# WHAT'S WRONG WITH THE GREEN BELT REVIEW?

Harpenden Green Belt Association

## INTRODUCTION

- St Albans District Council commissioned a Green Belt Review from Sinclair Knight Merz (SKM) to help it draw up its Strategic Local Plan.
- The Green Belt Review is supposed to identify those parts of the Green Belt in the District which are less important than others.
- The Harpenden Green Belt Association thinks that the Review doesn't do what it set out to do, and its conclusions are unreliable. In this slideshow we explain what the issues are.
- Question 6 of the Council's consultation asks respondents whether they agree with the approach taken in the Green Belt Review. HGBA is asking its members to say that they STRONGLY DISAGREE with the approach taken.

# **GREEN BELT PURPOSES**

Green Belts are recognised in national policy as serving five purposes:

- 1. To check the unrestricted sprawl of large built-up areas.
- 2. To prevent neighbouring towns from merging into one another.
- 3. To assist in safeguarding the countryside from encroachment.
- 4. To preserve the setting and special character of historic towns.
- 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt Review assessed parcels of land against the first four purposes. It did not assess them against the fifth, because SKM took the view that all the Green Belt in our area would inevitably fulfil this purpose.

They added, however, a local Hertfordshire purpose, namely to maintain existing settlement patterns.

# **GREEN BELT REVIEW – PART 1**

- The Green Belt Review is in two parts. You can view both of them on the HGBA website.
- Part 1 of the Green Belt Review looked at the Green Belt across three Council areas: St Albans, Dacorum and Welwyn Hatfield.
- The consultants divided up the three council areas into 60 strategic parcels and considered how well each of these parcels fulfilled the five purposes they were considering (four national, one local).
- The conclusion of the Part 1 study was that the Green Belt plays a significant role across the whole area they studied.
- ➤ However, SKM advised that eight large "strategic" areas of land and eight smaller "sub-scale" areas contributed less to Green Belt purposes than other areas and should be taken forward for further assessment.

## **GREEN BELT REVIEW – PART 2**

- Part 2 of the Green Belt Review was where we think things really started to go wrong.
- > Part 2 looked in more detail at the eight "strategic" areas identified in Part 1.
- > It did not look at all at the eight "sub-scale" areas identified in Part 1.

## **GREEN BELT REVIEW – PART 2**

- The consultants took each of the areas identified in Part 1 and then subdivided them into two or three smaller parts.
- Then then compared the sub-parts against each other on landscape, not Green Belt, grounds.
- They then put one sub-part from each area forward for potential development.

## WHAT'S SO WRONG WITH THAT?

#### The first problem is:

- The consultants split the land they were considering up into smaller and smaller parts by the end of Part 2, the areas they had identified were very much smaller than those they started out with in Part 1.
- > Subdividing the land like that makes it harder for *any* of the areas to fulfil all of the green belt purposes to a significant extent.
- Also, by subdividing the "strategic" parcels in Part 2, the consultants ended up with areas of land which in some cases were no larger than the "non-strategic" areas identified in Part 1. But these "non-strategic" areas have not been subject to the same assessment.

## WHAT'S SO WRONG WITH THAT?

#### The second problem is:

- In Part 2, the consultants did not compare any of the areas of land with each other. They just compared parts of each area with other parts of the same area.
- So, for example, they compared the East part of Site 1 against the West part of Site 1. But they never compared the whole of Site 1 against the whole of Site 2, or any part of Site 1 against any part of Site 2.
- This means that the Council was never offered the full range of options to consider. It was not offered the option to consider building entirely on one site but not at all on another. It was assumed that the Council would build on part of every site.
- Consequently, the study does <u>not</u> identify those parts of the Green Belt which perform worst against the Green Belt purposes, which is what it was supposed to do.

## WHAT'S SO WRONG WITH THAT?

#### The third problem is:

- ➤ that the consultants confused Green Belt purposes with landscape and other planning issues when making their choices in Part 2.
- ➤ Green Belt purposes and landscape character are two different things. The Green Belt does not seek to preserve land because it is "pretty" and is not to be given up just because the consultants think one part of the Green Belt is less pretty than another.

#### WHAT CAN I DO?

Question 6 of the Local Plan consultation asks whether you agree with the approach taken in the Green Belt Review.

Tell the District Council that you STRONGLY DISAGREE with the approach taken, because

- 1. The process of dividing up the land, sub-dividing and then sub-dividing again blurred the distinction between the strategic and non-strategic sites.
- 2. In Part 2, the consultants did not compare the areas of land they had identified with each other. As a consequence, the Council was not offered the opportunity to consider building on one whole site rather than another. It was assumed that the Council would <u>have</u> to build on <u>part</u> of each site.
- 3. The consultants confused Green Belt purposes with other planning issues, particularly landscape character.