

**East Herts  
Examination in Public**

**Hearing Statement  
Matters and Issues  
Part 2  
Chapter 4 – Green  
Belt and Rural Area  
Beyond the Green  
Belt – Policy GRB1**



**CONTENTS**

1.0 INTRODUCTION .....3

2.0 CHAPTER 4 – GREEN BELT AND RURAL AREA BEYOND THE GREEN BELT .....3



## 1.0 INTRODUCTION

- 1.1 This hearing statement is submitted on behalf of Haileybury College. Haileybury College is a leading co-educational independent school based in Hertford Heath. The school own land in and around the village.
- 1.2 The College are promoting a part greenfield/part brownfield site adjacent to the village, within the green belt, for residential development.

## 2.0 CHAPTER 4 – GREEN BELT AND RURAL AREA BEYOND THE GREEN BELT

**QUESTION 1 – GBR1 Green Belt – I have already set out in matters and issues for part 1 that a Neighbourhood Plan cannot alter the boundary of the Green Belt. Criterion II will therefore need to be changed to be sound.**

- 2.1 The emerging direction of travel in regard to the treatment of Group 1 Green Belt villages, which is to require 10% growth over the plan period, is one that we support in principle - notwithstanding we remain of the view that it would be desirable in planning terms for these villages to accommodate additional growth beyond 10%. However, 10% growth is a significant improvement on the position under the submission draft plan which effectively prevented growth. Growth in group 1 green belt villages is required to meet the requirements of national policy as set out in the Framework at paragraphs 54 and 55, and reiterated in the NPPG at paragraph 50-001. This need is recognised in the supporting text of the draft Plan at 10.2.2.
- 2.2 We agree with the Council that the current evidence base does not provide sufficient information to consider allocations around group 1 green belt villages now, and that further work is required. In particular, for Hertford Heath, the current green belt review is at too coarse a scale to properly consider the suitability of sites around the village in green belt terms and as a result the site assessments within the Strategic Housing Land Availability Assessment are not robust.
- 2.3 We note the continued emphasis by the Council on development in the villages being led by NPs. We have significant concerns with the proposal that sites identified in NPs will not be released from the green belt until the Local Plan is reviewed. Whilst



Government have set out in the Housing White Paper (paragraph 1.8) that the regulations to the Neighbourhood Planning Bill will require local plans to be reviewed at least once every five years this requirement is not yet in place. Guidance within the NPPG (paragraph 12-008) that “*most Local Plans are likely to require updating in whole or part at least every 5 years*” is advisory only, and in practice is rarely adhered to. There are no policies in the draft Plan that establish a timetable for future review.

- 2.4 Linking housing delivery in the group 1 green belt villages to a Local Plan review is unacceptable for three reasons. First, given the tightly drawn Green Belt boundaries, it means the needs within these villages may not in reality be addressed until late in the plan period if there is a delay to the review of the Local Plan.
- 2.5 Secondly, it could result in a significant democratic deficit whereby Neighbourhood Planning Groups proceed, with best intentions, to set out within their plans where development could come forward, only to find that realising their vision is dependent on a timescale that (in the absence of regulations coming forward from Government) is wholly dependent on an ever-shifting Local Plan review timetable that will inevitably be driven by factors other than the delivery of housing in the villages.
- 2.6 Finally, in the converse of the previous scenario, a Neighbourhood Planning Group’s progress may be subject to delay. Of the three group 1 Green Belt villages only one (Watton-at-Stone) has made significant progress with their Plan. Hertford Heath is at the very early stages and Stanstead Abbots and St Margarets have yet to request an area designation. If these settlements make significant progress with their Plans but still miss critical milestones to feed into a review of the Plan will they then have to wait a further five years before the opportunity arises again for sites to be removed from the green belt? Consideration would also be required as to the interaction in this scenario with the proposed ‘step in clause’ which will allow the District Council to take forward allocations even that sufficient progress is not made on NPs.
- 2.7 In addition to the issues outlined above, we are also concerned about whether Neighbourhood Planning groups will have the ability and resources to generate an evidence base that will be sufficiently robust to satisfy the needs of a Local Plan



examination and whether this places too great a burden on Neighbourhood Planning Groups.

- 2.8 In our view, the most realistic solution to these issues would be a site allocations or Area Action Plan approach. The preparation of such documents would form part of the Local Plan and therefore meet with the requirement at paragraph 83 of the Framework that boundaries should only be altered through the preparation and review of the Local Plan. The exceptional circumstances would be established by a requirement within the (by then) adopted Plan for 10% growth within the Group 1 Green Belt villages to meet the housing needs of the district in a sustainable manner (i.e. provides for a strategy which accommodates the need to allow group 1 green belt villages to grow).
- 2.9 In terms of satisfying the requirements of paragraph 83 of the Framework to alter boundaries through the Local Plan process, we note that Sunderland City Council and South Tyneside Council are using an Area Action Plan to release land from the green belt for a Manufacturing Park to provide for the needs of the UK automotive industry. The Plan has been subject to Examination in Public and whilst the Inspector's report is still awaited the Plan has proceeded to main modifications stage – i.e. significant soundness concerns have not yet been raised.
- 2.10 The benefit to a site allocations/Area Action Plan approach is that the site allocations process for each village could follow a bespoke timetable to match the emergence of each neighbourhood plan, reducing the perception of demographic deficit and ensuring prompt delivery of sites once decisions have been made by communities.
- 2.11 A further benefit of this approach would be that it would allow the Council to commission evidence base work as part of the preparation of the site allocations document, working alongside and in conjunction with each neighbourhood planning group to their timetable. This would ensure the evidence base is sufficiently robust to meet the tests of soundness required for Local Plans, without placing an unacceptable burden on neighbourhood planning groups whose evidence base is focused on meeting the basic conditions.
- 2.12 A site allocations/Area Action Plan approach would also allow a clearer framework for



setting an appropriate trigger for the Council to exercise 'step in rights' as it would not need to cater for an uncertain Local Plan review timetable.