

## 4 Conclusions

- 4.1.1 This study has examined the Green Belt in East Herts District in recognition that the District Council needs to prepare a spatial strategy as part of the District Plan informed by all relevant considerations. Parts of the District are designated as Green Belt and therefore the Green Belt is both a factor in identifying the most appropriate spatial strategy and may need to be changed to enable locations for development to be identified in the plan. It remains the national policy position (as set out in section 9 of the NPPF, with some explanation in the PPG), that established Green Belts can be altered through the preparation of a local plan, if there are 'exceptional circumstances'. The requirement to seek to meet the objectively assessed housing need can provide the exceptional circumstances, and whilst the presence of Green Belt may be one factor in a planning authority proposing a level of provision less than the need, it could not expect its plan to found sound on this basis unless it could demonstrate that locations in the Green Belt that could otherwise be suitable for development for housing had been assessed against the five purposes of including land in the Green Belt.
- 4.1.2 The study of the Green Belt has focussed on the periphery of the main settlements and those smaller settlements identified by the planning authority as appropriate to consider for development (the Group 1 settlements). It is to be noted that the original concept of the Green Belt, carried forward in the current purposes Green Belt is said to serve, was about preventing the 'sprawl' of large built up areas, and preventing neighbouring towns merging into one another. Whilst development properly and positively planned through a development plan cannot be construed as 'sprawl', this means that the Green Belt around the major settlements is likely to be the most important according to these long established ideas.
- 4.1.3 The outer extent of the Green Belt in East Herts is because of its history rather arbitrarily identified in relation to the settlements within East Herts or adjoining the District's administrative boundary. The significance of the Green Belt designation of land well removed from the periphery of the main settlements for the purpose of identifying locations for strategic development is negligible. These types of area are in any case protected for their own sake by the long established planning principle and policy of avoiding development in the open countryside in less accessible and unsustainable locations.

### 4.2 Assessment

- 4.2.1 The plan at **Appendix 4** combines the findings of the assessment of the land parcels examined against the four relevant purposes of Green Belt considered individually, and presents graphically the overall conclusions on the suitability these parcels have for development in terms (solely) of the effect on the fulfilment of the role being performed by the Green Belt. How this aggregation has been done is explained at **para.2.8.1**.

- 4.2.2 The plan illustrates the conclusion from the assessment that the great majority of the parcels and hence the great majority of the Green Belt assessed in the study appears important to the fulfilment of the purposes of Green Belt.
- 4.2.3 The parcels that are identified as having least importance to the fulfilment of the purposes of Green Belt and identified as 'Potential Areas of Search' for development locations are:
- Parcel 31a – west of Hertford
  - Parcel 59 – north of Sawbridgeworth
  - Parcel 59a - north of Sawbridgeworth
  - Parcels 66-70 – south/west of Bishop's Stortford.
- 4.2.4 The Council will need to consider other planning considerations relating to these locations, including housing need; spatial strategy and other policy and constraint considerations, to identify the most sustainable locations for development.
- 4.2.5 The parcels that are identified as having moderate suitability and identified as 'Potential longer-term Areas of Search' for development locations are:
- Parcel 24 – south east of Hertford
  - Parcel 37a – west of Ware
- 4.2.6 This conclusion arises from combining the assessment of the parcels combined against each of the four purposes considered. There are further considerations arising from the findings of the assessments undertaken against each of the purposes.

### **4.3 Green Belt assessment according to individual purposes**

- 4.3.1 The aggregation of the assessment of the purposes has assumed that all of the purposes are of equal importance, and there is no basis in Green Belt policy (and no guidance either) to provide any basis for doing anything else. It is likely to be informative however to look at how different areas perform in relation to different purposes.
- 4.3.2 Achieving the required scale of development in East Herts to address the needs of the community over the plan period, and doing so in ways which advance sustainable patterns of development, is likely to require a combination of development within and beyond the settlements, and given the distribution of Green Belt, using land currently designated as Green Belt and land outside the Green Belt.

- 4.3.3 Whilst this study has not been an assessment of landscape sensitivity, it is a noticeable characteristic of East Herts that the distinction between town and country in most areas is quite clear.
- 4.3.4 It is an important aspect of Green Belts that the distinction between Green Belt land and non Green Belt land should feel inevitable. That is, it ought to be clear to the casual observer what the difference is either side of the boundary. All too often Green Belt boundaries are simply drawn to the back of the last houses in a settlement, a reflection of the use of Green Belt policy as a powerful tool in the development management armoury. Marked changes in the landscape or the way land is used may provide for the identification of inevitable and defensible Green Belt boundaries in the proper sense, and certainly some of the edges created through the original planning of the new towns are present in some of the areas being examined for this study.
- 4.3.5 It is a feature of Hertfordshire, that the area has a number of new towns. These are settlements conceived and planned as a whole, rather than having simply grown to a larger settlement from small beginnings through development which may or may not have been identified through a development plan. A critical feature of these planned settlements is that the edges have been designed as part of the overall scheme, with a combination of the incorporation of natural features, the configuration of transport corridors and the creation of strategic landscape features. Parts of the eastern edge of Stevenage are an excellent example.
- 4.3.6 It is generally the case that there is very little of the District that displays the classic characteristics of 'urban fringe', whereby uses necessary to support urban populations but which are unpopular in urban areas are accommodated on the edge of the town in a rather fragmented landscape with a rather uncared for appearance. In contrast, in most cases the transition between the built up areas and open countryside occurs almost immediately. The land around most of the settlements is in agricultural use in larger units and is well managed and productive (which, at least in part, is probably due to high agricultural land quality/productivity value).
- 4.3.7 This is why most of the Green Belt on the periphery of the settlements has been found to be performing an important role in relation to the purpose of 'preventing encroachment', as well as the purpose of 'preventing sprawl'. These two purposes are often the hardest to assess land against, because they are the least spatially specific and tend to be relevant to all urban edges, though the quality of the urban edge, the nature of the transition to openness and the way the landscape are managed all have some bearing.

#### **4.4 Green Belt and historic towns in East Herts District**

- 4.4.1 One of the five purposes of Green Belt from the Framework is '*to preserve the setting and special character of historic towns*'. For this study the view taken has been that Hertford is a historic town and hence the area around the town

in the Green Belt has been considered according to its significance in fulfilling this purpose.

- 4.4.2 There are also local 'setting/special character' considerations at Bishop's Stortford where 'inner' parts of the green fingers that penetrate the urban area lie within the town's Conservation Area.
- 4.4.3 As Watton-at-Stone is a Conservation Area and is a Group 1 settlement, this area has also been considered in relation to this purpose. That is, the study has considered whether the land in Green Belt for these two locations is part of the setting and how important to the preservation of the parts of the town which are part of its historic character, and the findings are presented in section 3 and on the map in Appendix 3. Other parts of the East Herts Green Belt have not been assessed in relation to this purpose as there is simply no connection.
- 4.4.4 Hertford and Bishop's Stortford have developed with a particular urban form, with wedges of green infrastructure (largely open because they follow water bodies) interspersed with fingers of development. Whilst the open land is Green Belt, development of these green areas is effectively prevented in any case, and this pattern of green wedge protection should be continued, connecting the heart of the town with the open countryside, as they are an important source of open space and recreational areas for town residents and visitors.

#### **4.5 Green Belt and coalescence**

- 4.5.1 The Green Belt purpose that relates most particularly to different locations and hence the purpose that is most likely to provide some distinction between different parts of the Green Belt is that which says, '*to prevent neighbouring towns from merging into one another*'. In national planning policy, coalescence is specifically and solely a Green Belt issue. There is no other mention of how the relationship between towns (or any other settlements) should be addressed.
- 4.5.2 A common interpretation of the objective of achieving more sustainable patterns of development is that development should be directed to larger towns, to take advantage of a greater range of services and facilities, to enable more needs including employment to be met with shorter trips, and for more of those trips to be made by lower energy modes. Linear development forms are noted to be efficient in terms of achieving good public transport services, though there is a direct tension here with the operation of Green Belt policy.
- 4.5.3 A concern for places to be kept separate from each other is commonly expressed through community involvement on planning strategies and in the consideration of planning proposals. What constitutes 'identity' is difficult to ascertain and (by definition) is particular to a place, but is likely to involve something more sophisticated than the width of an undeveloped patch of land

between the place and another place, though this is how national planning policy is generally applied.

- 4.5.4 In this study Green Belt policy is applied as it was originally conceived and as it is written in the Framework, in that the purpose is written in terms of towns. Appropriating such a strong policy and using it in other ways than was intended, though frequently seen elsewhere, is not something done here nor recommended in the preparation of the District Plan spatial strategy.
- 4.5.5 From the assessment reported in section 3, the area within the Green Belt in East Herts where coalescence is most an issue, where two towns are close to each other, is in the east of the District around Sawbridgeworth and Harlow (though Harlow is not in the District). There is a ribbon of narrow development to the south west of Sawbridgeworth along A1184 which on a map or as seen from the road means the gap or area of openness between the two places is very small. This gap could be seen as either nominal or strategic, depending on the commentator, and the slight physical separation of Sawbridgeworth and Harlow viewed to be important or not. However, the continued application of Green Belt policy in East Herts would require this gap to be maintained.

#### 4.6 SLAA sites and Broad Locations

##### Sites Promoted for Development

- 4.6.1 The Council are currently undertaking a Strategic Land Availability Assessment (SLAA), to inform the District Plan. The SLAA has not yet been finalised or published. However, the Council have undertaken a ‘call for sites’ exercise and received a number of sites being promoted for development. The Council provided PBA the GIS layer of SLAA sites which are currently being considered by the Council.
- 4.6.2 The table below lists the SLAA sites which fall within parcels identified in this study as having a ‘Moderate’ or ‘High’ potential for development, in Green Belt terms only. These are shown in **Appendix 5**.

SLAA site	Site size inside parcel (ha)	Parcel	Suitability for development in the Green Belt
03/006	3.65	24	Moderate
04/008	1.05	59	High
04/012	5.3	59	High
01/020	12.33	66	High

01/024	28.52	66	High
01/017	3.08	67	High
01/018	0.11	67	High
01/019	0.29	67	High
01/014	2.04	68	High
01/136	4.16	68	High
01/011	0.56	70	High

### Broad locations

4.6.3 The Draft District Plan (2014) identified a number of Broad Locations for potential future development. Green Belt parcels within these broad locations have been assessed and the suitability of these parcels for development is detailed below and shown in **Appendix 5**.

Broad Locations	Green Belt Parcel number	Suitability of Green Belt land for development according to Green Belt purposes
East of Welwyn Garden City	14	Very Low
Gilston north of Harlow	49/51	Very Low
North and East of Ware	41/42	Very Low
East of Stevenage	2/3	Very Low/Low

4.6.4 All of the parcels, identified in the Broad Locations, were identified as having 'Very Low' or 'Low' suitability as an area of search for development, in relation to Green Belt purposes.



## 4.7 Implications for the spatial strategy

- 4.7.1 The Council has to set out a spatial strategy addressing the development needs of the District over the plan period, and take account of the present Green Belt in doing so. The degree to which the presence of Green Belt can be used to avoid addressing the ‘objectively assessed’ housing needs of a district is frequently debated, though there is nothing in the Framework to indicate that a planning authority can abdicate its role in seeking an adequate supply of land on the basis of there being a historic Green Belt designation in its area. At the very least the Council has to be able to demonstrate that there has been a full and proper examination of how parts of the Green Belt perform in relation to the purposes for which Green Belt policy can be used. This will certainly have been the case for East Herts.
- 4.7.2 In addition to strategic allocations which will have to be considered against the findings of the Green Belt study where relevant, amongst other things, the Council is looking to propose ‘broad locations’ – areas within which development could take place subject to the scale, location and form being determined through subsequent elements of the District Plan.
- 4.7.3 It is noted that there are various parties interested in developing in the general areas the Council is considering. This is significant as the District Plan will have to be demonstrated by the Council to be deliverable, and this will include the need to be able to say there are willing landowners and promoters. Market interest also raises the possibility of applications being received ahead of the District Plan process for development either in locations the Council considers to be the most appropriate, or in other locations. Should such applications arise to be determined ahead of the plan being adopted, the evidence the Council has on the performance of parts of the Green Belt will become very significant.
- 4.7.4 The area contemplated in the emerging District Plan for the most significant development is the broad location of land to the north of Harlow, and the relevance of this Green Belt study to this current proposal needs some comment.
- 4.7.5 The Stort Valley forms a natural northern edge to Harlow and much of it lies within the administrative area of Harlow. The land north of Stort Valley is within the Green Belt in East Herts District. Land here is being considered for development. The immediate northern edge of Harlow, regardless of its Green Belt designation, is not an area where development could take place, because with the River Stort it is a river valley and there is a considerable area at risk of flooding. This area of green infrastructure forms a strong edge and natural constraint to the northern side of Harlow.
- 4.7.6 The Green Belt is not very wide around Harlow and there is land further north outside the Green Belt which is one of the largest undeveloped areas of East Herts District. Development could be accommodated here on a substantial scale if the Council accepts that not all of the development needs of the

District can be accommodated satisfactorily within settlements or on the edge of the main settlements, with or without changes to the Green Belt. If this idea is to be pursued, the development has to be properly conceived and well planned, beginning with the District Plan, rather than flowing entirely from the aspirations of landowners. The location and the form of development should emerge from a careful examination of the landscape as well as the way in which infrastructure needs will be met, together with a clear concept for the form and role of the intended development.

- 4.7.7 It would be rather misleading to present such development as an extension to Harlow. Extending Harlow is not a matter that can be dealt with entirely by East Herts District Council, and the development would be better thought of as a large freestanding development, close to but distinct from Harlow. The development would necessarily share some of the transport facilities and green infrastructure available to Harlow residents and visitors, but would need to be developed as a mixed use scheme to achieve deliverability and greater sustainability.

#### **4.8 Informing the District Plan - What next**

- 4.8.1 This Green Belt Review has identified those areas of the Green Belt which meet the purposes least well. It does not suggest or propose the removal of particular areas from the Green Belt. This is the function of the development plan and plan making.
- 4.8.2 To inform the location of development in the Green Belt, and redraw Green Belt boundaries, the Council need to:
- Identify a housing target for the whole district and spatial strategy for individual settlements;
  - Finalise a SLAA, identifying sites and the capacity within each urban area and Category 1 and 2 Villages, and identify the amount of housing that cannot be accommodated in urban areas and Category 1 and 2 Villages;
  - Taking account of issues of sustainability, identify locations for development in the Green Belt i.e. those where infrastructure services and facilities are available to support communities, identifying the quantum of development and potential amount of land to be released from the Green Belt.
- 4.8.3 The District Plan needs to ensure that all planning considerations, including Green Belt, are taken into account when determining its development strategy, and this report will form one part of the balance of considerations necessary to produce a sound Plan.