

Green Belt Technical Paper



December 2015

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1. Introduction

What is a technical paper?

- 1.1 Technical papers provide additional information to help explain how policies in the draft local plan have been developed.
- 1.2 Our evidence base contains a number of studies. However, it is not always appropriate or possible to simply translate their recommendations directly into policy.
- 1.3 This might be for a number of (overlapping) reasons:
 - We need to consider evidence ‘in the round’. Our studies normally focus on particular issues or specialist areas. Once they are completed, we need to consider how they interact with the findings of other work we have carried out;
 - Government policy is set out in the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). These are clear that many of the analyses we have to carry out to support our plan should be objective and ‘unfettered’ by other considerations. Our Strategic Housing Market Assessment (SHMA), for example, should not have any regard to potential constraints ~ such as a lack of sites or the presence of Green Belt ~ when working out how many homes might be needed;
 - This means that we have to look across all of the evidence we have gathered, including public consultation responses, and come to a view on:
 - a. The most appropriate balance of land uses for the plan;
 - b. The most appropriate targets for these land uses (where relevant); and
 - c. The most appropriate sites where these requirements can be met;
 - Some potential sites will have been promoted for more than one use. A landowner might be willing, for example, to let their land be used for either housing or employment. We need to decide which, if any, of these uses is most appropriate;
 - Some potential sites identified in our evidence base will be in less preferable areas for development. This might include land that is not previously developed, in the Green Belt, in a Conservation Area or at greater risk of flooding than other options. We need to work out whether it is necessary or appropriate to use any of these sites;
 - We may receive objections to the findings of our studies, or use alternate sources of information that might suggest slightly different answers could be available;
 - New data may have been released since the relevant study was completed; while
 - We have to consider how our evidence and emerging proposals compare with those of other nearby authorities. It wouldn’t necessarily be appropriate, for example, for two neighbouring towns to both promote major retail development in their areas.
- 1.4 Technical papers help to explain how we have taken these matters into account and got ‘from A to B’, or from our initial study findings to the policies in our plan.

What does this technical paper cover?

- 1.5 This paper covers the Green Belt and seeks to explain how we have justified rolling back the boundary in a number of locations across the town.
- 1.6 The Local Plan removes five areas of land from the Green Belt for different types of development:

Residential:

- Land to the North of Stevenage
- Land to the South East of Stevenage
- Land to the north of Graveley Road (Gypsy and Traveller provision)

Employment:

- Land at Junction 8

Retail:

- Garden Centre

- 1.7 The Plan also puts a site into the Green Belt at Norton Green.
- 1.8 This paper explains the justification for this approach, and demonstrates the 'exceptional circumstances' that we have taken into account when making these decisions.

What are the key evidence studies?

- 1.9 The following studies should be read alongside this technical paper:
- Review of the Green Belt around Stevenage: Part 1 – Survey against Green Purposes (AMEC, 2013)
 - Review of the Green Belt around Stevenage: Part 2 – Site Assessment and Capacity Testing (AMEC, 2015)
 - Functional Economic Market Area Study: Stevenage, North Hertfordshire and Central Bedfordshire Councils (NLP, 2015)
 - Identifying Housing Market Areas in Bedfordshire and surrounding areas (Opinion Research Service (ORS), 2015)
 - Strategic Land Availability Assessment – Employment (Stevenage Borough Council (SBC), 2015)
 - Stevenage and North Hertfordshire Strategic Housing Market Assessment Update (Opinion Research Services (ORS), 2015)
 - Stevenage Central Town Centre Framework (David Lock Associates (DLA), 2015)
 - Housing Technical Paper (SBC, 2015)
 - Employment Technical Paper (SBC, 2015)
 - Gypsy and Traveller Site Search (SBC, 2014)
 - Stevenage Borough Council Gypsy and Traveller Accommodation Assessment (David Couttie Associates (DCA), 2013)

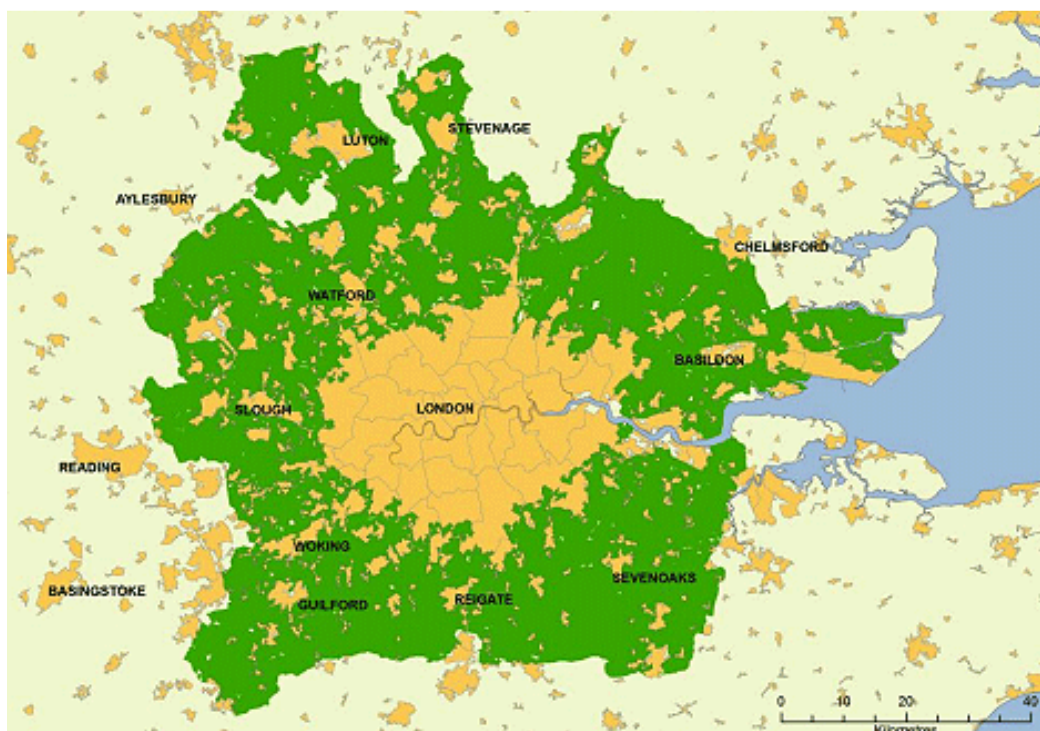
What are the key issues for this paper?

- 1.10 This paper justifies why we have made changes to the Green Belt boundary within the Local Plan.
- 1.11 Green Belts are one of the best known and oldest national planning policies. They are designed to serve the following five purposes¹:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.12 Nationally there are over 1.6 Million hectares of Green Belt land in 14 different Green Belts that have been designated by councils across England. The Green Belt which surrounds Stevenage is part of the London Metropolitan Green Belt. Over half of Hertfordshire is covered by this Green Belt².
- 1.13 Across England, Green Belt policy has been highly effective in achieving its objectives despite considerable development pressures in the last half century. This was a key finding of a major Government study in 1993 and it was supported by a 2010 report by the Campaign to Protect Rural England (CPRE) and Natural England.
- 1.14 Green Belts perform a number of other useful functions. They make a contribution to green infrastructure, which is important to the successful functioning of urban areas and their relationship with the rural areas around them. Green Belts improve the connectivity between areas designated for their environmental importance, urban green spaces and the wider countryside to form ecological networks and green recreation networks. Stevenage has a network of Green Lungs stretching from within the heart of the urban area out to the countryside: many of these form public access routes and wildlife corridors.
- 1.15 Green Belt land across England has a greater proportion of woodland and a more concentrated range of public access opportunities than other parts of England. The Ramblers Association's Stevenage Outer Orbital Path (STOOP) runs through the Green Belt in a broad circle around Stevenage. Green Belt land is also making a significant contribution to the ecosystems that are essential to help mitigate, and adapt to, climate change. Green Belts help in creating a healthier society, through providing for active outdoor lifestyles.
- 1.16 Stevenage is a very small and under-bounded Borough. In places, the town is built right up to the Borough boundary, and to the north-east already spreads across it into neighbouring North Hertfordshire. The Green Belt boundary is, with the exception of the west of the A1(M), drawn tightly around the edge of the urban area which is also, for much of its length, the administrative boundary with neighbouring districts. Previous releases from the inner Green Belt boundary have been made to allow for the development of Great Ashby/Burleigh Park and Stevenage West.

¹ Paragraph 80, NPPF, 2012

² Protecting our Green Belts, CPRE Hertfordshire, May 2013.

Fig 1: London Metropolitan Green Belt



Source: CPRE

- 1.17 These administrative and Green Belt constraints mean that limited opportunities exist within the Borough to meet our Objectively Assessed housing needs (OAN), as well as other growth requirements. Stevenage faces particular challenges in balancing and/or reconciling competing, and potentially conflicting, objectives.
- 1.18 Following the revocation of the East of England Plan, the Borough Council is now solely responsible for setting and reviewing Green Belt boundaries within the Borough.
- 1.19 To assist us in determining where to strike the balance between meeting our OAN and protecting the Green Belt, we commissioned a two-part Green Belt review from external consultants. We asked the consultants to:
 - Provide an independent assessment of the extent to which the land around the urban edge of Stevenage still fulfils the five purposes of Green Belt policy as defined in the NPPF;
 - Evaluate the sensitivity of the land to any development and/or change;
 - Identify broad areas for potential compensatory Green Belt provision, in the event that Green Belt releases are required around Stevenage; and then to
 - Consider these broad areas in more detail as to their potential release in light of their contribution to Green Belt purposes.
 - Recommend sites which could be released from the Green Belt or safeguarded for future development beyond the plan period.
- 1.20 National planning policy makes provision for changes to be made to the Green Belt. It requires Green Belt boundaries and policies to be established in Local Plans. However, it states that

“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”³

- 1.21 Many objectors to Green Belt release have previously cited Paragraph 34 of the National Planning Policy Guidance (NPPG) as an argument against development in the Green Belt, as this states that *“Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green belt”*. However, the need to demonstrate ‘very special circumstances’ relates to decision taking only, and not to plan making. It is ‘exceptional circumstances’ that need to be demonstrated when producing Local Plans. The NPPG has recently been revised to make this clear.
- 1.22 There is no definition of what constitutes ‘exceptional circumstances’ in the NPPF, or in the accompanying guidance document. A number of recent cases have concluded that the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment.
- 1.23 In the case of **Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078⁴**, the Hon. Mr Justice Jay, sets out a number of matters that should be identified and dealt with in order to ascertain whether ‘exceptional circumstances’ exist to justify rolling back the Green Belt:
- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
 - (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
 - (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
 - (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
 - (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*
- 1.24 The circumstances in this case have been assessed according to these criteria.

2. Exceptional Circumstances

The acuteness/intensity of the need for new homes, employment and retail provision

- 2.1 Due to the small, under-bounded nature of the Borough, we have limited land available to meet our needs. The town is built right up to the Borough boundary in many places, and even spreads across it into neighbouring North Hertfordshire, to the north-east. This makes additional development more difficult for us to accommodate than in other areas where land availability is greater. As such, any identified development needs become more acute.

³ Paragraph 83, NPPF, 2012

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

- 2.2 Our evidence⁵ concludes that the Objectively Assessed Need (OAN) for housing in Stevenage is 7,300 dwellings over the period 2011-2031.
- 2.3 Although parts of our earlier assessment work have been superseded, a number of its findings remain valid⁶. In particular it calculates an affordable housing need of 575 units per year and identifies a requirement to redress structural imbalances in the housing stock.
- 2.4 The Local Plan sets a target of 7,600 homes to be developed within the Plan period. Although this is higher than the OAN, we consider this is necessary for a number of reasons:
- It takes into account the Government's latest household projections for the Borough, which suggest that just over 7,600 new homes will be required. Even though our OAN is calculated in a slightly different way, in accordance with the recommendations of our evidence, we think it is important to aim towards this slightly higher number. This ties in with our wider regeneration plans for the Borough and should help us to put forward a positive message, helping us to attract investment and achieve sustainable patterns of development;
 - There is a severe shortage of affordable housing in the town. We need to try and meet this need, to ensure a sustainable future for our residents. Providing enough affordable homes for the people of Stevenage is a key priority for the council, and one which we are actively working towards resolving. A new team has been set up to progress the delivery of new council homes. A modest increase in the target will allow more homes in response to this pressure, whilst remaining broadly consistent with the approach being taken by other nearby authorities⁷. The NPPG states that *'an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes'*;
 - The housing numbers exclude requirements for care homes and other institutional style accommodation. As people live for longer, and live in their own homes for longer, it may be appropriate to assume some of this need will be met in the normal housing stock⁸;
 - A number of the potential schemes we are considering require a certain number of homes in order to be viable. If we try and reduce the number of homes on these sites, they may not come forward at all⁹; and
 - Setting a challenging target provides a clear signal that we are serious about delivering regeneration and change in the Borough. This is crucial if we are to encourage the investment and growth required to meet out our Local Plan objectives. Another key priority of the Borough Council is the redevelopment of the town centre. This will be residential-led and, although it is being actively led by the Borough Council (as majority landowner), other landowners will require a level of confidence in the market and in the Borough Council's commitment to this objective, if they are to consider further investment and growth.
- 2.5 The site allocations within the Local Plan provide an appropriate buffer above the 7,600 target, to reduce the risks associated with non-delivery and to allow for some level of contingency. Due

⁵ Stevenage and North Hertfordshire Strategic Housing Market Assessment Update, 2015

⁶ Stevenage Borough Council Strategic Housing Market Assessment, 2013

⁷ Our previous SHMA (DCA, 2013) said 575 affordable homes were required each year. The latest SHMA suggests that our Objectively Assessed Needs should contain a 10% uplift in response to market signals and affordable housing needs. These extra homes would equate to a 14% uplift.

⁸ Our latest SHMA suggests a requirement for almost 200 additional bedspaces over the period to 2031. These would normally be classified as a "C2" use, compared to dwellings which are "C3". It is standard statistical practise to assume that the proportion of older persons requiring this form of accommodation will remain constant.

⁹ Paragraph 173 of the NPPF is clear that plans should ensure that the viability of sites is not threatened.

to the nature of the town, we are heavily reliant on a small number of large sites. This creates a risk in that if just one of these sites is not delivered, we will not be able to meet our housing target.

- 2.6 A separate study¹⁰ identifies a requirement for three Gypsy and Traveller pitches by 2018 with a further three to five pitches in each five year period thereafter. This equates to a total requirement of 11-16 additional pitches up to 2031.
- 2.7 As well as the acute need for new housing over the plan period, our evidence¹¹ identifies the need for up to 30 hectares of new employment land. The study makes a number of recommendations, including the provision of new employment land to allow existing Stevenage companies the chance to grow. The Borough Council has always been committed to ensuring sufficient jobs are provided to meet the needs of our residents. Self-containment was a key feature of the original Masterplan for the town, and this has been carried forward, not only through the plan making process, but also corporately, as a key objective of the Borough Council. As such, to ensure a sustainable approach, it is preferable for employment land to be provided within the Borough Boundary, where possible.
- 2.8 Our evidence¹² also demonstrates a need for 9,100m² new convenience retail floorspace provision, towards the end of the plan period. Around 20% of this need will be provided as extensions to existing convenience stores and small-scale provision across the town in line with the retail hierarchy. However, a new site is required to accommodate the remaining 7,600m² in a single new superstore. No alternate site of this size is available and the allocated site, whilst in the Green Belt, is already in A1 retail use.

Wider Market Area need

- 2.9 It is not just the needs of the Borough that must be considered. The Duty to Cooperate requires local authorities to work together to ensure requirements across wider market areas are met.
- 2.10 The Borough Council has worked collaboratively with six other authorities to identify Housing Market Areas (HMAs). This evidence shows that the whole of Stevenage is located within a single functional HMA. This stretches from Welwyn Garden City in the south to Sandy in the north and broadly follows the A1(M) / A1 corridor. It ranges from the edges of Luton in the west to Royston in the east. The HMA covers the significant majority of North Hertfordshire's administrative area and smaller parts of Welwyn Hatfield, Central Bedfordshire and East Hertfordshire¹³.
- 2.11 Housing demand in the south east of the country is high. In the HMA as a whole, an objectively assessed need for around 80,800 new homes is identified.
- 2.12 A similar process has been followed in terms of analysing employment needs across the wider area. A Functional Economic Market Area (FEMA) study¹⁴ was commissioned jointly with North Hertfordshire and Central Bedfordshire councils. It concludes that the area containing Stevenage, North Hertfordshire and the eastern half of Central Bedfordshire shares a number of economic characteristics and that it is reasonable to consider employment provision across this wider area. It also notes the strong connections between Stevenage and Welwyn Garden City.

¹⁰ Gypsy and Traveller Accommodation Study

¹¹ Employment and Economy Baseline Study, 2013

¹² Stevenage Retail Study, 2014

¹³ Housing Market Areas in Bedfordshire and surrounding areas (ORS, 2015)

¹⁴ Functional Economic Market Area Study: Stevenage, North Hertfordshire and Central Bedfordshire (NLP, 2015)

- 2.13 Meeting all of these needs within the wider market areas is challenging and will require a large amount of land to be allocated for development.

The inherent constraints on supply/availability of land *prima facie* suitable for sustainable development

- 2.14 As a small, predominantly urban authority, Stevenage has limited land available for development. The urban area reaches right up the Borough boundary on most sides.
- 2.15 Our residential Strategic Land Availability Assessment (SLAA) (as updated in Oct 2015¹⁵) identifies enough sites to deliver 5,423 homes on Previously Developed Land (PDL) and Greenfield sites within the Borough (including a windfall allowance). Adding this to homes already completed and those within the planning process, this would allow for around 7,774 new homes to be delivered within the plan period. It would appear that we can meet just about meet our OAN without the need to use Green Belt land.
- 2.16 However, the SLAA assesses whether sites are suitable, available and achievable for housing in simplistic terms. It assesses them on an independent basis, without considering:
- The need to reserve sites for other land uses, such as employment or retail;
 - The results of other evidence studies;
 - Other policy considerations, such as environmental or social requirements;
 - The cumulative impact of development.
- 2.17 The Housing Technical Paper goes through a process of updating the results of the SLAA to take these issues into account. This paper says we can build 6,797 new homes outside of the Green Belt, including a windfall allowance, leaving us around 800 short of the 7,600 target. Using only previously developed and Greenfield sites would not allow us to meet our needs.
- 2.18 An appropriate buffer, above the 7,600 target, is also required in order to reduce the risks associated with non-delivery and to allow for some level of contingency. Due to the nature of the town, we are heavily reliant on a small number of large sites. This creates a risk that if just one of these sites is not delivered, we will not be able to meet our housing target.
- 2.19 The allocation of Green Belt sites enables us to meet our housing requirement, and provide this buffer.
- 2.20 Green Belt sites are also required if we are to meet our employment and retail needs.
- 2.21 The Employment Technical Paper shows that Stevenage cannot meet its identified employment requirements by using only the SLAA sites outside of the Green Belt. Further consideration has been given to whether any sites or areas not identified in the SLAA might be capable of delivering additional employment development over the plan period. However, it is clear that we can only meet just over half of the identified employment requirements on land outside of the Green Belt. The Green Belt site identified for employment in the SLAA contributes a further 4.4 hectares (net) of employment land, equating to around 18,000m².
- 2.22 Although some of the convenience retail need will be met through extensions to existing stores and new small-scale provision, a site is required to accommodate the remaining 7,600m² trading convenience floorspace in a single new superstore. As our technical papers show, all identified SLAA sites outside of the Green Belt, are already being used to meet our employment and

¹⁵ Housing SLAA as updated by the Housing Technical Paper, 2015

residential needs. No alternative sites of the right size outside of the Green Belt have been identified for this use.

- 2.23 Because much of Hertfordshire is covered by the Green Belt, many local authorities within the surrounding area will either choose not to meet their OAN or will rely on Green Belt release in order to meet their own needs. Placing reliance on other Hertfordshire authorities, via the Duty to Cooperate, to make housing provision for Stevenage would be an unrealistic and very uncertain option.
- 2.24 A recent **Report into the Bath and North East Somerset Council Core Strategy**¹⁶ recognises that unmet housing need can be considered as an 'exceptional circumstance' for reviewing Green Belt boundaries. Paragraph 165 states that *'I consider that there are the exceptional circumstances to justify removing land from the Green Belt and for major development within the AONB. The need for housing and the benefits of additional housing in this location at Bath outweigh the harm that would arise, taking into account the great weight that must be given to protecting the AONB and heritage assets. The Council's decision to allocate this site represents positive planning and is justified. This allocation is needed to make the plan sound.'*

Five year housing land supply

- 2.25 As well as meeting our overall housing needs, Government guidance requires us to identify **deliverable** sites for the first five years of the plan. A deliverable site is a viable site that is available for development now, in a suitable location for housing, with a reasonable prospect of housing delivery on site within five years.
- 2.26 Our deliverable housing requirement, for monitoring years ending 2017 to 2021, is 2,570. This includes a 20% buffer to account for persistent undersupply, and the current deficit spread across the plan period, as explained in our Housing Paper.
- 2.27 The updated housing trajectory in our Housing Paper shows that we do not have sufficient **deliverable sites** to meet this requirement. Our committed supply and deliverable housing sites, those which we believe will come forward within the first five years of the plan period, equate to just 1,627 new homes.
- 2.28 As the Housing Paper explains, Green Belt sites provide the only option in terms of pulling additional sites into this five year period. All others have significant constraints which we do not believe can be overcome within / prior to this period.
- 2.29 The allocation of the four Green Belt sites adds a further 980 homes to the first five years supply, bringing the total to 2,607. This enables us to meet our five year housing land requirement.
- 2.30 All of these sites are only constrained by their Green Belt designation. Two have interested and active developers, and could otherwise be progressed within the first five years. The Land South of the A602, does not have any physical constraints and although it is not being actively pursued by a developer, it is owned by the Borough Council, so we have the opportunity to push this site forward earlier if required.
- 2.31 The release of Green Belt sites provides us with viable sites, which are available for development straight away and can help us to meet the more immediate shorter-term needs.

¹⁶ 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

- 2.32 Meeting our housing target within the Borough boundary and increasing the short term housing supply will enable local people to gain access to the resulting affordable housing that is developed.

The consequent difficulties in achieving sustainable development without impinging on the Green Belt

Maintaining a balanced strategy

- 2.33 As the Technical Papers demonstrate, we have exhausted all possible opportunities in terms of using previously developed and Greenfield sites to meet our development needs. The release of Green Belt land is essential if we are to meet these requirements. In terms of the positively assessed SLAA sites that have not been allocated for residential use, the only ones which could feasibly be allocated for housing are those which are being used to meet other needs of the Plan.
- 2.34 The Local Plan is charged with delivering the best overall package of land uses for Stevenage. It takes into account all of the evidence we have prepared and identifies a sustainable development strategy to meet these needs and requirements. The SA sets out how reasonable alternatives have been generated and considered.
- 2.35 The development option selected seeks to provide a sustainable pattern of development that meets all of our identified needs, whilst retaining the green infrastructure, heritage assets and other community facilities that our residents value. Using our allocated employment sites for residential use, for example, would lead to an unbalanced strategy, where people are forced to go outside of the Borough to work. Allowing homes to be built in our parks and gardens would have a negative impact on the supply of public open space and thus, on the quality of people's lives. The Local Plan seeks to balance all of these competing objectives effectively.
- 2.36 Meeting all of our social, economic and environmental needs requires the majority of available land within the Borough to be used, including some Green Belt sites.
- 2.37 A report on the examination into the **Lichfield District Local Plan: Strategy**¹⁷ emphasises the importance of a sustainable overall strategy: *"In my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan's urban and key centre strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt land at Deanslade Farm and Cricket Lane and their allocation for development..."*.

Enabling development outside of the Borough boundary

- 2.38 Under the Duty to Cooperate, we have been actively working with North Hertfordshire District Council, amongst others. In their last Local Plan consultation, North Hertfordshire considered development around the edge of Stevenage as a way of meeting their housing needs..
- 2.39 One of the sites considered, was the land beyond our large-scale housing allocation to the North of the Borough. This has the potential to provide an additional 1,000 new homes.

¹⁷ Report to Lichfield District Council, The Planning Inspectorate, 16 January 2015
<http://www2.lichfielddc.gov.uk/localplanexamination/files/2015/01/Lichfield-Report-Word-16-Jan-2015.pdf>

- 2.40 However, due to its location, this site could only be successfully delivered if the North Stevenage allocation within our Borough is developed. Accordingly, if this site were to remain in the Green Belt, not only would we be incapable of meeting our housing needs, but it could limit the scope of North Hertfordshire District Council to meet their target.

Options under Duty to Cooperate

- 2.41 If we cannot meet our needs within the Borough boundary, the NPPF requires them to be met elsewhere, ideally within the Housing/Functional Employment Market Area. This would involve relying on our neighbours under the Duty to Cooperate.
- 2.42 We have, and continue to, actively engage with neighbouring authorities, and those within our housing and employment market areas, throughout the plan-making process.
- 2.43 Many local authorities within the surrounding area, although at an earlier stage in the plan-making process, are also struggling with development constraints.
- 2.44 Because much of Hertfordshire is covered by the Green Belt, many local authorities within the surrounding area are also likely to be relying on Green Belt release in order to meet their own needs, making reliance on neighbouring authorities via the Duty to Co-operate a less plausible option for us.
- 2.45 A review of published capacity across the Housing Market Area demonstrates there would be a substantial shortfall against identified needs if all authorities were to restrict themselves to consideration of sites outside of the Green Belt¹⁸.

Table 15: Indicative capacity within functional Housing Market Area (HMA)

| | OAN 2011-2031 | % of population in HMA | Indicative OAN in HMA | Capacity in HMA (ex - GB) | Capacity in HMA (total) |
|----------------------|----------------------|-------------------------------|------------------------------|----------------------------------|--------------------------------|
| Stevenage | 7,300 | 100% | 7,300 | 6,800 | 8,200 |
| North Hertfordshire | 14,400 | 99% | 14,200 | 4,600 | 18,500 |
| Central Bedfordshire | 29,500 | 29% | 8,400 | 5,900 | 5,900 |
| East Hertfordshire | 16,400 | 6% | 1,000 | 0 | 500 |
| Welwyn Hatfield | 13,200 | 52% | 6,900 | 2,700 | 4,900 |
| Total | 80,800 | | 37,800 | 20,000 | 38,000 |

Source: Authority websites / ORS / SBC analysis. Figures rounded to nearest 100.

- 2.46 Based on current information, none of the authorities in the HMA could meet their share of OAN on non-Green Belt sites alone. It would be inconsistent for Stevenage to ask other authorities to use their Green Belt land to meet our needs, whilst simultaneously protecting our own Green Belt.
- 2.47 In order to meet our employment needs, our Employment Paper concludes that the requirement for some employment provision to be made outside of the Borough boundary is inevitable. As such, it is considered appropriate to maximise the level of employment provision within the Borough.

¹⁸ Figures for other authorities based upon SLAAs or other published sources and may not include additional sites that have been submitted in response to any subsequent consultation exercise or 'call for sites'. Figures for other authorities do not take account of any alterations to SLAA results that might arise following consideration of the wider evidence base or other relevant factors.

- 2.48 Meeting our objectively assessed needs within our own administrative boundaries reduces the pressure on the Green Belt in these other local authority areas. Retaining the existing Green Belt boundary would significantly hamper our ability to meet our objectively assessed needs in the most sustainable manner.

A new settlement

- 2.49 An alternative option, suggested in response to our previous consultations, is for a completely new settlement to be considered. Obviously, as the Borough covers a small, mainly urban area, this would need to be located outside of the Borough boundary. We would need to rely on neighbouring authorities under the Duty to Cooperate. No specific sites have been identified.
- 2.50 A new settlement would be beneficial in providing new homes for the wider Housing Market Area. However, a completely new town would require a long lead time and significant new infrastructure, as well as also requiring Greenfield land to be developed. It is more sustainable to expand existing settlements whilst this remains a practicable option and, where necessary, improve the facilities that are already in place.
- 2.51 The timeframes involved in delivering a new town of the necessary size need to be taken into account. Short term housing delivery is a particular problem for the Borough. As our technical work¹⁹ demonstrates, we cannot meet our five year housing land requirement without the release of Green Belt sites. A new settlement would take many years to deliver, and it is highly unlikely that all constraints would be resolved and enough homes would be delivered within the plan period to meet our needs.
- 2.52 The concept of a new settlement has been discussed with neighbouring authorities under the Duty to Cooperate. It is not considered that this represents a 'reasonable alternative' in the period to 2031. Exploratory work has begun to consider options for providing a new settlement post-2031, which may be a practicable option if preparatory work begins early enough.

The nature and extent of the harm to *this* Green Belt (or those parts of it which would be lost if the boundaries were reviewed)

- 2.53 Our Green Belt Review recommends that the sites allocated can be released from the Green Belt, without damage to its overall purpose. Revisions to the Green Belt are based on recognisable features, with strong defensible boundaries. They are shown to have minimal impact on the Green Belt purposes.
- Land at North Stevenage – This parcel's south facing topography and strong boundaries means there is relatively limited connection with the open countryside to the north. The site is enclosed by existing development to the south and North Road to the west. Mature planting along Stevenage's boundary makes the visual containment stronger. North Hertfordshire District Council is considering the release the parcel of land to the north of this site from the Green Belt as well, to enable an extended scheme. Although the site does make a contribution to some of the Green Belt purposes, this is not significant, and its containment can be substantiated through further landscaping.
 - Land to the South of Stevenage (north and south of A602) – Both sites are well contained by strong boundaries, meaning that sprawl can be restricted and the sites have limited

¹⁹ Housing Technical Paper, 2015

connections with the wider countryside. To the north of the A602, the revised boundary follows Aston Lane up to the edge of the Borough boundary. South of the A602 a small area of Green Belt within the Borough boundary will be retained (to the east), using the existing boundaries the wooded area and the distinct field boundary between the housing allocation and the adjacent public house to the east.

- Land at Junction 8 (employment site) – These ‘remnant’ parcels are strongly enclosed on all sides by existing roads and the railway line to the west. The effect of bisection by transport routes means that its visual and functional connection with the wider Green Belt is limited. It makes a ‘contribution’ to preventing encroachment into the wider countryside, but assessment against the other purposes of the Green Belt show a ‘limited contribution’.
- Land to the North of Graveley Road (Gypsy and Traveller site) – This site is physically and perceptually distinct from the wider Green Belt parcel assessed in the Part 1 Green Belt Review due to it being heavily wooded and strongly enclosed on all sides. This makes it visually well contained. Due to this containment, it is considered that the release of this site would not cause undue damage to the strategic role of the Green Belt.
- Garden Centre (retail site) – The site is brownfield land contained by Graveley Road to the north west and North Road to the east. It is assessed as making a ‘limited contribution’ against all purposes of the Green Belt, reflecting its small scale and strongly enclosed character. This site is already in Use Class A1 retail use and is described as a ‘remnant parcel’ in Green Belt terms.

The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

- 2.54 The Borough Council is committed to ensuring a sustainable approach to development is adhered to, within the plan period, and beyond. The previous section shows that the release of these Green Belt sites will not damage the overall purposes of the Green Belt as a whole in this location. However, appropriate mitigation measures can help to reduce any impact further.
- 2.55 The Green Belt Review proposed putting three sites back into the Green Belt in order to strengthen its current purpose and respond to the recommended removals. Two of these lie outside of the Borough boundary. Land at Norton Green has been added back into the Green Belt for this purpose. We will work with our neighbours to try and implement the other recommendations.
- 2.56 Our Local Plan policies aim to mitigate the loss of Green Belt land by ensuring development schemes maintain any physical boundaries that provide visual and functional separation from the Green Belt, and enhance these, where possible. Schemes will incorporate effective landscaping schemes and buffers, where required, to create appropriate transitions.
- 2.57 We have also only released sites that we consider are suitable for development, despite the results of the Review suggesting further sites for release, or safeguarding for future development. The following sites have not been released:
- Additional land to the north of Stevenage - this site forms part of the St. Nicholas / Rectory Lane Conservation Area and is significant in terms of its views across the countryside. It is to be retained as an important open space.
 - Land at Junction 7 – this site is not suitable for housing without larger scale development (the development of a new community) beyond the Borough boundary, which is not

supported by NHDC. The landowner has also confirmed the site is unavailable for residential or employment use.

- Additional land around Junction 8 - part of this site is designated as a Wildlife Site and access is also a key issue. The landowner has confirmed that this site is not available for residential or employment use.
- Sites to the east of Stevenage – this includes two sites within the Borough, to the east of Gresley Way. Both have previously been assessed, in full or in part, for residential development within the SLAA. They were not found to be suitable for this use. The sites are separated from the town by Gresley Way. The smaller site to the south is very narrow and heavily sloping, making it very difficult to develop. The land at Lanterns Lane is a designated wildlife site.

2.58 The Review also assesses land outside of the Borough boundary, in neighbouring authorities, to ensure a consistent and strategic approach to Green Belt boundaries is taken. Although we cannot plan for land outside of the boundary, we will continue to work with our neighbours to implement the full results of the Green Belt Review and to minimise the impacts of Green Belt release.

3. Conclusion

- 3.1 This report sets out the Borough Council's approach to Green Belt release within the Local Plan. It takes into account a number of evidence studies related to this issue, considering evidence 'in the round' and not independently from other issues. It justifies why we have made changes to Green Belt boundary.
- 3.2 National planning policy makes provision for changes to be made to the Green Belt within the Local Plan, if 'exceptional circumstances' can be demonstrated.
- 3.3 A recent High Court decision²⁰ sets out a number of matters that should be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify rolling back the Green Belt. The circumstances in this case have been assessed according to these criteria.
- 3.4 Our evidence identifies a significant need for new housing, employment and retail floorspace over the plan period. The Local Plan sets a target for 7,600 new homes to be delivered, alongside 30 hectares of new employment land and around 9,000m² convenience retail floorspace. The objectively assessed needs of the wider market area also need to be considered.
- 3.5 The significant needs of the wider housing and employment market areas, and the extent of the London Metropolitan Green Belt across these areas, makes meeting these needs impossible without Green Belt release. As a small, predominantly urban authority, Stevenage has limited land available for development. The urban area reaches right up the Borough boundary on most sides.
- 3.6 Our Housing and Employment Technical Papers conclude that only using previously developed and Greenfield sites would not provide us with enough land to meet our Objectively Assessed Needs. The allocation of Green Belt sites enables us to meet these requirements. It also provides us with the only solution in terms of providing a five year supply of housing. All other

²⁰ Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078:
<http://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>

identified sites have significant constraints which we do not believe can be overcome within / prior to this period.

- 3.7 The Local Plan is charged with delivering the best overall package of land uses for Stevenage. The development option selected seeks to provide a sustainable pattern of development that meets all of our identified needs, whilst retaining the green infrastructure, heritage assets and other community facilities that our residents value. This is in line with the approach supported during the Lichfield examination²¹: *“the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan’s....strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt land”*.
- 3.8 Other options have been considered, particularly, in relation to the Duty to Cooperate. However, due to the extent of the Green Belt across the wider area, it is clear that it would be very difficult to meet all development needs using non-Green Belt sites alone. Meeting our objectively assessed needs within our own administrative boundaries reduces the pressure on the Green Belt elsewhere in Hertfordshire.
- 3.9 Our Green Belt Review concludes that the sites allocated can be released from the Green Belt, without damage to its overall purpose. Revisions to the Green Belt are based on recognisable features, with strong defensible boundaries. The release of these sites is shown to have minimal impact on the Green Belt purposes. Mitigation measures have been identified within the Plan to help minimise any impact of Green Belt release further, including the re-designation of land at Todd’s Green to form part of the Green Belt in order to strengthen its overall purpose.
- 3.10 Exceptional circumstances can be demonstrated in this case and Green Belt release is supported as the most sustainable approach to development within the Borough.

²¹ Report to Lichfield District Council, The Planning Inspectorate, 16 January 2015
<http://www2.lichfielddc.gov.uk/localplanexamination/files/2015/01/Lichfield-Report-Word-16-Jan-2015.pdf>