

Examination of the North Hertfordshire Local Plan (2011-2031)
Examination hearing sessions
Statement of North Hertfordshire District Council

Matter 10 – The housing allocations and the settlement boundaries: The Towns - Baldock

Note: *This Statement relates to sites in and around Baldock which are currently located within the Green Belt: Sites BA1, BA2, BA3 and BA4.*

10.1 Are all of the proposed housing allocations deliverable? In particular, are they:

a) confirmed by all of the landowners involved as being available for the use proposed?

1. Yes. The landowner of all four sites confirms that they support the allocations and their deliverability for housing in their representation to the Regulation 19 consultation on the plan (ED3, p.16).
2. The landowner submitted an EIA Scoping reports in May 2017 for site BA1, Baldock North [Referenced: 17/01344/1SCP] and for sites BA2, BA3 and BA4 known as Baldock South-east [Referenced 17/01364/1SCP]. The Council adopted EIA scoping opinions relating to these two applications on 8 September and 18 September 2017 respectively. The land owner have also undertaken two public pre-application exhibitions for all four sites in July and October 2017.
3. It is anticipated that planning applications for all four sites will be submitted in January 2018.

b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

4. Yes. No site specific objections to the allocations have been received from the highway authority. All sites provide opportunities to connect into the existing highway and pedestrian footpath network.
5. Two options for securing access are proposed. For Site BA1, this includes a northern link road connecting the site to the A507 North Road in the west with a link over the railway line to the B656 Royston Road to the south at the junction with the A505 (LP1, Policy SP14 (d), and p.61). For sites BA3 and BA4 this includes a southern link road linking the sites to the B656, Royston Road in the north to Wallington Road in the west. The Plan requires sites BA3 and BA4 to be delivered in combination to ensure delivery of the southern link road. (LP1, BA3 and BA4 pp.138 and 139).The B656 Royston Road links to the Baldock bypass, which links the town to the A1(M) at junction 9 in the

south and eastwards to the A505 leading to Royston. Access for BA2 will be via the A507 Clothall Road.

6. The transport modelling undertaken to support the plan does not identify any significant issues with the operation of the highway network which cannot be addressed through mitigation measures. (TI4, Figures 4.4 & 4.5, pp.14-15). The proposed link roads will improve connectivity for the town without traffic having to go through the Station Road/Clothall Road/Royston Road junction identified as a pinch point in the transport modelling undertaken for the Plan. (Identified as Scheme HM3 in TI4). The Council has undertaken an air quality assessment of the development sites in Baldock (TI6) in terms of predicted future traffic growth and sets out how the policy framework in the plan will ensure these issues are appropriately addressed.
7. The Council's Transport Strategy (ED14) aims to reduce car traffic volumes below those informing the transport modelling and identifies a broader suite of potential projects and mitigation measures across Baldock to ensure the continued operation of the highway network for which reasonable contributions will be sought.
8. A number of pedestrian and cycle routes are proposed connecting the sites to existing public rights of way and ensuring their integration with the town and the countryside, thereby promoting sustainable travel. For Site BA1 this includes at least a secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way, located to the south of the railway between the railway line and the B656. Such links will provide access to the Baldock Station and to the town centre. (LP1, SP14(e), p.61).
9. Modifications to Policy SP14 are proposed to correct road names at criterion (d) and (l)(i) and to more effectively address transport infrastructure in relation to education provision discussed at paragraph 13 of this statement. These proposed modifications are attached as Appendix A to this statement.

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

10. Yes. All sites have been considered through the SHLAA and are considered suitable locations for development having regard to potential constraints (HOU9, See Appendix 3, p.24 and Appendix 4, pp.28-31 - site refs:
 - 200; 201; B/r01a; B/r02a; B/r11a; B/r23 and D (part) for site [BA1];
 - B/r04 for site [BA2]; B'r12 for site [BA3]; and
 - 202 and B/r03 for site [BA4])

This is expanded upon in answer to Issue 10.2 below.

11. The sites have been subject to consultation with a range of statutory providers. The Infrastructure Delivery Plan (TI1) and Local Plan Viability Assessment Update (TI2)

show that these developments are deliverable in infrastructure planning terms and that the development would be profitable such as to support a package of infrastructure measures. The likely significant environmental affects of allocating the sites have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.503-505)¹.

12. No fundamental constraints to development have been identified. Site-specific infrastructure and / or mitigation measures for these sites are identified as policy measures in the plan (LP1, Policy SP14, pp.61-62 and Sites BA2, BA3 and BA4, pp.138-139). This includes the provision of new primary schools and a secondary school as part of the development of site BA1 and education provision as required as part of Site BA3. A local centre, community hall, and GP surgery would all be provided as part of BA1. (LP1, SP14(b),(g) and (h), p.61)
13. Following ongoing discussions with Hertfordshire County Council as education authority and in response to their Reg 19 representation, it is proposed to modify policy SP14 and the associated supporting text to be more explicit regarding the secondary education requirements for the site and will also serve the existing residents of Clothall Common and adjoining new development within the town. Modifications are proposed to criterion (h), with the inclusion of an additional criterion at (i) to specify the requirements for the secondary school and to ensure that appropriate measures are provided to ensure pupils can safely and conveniently walk or cycle to school from the south of the railway line. These proposed modifications will require consequential renumbering of the criteria within policy SP14 and the associated supporting text. These modifications are included in Appendix A attached to this statement.
14. These measures will be supplemented by the generic development management policy requirements that apply to all sites in relation to issues including (but not limited to) affordable housing, housing mix, transport, design, open space and heritage.

Question 10.2 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

15. Yes. All of the proposed housing allocations in Baldock are justified and appropriate. The appropriateness of the individual allocations are discussed below.
16. In broad terms, each allocation in the plan is justified by (see the Council's Statements on Matters 5, 7 and 9):
 - The need to seek to meet the Objectively Assessed Needs (OAN) for housing as far as is consistent with the policies set out in the NPPF in a district that is currently highly constrained by Green Belt and other considerations;
 - The 'presumption in favour of sustainable development' and plan-making requirements set out in Paragraph 14 of the NPPF. Potential adverse impacts

¹ Page references in LP4 are to the "NHDC Page Number" in the top-left hand corner

and specific policies in the Framework which indicate development should be restricted have been properly considered. Mitigation measures have been identified to address key issues. A balanced planning judgement has been made on the benefits and impacts of each individual site.

- The significant majority of the deliverable and developable sites identified in the SHLAA (HOU9) being required for allocation if the District is to be able to meet the OAN;
- No preferable, deliverable alternative sites existing which would allow OAN to be met over the plan period in a substantively different way;
- There being no reasonable prospect of other authorities in shared housing market areas being in a position to assist under the Duty to Co-operate should North Hertfordshire have resolved not to meet its OAN in full.

17. Baldock is a town within the district settlement hierarchy where draft Policy SP2 (as proposed to be amended) directs the significant majority of new development over the plan period.

Site BA1

18. The site BA1, known as North of Baldock, lies to the north of Baldock in an area currently designated as Green Belt. The site provides an opportunity to make a strategic-scale contribution to the District's future housing needs. Paragraph 52 of the National Planning Policy Framework identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development including extensions to existing towns that follow the principles of Garden Cities.

19. The justification and impacts in relation to Green Belt are discussed under Issue 10.4 below.

20. The site lies within the North Baldock Chalk Uplands landscape character area as identified in the Council's evidence base (CG16a, pp.146-151c) This is a large parcel to the north east of Baldock that stretches northwards towards the villages of Caldecote and Ashwell and south eastwards as far as the chalk scarp south of the A505 and the settlement of Baldock. The village of Bygrave, located to the north east of BA1 falls within this landscape character area. The area is considered to be of moderate to high sensitivity and moderate landscape value.

21. A detailed assessment of landscape sensitivity has been carried out for this strategic site (CG3 and CG4). The landscape assessment divides the site into two land parcels. B1 and B2 (CG3 p.12). This concludes that the allocation lies within land parcels of moderate to high (B1), and moderate to low (B2) landscape sensitivity. The least sensitive areas being located along the north and north eastern edge of the existing settlement of Baldock and part of the railway line, as shown on drawing Sk_1 at CG4.

22. The landform is fairly flat and even along its southern boundary rising gently eastwards and more steeply northwards towards the public right of way (PROW) (Bridleway Bygrave 001) which forms the northern boundary of the site. Small scale ridges and valleys run in a generally west-east direction with relatively shallow and even slopes. The ridgelines affords the opportunity for development to be located sensitively within the landscape and in some locations would be hidden from viewpoints. The site is visible in views from higher ground surrounding the town but there is limited visibility from the settlement of Baldock. In terms of landscape impacts the site is bound by the urban edge of Baldock and the railway line to the south, and the A507, North Road to the west. The area to the north and east are open countryside with some scattered tree/hedgerows along parts of the site boundary.
23. It is important that built development is contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road. This ridgeline is located approximately 200m to the south of the PROW which forms the northern edge of the site. To the north where the site relates to the countryside beyond, it is considered that this area would be most appropriate for some types of open space or replacement habitat where it would create an appropriate transition between the built form and rural landscape. Screening can also be achieved along the eastern edge, where the boundary to the north of Ashwell road is defined by a field boundary hedgerow which could be reinforced. Such landscape features and screening measures will also help to establish a defensible Green Belt boundary along the northern and eastern edge of the site for the future.
24. The proposed site would be confined to the southern part of the B1 landscape parcel minimising impacts on their wider character area. Detailed design will need to ensure visual and landscape impacts are minimised. It is not considered that the adverse impacts of development on landscape grounds alone significantly and demonstrably outweigh the benefits of a strategic scale housing allocation and associated infrastructure to meet identified needs and provided in close proximity to the town of Baldock.
25. The site comprises an area of Grade 2 Agricultural Land. Where significant development of agricultural land is demonstrated to be necessary, Paragraph 112 of the NPPF says local planning authorities should seek to use poorer quality land in preference to that of a higher quality. The Housing and Green Belt background paper (HOU1, p.21) shows that limiting new housing development on the basis of agricultural land quality would significantly impact the District's ability to meet its housing needs.
26. Other potential constraints identified by the SHLAA include the presence of areas of surface water flood risk, which is towards the southern part of the site, south of Ashwell Road. A number of sensitive ecological habitats and species occur within and adjacent to the site. Ivel Springs Local Nature Reserve (LNR) and County Wildlife Site (CWS) lies to the west of BA1 on the opposite site of North Road. There are concerns about increased visitor impacts on the area and other ecological impacts on the area. There is also high ecological sensitivity for farmland birds and rare plant habitats within the

site. One such farmland bird, is the corn bunting which is becoming a Red-listed Bird of Conservation² and is also a Species of Principal Importance for the conservation of biodiversity in England under section 41 (S41) of the Natural Environment and Rural Communities (NERC) act 2006.³ In response to concerns raised and comments made at the Preferred Options stage of the Plan, the Council commissioned two studies by BSG Ecology which provide the necessary guidance required for potential impacts on the Ivel Springs LNR (NEH9) and the corn bunting, including guidance on the provision of possible suitable off-site compensation. (NHE8).

27. Hertfordshire Ecology, have identified no apparent fundamental ecological constraints that cannot be suitably addressed through appropriate mitigation measures. Natural England are of the view that this site is unlikely to impact on any designated sites and would expect well planned networks of green infrastructure to be secured for this site. These issues can be dealt with through appropriate masterplanning and the application of the detailed development management policies of the plan. A site specific policy criterion requires appropriate mitigation, compensation and/or enhancement of key features of biodiversity. (LP1, SP14(j), p.61)

28. Potential impacts upon heritage assets include the potential presence of archaeological remains and the setting of the SAM at Blackhorse Farm. A number of archaeological areas and areas of archaeological significance are contained within the site or across its borders. The setting of a number of listed buildings within close proximity of the site require consideration along with the reference by Historic England in their representation to the Preferred Options consultation that the layout of the proposed site should positively integrate views towards St. Mary's Church. St Mary's Church is a grade 1 listed building located within the Baldock Conservation Area. The Baldock Conservation Area is some 225m south west of site BA1 at its nearest point for which the site is considered to have no impact. The Heritage Assessment of Baldock (NHE2) provides a detailed assessment of designated and non-designated heritage assets for BA1 and provides recommendations as to the suitability and management of these heritage assets. The policy for this site requires heritage assets to be considered through the masterplanning process (LP1, Policy SP14(l), p.61). This follows advice received from English Heritage (now Historic England) at the Preferred Options stage of the plan.

29. The Housing and Green Belt Background Paper summarises the reasons for the selection of site BA1 (HOU1, Appendix 2, p.53). The allocation of site BA1 is critical to overall housing numbers that are achievable through the plan. Development at this scale is able to deliver key supporting infrastructure to meet needs arising from within site.

² These are species which may have experienced significant declines or become more localised in the UK. Birds with 'red' status are those of high concern. (NHE8, para 2.8, pp 3-4)

³ The S41 list is used to guide decision makers such as public bodies, including local authorities, in implementing their duty under section 40 of the NERC Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions including development control and planning.

30. On balance, the significant positive opportunities afforded by this site are considered to outweigh the potential harms of its development.
31. A Statement of Common Ground with the owner of this site has been prepared and submitted to the examination (ED27). This primarily related to broad issues of delivery and infrastructure to support earlier hearing sessions.
32. It is intended that a supplementary statement addressing the site specific issues above will be prepared and, subject to its agreements, will be made available to the examination in advance of the hearing sessions.

Site BA2

33. The site BA2 lies to the south east of Baldock in an area currently designated as Green Belt. The justification and impacts in relation to Green Belt are discussed under Issue 10.4 below.
34. BA2 is currently surrounded by residential development on north west and a mobile home park to the south west. It is bound by the A507 Clothall Road and some residential properties at Roman Road to the north-east and east with a large open agricultural field on the opposite side of Clothall Road. The south-eastern part of the site adjoins an agricultural field with the Baldock bypass beyond. It is an open site with limited screening from Clothall Road and from the adjoining residential properties.
35. The site lies within the North Baldock Chalk Uplands landscape character area as identified in the Council's evidence base (CG16a, pp.146-151c) This is a large parcel to the north east of Baldock that stretches northwards towards the villages of Caldecote and Ashwell and south eastwards as far as the chalk scarp south of the A505 and the settlement of Baldock towards the Baldock bypass. Site BA2 falls within the south western corner of this landscape character area which comprises land sloping in a north easterly direction downwards from the Baldock bypass. This part of the landscape character area is considered to be of moderate landscape value. To the south-east, the topography of the site is such that screening can be achieved through the use of effective planting to screen the site from the Baldock bypass. Detailed site design will need to ensure visual and landscape impacts here are minimised.
36. The site comprises an area of Grade 2 Agricultural Land. Where significant development of agricultural land is demonstrated to be necessary, Paragraph 112 of the NPPF says local planning authorities should seek to use poorer quality land in preference to that of a higher quality. The Housing and Green Belt background paper (HOU1, p.21) shows that limiting new housing development on the basis of agricultural land quality would significantly impact the District's ability to meet its housing needs.
37. Other potential constraints identified in the SHLAA include potential impacts on heritage assets with the potential presence of archaeological remains and the setting of the SAM at Walls Field located to the north, between Clothall Road and Wallington

Road. Weston Hills Local Wildlife Site is located to the south west of the site beyond the mobile home park. Hertfordshire Ecology have identified no fundamental ecological constraints on the site.

38. A range of site-specific criteria are identified to address and / or mitigate against potential impacts arising from development of the site (LP1, BA2, p.138). Other issues can be dealt with through appropriate detailed design work and the application of the detailed development management policies of the plan.
39. The Housing and Green Belt Background Paper summarises the reasons for the selection of site BA2 (HOU1, Appendix 2, p.53). The allocation of site BA2 makes a contribution to the overall housing numbers achievable within the plan and the five-year land supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and to address issues raised through consultation. On balance, the positive opportunities afforded by this site are considered to outweigh harms.
40. A number of proposed minor modifications to Policy BA2 are proposed for clarity purposes. This includes:

Amending the description of Site BA2 from 'Land west of Clothall Road to **'Land south-west of Clothall Road'**.

Amending the boundary reference in the first bullet point to read.

'Creation of appropriate defensible Green Belt boundary along ~~the south-western~~ **south-eastern** perimeter of ~~the~~ **the** site.'

Site BA3

41. The site BA3 lies to the south east of Baldock in an area currently designated as Green Belt. The justification and impacts in relation to Green Belt are discussed under Issue 10.14 below.
42. BA3 is bound by Wallington Road and the Clothall residential development area to the north, the Baldock Bypass along its eastern edge, allotment gardens and an open agricultural field along its western edge which abuts Clothall Road with further residential development beyond.
43. The site lies within the North Baldock Chalk Uplands landscape character area as identified in the Council's evidence base (CG16a, pp.146-151c) This is a large parcel to the north east of Baldock that stretches northwards towards the villages of Caldecote and Ashwell and south eastwards as far as the chalk scarp south of the A505 and the settlement of Baldock towards the Baldock bypass. Site BA3 falls within the southern part of the landscape character area which comprises an open undulating-rolling plateau landform forming part of the setting of Baldock. The area is considered to be of moderate to high sensitivity and moderate landscape value. The topography of the site

is such that screening can be achieved through the use of effective planting to screen the site from the Baldock bypass. Detailed site design will need to ensure visual and landscape impacts here are minimised.

44. The site comprises an area of Grade 2 Agricultural Land. Where significant development of agricultural land is demonstrated to be necessary, Paragraph 112 of the NPPF says local planning authorities should seek to use poorer quality land in preference to that of a higher quality. The Housing and Green Belt background paper (HOU1, p.21) shows that limiting new housing development on the basis of agricultural land quality would significantly impact the District's ability to meet its housing needs.
45. Other potential constraints identified by the SHLAA include a risk of surface water flood risk on part of the site, the presence of ordinary watercourses and public rights of way, which would need to be incorporated into the site layout. Hertfordshire Ecology have identified no apparent fundamental ecological constraints.
46. Potential impacts on heritage assets include the potential presence of archaeological remains and the setting of the SAM at Walls Field located to the north-west, between Clothall Road and Wallington Road.
47. A range of site-specific criteria are identified to address and / or mitigate against potential impacts arising from development of the site (LP1, BA3, p.138-139). Other issues can be dealt with through appropriate detailed design work and the application of the detailed development management policies of the plan.
48. The Housing and Green Belt Background Paper summarises the reasons for the selection of site BA3 (HOU1, Appendix 2, p.53). The allocation of site BA3 makes a contribution to the overall housing numbers achievable within the plan and the five-year land supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and to address issues raised through consultation. On balance, the positive opportunities afforded by this site are considered to outweigh harms.

Site BA4

49. The site BA4 lies on the eastern edge of Baldock in an area currently designated as Green Belt. The eastern part of the site is currently designated for education purposes within the current North Hertfordshire Local Plan and falls within the existing settlement boundary of Baldock. The remainder of the site falls within the Green Belt. The justification and impacts in relation to Green Belt are discussed under Issue 10.4 below.
50. BA4 is bound by the Clothall residential development area to the west and south-west, the B565 Royston Road to the north and open countryside to the east and south-east with the Baldock bypass beyond. A man-made bund screening the bypass from the residential area rises steeply between the site and the bypass.

51. The site lies within the North Baldock Chalk Uplands landscape character area as identified in the Council's evidence base (CG16a, pp.146-151c) This is a large parcel to the north east of Baldock that stretches northwards towards the villages of Caldecote and Ashwell and south eastwards as far as the chalk scarp south of the A505 and the settlement of Baldock towards the Baldock bypass. Site BA4 falls within the southern part of the landscape character area. The area is considered to be of moderate to high sensitivity and moderate landscape value. The topography of the site is such that screening can be achieved through the use of effective planting or open space to screen the site from the Baldock bypass and from the B656, Royston Road. Detailed site design will need to ensure visual and landscape impacts here are minimised.
52. The site comprises some Grade 2 Agricultural Land. Paragraph 112 of the NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. The Housing and Green Belt background paper (HOU1, p.21) identifies that restricting site selection on the grounds of agricultural quality would significantly impact on the District's ability to meet its housing needs.
53. Other potential constraints identified by the SHLAA include a risk of surface water flood risk on the site, and the site being adjacent to public rights of way, which would need to be incorporated into the site layout. There is also the potential presence of archaeological remains on and adjacent to the site. Hertfordshire Ecology have identified no apparent fundamental ecological constraints.
54. A range of site-specific criteria are identified to address and / or mitigate against potential impacts arising from development of the site (Lp1, BA4, p.139). Other issues can be dealt with through appropriate detailed design work and the application of the detailed development management policies of the plan.
55. The Housing and Green Belt Background Paper summarises the reasons for the selection of site BA4 (HOU1, Appendix 2, p.53). The allocation of site BA4 makes a contribution to the overall housing numbers achievable within the plan and the five-year land supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and to address issues raised through consultation. On balance, the positive opportunities afforded by this site are considered to outweigh harms.

10.3 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

56. The proposed allocation of site BA1, BA2, BA3 and BA4 represent the only reasonable alternatives for the expansion of Baldock beyond its existing limits. HOU1 (Appendix 2, pp.62-63) shows that all but one of the potential sites identified within and around Baldock are being carried forward for proposed allocation in the plan. Site (SHLAA Ref 14, Land west of Weston Way) was discarded for:

- landscape reasons, as not all of the site is considered deliverable given the topography and the heavily wooded/planted nature on part of the site;
- being within the Green Belt; and
- the other proposed allocations in Baldock being considered to represent better opportunities for development as well as reasonable maximum development for the settlement of Baldock.

57. The Council's Matter 5 statement demonstrates there is a lack of reasonable alternatives for an alternate distribution of development between the District's main settlements if the proposed housing requirement is to be met.

58. A review of the sites not proposed for allocation through the plan (HOU1, Appendix 2) shows that these are generally:

- In or adjoining less sustainable village locations; and / or
- Also within the Green Belt; and / or
- Subject to flood risk constraints which make them sequentially less preferable for allocation than these sites

10.4 Sites BA1, BA2, BA3 and BA4 comprises land in the Green Belt.

a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?

59. Yes. Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at BA1, BA2, BA3 and BA4. The sites provide the only reasonable alternatives for the expansion of Baldock beyond its current limits (see also Paragraph 56).

60. Under the saved policies of the current District Plan, Baldock is tightly surrounded by the Green Belt. The Council's general case for the existence of exceptional circumstances is set out in its response to Matter 7. The objectively assessed need for housing significantly exceeds the level of development which can be met on development opportunities on brownfield land or contained within existing urban areas or in rural areas beyond the Green Belt.

61. The District is highly constrained by Green Belt and many of the most sustainable locations for new development are within or adjacent to existing higher order settlements as set out in Policy SP2 and supported by Section 4 of the Sustainability Appraisal in (LP4, pp.54-69).

62. The harms to the Green Belt of the potential allocations have been assessed and weighed against the benefits of development in these locations. Measures to ameliorate or reduce the consequent impacts to the lowest reasonably practicable extent have been identified.

Site BA1

63. Site BA1 provides the opportunity to make a strategic scale contribution to the District's Objectively Assessed Housing Needs, along with the delivery of supporting infrastructure, adjoining one of the main towns identified by Policy SP2 of the plan and in accordance with paragraph 52 of the NPPF. There are not considered to be any insurmountable non-Green Belt constraints to development of the site which can not be addressed through the policy requirements of the plan.

Sites BA2, BA3 and BA4

64. Sites BA2, BA3 and BA4 provide the opportunity to make a contribution to overall housing requirements and five-year land supply adjoining one of the main towns identified by Policy SP2 of the plan. There are not considered to be any insurmountable non-Green Belt constraints to development of these sites which can not be addressed through the policy requirements of the plan.

b) What is the nature and extent of the harm to the Green Belt of removing the site from it?

65. All of the land parcels surrounding Baldock were assessed as making a moderate contribution to the purposes of the Green Belt by the 2016 Green Belt Review (CG1, Figure 2.8, p.31). However the Green Belt Review also took a fine grained approach to the assessment, further dividing the parcels into sub-parcels and also assessing individual sites as shown on the map for Baldock and East Letchworth at CG1 (p.125).

Site BA1

66. The assessment found that the contribution of south-western part of site BA1 where it adjoins the existing built-up area of Baldock and part of the railway line was significant for at least two of the four purposes of Green Belt assessed, with a mixture of moderate and limited for the other purposes, thereby making an overall moderate contribution (CG1, Table 5.3 pp. 104-106, assessed as sites referenced 201; B/r01a; B/r01; B/02; B/02a; B/r11; B/r11a and B/r23).

67. The assessment found that the contribution the larger northern, eastern and south-eastern part of site BA1 was significant for two of the four purposes and moderate for the other two purposes of Green Belt assessed, thereby making an overall significant contribution (CG1, Table 5.3 p.104, assessed as site 200).

68. The assessment is summarised in Table A.

Table A: Contribution of allocations comprising Site BA1 to the purposes of Green Belt

Site	Green Belt purpose				Overall contribution
	Sprawl	Merge	Countryside	Historic	
201	Significant	Moderate	Significant	Limited	Moderate
B/r01&B/r01a	Moderate	Moderate	Significant	Limited	Moderate
B/02 & B/02a	Significant	Moderate	Significant	Limited	Moderate
B/r11 & B/r11a	Significant	Moderate	Significant	Limited	Moderate
B/r23	Significant	Limited	Significant	Limited	Moderate
200	Significant	Moderate	Significant	Moderate	Significant

Sites BA2, BA3 and BA4

69. The assessment found that the contribution of site BA2 was significant for one of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.105, assessed as site reference B/r04).

70. The assessment found that the contribution of site BA3 was significant for two of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.106, assessed as site reference B/r12).

71. The assessment found that the contribution of site BA4 was significant for two of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.104, assessed as site reference 202).

72. The assessment for these sites is summarised in Table B.

Table B: Contribution of allocations BA2, BA3 and BA4 in Baldock to the purposes of Green Belt

Site	Green Belt purpose				Overall contribution
	Sprawl	Merge	Countryside	Historic	
Site BA2	Moderate	Limited	Significant	Limited	Moderate
Site BA3	Significant	Limited	Significant	Limited	Moderate
Site BA4	Significant	Moderate	Significant	Limited	Moderate

c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

73. Actions have been specified as conditions which must be satisfied before the grant of planning permission on the allocated sites.

Site BA1

74. Policy SP14(c) (LP1, p.61) requires the inclusion of:

“Structural planting to create a sense of place, integration into the surrounding landscape and to reinforce a long-term, defensible Green Belt boundary, to the north and east.”

And criterion SP14(k) requires:

“Built development contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road.”

Site BA2

75. The south–eastern boundary of the site follows an historic field boundary which was previously defined by a hedgerow. This hedgerow no longer exists and in response to the Reg19 representation⁴ made by the promoter of the site it is suggested that the Green Belt boundary is rolled back further to the edge Baldock Bypass and where it adjoins a definitive footpath at the boundary with the mobile home park. This would increase the site allocation. This is further discussed under issue 10.4(g) below.

76. The site-specific criteria for site BA2 (LP1, p.138) would still apply which include:

- “Creation of appropriate, defensible Green Belt boundary along south-eastern perimeter of the site (as per proposed modification referred to in paragraph 40 of this statement); and
- Proposals to be informed by a site-specific landscape assessment.”

Site BA3 and BA4

77. These sites have a semi-urban character due to their proximity to the edge of the Baldock bypass. The creation of a new boundary following the alignment of the Baldock bypass will create a strong boundary to the south east of Baldock and would prevent further encroachment into the open countryside beyond. The site specific criteria for BA3 and BA4 include “proposals to be informed by a site-specific landscape assessment”, which would need to address layout requirements and sensitive design in the terms of boundary treatment, which could include the provision of open space and the use of planting to provide screening.

⁴ HCC Representation Ref: 5167

d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?

78. Through the actions specified in the allocation criteria as set out above, the adjacent Green Belt to BA1, BA2, BA3 and BA4 will continue to contribute to the purposes of Green Belt.

79. The assessment of the strategic land parcels and sub-parcels in CG1 shows that land beyond the proposed allocation boundaries already serve Green Belt purposes (CG1, Figure 2.8, p.31 and Figure 3.6, p.66).

80. The adjacent Green Belt land would continue to play an important role in preventing encroachment into the wider countryside and, in particular, preventing encroachment and maintaining the separation of Baldock from Letchworth and from the village of Bygrave in the case of Site BA1.

e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?

81. The extent to which existing settlements might be further expanded in order to meet future need is finite particularly given the dense settlement pattern in existence at the more sustainable locations in the west and central areas of the District.

82. The review and release of land undertaken as part of this plan would extend Baldock to its logical maximum to both the north and the east. Proximity to Letchworth precludes any realistic prospect of future expansion to the west.

83. To the north, any further development would substantially breach the ridgeline and the rural open character of the landscape as it stretches northwards towards the villages of Caldecote and Ashwell. To the east development would encroach into the important gap which seeks to preserve the setting and separation of Bygrave village from site BA1. To the south-east the Baldock bypass provides a strong permanent boundary restricting encroachment into the open countryside beyond and preserving the setting of Baldock.

84. The Plan recognises that, in the longer-term, continual incremental additions to existing settlements may not be the best solution (LP1, paragraph 4.100, p.50). It is presently anticipated that alternative options for accommodating growth in future plan periods are likely to first necessitate exploration of a new settlement approach and the operation of the Duty to Co-operate rather than pursuing further expansion of settlements located within the Metropolitan Green Belt. However, each settlement will need to be assessed for further expansion capacity to inform this process.

85. It is the intention of the plan that the Green Belt boundaries amended by the plan to accommodate growth of settlements will endure beyond the plan period in order to continue to ensure the Green Belt continues to perform its key strategic functions.

f) *Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?*

86. Green Belt boundaries have been determined with a view to achieving the most sustainable pattern of development. The new Green Belt boundaries have been established in order to accommodate the reasonable maximum of development that can be accommodated within the District at the present time in accordance with the settlement hierarchy.

87. This seeks to allocate development to higher order settlements in the first instance in accordance with Policy SP2 (as amended) and supported by the Sustainability Appraisal in (LP4, Section 4). This approach to the distribution of development and the establishment of enduring Green Belt boundaries is supported as the most sustainable approach to achieving the development needs over the plan period.

g) *Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?*

88. Every effort has been made to clearly define the Green Belt boundaries around allocated sites using physical features such as roads and watercourses that are readily recognisable and likely to be permanent.

89. Where no such permanent features exist, or where use of such features would necessitate release of substantial additional land beyond the proposed allocation boundary from the Green Belt, it has been necessary to use semi-permanent existing features such as field boundaries, hedgerows, public rights of way and / or tree belts.

90. Where no features exist the allocation criteria specify that the allocation should seek to establish a landscape feature that will sufficiently contain the site and be identifiable as the Green Belt boundary such as through the establishment of hedgerows or tree belts.

Site BA1

91. There are currently limited existing features that can be used to define a new Green Belt boundary around the north and eastern limits of BA1. A boundary has been identified based where possible on these features or their alignment. New structural planting will be required to establish and reinforce the new boundary in the east and north. The drawing back of built development in the north to south of the ridgeline and

the use of this area for some types of open space, green infrastructure or replacement habitat would help to strengthen the boundary and maintain openness.

92. This boundary will consist of (clockwise from the west) and as shown on the Policies Map:

- From the rear of the properties on Salisbury Road following the A507 North Road northwards as far as the public right of way (PROW) (Bridleway Bygrave 001) to the north of Blackhorse Farm;
- Following this PROW in a NNE direction to a point where it meets a field boundary hedgerow running southwards to Ashwell Road. New planting and open space along this northern edged would create a boundary;
- Following this field boundary using the existing hedgerow, which should be reinforced, in a SE direction as far as Ashwell Road;
- Following Ashwell Road in a ENE direction to the point where it meets Footpath 015, immediately south of the residential properties of Bygrave village;
- A broad continuation of the boundary alignment drawn in a SE easterly direction following a field boundary to the railway line in the south. New planting will be required to create a boundary that is sensitive and integrates the development into the surrounding landscape;
- Following the railway line in a westerly direction to where it meets and follows the property boundary of the cattery southwards towards the Baldock Bypass.

Site BA2

93. The current Green Belt boundary follows the existing urban edge. There are currently limited existing features along the south-eastern edge of the site, with the exception of the Baldock bypass beyond. Site specific criteria require an appropriate, defensible Green Belt boundary to be provided along this part of the site where it would extend in a straight line from the rear of the mobile home park towards the rear of the properties at Roman road off the A507 Clothall Road.

94. As discussed in paragraph 75 above, a modification is proposed to the Policies Map (LP2a) to draw back the Green Belt boundary to the western edge of the Baldock bypass and Bridleway Weston 001 to the south which goes over the bypass leading from the rear of the mobile home park. This would create a more defensible permanent boundary along the length of the bypass from the bridge at Bridleway Weston 001 in the south to the junction with the B656, Royston Road in the north east, in accordance with paragraph 85 of the NPPF. The proposed modification is shown on the map attached as Appendix B to this statement.

Sites BA3 and BA4

95. The proposed alteration to the Green Belt boundary for sites BA3 and BA4 is clearly defined by the Baldock bypass where Clothall Road goes over the bypass in the south

east to the junction of the bypass with the B656 Royston Road in the east as shown on the Policies Map (LP2a).

Question 10.5 Is the proposed settlement boundary:

a) consistent with the methodology for identifying the settlement boundaries?

b) Appropriate and justified?

96. The Council's proposed amendment to the supporting text of Policy SP2 (LP3, amendment to paragraph 4.13, p.2) makes clear that settlements are those areas excluded from the prevailing policy designation of the surrounding rural area; the boundaries of Baldock are 'inner' boundaries to the Green Belt rather than 'outer' boundaries to the settlement itself.

97. The approach to establishing Green Belt boundaries and therefore the settlement boundary of Baldock is discussed in the Council's answer to question 10.4(g) above.

98. A map showing the existing and proposed settlement extent to the north and east of Baldock is attached to this Statement as Appendix C to aid interpretation.

Appendix A: Proposed modifications to Policy SP14

Policy SP14: Site BA1 – North of Baldock

Land to the north of Baldock, as shown on the Proposals Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,800 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met:

- a. A site masterplan to be ~~approved~~ **secured** prior to the ~~submission~~ **approval** of any detailed matters;
- b. A new local centre along with additional neighbourhood-level provision providing around 500m² (net) class A1 convenience retail provision and 1,400m² (net) of other A-class floorspace;
- c. Structural planting to create a sense of place, integration into surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the north and east;
- d. A new link road connecting the A507 ~~London~~ **North Road** to the A505 Baldock bypass including a new bridge across the railway;
- e. Sustainable transport measures to include:
 - i. A secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way;
 - ii. Safe access routes to / from, and upgrades to, Baldock station;
 - iii. Sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development; and
 - iv. The use of Bygrave Road / Ashwell Road from the south-western edge of the allocated site to the link road as a sustainable transport corridor
- f. At least 28 serviced plots for self-build development;
- g. A community hall and GP surgery;
- h. Up to 6 forms of entry (FE) of additional primary-age ~~and secondary-age~~ education provision;
- i. **Up to 8 forms of entry (FE) of additional secondary-age education provision. A secondary school larger than 6FE will be supported where:**
 - i. **It is located at the south of the allocation sites; and**
 - ii. **Safe, sustainable and direct routes to school are provided from Clothall Common;**
- ~~i.~~ j. Address existing surface water flood risk issues, particularly to the south of Ashwell Road, through SUDs or other appropriate solution;
- j. **k.** Appropriate mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including:

- i. Ivel Springs Local Nature Reserve;
- ii. Bygrave Road local wildlife site; and
- iii. Identified protected species and priority habitats;
- k. I. Built development contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road; and
- l. m. Sensitive treatment of heritage assets and their settings including:
 - i. An access solution from the A507 ~~London~~ **North** Road which satisfactorily addresses potential impacts;
 - ii. Retaining framed views of St Mary's Church from within and beyond the site; and
 - iii. Using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy.
 - iv. Ivel Springs Scheduled Ancient Monument

4.176 Land to the north of Baldock is the largest, single development site allocated through this Plan. A total of 2,800 homes can be accommodated here, 2,500 of which are anticipated to be built within the plan period to 2031.

4.177 The location of the site, and the way in which Baldock has historically developed, enables substantial new development within relatively close proximity to both the train station and Baldock town centre.

4.178 This site enables growth to meet needs arising from the surrounding areas in such a way that does not erode the narrow gaps between the towns of Hitchin, Letchworth Garden City and Baldock.

4.179 The site is also large enough to support new schools, local facilities and a new link road, including an additional road bridge over the railway so that not all traffic has to use the Station Road bridge and the White Horse crossroads.

4.180 At minimum, the site will contain a 6FE secondary school to ensure the demands arising from within the development can be met. A larger school of 8FE would additionally serve existing residents of Clothall Common and adjoining new development. Appropriate measures to ensure pupils can safely and conveniently walk or cycle to school from the south of the railway line will be required to support this scale of provision.

4.1801 A range of sustainable transport measures will be required. Critically, this will include measures that allow safe access to the northern side of Baldock station and the town centre as well as routes through the development to provide access to the wider countryside for all Baldock residents.

4.1842 To the north, the allocation extends to the line of Bridleway Bygrave 001. This right of way is considered the most appropriate long-term, defensible boundary for the Green Belt⁵. Additional planting may be required to reinforce its role. However,

⁵ Green Belt Review (NHDC, 2016)

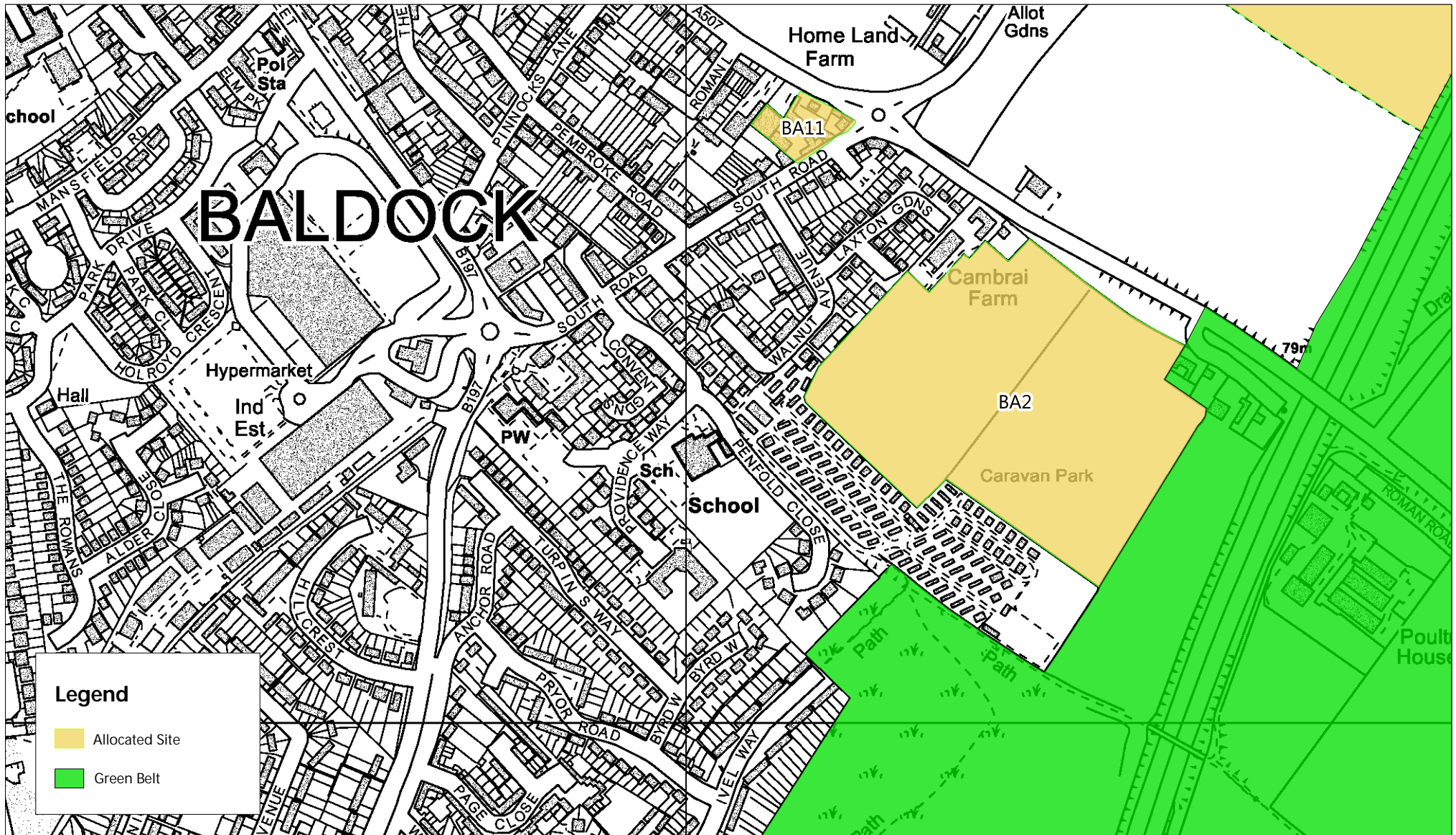
there is a clear ridgeline located approximately 200 metres to the south of this which is considered the most appropriate limit for built development.

- 4.1823 To the south of the ridgeline, the site faces towards the existing town. To the north it relates to the countryside beyond. This area would be most appropriate for the provision of some types of open space, school playing fields and / or replacement habitat where it creates an appropriate transition between the rural and urban.
- 4.18234 Along the eastern edge, the boundary to the north of Ashwell Road is defined by a field boundary hedgerow which should be reinforced. The boundary and ridgeline to the south of Ashwell Road are less well defined.
- 4.18245 The masterplanning process should address these issues and, where possible, mitigate against adverse impacts upon the wider landscape.
- 4.18256 The site and surrounding area has been specifically identified as (potentially) hosting a variety of habitats and species protected by legislation. This includes the corn bunting⁶. Appropriate measures will be required as part of any application. This may range from the localised retention of habitats on-site to biodiversity offsetting. This is where habitats lost are re-provided at an appropriate alternate location.
- 4.18267 Baldock and its surrounds are home to a wide-range of heritage assets. This includes sites associated with ancient settlements, the town centre Conservation Area and a range of individually listed buildings.

⁶ Blackhorse Farm, Baldock. Guidance Note; Corn Bunting (BSG Ecology, 2016)

Appendix B: Site BA2 Proposed Modification to Green Belt boundary.

Green Belt & Settlement Boundary as in Submission Local Plan

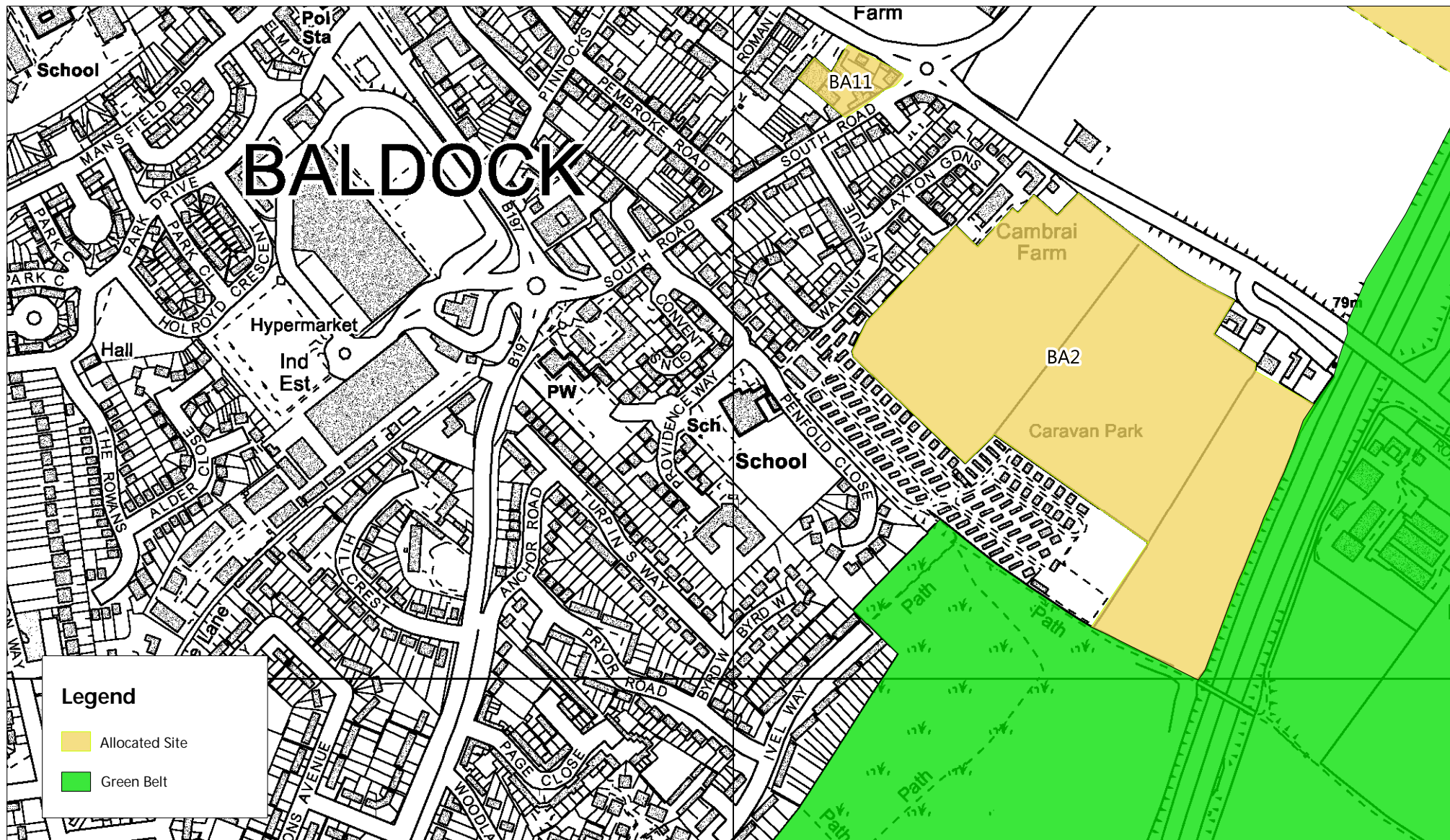


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Proposed Modification to Green Belt & Settlement Boundary

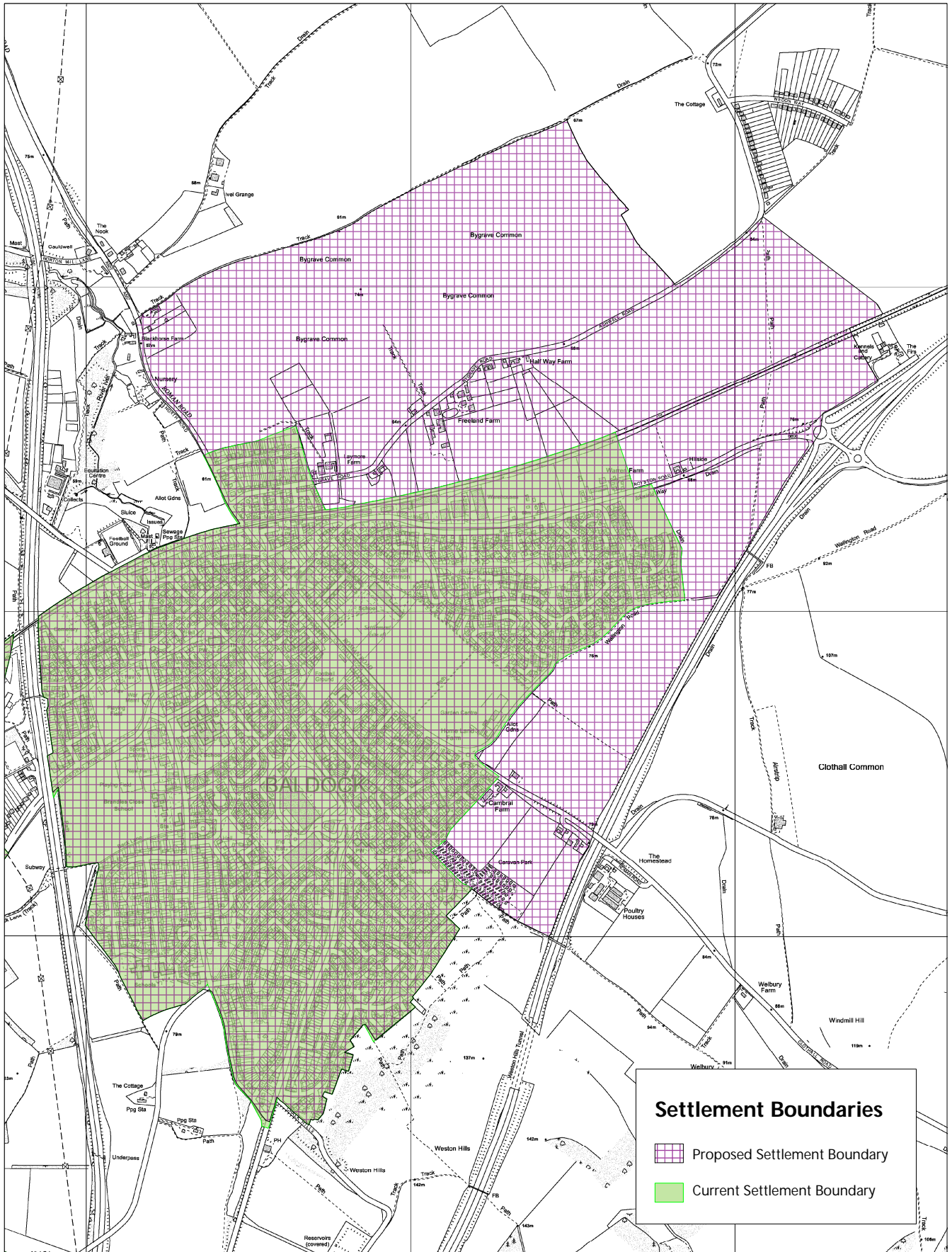


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Appendix C: Current and proposed settlement extent of Baldock

Baldock



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