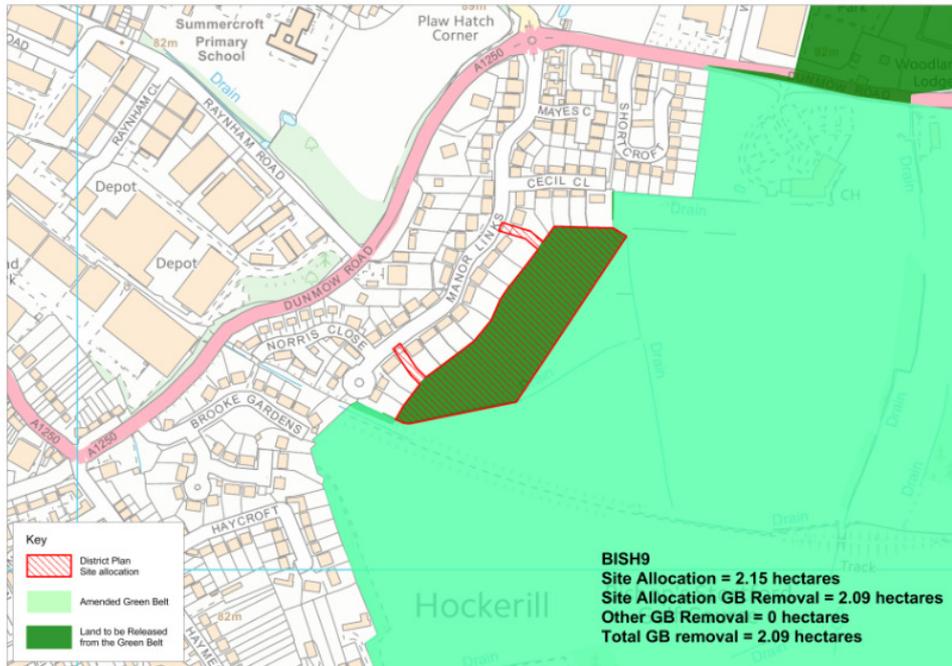
Map 1: BISH5 Bishop's Stortford South – 750 homes



2. Map 1 indicates the proposed site allocation boundary. In order to ensure the boundary of the Green Belt is robust, it is proposed to use the London Road as the new inner boundary. The existing properties on the west side of London Road, immediately adjacent to the site allocation will be enveloped within the area to be released from the Green Belt as they will be contiguous with the built form of the proposed allocation.

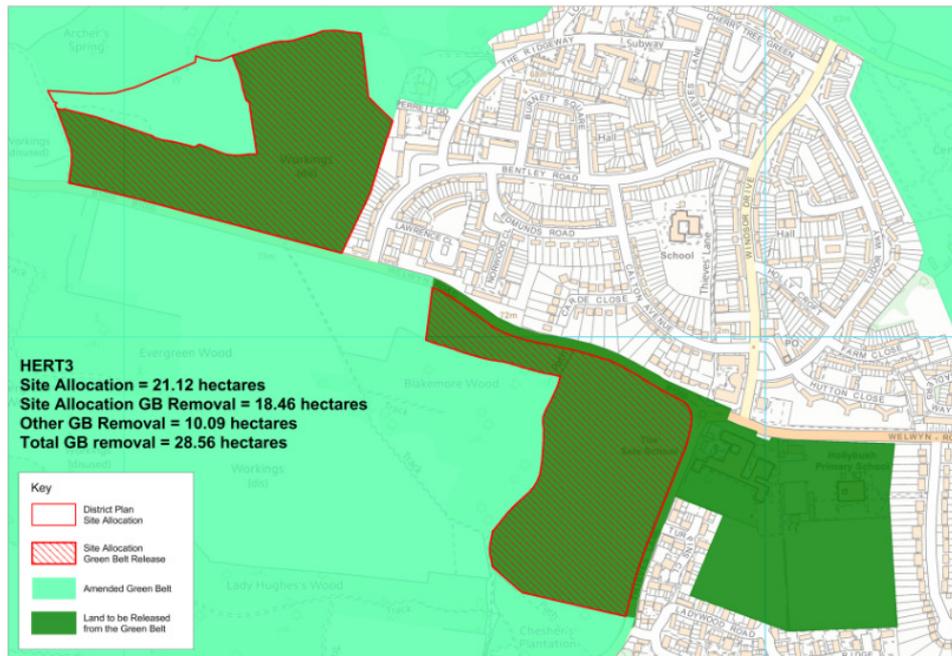
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Map 2: BISH9: East of Manor Links – 50 homes



3. Map 2 above illustrates the area proposed to be released from the Green Belt through the allocation of land to the east of Manor Links, Bishop's Stortford.

Map 3: HERT3 West of Hertford – 550 homes

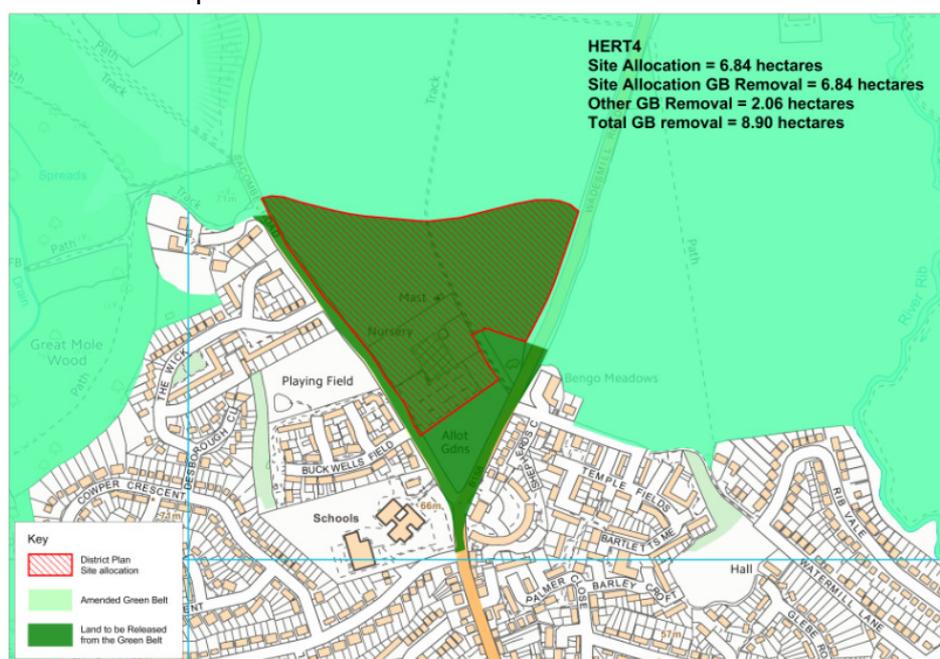


4. Map 3 above illustrates the proposed HERT3 site allocation for land to the West of Hertford, for both elements including land to the North of Welwyn Road and to the South of Welwyn Road/West of Thieves Lane. The overall site allocation for the element to the North of Welwyn Road is larger than the

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proposed Green Belt release due to the retention of a Local Wildlife Site, which will remain in the Green Belt. As a result of the proposed element of the site allocation at South of Welwyn Road/West of Thieves Lane, land at Sele School will be surrounded by development and will no longer perform a Green Belt role, so is also proposed for release. Also released from the Green Belt are the sections of Welwyn Road and Thieves Lane immediately adjacent to the development site at South of Welwyn Road/West of Thieves Lane.

Map 4: HERT4 North of Hertford – 150 homes

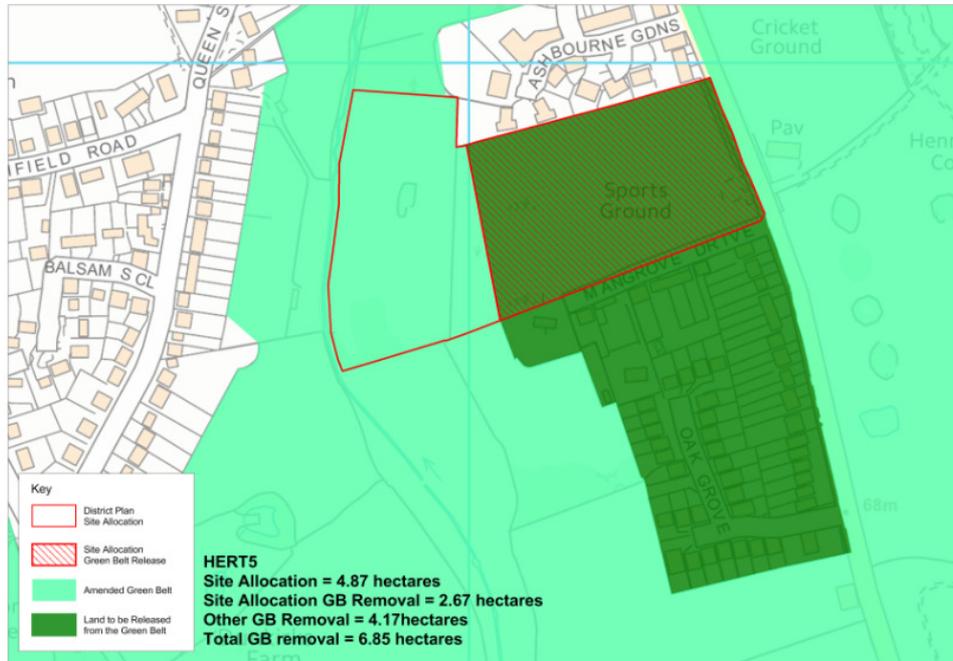


5. Map 4 above indicates the area identified for development to the North of Hertford (HERT4) which takes account of the need to create a defensible Green Belt boundary. Land to the north of the proposed allocation is identified as a Minerals Preferred Area, and as such, will result in a very different land form following restoration from that which was assessed in the Green Belt Review. This provides an opportunity to address issues relating to the impact of development in Green Belt terms. It is therefore an intrinsic aspect of the masterplanning of this site that a clear boundary is achieved through layout and design as evidenced in the revised Statement of Common Ground for this site (ED104).
6. Map 5 overleaf illustrates the removal of part of the overall site allocation to the South of Hertford (HERT5). The proposed Green Belt release for the overall South of Hertford proposed site is smaller than the overall site allocation, due to the retention of a section of the Hertford Green Finger, within the same land ownership as the allocation, where provision for open space is included in the policy, but where built development will not occur. It

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is further proposed to remove an existing housing estate from the Green Belt, which will, as a result of the proposed site allocation, be a contiguous part of the urban area.

Map 5: HERT5 South of Hertford – 50 homes



- Map 6 below illustrates where land at Mandeville School will be surrounded by development as a result of the proposed site allocation to the north of West Road, and will therefore no longer perform a Green Belt role.

Map 6: SAWB2 Land North of West Road, Sawbridgeworth – 125 homes



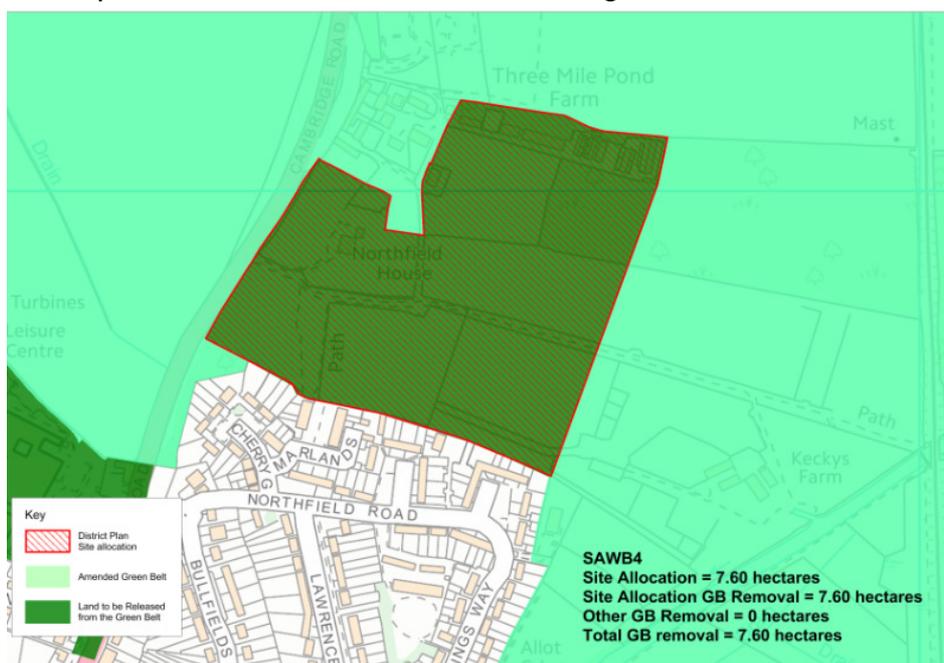
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Map 7: SAWB3 Land South of West Road, Sawbridgeworth – 175 homes



8. Map 7 above illustrates where an existing stretch of ribbon development is proposed to be removed from the Green Belt as it will be a contiguous part of the urban area as a result of the adjacent site allocation. Similarly, the open space to the east of the allocation will also be surrounded by development and will no longer perform a Green Belt role. The site allocation is greater than the developable area due to the need for structural planting to create a more robust Green Belt boundary to the west of the development.

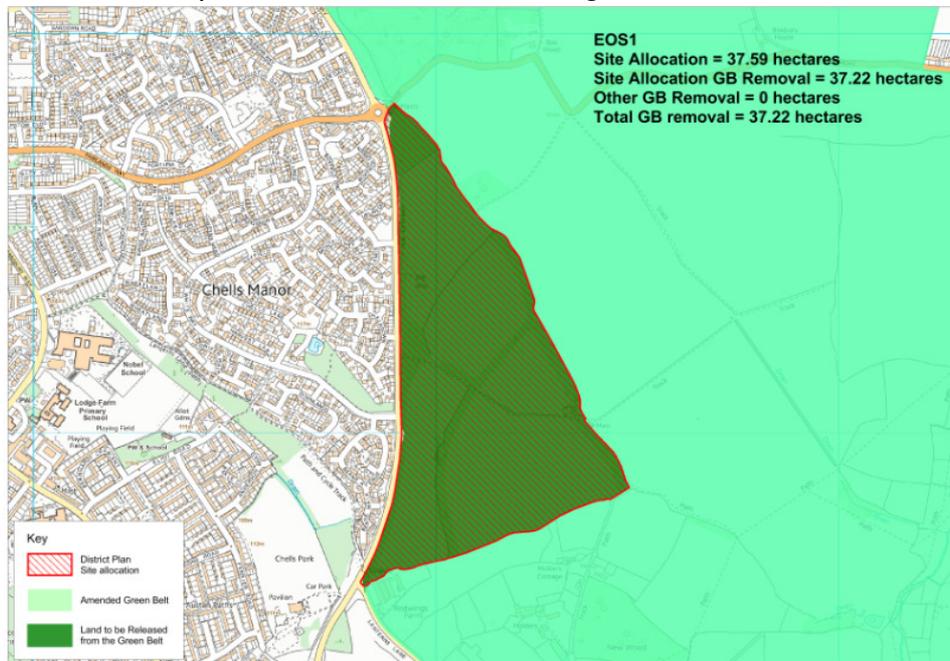
Map 8: SAWB4 Land North of Sawbridgeworth – 200 homes



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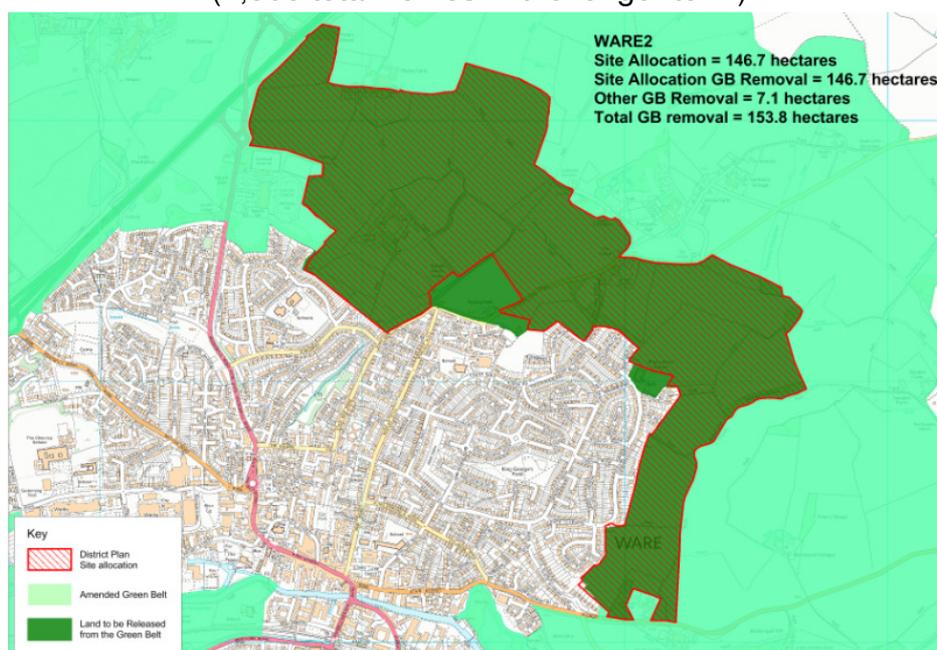
9. Map 8 above illustrates the area of land proposed to be released through the site allocation to the north of Sawbridgeworth. In this case, no additional land is to be released than that required for the development.

Map 9: EOS1 East of Stevenage – 600 homes



10. Map 9 above illustrates the area of land proposed to be released through the site allocation to the east of Stevenage. In this case, no additional land is to be released than that required for the development.

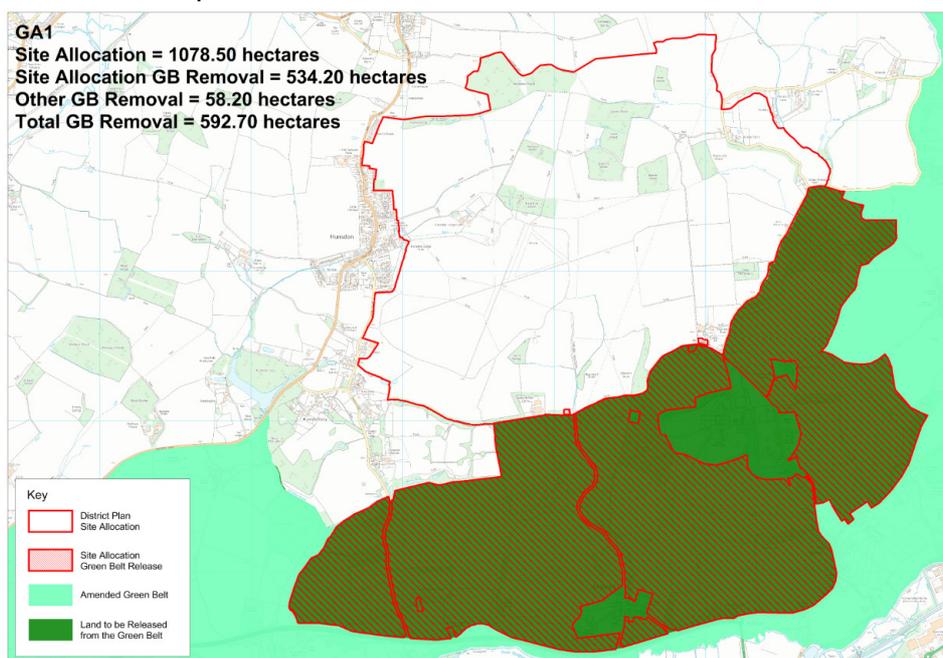
Map 10: WARE2 Land North and East of Ware – 1,000 homes  
(1,500 total homes in the longer term)



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11. Map 10 above illustrates the area of land proposed to be released from the Green Belt to accommodate development proposed at Land to the North and East of Ware (WARE2). This area makes provision both for development within the Plan period (1,000 homes) and for further development (additional 500 dwellings – total 1,500 homes) in the longer term. Additional land on the edge of the existing settlement adjoining the site allocation is also proposed for release as it would be surrounded by development and would no longer perform a Green Belt role.

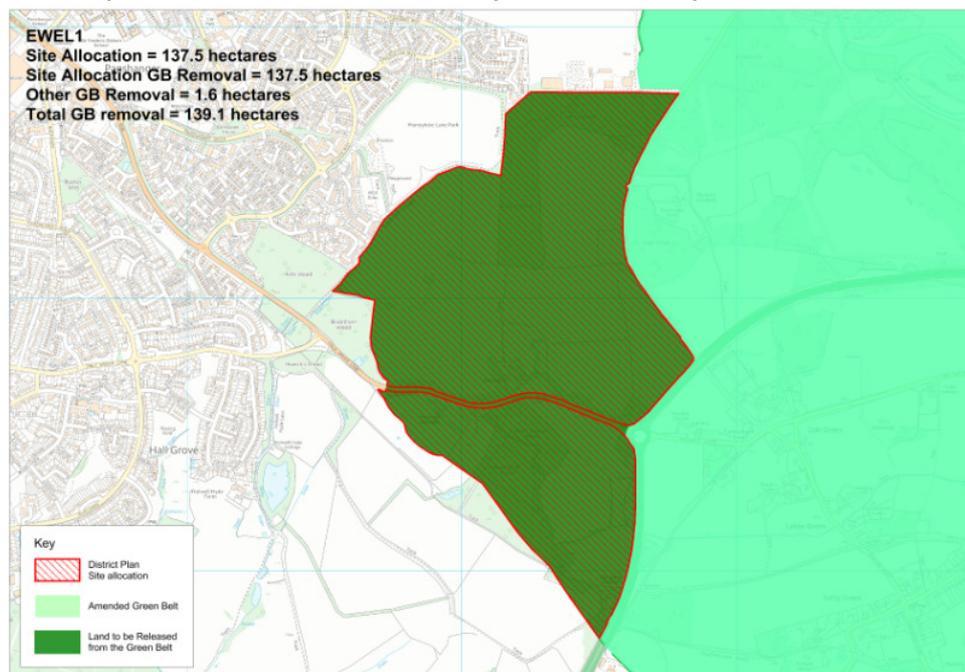
Map 11: GA1 The Gilston Area – 3,050 homes



12. Map 11 above shows where the single greatest Green Belt release is proposed in order to facilitate the development of the new settlement at the Gilston Area. As approximately two-thirds of the development is proposed beyond the current Plan period, this release will prevent the need to review the Green Belt boundary in this location at the next Plan review in accordance with paragraph 83 of the Framework.
13. Map 12 overleaf indicates the land proposed to be released from the Green Belt as a result of the site allocation to the east of Welwyn Garden City. This map indicates the East Herts portion of the site only. Panshanger Lane and the A414 represent strong boundary features.

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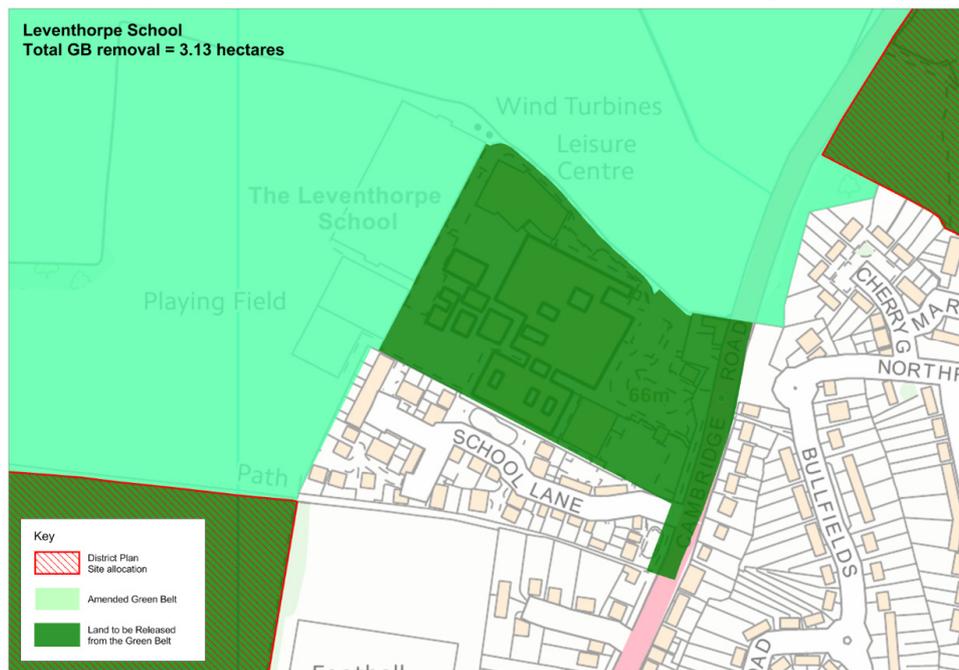
Map 12: EWEL1 East of Welwyn Garden City – 1,350 homes



14. In addition to the proposed allocations, two further sites are to be released from the Green Belt: The Leventhorpe School, to the north-west of Sawbridgeworth; and the Bishop's Stortford Football Club at Dunmow Road, Bishop's Stortford.
15. Map 13 below illustrates the removal of land currently occupied by the built form of The Leventhorpe School. This site was identified as a Major Developed Site in the Green Belt. As this definition was superseded by the National Planning Policy Framework, it is considered appropriate to reflect the urban character of the school and remove it from the Green Belt. It is understood that land to the north of the school has been acquired by the school to facilitate the expansion of the school. However, in the absence of an actual proposal it is not proposed to release further land from the Green Belt at this stage. There are no easily identifiable features upon which to define a revised boundary beyond the built form of the school.

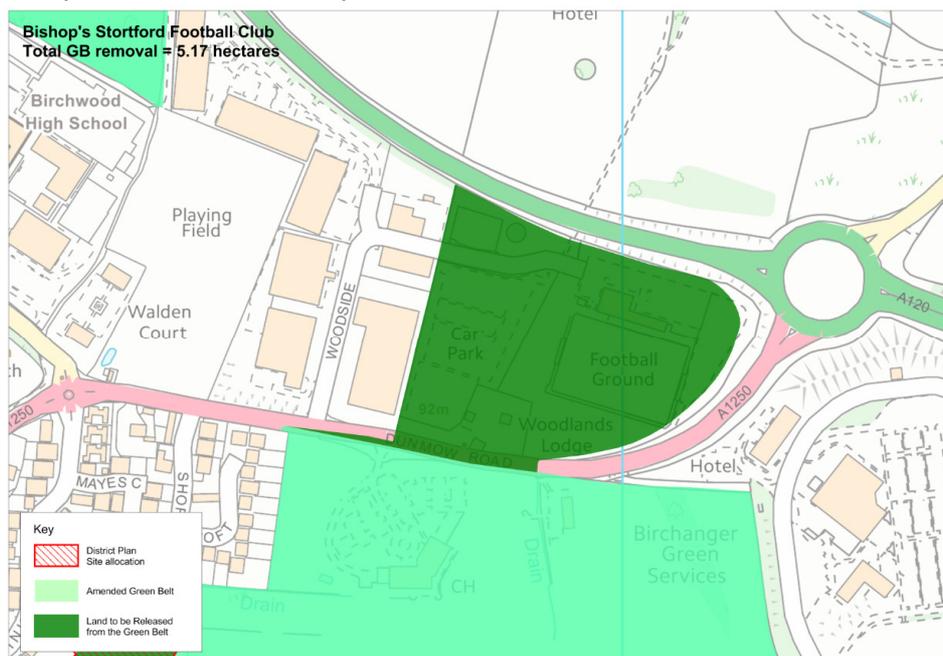
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Map 13: Land at Leventhorpe School, Sawbridgeworth



16. Map 14 below illustrates the removal of land currently occupied by Bishop's Stortford Football Club. The site comprises a football stadium and car parking and is contiguous with the adjacent urban area in terms of character. The Plan proposes that this land will be protected in its current use through the Community Facilities for Leisure and Recreation policy designation CFLR1, but was not considered to perform Green Belt functions in the Green Belt Review.

Map 14: Land at Bishop's Stortford Football Club, Dunmow Road



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17. Table 1 below summarises the areas proposed through each site allocation and additional Green Belt release.

Table 1: Land proposed to be released from the Green Belt

<b>Site Allocation</b>	<b>Site Allocation Area (Ha)</b>	<b>Green Belt Released Through Site Allocation (Ha)</b>	<b>Additional Land Released from the Green Belt (Ha)</b>	<b>Total Green Belt Release (Ha)</b>
BISH5 – Bishop’s Stortford South (750 homes)	54.12	54.12	8.37	62.49
BISH9 – East of Manor Links, Bishop’s Stortford (50 homes)	2.15	2.09	0	2.09
HERT3 – West of Hertford (North of Welwyn Road 300 homes) (South of Welwyn Road/West of Thieves Lane 250 homes)	21.12	18.46	10.09	28.56
HERT4 – North of Hertford (150 homes)	6.84	6.84	2.06	8.90
HERT5 – South of Hertford (50 homes)	4.87	2.67	4.17	6.85
SAWB2 – Land North of West Road, Sawbridgeworth (125 homes)	5.89	5.89	1.33	7.22
SAWB3 – Land South of West Road, Sawbridgeworth (175 homes)	14.01	9.76	2.16	11.92
SAWB4 – Land North of Sawbridgeworth (200 homes)	7.60	7.60	0	7.60
EOS1 – East of Stevenage (600 homes)	37.59	37.22	0	37.22
WARE2 – Land North and East of Ware (1,000 homes)	146.70	146.70	7.10	153.80
GA1 – The Gilston Area (3,050 homes)	1078.50	534.20	58.20	592.70

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EWEL1 – East of Welwyn Garden City (1,350 homes)	137.50	137.50	1.60	139.10
SUB-TOTAL	1516.89	963.05	95.08	1058.45
Land at The Leventhorpe School, Sawbridgeworth	0	0	3.13	3.13
Land at Bishop's Stortford Football Club, Dunmow Road	0	0	5.17	5.17
TOTAL	1516.89 Ha	963.05Ha	103.38 Ha	1066.75 Ha

### **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 this broadly justifies the amount of land to be released?***

1. The Council has sought to keep the release of Green Belt to the minimum area required to accommodate development unless there are strategic reasons for additional release. This largely occurs where school sites and other areas which were previously on the edge of a settlement are now effectively 'land-locked' by development and therefore make no strategic contribution to the Green Belt. This also occurs where features such as roads and buildings are enveloped as a result of the proposed site allocations and their release is necessary in order to ensure the resultant boundary is robust. 103.38 Ha of the total 1,066.75 Ha are released as a result of these amendments. This is illustrated in Table 1 above and also in Maps 1 to 14.
2. The proposed site allocations located on land which is currently Green Belt represent 43% of the total supply of the proposed delivery strategy; 8,050 homes of the 18,681 homes proposed in the Plan period. A further 10,631 homes have either been completed (3,244 homes), are committed (5,244 homes), are in rural village locations (500 homes), are SLAA sites (43 homes), are part of the windfall allowance (750 homes) or are on urban brownfield sites (850 homes).

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3. The Green Belt Topic Paper (TPA/003) and Development Strategy Topic Paper (TPA/001) (para 2.18) set out the approach taken in assessing potential locations for development. The Papers explain why the release of Green Belt is required in order to meet this housing need. In summary, there are very few brownfield sites within the District that are available for development. Where these do exist, they have been allocated for development within the District Plan. However, in order to meet the significant housing needs that exist, Greenfield sites are required. East Herts is a relatively large district, and as such there is potential to deliver the entirety of the housing target without using Green Belt land, for example, within the Rural Area Beyond the Green Belt. However given the lack of access to services and facilities and the lack of access to sustainable modes of transport it is considered that this would not be a sustainable approach, and as such the strategy would not be in conformity with the policies contained within the NPPF.
4. The Sustainability Appraisal of the District Plan (SUB/004) compares the proposed distribution of development with two alternative strategies; redirecting some Green Belt development to the rural area, or redirecting some Green Belt development to two new settlements. In both instances the Sustainability Appraisal concludes that the alternative strategies would not be as sustainable as the proposed distribution of development. The Development Strategy Topic Paper (TPA/001) therefore concludes that in the absence of any reasonable alternative, the release of Green Belt land for development is needed.
5. All the sites that are proposed to be released from the Green Belt are adjacent to urban areas, where opportunities to maximise access to services, community facilities and sustainable modes of transport are greatest. In addition, the Plan proposes a mechanism by which the three larger villages in the Green Belt will also be able to contribute towards meeting the OAN.
6. The SHMA (HOP/001) recognises that while the “best fit” functional housing market area is centred on Harlow<sup>1</sup>, the combined area also covers parts of the functional housing markets that were identified for Cambridge, Chelmsford and Stevenage<sup>2</sup>. The Council’s Statement for Matter 2, Question 10 describes how the relationship with Stevenage has been considered. There is however, no need to make provision for the Cambridge and Chelmsford functional housing market areas as these do not extend as far as East Herts.
7. The OAN Report (ED112) identified a need for 1,100 dwellings associated with the Stevenage functional housing market area (which includes both Stevenage and Welwyn Garden City) which would form part of the 18,396

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<sup>1</sup> SHMA paragraphs 2.71-2.75

<sup>2</sup> SHMA figure 24

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dwelling OAN for the East Herts local authority area. The two allocations to the east of Stevenage and east of Welwyn Garden City will provide housing that will help meet the proportion of the needs within East Herts that are associated with neighbouring local authority areas.

### **Question 3**

***Where can it be demonstrated that the Council has examined fully all other reasonable options?***

1. The Council has produced several documents during the Plan-making process. These include:
  - The Supporting Document (SSS/001), which details how 69 Areas of Search were considered against 21 topic areas, with each area subject to several 'sieves' in order to shortlist the options presented at the Regulation 18 stage. The Areas of Search comprised a range of potential scales of development, from new settlements, urban extensions and village developments.
  - The Green Belt Review 2015 (GRB/001) which considered 71 parcels and 6 sub-areas against the first four purposes of the Green Belt as set out in the National Planning Policy Framework.
  - The Sustainability Appraisal of the Submission District Plan (SUB/004) explains how the Council has developed and considered reasonable alternatives to the proposed development strategy. It sets out how the 'stepped approach' undertaken throughout the Issues and Options, Preferred Options and Submission District Plan preparation process identified and appraised development options, then established and appraised alternative spatial strategy options.
  - The Sustainability Appraisal of Strategic Options for the West Essex and East Hertfordshire Housing Market Area (HOP/002) explored options for meeting the objectively assessed need across the Housing Market Area (HMA). The Study provided a sustainability appraisal style assessment of the anticipated effects of each option and the potential mitigation measures where necessary. The Study facilitated the development of the Memorandum of Understanding between the four HMA authorities (Appendix A of SOC/001), which sets out a high level agreement as to how housing should be distributed across the HMA.

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- The Harlow Strategic Sites Assessment (HOP/003) explains how six options for accommodating new housing development across the West Essex and East Hertfordshire Housing Market Area were considered. The six options varied in terms of the overall quantum of development and the spatial distribution of that development, in particular the amount of new housing to be accommodated in and around Harlow town.
- The Strategic Land Availability Assessment (HOP/004) assessed 358 sites across the district for their suitability. The SLAA considered Green Belt as a policy constraint.
- The Village Hierarchy Study (HOP/010) looked at the sustainability of villages in East Herts, scored them against a number of criteria which focussed on the facilities available and the accessibility to services, and subsequently classified each settlement as Group 1, Group 2 or Group 3 Villages.
- The Settlement Appraisals for Bishop's Stortford (SSS/002), Buntingford (SSS/003), Hertford (SSS/004), Sawbridgeworth (SSS/005), Ware (SSS/006), the Gilston Area (SSS/008), East of Welwyn Garden City (SSS/009) and East of Stevenage (SSS/010) explain how alternative locations for development have been considered.
- The Settlement Appraisal for Villages (SSS/007) explains in detail how development across the rural area of East Herts has been considered throughout the Plan-making process, including within and beyond the Green Belt.

### **Question 4**

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

1. Section 4 of the Green Belt Topic Paper (TPA/003) sets out the exceptional circumstances in East Herts that justify the release of Green Belt land in order to accommodate development. A number of legal tests have concluded that the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement. The Bath and North East

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Somerset Council case<sup>3</sup> concluded that housing need can be considered as an 'exceptional circumstance' for reviewing Green Belt boundaries, taking into account the harm to the Green Belt and any other harm, and the benefits of securing the scale of additional housing and the sustainability merits of the location.

2. The Green Belt Topic Paper uses the five matters identified in the Calverton case<sup>4</sup>, to explain how the level of housing need, the constraints on the supply/availability of land and the consequent difficulties in delivering sustainable development without impinging on the Green Belt represent reasonable reasons why Green Belt sites have been considered. The nature and extent of the harm to the Green Belt and the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced, have been considered in the determination of the development strategy. The Topic Paper concludes that exceptional circumstances exist to justify the release of a proportion of the District's Green Belt in order to help deliver the identified housing need. In particular, the Council is of the view that the severity of this need, in addition to the lack of alternatives for delivering sustainable development, represents the 'exceptional circumstances' required by the National Planning Policy Framework.
3. The Updated Housing Topic Paper (ED121) explains that subsequent to the preparation and submission of the Green Belt Topic Paper (TPA/003) and Housing Topic Paper (TPA/004), the identified housing need for the District and the Housing Market Area has increased further, thus increasing the severity of the housing need in East Herts.

### **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 the Plan complies with national policy?***

1. Section 4.5 of the Plan as submitted, identifies three villages which are currently inset from the Green Belt and states that development beyond the

<sup>3</sup> Report to Bath and North East Somerset Council, The Planning Inspectorate, 24 June 2014  
[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs\\_pins\\_final\\_report.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf)

<sup>4</sup> Calverton parish Council v Greater Nottingham Councils & Ors (21 April 2015)  
[www.bailii.org/ew/cases/EHWC/2015/1078.html](http://www.bailii.org/ew/cases/EHWC/2015/1078.html)

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existing built up area of these villages can only come forward through an amendment of the Green Belt boundary (other than appropriate exceptions). These Group 1 Villages of Hertford Heath, Stanstead Abbots & St Margarets and Watton-at-Stone are considered sustainable locations for development and will be encouraged to consider whether it is appropriate to amend their Green Belt boundary through the formulation of a Neighbourhood Plan. This is captured in Part II of Policy GBR1 Green Belt.

2. Policy GBR1, Part II states that these three villages will be encouraged to consider whether it is appropriate to amend their Green Belt boundary through the formulation of a Neighbourhood Plan. However, the policy does not require these Neighbourhood Plans to amend the Green Belt boundary, nor does the development strategy rely on sites brought forward through this approach to deliver its housing needs. The Council accepts that as written, this part of the policy does not conform to current national planning policy, and is happy to accept a main modification to Part II of the policy.
3. One alternative, which has been considered, is for the District Plan to allocate sites and amend boundaries to facilitate the growth of the three villages. However, this may be on sites that are contrary to the wishes of the local population. A Neighbourhood Plan, which has been through a local referendum, will provide the certainty that the Authority needs that there is a local preference for a site. Similarly, local residents and Neighbourhood Plan groups also need reassurance that there is value in preparing a Neighbourhood Plan and that any allocations they identify will have some weight.
4. The other alternative which has also been considered is to restrict the growth of three of the District's more sustainable villages, by allowing only development within the built up area of the villages. This approach is likely to be challenged through speculative planning applications which could argue for development on the grounds of sustainability. This approach may undermine the ability of the neighbourhood to determine its own fate in terms of preferred locations of development, which would be against the ethos of the Localism Act.
5. Neighbourhood Plans can cite a preference for a site within the Green Belt and can even create policies to guide such development without amending boundaries, the role of which remains with the Local Plan. This approach has been endorsed through the Little Aston Neighbourhood Plan, where the Neighbourhood Plan identifies a Green Belt site on the basis that Lichfield District Council carries out a Green Belt review and subsequently allocates the site having consideration of the Neighbourhood Plan preferences when preparing the Local Plan Allocations Document. This approach may be an

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appropriate way forward in East Herts as this will enable Neighbourhood Plan groups to retain their autonomy in identifying sites, while retaining the primacy of the District Plan process.

6. There appears to be a direction of travel reflected in the Government's White Paper Fixing our Broken Housing Market (February 2017) which proposes a change to national planning policy to make it clear that development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate development and that where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a Neighbourhood Plan. Should this proposal be confirmed through amendments to the NPPF, the approach taken in GBR1, Part II would then be in conformity with this approach.
7. Two options available to ensure the Plan complies with the National Planning Policy Framework are to either delete GBR1 Part II in its entirety, or to amend the policy to state that:

*The villages of Hertford Heath, Stanstead Abbots & St Margarets and Watton-at-Stone will be encouraged to consider whether it is appropriate to identify sites within the Green Belt through the formulation of a Neighbourhood Plan to accommodate additional development, especially where it contributes to wider sustainability objectives and the delivery of community benefits. Such sites may then come forward through a review of the District Plan.*

### **Question 6**

#### ***Is the site selection/Green Belt review processes robust?***

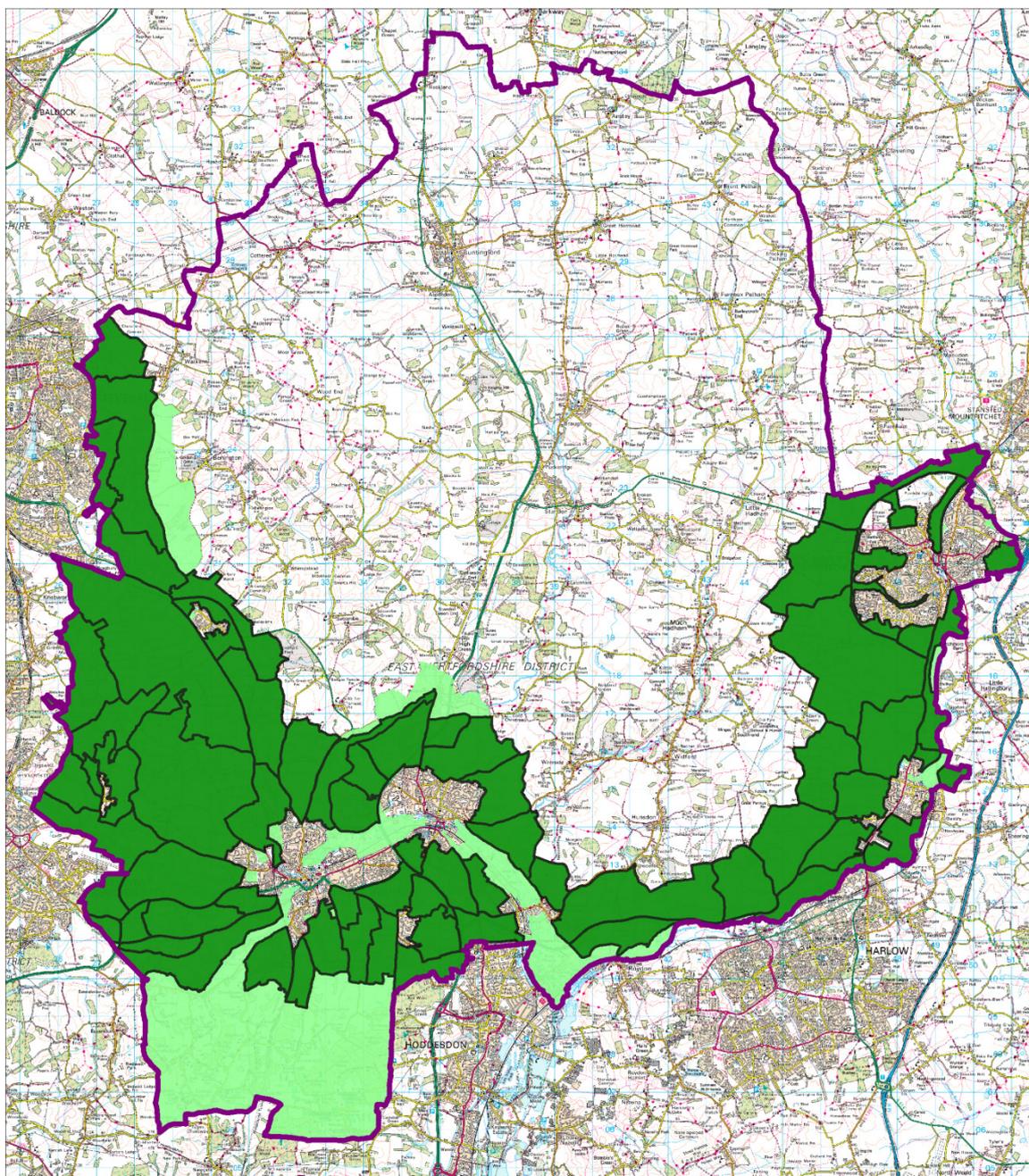
1. Peter Brett Associates (PBA) were commissioned by the Council to undertake an independent review of the District's Green Belt (GRB/001). There is no Government issued guidance on how to undertake a Green Belt review, however, there are examples of best practice adopted by consultants and authorities. The PBA methodology was subject to a period of stakeholder consultation and is accepted as a suitable and robust approach to assessing land against Green Belt purposes as defined by the National Planning Policy Framework.
2. Section 2 of the Green Belt Review (GRB/001) describes the methodology used in the Review and explains how land has been divided into separate

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parcels in order to allow a meaningful assessment of the way in which each performs in Green Belt terms. The first stage of the Review identified areas which were subject to absolute constraints and excluded these from the study prior to the division of the study area into parcels. The absolute constraints were agreed as follows:

- Large areas of land at risk from flooding - zone 3;
  - Sites of Special Scientific Interest (SSSIs);
  - Special Protection Areas and (SPA) and associated buffer;
  - Special Area of Conservation (SAC) and associated buffer;
  - Ancient Woodland; and
  - Registered Parks and Gardens.
3. Paragraph 1.7.5 of the Green Belt Review described how Green Belt on the immediate periphery of towns was the focus of the assessment, as in terms of population and economic growth, the main settlements are the locations where most of the development should be accommodated and in terms of location of facilities and services together with access to public transport services and opportunities, the periphery of the main settlements is where development should achieve the greatest accessibility above existing brownfield options within the towns. The Green Belt Review Method Statement (ED124) further explained that unless a site falls within a parcel of land that has a clear affinity with the built up area, the review does not consider sites that are more than 1km from the existing settlement edge. As such, the review parcels did not extend across some parts of the outer edge of the Green Belt as illustrated in the Map overleaf.
4. Land to the outer edge of the Green Belt east of Stevenage towards Benington was excluded on the basis of distance from the urban edge and the presence a SSSI. Land to the outer edge of the Green Belt north of Ware towards Thundridge and Wadesmill was excluded on the basis of distance, flood zone 3 and the presence of a Registered Park and Garden. Land between Hertford and Ware and to the south-east of Ware was excluded on the grounds of environmental constraints including flood zone 3, SSSI and Ramsar designation at the Lea Valley Regional Park. Land to the north-east of Sawbridgeworth was excluded due to the presence of a Registered Park and Garden. The southern part of the district was excluded, not only on the grounds of distance from the town of Hertford, but also due to environmental constraints such as SSSIs and a Special Area of Conservation at Wormley-Hoddesdonpark Wood.

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*Note: Dark green indicates parcels assessed; light green shows extent of Green Belt*

5. The identification of each of the Parcels was informed by a consideration of the Council's Landscape Character Assessment Supplementary Planning Guidance, being defined wherever possible along identifiable physical/visual features; and, where such features were weak, parcel boundaries were defined along less robust features. In these cases, consideration was given in the assessment to the need to strengthen boundaries such as through additional planting for example as part of any potential release of land to meet development needs.

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6. Whilst the Green Belt Review identifies parcels that have more contribution in Green Belt terms, it does not suggest any areas where development would cause significant harm to the integrity of the Green Belt as a whole. The Review instead makes clear recommendations where development could be acceptable even in parcels which have low suitability as an area of search, if properly planned, in a manner which respects the landscape and creates reinforced boundaries.
7. The 'stepped approach' to sieving and shortlisting areas of search was very comprehensive and was designed to integrate the Sustainability Appraisal approach throughout. The Supporting Document (SSS/001) provides considerable detail on the assessments undertaken. In addition, each Settlement Appraisal (SSS/002-010) sets out how sites have been chosen and alternatives considered. The Sustainability Appraisal itself (SUB/004) endorses this approach as a robust and comprehensive way of testing alternative spatial distributions and shortlisting sites. Green Belt is one of many considerations taken account of during the Plan-making process, in the context of the overarching aim of ensuring development is directed towards locations where sustainable development objectives could be achieved.

### **Question 7**

***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?***

1. The majority of the proposed allocations can be clearly defined using readily identifiable features on the ground, including roads, woodlands and strong tree belts. In other cases, it will be necessary to strengthen existing boundaries through structural planting for example, and through appropriate landscape, design and layout measures. Maps 1 to 14 above illustrate the proposed Green Belt boundaries and where additional land is removed from the Green Belt in order to create robust boundaries.
2. A number of site allocation boundaries were amended in response to the recommendations of the Green Belt Review: land South of West Road, Sawbridgeworth (SAWB3) was reduced in size, in order to mitigate impacts on the Green Belt and to accommodate structural planting to strengthen the inner Green Belt boundary; Land to the North of Sawbridgeworth was identified as an Area of Search with 'high suitability' in Green Belt terms, and as such is proposed as a site for development.

## **Matter 5: The Development Strategy - The Green Belt**

3. The area identified for development to the north of Hertford (HERT4) takes account of the need to create a defensible Green Belt boundary. Land to the north of the proposed allocation is identified as a Minerals Preferred Area, and as such, will result in a very different land form following restoration from that which was assessed in the Green Belt Review. This provides an opportunity to address issues relating to the impact of development in Green Belt terms. It is therefore an intrinsic aspect of the masterplanning of this site that a clear boundary is achieved through layout and design as evidenced in the Statement of Common Ground for this site (SCG/002).