



**Stage 2 Matters Statement for Stevenage Borough Council Local
Plan Examination**

Matter 5 – Green Belt

Statement of behalf of Miller Homes and Bellway Homes

Stevenage Local Plan Examination

Stage 2 Matters and Questions

Matter 5 – Green Belt

- 1. Do exceptional circumstances, as required by paragraph 83 of the Framework, exist to justify the plan's proposed revision of the boundaries of the Green Belt?**
- 1.1 Paragraph 83 of the Framework establishes that Green Belt boundaries are not permanent and a review of the Local Plan is the appropriate time at which a local planning authority may make adjustments to established Green Belt boundaries in exceptional circumstances. That Stevenage Borough Council considers an adjustment to its Green Belt boundaries is necessary through the Local Plan review is therefore entirely consistent with this part of the NPPF.
- 1.2 This then leads into consideration of whether exceptional circumstances exist to support these proposed adjustments to its Green Belt boundaries. Paragraphs 84 of the Framework provides some further guidance here. This states that local planning authorities should have regard to the need to promote sustainable patterns of development in reviewing Green Belt boundaries. They should also consider the consequences for sustainable development by identifying alternative locations for development, including urban areas, inset villages and locations beyond the Green Belt boundary.
- 1.3 The administrative boundary and inner boundary of the Green Belt within Stevenage are both drawn very tightly around the urban edge of the town. Stevenage has identified an objectively assessed need for 7,600 residential units in the Plan period. When it issued the Revised Housing Targets consultation in June 2015, the Council acknowledged that this would require release of land from within the Green Belt within the borough boundary.
- 1.4 In meeting this need, the Council has sought to utilise brownfield locations where possible. However, it does not have the option of directing growth to other villages or towns that are washed over by the Green Belt or to areas beyond the Green Belt. Therefore to meet its OAN requires a revision to the Green Belt boundary around the town. There are no reasonable alternatives and therefore this constitutes exceptional circumstances justifying release of Green Belt land.
- 1.5 This decision of the Council to revise the Green Belt boundary has been made with the benefit of a full assessment of the purposes of the Green Belt prescribed in Paragraph 80 of the Framework. The Council has carried out a Green Belt Review, which has concluded that those sections of the Green Belt boundary that are to be revised are in areas that are considered to make either a limited contribution or a contribution to Green Belt purposes.

There are no adjustments to the Green Belt boundary in locations that are considered to make a significant contribution to Green Belt purposes.

1.6 Paragraph 80 of the Framework identifies five purposes that the Green Belt serves. The first two concern checking urban sprawl and preventing neighbouring towns from merging into one another. The Green Belt around Stevenage forms part of the London Green Belt and the diagram below sets its context within the North Hertfordshire sub-region. Here it can be seen that the Green Belt effectively contains the regional towns of Stevenage, Letchworth, Hitchin and Welwyn. The proposed revisions to the Green Belt around Stevenage are relatively minor and will not in any way result in coalescence of these urban areas. Neither will these revisions cause any material encroachment on smaller villages located around Stevenage, for example Graveley to the north of Stevenage, which will still be separated by an extensive swathe of Green Belt land. Should the North Herts District Council proposed allocation come forward for the land adjacent to northern administrative boundary, a Green Belt buffer would be retained ensuring Graveley remains separated from the urban area of Stevenage.

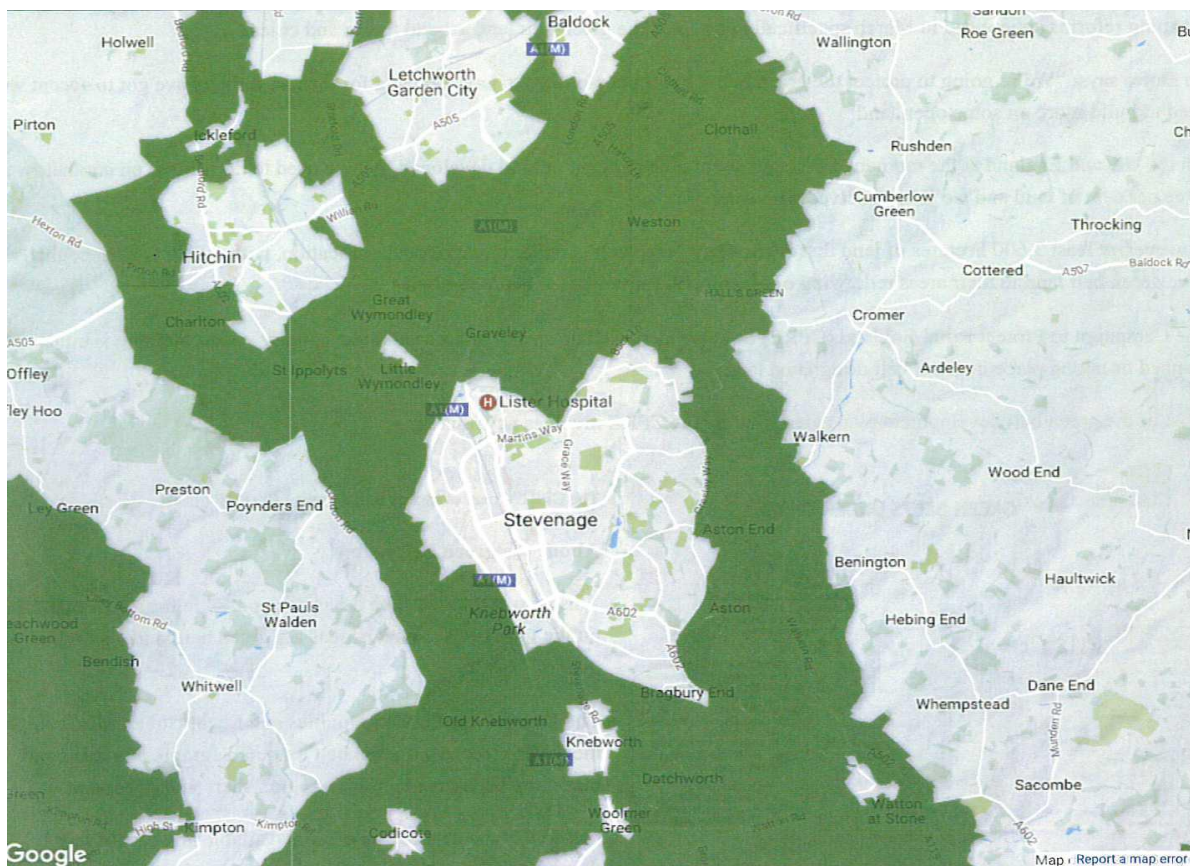


Figure 1: Green Belt around Stevenage

1.7 The third purpose is to safeguard the countryside from encroachment. Here it is acknowledged that there will be a degree of encroachment into the countryside through

limited release of Green Belt land. However, this is an inevitable consequence of altering the Green Belt boundary and the salient point is that the proposed encroachment into the countryside is not significant. Notably, the proposed housing allocation at North Stevenage is at a location that effectively forms an “indent” in the existing northern boundary of the urban area and therefore results in limited encroachment.

- 1.8 The final two purposes are to preserve the setting of historic towns and assist in urban regeneration. Given that Stevenage is a new town, rather than an historic town and does not therefore have swathes of redundant brownfield land characteristic of many urban areas, these purposes are of limited significance. The release of this Green Belt land will not undermine any urban regeneration objectives, which is fully promoted by the Council alongside limited Green Belt release, but simply does not have capacity to meet OAN on its own. The main focus on urban regeneration within Stevenage is town centre regeneration. Release of land from the Green Belt will deliver 1,350 new homes, whose occupiers will, of course, contribute towards a more vibrant town centre.
- 1.9 On this basis it has been demonstrated through the Council’s Green Belt Review and this Statement that the proposed revisions to the Green Belt boundary will not undermine the purpose and function of the Green Belt around Stevenage.
- 1.10 Whilst it has been established that the proposed revision to the Green Belt boundary will not undermine the purpose and function of the Green Belt around Stevenage, it is necessary to consider whether the proposed boundaries are suitable. This matter is addressed in Paragraph 85 of the Framework.
- 1.11 Paragraph 85 sets out the considerations to be taken on board when reviewing Green Belt boundaries including to:
- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and*
 - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*
- 1.12 Firstly, SBC has identified an objectively assessed need for 7,600 residential units in the Plan Period. If land is not removed from the Green Belt then almost 18% of the housing needed in the Borough will not be delivered and as a consequence the Plan will result in significant unmet housing need, contrary to Paragraph 47 of the Framework. The proposed locations for Green Belt release will provide for sustainable urban extensions to the town and in this regard will meet sustainable development objectives.

- 1.13 In relation to the Land North of Stevenage (Parcel N4(iii)), the Council's Green Belt Review recognises the contribution that this release of land will make to the borough's workforce and the provision of a diverse mix of high quality homes. These are significant social and economic benefits.
- 1.14 In terms of where the boundaries are defined, in relation to the Land North of Stevenage (Parcel N4(iii)), the Council's Green Belt Review recommends that Parcel N4(iii) be released from the Green Belt given its current containment by strong defensible boundaries and the opportunities to strengthen these through further landscaping. It is also recognised that any impacts on the setting of Graveley to the north can be mitigated through good master planning and that a development could realise the incorporation of significant green infrastructure.
- 1.15 Paragraph 85 of the Framework further states that local planning authorities should satisfy themselves that Green belt boundaries will not need to be altered at the end of the development plan period. This may be regarded as difficult for the Council in that the planned urban extensions within the Green Belt effectively means that there is little residual Green Belt land remaining within the borough. However, it is important to note that the Council has committed to working with North Hertfordshire and East Hertfordshire District Councils to consider the best ways of meeting housing needs beyond the plan period.
- 1.16 There is a long and complex history associated with the release of Green Belt land within Stevenage. Significantly, land at Great Ashby to the northeast of the town and land to the west of the A1(M) were released in 2004. Furthermore, some of the land currently allocated for release from the Green Belt within the Plan has also previously been proposed for development. The East of England Plan Regional Spatial Strategy (RSS) published in 2008 identified that sustainable urban extensions would be required to the north and west of Stevenage. The RSS therefore established the principle of the release of Green Belt land to facilitate housing delivery.
- 1.17 In response to the requirements of the RSS, Stevenage BC and North Herts DC began preparation of a joint masterplan, known as the Stevenage and North Hertfordshire Action Plan (SNAP). The purpose of the masterplan was to guide the expansion of Stevenage to the north and west. Work on the SNAP was ceased in 2010 due to uncertainty regarding housing targets and the status of the RSS.
- 1.18 Between the years of 2007 and 2010 SBC prepared a Draft Core Strategy. In May 2010, just before the announcement of the abolition of regional spatial strategies, the Core Strategy and other Development Plan Documents were submitted for examination. This included the allocation of Land to the North of Stevenage for residential development in accordance with RSS requirements.

1.19 In considering the Core Strategy Submission, the Inspector advised SBC in November 2010 that it failed to meet the statutory requirements of soundness. It was considered unsound because the housing numbers were not justified by local needs, following the decision to revoke the RSS. The plan was *not* found unsound in relation to locational or site specific Green Belt issues. The proposed Green Belt release at North Stevenage within the emerging Local Plan is clearly underpinned by a historic commitment to its residential development.

1.20 It is clear that uncertainty in the strategic planning process has contributed towards a hiatus in local plan preparation within the area, which, in turn, has seriously constrained the supply of housing to meet OAN. The table below shows when neighbouring authorities last adopted a Local Plan:

Authority	Date Local Plan adopted
Stevenage	2004
North Hertfordshire	1996
East Hertfordshire	2007
Welwyn Hatfield	2005

1.21 The consequence of this hiatus is that there has been no planned housing growth in the sub-region for a significant time, but also no Green Belt housing land release, given that all of these authorities incorporate Green Belt land within their respective areas. The consequence of this is that all of these boroughs and districts, are now planning on making alterations to the Green Belt through their respective local plan reviews that are underway. This establishes a general consistency in approach that to meet the objectively assessed housing needs requires release of Green Belt land.

1.22 In conclusion, Stevenage Borough Council has identified an objectively assessed housing need that will require the release of land within the Green Belt. The Council therefore faces a choice of reviewing Green Belt boundaries or committing itself to a planned undersupply of housing over the Plan period. Whilst this latter approach would undermine the objectives of Paragraph 47 of the Framework, the Council must nevertheless consider whether exceptional circumstances exist to justify altering existing Green Belt boundaries, which are tightly drawn around the urban area. The Council has assessed through the plan preparation process and Sustainability Appraisal that there are no reasonable alternatives for delivering housing land to meet their objectively assessed housing need.

- 1.23 The Council's Green Belt Review has identified suitable sites within the Green Belt which could be released without adversely affecting the purposes of the Green Belt. The release of these contained sites will not result in coalescence of existing settlements and will ensure the retained Green Belt land will serve the five purposes of the Green Belt. Furthermore, the sites identified for release from the Green Belt would provide sustainable urban extensions to the town, which are located in close proximity to the existing built up boundary, public transport and facilities.
- 1.24 It is also noteworthy that, as a New Town, the Green Belt was not designated to aid urban regeneration. Whilst the Council has allocated brownfield sites within the town centre to assist in regeneration, it is likely that release of the Green Belt will also aid the regeneration of the town centre through increased population and consumer spending power.
- 1.25 The Green Belt release has also been considered within the wider context of the emerging NHDC Local Plan which seeks to allocate land adjacent to Land North of Stevenage for residential use. This accords with the principles established originally in the RSS and will bring forward an integrated sustainable urban extension to the town. As such, having regard to Paragraph 84 of the Framework, the release of the sites identified by SBC would promote sustainable patterns of development.
- 1.26 On this basis the conclusion is reached that exceptional circumstances do exist to justify the Council's approach of revising Green Belt boundaries in order to meet its identified housing target and deliver sustainable development over the plan period.