

Matter 4 – The Metropolitan Green Belt (Policy S3)

Main Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to the Green Belt.

1. Question 1

[i] What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? [ii] Is the Council's approach to the Green Belt set out in its response to the Inspector's Initial Question 16 and letter of the 2 July 2019 (Green Belt topic paper) robust and in line with national guidance?

- 1.1 [i] The basis of the Green Belt Review, carried out by independent consultants SKM, was the NPPF (2012) that applied at the time it was carried out in two stages in 2013-14. The methodology applied directly accords with the NPPF and is set out in detail in the Green Belt Review itself ([GB001-008h](#)). It can be summarised as: examining parcels of land across the three commissioning LPAs – St Albans, Welwyn & Hatfield and Dacorum against the five national Green Belt purposes (and then the consultants on the basis of the NPPF and local evidence added a local Hertfordshire purpose) and identifying potential strategic scale sites at stage 1; and at stage 2 a more detailed assessment of potential Green Belt boundaries and indicative site capacities. This is set out relatively concisely in the Green Belt Review Purposes Assessment ([GB004](#)) at 1.3.3 as:

The main purpose of the study is to undertake a strategic review of all Green Belt land across the three planning authorities to identify the contribution of the Green Belt towards national Green Belt purposes as set out in the National Planning Policy Framework (NPPF). This will identify both the primary functions of the Green Belt, which deliver the national purposes, and identify areas of Green Belt land which are considered to contribute least towards national purposes. This land will be subject to further assessment in separate studies (undertaken by each planning authority) to consider wider issues not covered by this study, but that must be considered in preparing a Local Plan. The outcome of this study will therefore provide only one piece of evidence among a wide range of considerations that must be taken into account before deciding on any changes to Green Belt boundaries.

- 1.2 [ii] The Council does indeed consider that its approach to the Green Belt as set out in detail in its response to the Inspector's Initial Question 16 and the Green Belt Topic Paper ([ED 25C](#)) is robust, sound and in line with national policy, guidance and the relevant case law. The Council considers that a full overview of the lawfulness and soundness of the approach requires a full consideration of the extensive detail given in those documents, [ED25C](#) and [ED18](#).

2. Question 2

[i] How have the conclusions of the Green Belt Review informed the Local Plan? [ii] Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evident?

- 2.1 The conclusions of the Green Belt Review with regard to both the GB parcel assessments (principally [GB004](#)) and the GB sites and boundary assessments (principally [GB001](#)) have directly informed the [Strategic Site Selection work](#) (2018) which itself has directly informed the approach to the Green Belt and the Broad Locations in the Plan. The need to promote sustainable patterns of development has been an overarching approach as set out in Policy S1 and as the District has no land beyond the Green Belt, this has also been explored through the Duty to Cooperate discussions (as set out in [CD 028](#)). All previously developed sites have been prioritised and sites which are or could be well served by public transport was a criterion by which the Broad Locations were selected. This is evident in a variety of documents, brought together concisely as set out in the Green Belt Topic Paper ([ED25C](#)):

The Council undertook the [Strategic Site Selection work](#) (2018) to review the existing SKM identified sites and to seek further potential sites to make up the 'shortfall'. As indicated in more detail in extracts from the PPC March 2018 Report – '[Local Plan - Development Strategy and Draft Strategic Site Selection Process](#)' including at paragraph 4.5 below):

Stage 1

1. *Green Belt Review evaluation will be undertaken on the basis of a judgement of impact on (i.e. 'damage' to) Green Belt purposes (taking account of the purposes defined in and considered in the relevant parcel assessment in the GBR). Sites are rated as 'higher impact', 'medium impact' or 'lower impact' (set out as Red Amber Green (RAG)). It is important to remember that the independent Green Belt Review set out that "All strategic parcels in the Green Belt, at least in part, clearly perform a key role". The assessment is a comparative one in the context of understanding relative impacts on the Green Belt. To achieve 'further consideration for development' the site must be evaluated as lower or medium impact (Green or Amber). Any Red rating (higher impact) will rule a site out for further consideration.*

Stage 2

2. *Suitability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development – eg Access, Transport, Heritage, Biodiversity, Flood Risk. Any Red rating will rule a site out for further consideration.*
3. *Availability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc. Any Red rating will rule a site out for further consideration.*

Stage 3

4. *Unique contribution to improve public services and facilities, e.g. public transport - (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale*
5. *Unique contribution to enhancing local high quality job opportunities and the aspirations of the Hertfordshire Local Economic Partnership / Hertfordshire EnviroTech Enterprise Zone - (set out as Green Amber Red). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale.*
6. *Unique contribution to other infrastructure provision or community benefits - (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale*
7. *Deliverable / Achievable is there is a reasonable prospect that the development, including all key aspects (including viability) being assessed as part of the overall 'package' proposed, is viable and deliverable (set out as Red Amber Green). Any Red rating will rule a site out for further consideration.*
8. *An overall evaluation judgement will be recorded (set out as Red Amber Green) as how the site is evaluated for further consideration for development in the Plan.*

- 2.2 It can be noted there was a further testing of potential alternative approaches indicated in more detail in extracts from the June 2018 PPC Report ['Draft Local Plan for Publication \(Regulation 19 Stage\) Consultation - Recommendation to June Cabinet – Appendix 1'](#) below):

*Alternative housing development strategy options and effects of different strategies tested against the current proposed strategy
Currently, other strategy options are:–*

- 1) *North East Redbourn – Amber rated*
...
- 2) *Using Red rated sites*
...
- 3) *Different delivery trajectories*
...
- 4) *Other LPAs delivering development*
...
- 5) *Neighbourhood Plans*
...
- 6) *Development of a number of smaller sites currently in the Green Belt*

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3. Question 3

**Has a comprehensive assessment of capacity within built up areas been undertaken?
Have all potential options on non-Green Belt land in the countryside been assessed?**

- 3.1 Yes, comprehensive assessments of capacity are a particularly important in a District such as St Albans, which is completely washed over by the Metropolitan Green Belt. These have been undertaken in the form of comprehensive Strategic Housing Land Availability Assessments and the Annual Monitoring Report. The SHLAA was originally undertaken in 2009 and since then it has been updated in 2016, 2017 and 2018. Several 'Call for Sites' exercises have been undertaken in association with this SHLAA work, most recently in 2018. As set out in more detail in response to Matter 8 Questions, particularly Matter 8 Question 4, SADC has been tested regularly regarding land supply and urban capacity calculations at planning appeal by Public Inquiry, in the high court and at the court of appeal.
- 3.2 With regard to recorded and published data in the Authority's Monitoring Report, this consists of annual site surveys, recording completions, removing sites that have lapsed without a material start and reviewing pre-application meetings/discussions and Building Control records. On-going monitoring is undertaken and where possible discussions are held with landowners and developers to discuss progress of delivery on each site. To put into context based on the submitted Local Plan (Appendix 2) – Housing Trajectory, this has captured all known sites, including sites granted either planning permission or outline consent as of 1st April 2018, of which the Council considers as deliverable. This is also the case for the updated Trajectory (1 April 2019 base date).
- 3.3 Overall, this evidence constitutes a comprehensive assessment of capacity within built up areas (including PDL in the Green Belt).
- 3.4 There are no potential options on non-Green Belt land in the countryside. As set out in [ED 25C](#) (the Green Belt Topic Paper) at paragraphs 1.7-1.8:

There is no non-Green belt rural land within this District. This step was investigated further through the Duty to Co-operate discussions with adjoining and nearby LPAs throughout the period 2013-2019. The more recent of these Meeting Notes have been included in the examination documents (Doc CD028).

- 1.8 *Contextual consideration of whether or not there was any realistic prospect of any non-Green Belt rural land (in other Districts) meeting any of SADC's need was set out in the June 2018 PPC Report (as set out in more detail in extracts from the June 2018 PPC Report 'Draft Local Plan for Publication (Regulation 19 Stage) Consultation - Recommendation to June Cabinet' at paragraphs 4.13 and 4.14 below):*

...The District is wholly bounded by the Green Belt [i.e. there is no non-Green Belt rural land] and Duty to Cooperate discussions with adjoining and nearby authorities currently show no reasonable prospect of the District's housing need being met elsewhere at this point in time. Work with adjoining and nearby authorities is ongoing.

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4. Question 4

Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?

- 4.1. Yes, the Council considers that opportunities to maximise capacity on non-Green Belt sites, including increasing densities, have been taken. The Plan at policy S1 explicitly sets out requirements to increase densities through re-development in existing urban areas. Policies L1 Housing Size, Type, Mix and Density and L8 - Primarily Residential Areas also facilitate maximisation of capacity on urban sites. The Plan has also de-allocated a number of less strategically important employment sites in order to provide new opportunities to maximise non-Green Belt capacity (as dealt with in more detail in response to Matter 8 Q4 in particular). It can also be noted that, where Green Belt releases are required (in the Broad Locations), the required density has been significantly increased above historic norms locally. This is in part in order to minimise the total area of Green Belt release required.
- 4.2. As can be seen in the detail at Policy S1:

Policy S1 - Spatial Strategy and Settlement Hierarchy

...

Development must make efficient use of land by increasing the density and height of development. This will be encouraged, particularly in the most accessible parts of the main urban settlements (below).

...

1) City, Towns - Main urban settlements excluded from the Green Belt

...

Larger scale, higher density developments will be encouraged

- 4.3. As noted in the detail in response to Matter 8 Q4, the Council has also maximised urban capacity by re-developing certain less well-performing employment sites (designated in the [District Local Plan Review 1994](#)) and re-developing some council owned sites as part of the Urban Optimisation approach. The rationale behind this approach (with regard to employment land) is set out in response to Matter 5 Question 20, 24 and 25.
- 4.4. For reference, the employment sites not carried forward from the [District Local Plan Review 1994](#) are set out at M8Q4 Appendix 1. This is in accordance with paragraph 120 of the NPPF as set out below:
- 120. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*
- a) *they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*

- b) *in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.*

4.5 Policy L1 'Housing Size, Type, Mix and Density' facilitates maximisation of urban capacity by setting out:

All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated. Higher density development, including buildings of greater height than existing, will be encouraged, particularly in accessible urban locations with good access to services.

Development proposals that fail to make efficient use of land for housing, having appropriate regard to local character and site-specific factors, will be refused permission.

4.6 Policy L8 – 'Primarily Residential Areas' also facilitates this maximising approach where it sets out:

Planning applications for development and redevelopment to provide additional residential dwellings will be supported in principle. Priority will be given to residential use in these areas.

...

Residential development/redevelopment, including residential infill development, will be encouraged subject to the site planning and design considerations...

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5. Question 5

Have discussions taken place with neighbouring authorities about whether they could accommodate some of the identified housing need?

5.1. Yes, as set out in response to Matter 5 Q3 and earlier in document [ED 25C](#), discussions have taken place with neighbouring authorities over a long period of time about whether they could accommodate some of the identified housing need. The clear conclusion to those discussions is that there is no reasonable prospect of any other authority accommodating some of this District's need. This issue and its relationship as part of the 'Calverton' test regarding 'exceptional circumstances' in the Green Belt has been an important and consistent reference point in the Plan's development.

5.2. As can be seen in the detail in [ED 25C](#):

1.4 Ongoing dialogue with neighbouring and nearby LPAs throughout 2013-2016 and 2017-19 to see if they could accommodate any of SADC's housing 'need' has been an ongoing feature – with no reasonable prospect that such need would be met elsewhere.

...

2.47 PPC June 2018 Report - Draft Local Plan for Publication (Regulation 19 Stage) Consultation - Recommendation to June Cabinet

...

(iii) - The District is wholly bounded by the Green Belt and Duty to Cooperate discussions with adjoining and nearby authorities currently show no reasonable prospect of the District's housing need being met elsewhere at this point in time.

...

2.55 The context also included the ongoing Portfolio Holder DtC meetings with neighbouring and nearby LPAs over recent years. There was a full round of these Portfolio Holder DtC discussions in summer 2018 in association with the draft SADC LP. All of the Agendas and agreed Meeting Notes are included in the Examination papers (CD028). The upshot of these discussions and the need to consider Green Belt release was that, at present there is no realistic prospect of other LPAs providing for SADC's housing needs.

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6. Question 6

Does the Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?

- 6.1 Yes, the Plan does seek compensatory improvements to the environmental quality and accessibility of the Green Belt, primarily through the approach taken at policy S6. Firstly, the Plan sets out the specific identification of some compensatory improvements as requirements under each Broad Location at S6 i-xi. These requirements were derived through the initial work undertaken to investigate the potential of the Broad Locations. An example of this can be seen in S6 i), for East Hemel Hempstead (North);
7. *Strategic and local public open space, including woodland and ecological network links.*
 8. *Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt*
 9. *A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to Redbourn*
 - ...
 17. *Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands.*
- 6.2 Secondly, the required approach to Council-led Masterplanning as set out at S6 provides the opportunity through the Masterplanning process to seek compensatory improvements to the environmental quality and accessibility of the Green Belt. The new approach in the PPG at paragraph 002, Reference ID: 64-002-20190722 sets out:
- “Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:*
- *new or enhanced green infrastructure;*
 - *woodland planting;*
 - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - *improvements to biodiversity, habitat connectivity and natural capital;*
 - *new or enhanced walking and cycle routes; and*
 - *improved access to new, enhanced or existing recreational and playing field provision.”*
- 6.3 This updated guidance, updated 22 July 2019, is already informing discussions at the Masterplanning Stage for the Broad Locations. This new opportunity for additional compensatory improvements has been noted and embraced by the Council, communities and the landowner/developer teams currently undertaking Masterplanning work for the first tranche of Broad Locations (this process is set out in more detail in response to Matter 7 Questions). It is anticipated that further compensatory improvements, beyond those already specifically identified in policy S6 i-xi, will emerge as Masterplans progress.

- 6.4 Thirdly (and closely linked to the point at paragraph 6.3 above), Local Plan Policy L29 (Green and Blue Infrastructure, Countryside, Landscape and Trees) sets out a district wide approach, including Key Green Infrastructure Network, with conservation and enhanced public access improvements as a high priority. This includes using Masterplans to plan positively for related open space and access links across Site Boundaries.

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7. Question 7

Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the plan's proposed removal of land from the Green Belt?

- 7.1. Yes, the Council considers that the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the Plan's proposed removal of land from the Green Belt. The process of considering Green Belt release and 'exceptional circumstances' has been explicitly considered and the clear conclusion reached that the required 'exceptional circumstances' exist; meeting the NPPF test and the tests in the relevant legal cases (generally referred to as the 'Calverton' test regarding 'exceptional circumstances' in the Green Belt). There is considerable detail set out in the Green Belt Topic Paper ([ED 25C](#)) on this specific question, including in particular at paragraphs 1.1-1.27, 2.31, 2.36, 2.43, 2.47, 2.53 and at 2.55. Concisely, [ED 25C](#) sets out at 1.2 and at 2.55 page 75:

*1.2 The Green Belt release assessment has adopted a two stage approach. Stage 1 involves:
a thorough investigation of the capacity of the existing urban areas and subtracting this from the OAHN figure; obtaining information on other available sites in discussions with neighbouring authorities; and considering if there is any non-Green Belt rural land which could meet any of the unmet need)*

*Stage 2 involves assessing:
which sites would best meet the identified need having regard to Green Belt harm and other relevant considerations including whether they are suitably located and developable; and reaching a conclusion as to whether exceptional circumstances exist for each of the individual Green Belt releases.*

...

4.14 At this time and on the basis of the evidence, officers consider that the test for 'exceptional circumstances' requiring alteration to Green Belt boundaries as set out in the draft LP has been made.

- 7.2 The Council considers that a full overview of the lawfulness and soundness of the approach requires a full consideration of the extensive detail given in those documents, [ED25C](#) and [ED18](#) and in response to these MIQs overall.

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8. Question 8

Are all the sites and their boundaries clearly shown on a map?

- 8.1 Yes, the Council considers that the Broad Locations have been adequately identified as set out in detail on the Policies Map, ([CD003](#)). The Council considers that they have been sufficiently clearly defined. It may be helpful to note that [CD003](#) has been created in a version of the pdf format that allows a high degree of 'zoom' or expansion and provides clarity at what the Council considers is a reasonable level of detail. Once adopted, the Plan would also be translated into GIS systems at a high degree of resolution.

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9. Question 9

Is the approach to secondary school sites in the Green Belt justified?

- 9.1. Yes, in the context of this District at this time, the Council considers that the approach to secondary school sites in the Green Belt is justified. The District has 19 schools that currently lie within the Metropolitan Green Belt. This includes 8 secondary schools and 11 primary schools. There is no evidence that the location of existing schools in the Green Belt has unreasonably restrained their ability to evolve over time. Indeed, to the contrary, there have been numerous extensions, expansions and changes approved in recent years. Examples from just 3 of these 19 schools are set out below:

School	Application Reference	Description of Development
<i>Sandringham, The Ridgeway, St Albans</i>	<i>5/2018/1384</i>	<i>Two storey detached teaching block, extension to tennis courts, first floor extension to art block, two storey front extension to The Sandpit Theatre and synthetic flooring to outside warm-up area.</i>
	<i>5/2017/1482</i>	<i>All weather external 3G sports pitch and additional car parking</i>
	<i>5/2016/1015</i>	<i>Demolition of existing modular classroom and construction of replacement single storey drama studio</i>
	<i>5/2014/0729</i>	<i>Construction of a new two storey science/maths classroom block, extension to existing art/music block to provide one classroom, extension to existing library/teaching block to provide extended dining and office areas.</i>
<i>Roundwood Park School, Roundwood Park, Harpenden</i>	<i>5/2016/3228</i>	<i>Creation of artificial turf pitch with fencing, floodlighting, storage container and associated works</i>
	<i>5/2010/0599</i>	<i>New sports hall, including changing rooms and associated works</i>
<i>Nicholas Breakspear RC School, Colney Heath Lane, St Albans</i>	<i>5/2011/0592</i>	<i>Changing/teaching building and new multi-use games area with floodlighting to existing school playing field.</i>
	<i>5/2003/2269</i>	<i>Erection of single storey information centre with ancillary rooms and extensions to existing main entrance wing.</i>

- 9.2. HCC have consistently raised the example of a school in the Green Belt in the Three Rivers Core Strategy Examination, which the Council acknowledges. However, the situation with this Plan is understood to be fundamentally different and so a different approach is justified. It is understood, in the Three Rivers case, that the location of the school build zone was known. A specific understanding of the impacts of amending the Green Belt boundary to accommodate the school building zones was therefore possible. An informed judgment regarding the 'exceptional circumstances', as explicitly required in the NPPF and case law to justify an amendment to the Green Belt boundary, could therefore be made. That is not currently the case with any of the schools proposed in the Green Belt in this Plan. Whilst overall areas accommodating the schools are known and set out, the position within them of the school build zones and the open space is not yet known. That work is being taken forward as part of Masterplanning and will be crystallised in forthcoming planning

applications. The Council is very open to considering the matter again once this Plan is adopted and the school build zones are known, in a review of the Plan.

- 9.3. It is acknowledged that HCC have raised an objection on this issue and that they consider that the policy S3 should be amended in order to remove the school building zones from the Green Belt. It is also acknowledged that this has been HCC's position consistently when raised in DtC discussions and other meetings. SADC's position has also been clear and consistent over time and the authorities have effectively reached a position where they 'agree to disagree' on the issue.

- 9.4. As set out in S3:

Schools are a key element of infrastructure. They have been successfully provided and retained in the Green Belt in this District in numerous locations over many years. The largely open nature of such sites often makes an important contribution to the Green Belt.

- 9.5. As set out in the NPPF at paragraph 35:

b) ***Justified*** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- 9.6. Overall, the Council considers that its approach is appropriate, taking into account the reasonable alternatives, in the specific context of the District and the evidence at this time.

10. Question 10

Is the approach to transport infrastructure in the Green Belt justified?

- 10.1. Yes, in the context of this District at this time, the Council considers that the approach to transport infrastructure in the Green Belt is justified. The District is entirely washed over by the Metropolitan Green Belt and there are numerous elements of transport infrastructure that lie within the Green Belt. This includes all of the several junctions lengths of the M1 and M25 that lie in the district as well as numerous major dual carriageway A roads such as the A414. All of the lengths of the Thameslink mainline rail line and the St Albans to Watford Abbey line, outside of the main settlements, also lie with the Green Belt. There is no evidence that the location of this transport infrastructure in the Green Belt has unreasonably restrained their ability to evolve over time. Indeed, to the contrary, there have been numerous expansions and changes in recent years, such as major widening of the M25 from three to four lanes in each direction.
- 10.2. There are only two locations specifically identified to which the approach in S3 applies to transport infrastructure, as identified on the Policies map. These are east of the M1 at junction 8, related to the East and North Hemel Broad Locations; and south of the A414, related to the Park Street Garden Village Broad Location. There is a broad corollary with the school issue addressed in response to M4Q9. Whilst overall areas accommodating the transport improvements are known and set out, the precise position within them of the exact build zones is not yet known. That work is being taken forward as part of Masterplanning and will be crystallised in forthcoming planning applications. An informed judgment regarding the 'exceptional circumstances', as explicitly required in the NPPF and case law to justify an amendment to the Green Belt boundary, cannot at this time therefore be made. The Council is very open to considering the matter again once this Plan is adopted and the build zones are known, in a review of the Plan.
- 10.3. Overall, the Council considers that its approach is appropriate, taking into account the reasonable alternatives, in the specific context of the District and the evidence at this time.

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11. Question 11

Did the Council consider the designation of safeguarded land in the Plan, and should this be identified?

- 11.1. Yes, the Council did explicitly consider the designation of safeguarded land in the Plan during its evolution. It does not consider that it is the most appropriate approach in the circumstances of the District and does not consider that this should be identified. The issue of safeguarded land was explicitly set out in the [March 2019](#) PPC report entitled "Draft Local Plan Publication (Regulation 19 Stage) - Detailed Consultation Representations and Recommended Responses – Appendix 1", now set out as the Regulation 22C Statement ([CD 005](#)). The issue of potential use of safeguarded land was raised by a small number of respondents and summarised and the Council's response set out as:

The Plan covers the time period to 2036 and the trajectory at Appendix 2 clearly shows substantial delivery of housing post 2036 on land excluded from the Green Belt.

- 11.2. The NPPF directly addresses the issue of safeguarded land at:

139. When defining Green Belt boundaries, plans should:

...

- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

- 11.3. The Council has made the decision to make changes to the Green Belt boundaries on the basis of 'exceptional circumstances' as set out in the Green Belt Topic Paper ([ED 25C](#)). The Council does not consider that the evidence at this time makes "necessary" the identification of safeguarded land in the Plan.