



North Hertfordshire Local Plan 2011 - 2031

Background Papers

Publication consultation

Housing and Green Belt background paper

This study is one of several evidence studies which have been prepared. It needs to be read in conjunction with all other studies, which have all been taken into account in preparing the Local Plan. Collectively these studies have informed the site selection process. All studies are available to view at:

www.north-herts.gov.uk/localplan

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1 Introduction

- 1.1 This paper has been prepared in order to set out how policies and allocations in the draft Local Plan have been developed.
- 1.2 The evidence base supporting the Local Plan contains a range of evidence studies. However, it is not always appropriate to simply apply their findings without further consideration.
- 1.3 The production of a local plan requires a series of balanced planning judgements to be made, which consider all of the evidence 'in the round'. These papers help to explain some of that thought process.
- 1.4 Key evidence studies linked to the matters discussed in this paper include (but are not limited to):
 - Stevenage and North Hertfordshire Strategic Housing Market Assessment Update (ORS, 2015);
 - Housing Market Areas in Bedfordshire and surrounding areas (ORS, 2015);
 - Updating the Housing Need (ORS, 2016)
 - Stevenage and North Hertfordshire Strategic Housing Market Assessment Update: Volume Two – establishing the need for all types of housing (ORS, 2016)
 - Strategic Housing Land Availability Assessment (NHDC, 2016);
 - North Hertfordshire Green Belt Review (NHDC, 2016);
 - North Hertfordshire Site Selection Report (Peter Brett Associates, 2016)
- 1.5 Further information on sites is set out in the Council's site matrix document. This collates data and responses for each site but does not evaluate, or otherwise seek to make judgements, about them.
- 1.6 Housing and Green Belt are two of the most high profile, and contentious, issues associated with producing a local plan. The associated decision-making can be an iterative process in order that various combinations and permutations can be considered.
- 1.7 Decisions on these matters have therefore not necessarily been made sequentially in the order that the various matters in this paper are discussed.

2 Settlement hierarchy

- 2.1 A detailed Housing and Settlement Hierarchy Background Paper (NHDC, 2014) supported the previous iteration of the Local Plan – the Preferred Options consultation. In turn, the Preferred Options proposed a three-tier settlement hierarchy in draft Policy HDS2. This draft policy is shown below.

Housing and Development Strategy Policy HDS2: Settlement hierarchy

The majority of the district's development will be located within the settlement boundaries of the following towns:

- Baldock;
- Hitchin;
- Letchworth Garden City;
- Royston;
- Great Ashby;
- Other urban extensions to Stevenage as identified in Chapter 12; and
- Urban extensions to Luton as identified in Chapter 12.

General development will also be allowed within the defined settlement boundaries of the Category A villages of:

• Ashwell;	• Little Wymondley;
• Barkway;	• Oaklands;
• Barley;	• Offley;
• Breachwood Green;	• Pirton;
• Cockernhoe;	• Preston;
• Codicote;	• Reed;
• Graveley;	• Sandon;
• Hexton;	• St Ippolyts;
• Ickleford;	• Therfield;
• Kimpton;	• Weston; and
• Knebworth;	• Whitwell.

Infilling development which does not extend the built core of the village will be allowed in the Category B villages of:

• Blackmore End;	• Newnham;
• Clothall;	• Old Knebworth;
• Great Wymondley;	• Peters Green;
• Hinxworth;	• Radwell;
• Holwell;	• Rushden;
• Kelshall;	• Wallington; and
• Lilley;	• Willian.

Only affordable housing and associated development in line with Policy HDS3 on exception sites will be allowed in the Category C villages of:

• Bygrave;	• Langlely; and
• Caldecote;	• Nuthampstead.

Source: Local Plan Preferred Options Consultation Paper (NHDC, 2014)

- 2.2 The justification for this approach was set out in a supporting Housing and Settlement Hierarchy Background Paper (NHDC, 2014). The housing analysis in the 2014 background paper has now been superseded by subsequent work. However, the settlement analysis carried out at that point still forms the basis of

the hierarchy proposed in the draft Plan. The relevant section of the 2014 paper is included as Appendix 1 to this report.

- 2.3 It is considered that the broad bases on which the settlement hierarchy was established remains appropriate. This primarily relied upon the distribution and availability of key facilities alongside broader sustainability considerations and a high-level understanding of urban form. The categorisation set in 2014 has largely been carried forward¹.
- 2.4 The principal difference between the two iterations of the Plan is derived from the further analysis of Green Belt that has taken place in the interim and, in particular, the contribution of settlements in the hierarchy to Green Belt openness.
- 2.5 The National Planning Policy Framework (NPPF) advises as follows:
- If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.*(NPPF, paragraph 86)
- 2.6 This consideration of openness did not explicitly form part of the previous justification for the settlement hierarchy – although the urban form considerations had some regard to whether or not settlements were “loose knit”. This has now been addressed through further analysis and the updated Green Belt Review. This report sets out specific analysis of the majority of relevant settlements in relation to the Green Belt.
- 2.7 As a consequence of its findings, it is considered that a more restrictive approach to development should be taken in the settlements of Clothall, Peters Green and Radwell in order to protect openness. These are now considered as Category C settlements, rather than Category B villages. A restricted, ‘exceptions’ approach to development will be taken in these locations to preserve their open nature and avoid harm to the Green Belt.
- 2.8 The other substantive change to the settlement hierarchy is the identification of Lower Stondon. This settlement currently lies outside of North Hertfordshire’s administrative area in Central Bedfordshire but the urban area adjoins the District.
- 2.9 A new site adjoining Lower Stondon, but within North Hertfordshire’s administrative area, was promoted in response to the Preferred Options. This has been favourably considered by the Strategic Housing Land Availability Assessment (SHLAA) and, following the further assessment as set out in this paper, is included as a draft allocation in the Plan.
- 2.10 A settlement boundary around this site and some adjoining development within the District has consequentially been identified and included as a Category A village.

¹ Reference to King’s Walden being classed as a Category B village in paragraph 12.115 of the preferred options was an error. Policy HDS2 correctly omitted King’s Walden from the hierarchy on the basis of the evidence included in Appendix 1.

3 Updating the SHLAA results

- 3.1 The most recent Strategic Housing Land Availability Assessment was completed in March 2016. This identified a total potential capacity for 19,146 homes to be built within North Hertfordshire over the plan period 2011-2031.
- 3.2 In moving towards the draft allocations proposed in the Plan, it is necessary to consider and refine these results. This is for a number of reasons:
- The SHLAA used a base date for monitoring of 31 December 2015. Monitoring data to 31 March 2016 has now been collated allowing the SHLAA results to be updated and brought into line with the standard financial year monitoring cycle;
 - There are sites included within the SHLAA where circumstances have changed since the analysis in that document was completed; while
 - There are sites included within the SHLAA where further consideration of the likely implications of an overall development strategy for the Local Plan results in changes, including necessary allowances for infrastructure provision.
- 3.3 These factors are discussed in turn below and lead to an updated assessment of potential capacity on which the subsequent analysis is based and local plan allocations have been selected.

Updated monitoring results

- 3.4 In the year to 31st March 2016, a net total of 341 new homes were completed in the District. This brings the total number of new homes built in North Hertfordshire since the start of the plan period in April 2011 to 1,455. As of the start of the new monitoring year on 1 April 2016, there were outstanding planning permissions for 1,032 new homes.
- 3.5 This includes a permission for 27 homes on SHLAA site H/r24, which is now included in the supply figures. This is the land at Hitchin Cricket & Hockey club on Lucas Lane which was included in the Preferred Options consultation as site HT4. This site is therefore excluded from further consideration as a potential allocation.
- 3.6 After 1 April 2016, but prior to the publication of the draft plan, planning permission was granted on five further sites from the SHLAA:
- Adjacent Raban Court, Royston Road, Baldock (SHLAA ref B/r07; Preferred Options site BA9);
 - Works, Station Road, Baldock (B/r18 ; BA8);
 - The Centre for the Arts, Willian Road, Hitchin (H/r40; HT9);
 - Land at Holwell Turn, Pirton (214; PT2);
 - Land north of Hambridge Way, Pirton (344; not included in Preferred Options)².

² A single application was submitted substantively covering sites 214 and 344. Outline planning permission has been granted for up to 82 new homes on this site. The precise number of homes to be built will be determined by a detailed, 'reserved matters' application. An estimate of 70 homes has been used for the purposes of calculating overall housing numbers in the plan. This figure is without prejudice to the determination of any future planning applications on this site.

- 3.7 Although the general monitoring data has not been further updated since April 2016, these sites have been added to the supply calculations and excluded from the draft allocations in the Plan to avoid double-counting and for the avoidance of confusion.
- 3.8 The updated monitoring data to 1 April 2016 leads to a consequential change in the windfall allowances identified in the SHLAA. The SHLAA included a small sites allowance of 40 homes per year. The updated monitoring data means that this figure should be revised down to 15 years worth of windfalls – 600 homes (versus 610 in the SHLAA).
- 3.9 No changes are made to the large windfall allowance. The resultant changes to the data used to inform the Local Plan is set out in Table 1 below.

Table 1: Updated monitoring data compared to SHLAA

Potential Source	2016 SHLAA	Revised figures	Change
Completions	1,114	1,455	+341
Planning permissions	1,324	1,237	-87
Windfall allowances	1,110	1,100	-10
Total	3,548	3,792	+244

SHLAA sites with changed circumstances or requirements

- 3.10 The SHLAA identified 126 sites which were considered to pass the necessary tests to be considered for allocation. These were estimated to have a total potential yield of 15,548 homes.
- 3.11 There are a small number of sites where circumstances have changed since the completion of the SHLAA, resulting in changes to the conclusions which were reached.
- 3.12 The SHLAA concluded that site 306, Ashridge Farm Caravan Club, **Ashwell**, was only suitable for development in part. The landowner subsequently confirmed that they would not wish to pursue a development at this scale.
- 3.13 Negotiations are ongoing to transfer part of the land at Windmill Close, **Barkway** (within site BKr/02 / part of Preferred Options site BK2) to Barkway Parish Council for the purposes of open space provision.
- 3.14 Following further investigation, site 209E (known locally as Priory Fields) at **Hitchin** was excluded from further consideration due to potential adverse impacts upon the nearby Air Quality Management Area. There was insufficient certainty that a scheme could be realised here without triggering an objection on air quality grounds.
- 3.15 SHLAA site 64S in **Pirton** was included in the Preferred Options Local Plan as site PT1 – Land east of Priors Hill. In May 2016, the Secretary of State for Culture, Media and Sport added this site to the Schedule of Monuments. The site has been discounted from further consideration.
- 3.16 At the time of writing the SHLAA, no confirmation had been received regarding the availability of site 358 – land at Barkway Road, **Royston**. This was

received shortly after the analysis was completed and this site can now be included for further consideration.

- 3.17 SHLAA site 118 in **Therfield** was included in the Preferred Options Local Plan site TH2 – Land south of Kelshall Road. The 2016 SHLAA identified a possible constraint regarding this site’s achievability owing to a complex legal history. Following the receipt of further advice, it is considered that there is insufficient certainty to enable it to proceed as a potential allocation in the Local Plan and it has been excluded from further consideration.
- 3.18 In May 2016, the District Council’s planning committee refused planning permission for a residential scheme on site WH/r1, land south of the High Street (Preferred Options site SP1) in **Whitwell**. Although this site has previously been identified in various iterations of the SHLAA and local plan consultation documents, the need to secure an appropriate access has been consistently highlighted.
- 3.19 The proposed access route was key to the recent planning decision and no deliverable, alternate access to the site has been identified leading to this site being excluded from further consideration for local plan purposes.
- 3.20 This consequentially eliminates site WH/r2 as the SHLAA makes clear that the suitability of this land is contingent on the inclusion of the adjoining WH/r1.
- 3.21 Other sites within the SHLAA may have been subject of recent or past planning applications. Should these applications be refused the applicant has a right of appeal to the Planning Inspectorate.
- 3.22 When considering the continued possibility of including any such sites within the Local Plan, the right of appeal and any grounds for refusal either by the Local Planning Authority or the Planning Inspectorate have been taken into account along with the context in which those decisions were made.
- 3.23 The consideration as to whether it is suitable to continue contemplating these sites as potential allocations has had regard to whether that context has changed and / or whether there is a reasonable prospect of any alternative solution(s) overcoming any reason(s) for refusal within the lifetime of the plan.
- 3.24 On-going consultation with Hertfordshire County Council (HCC) had identified a number of locations where additional schools provision would likely be required should they proceed to allocation. These sites are below the indicative threshold at which on-site schools provision is normally sought, meaning no specific allowances were built in to the dwelling assumptions in the SHLAA.
- 3.25 This has led to adjustments to assumed housing numbers for sites in Baldock (SHLAA site B/r12), Codicote (313), Ickleford (330) and Knebworth (53) in relation to potential primary school provision. Adjustments have been made to sites adjoining Great Ashby (323) and in Knebworth for potential secondary school provision (across adjoining sites 55, 57, 58 & 336).
- 3.26 Finally, further consideration of the likely design and layout considerations at site L/r18 in Letchworth has resulted in a revised estimate of 45 homes (compared to 68 in the SHLAA).

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- 3.27 The changes set out above are summarised in Table 3 below. It can be seen that this leads to a total reduction of 1,128 in the potential number of homes from specific SHLAA sites.
- 3.28 The amended totals are set out in Table 2 below. It can be seen that the revised total potential capacity for North Hertfordshire has changed from 19,146 to 18,285.

Table 2: Updated total figures compared to SHLAA

Potential Source	2016 SHLAA	Revised figures	Change
Completions, permissions and windfalls	3,548	3,792	+244
Specific sites passing SHLAA tests	15,548	14,420	-1,128
Broad locations	50	50	0
Total	19,146	18,262	-884

Table 3: Sites with changes since publication of SHLAA

SHLAA ref	Preferred Options ref	Address	SHLAA estimate	Revised estimate	Reason(s)
306	-	Ashridge Farm Caravan Club, Ashwell	12	0	Site not available at this scale
B/r07	BA9	Adjacent Raban Court, Royston Rd, Baldock	18	0	Permission granted. To supply
B/r12	BA3	South of Clothall Common (Clothall parish)	267	200	Allowance for education uses
B/r18	BA8	Works, Station Road, Baldock	32	0	Permission granted. To supply
BKr/02	BK2 (part)	Land off Windmill Close (a), Barkway	10	6	Part use as open space
313	-	Land south of Heath Lane, Codicote	125	98	Allowance for education uses
323	-	Land north-east of Great Ashby	395	250	Allowance for education uses
H/r24	HT4	Land at Lucas Lane, Hitchin	27	0	Permission granted. To supply
H/r40	HT9	Centre for the Arts, Willian Road, Hitchin	85	0	Permission granted. To supply
209E	-	Reduced version of south west Hitchin (east)	285	0	Unsuitable – air quality issues
330	-	Land at Bedford Road, Ickleford	180	150	Allowance for education uses
53	KB2	Land at Gypsy Lane, Knebworth	229	184	Allowance for education uses
55	-	Land north of Old Lane	63	200	Allowance for education uses
57	-	Land south of Swangley's Lane	100		
58	-	Land north of Watton Road	100		
336	-	Land east of Old Lane	44		
L/r18	LG4	Land north of former Norton School, Letchworth	68	45	Allowance for scheme design and layout
64S	PT1	Land east of Priors Hill (south), Pirton	58	0	Unsuitable – Scheduled Monument
214	PT2	Holwell Turn, West Lane, Pirton	35	0	Permission granted. To supply
344	-	Land north of Hambridge Way, Pirton	34	0	Permission granted. To supply
358	-	Land at Barkway Road, Royston	0	18	Site confirmed available
118	TH2	Land south of Kelshall Road, Therfield	12	0	Receipt of legal advice
WH/r1	SP1	Land south of High Street, Whitwell	40	0	No access
WH/r2	-	Land south of High Street, Whitwell	60	0	Linked to WH/r2
Total			2,279	1,151	Total reduction of 1,128 homes

4 Potential constraints to development

- 4.1 Determining the appropriate balance between development and preservation lies at the heart of any local plan.
- 4.2 The NPPF places a generally positive obligation upon local authorities. Paragraph 14 of the NPPF sets out a “*presumption in favour of sustainable development*” and states that, for plan-making, “*local authorities should positively seek opportunities to meet the development needs of their area*”.
- 4.3 This overarching approach is reiterated on a topic-by-topic basis throughout the NPPF:
 - “*Planning should operate to encourage and not act as an impediment to sustainable growth...local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century*” (paragraphs 19 & 20);
 - “*It is important that needs for retail, leisure, office and other main town centre uses are met in full*” (paragraph 23);
 - Local planning authorities should “*boost significantly the supply of housing*” (paragraph 47).
- 4.4 Set against this, are those requirements of the Framework which advocate a more cautious approach. Although paragraph 14 of the framework requires that local plans should “meet objectively assessed needs”, this is caveated by the advice which seeks to restrain development where;
 - “*any adverse impacts of [meeting development needs] would significantly and demonstrably outweigh the benefits...*”; or
 - “*specific policies in this Framework indicated development should be restricted*”.
- 4.5 The advice on housing in paragraph 47 of the NPPF is similarly caveated. The requirement for objectively assessed needs for housing to be met in full applying in “*as far as is consistent with the policies set out in this Framework*”.
- 4.6 Footnote 9 of the NPPF is helpful in interpreting this advice, setting out a number of examples of policies which might be taken to “*indicate development should be restricted*”. This includes consideration of, amongst others, Sites of Special Scientific Interest, land designated as Green Belt, an Area of Outstanding Natural Beauty, designated heritage assets and locations and risk of flooding.
- 4.7 Other policies in the NPPF cautioning restraint, and of potential relevance to land in North Hertfordshire, include advice seeking to protect and enhance valued landscapes (paragraph 109) and ensure consideration of the best and most versatile agricultural land (paragraph 112).
- 4.8 Previous decisions provide a useful guide as to how this advice has been interpreted in practice. In developing North Hertfordshire’s Local Plan, the examination of other plans (including relevant case law arising out of these examinations) has been monitored on an on-going basis and has been used to inform the decision-making process.

- 4.9 Consideration of the amount of potential development which might be achieved within North Hertfordshire, having regard to a number of 'footnote 9' and other constraints is considered below, principally in relation to Green Belt but also in relation to other restraints.
- 4.10 In doing so, regard has been had to how these factors relate to the provision of new development:
- Within North Hertfordshire District;
 - Within the constituent parts of North Hertfordshire District lying within wider market areas for housing and employment;
 - Across those wider market areas as whole;
 - Across other authorities in the Metropolitan Green Belt, particularly to the north of London in Hertfordshire and Essex; and
 - Over the whole plan period to 2031 and, additionally for housing:
 - within the five-year period following anticipated adoption of the Local Plan in 2018; and
 - within the period against which current five-year land supply must be measured.
- 4.11 In order to consider these factors, it is worth reiterating a number of key points which are of relevance across all of these considerations.
- The Council's evidence base identifies a requirement for 13,800 new homes within North Hertfordshire over the period 2011-2031³. This is accepted as the Council's Objectively Assessed Need (OAN) for housing;
 - Consideration of a range of economic reports and forecasts has led to the conclusion that around 20ha of additional B-class employment land would be a sensible upper limit for provision to meet North Hertfordshire's own needs over the plan period⁴;
 - Through joint work with other authorities under the Duty to Co-operate, wider market areas for both housing⁵ and employment⁶ have been identified. These represent the relevant housing and economic market areas for North Hertfordshire as required to be considered by national guidance⁷;
 - In terms of housing market areas, the substantial majority of North Hertfordshire lies in a housing market area stretching from Welwyn Garden City, through and across the District to the Cambridgeshire borders and into Bedfordshire (the Stevenage HMA).
 - A small area to the west of the District, including Hexton, Lilley and Breachwood Green, lies within a different housing market area centred on Luton (the Luton HMA);
 - On a 'pro-rata' basis, the District's OAN of 13,800 homes can be split between these different market areas resulting in a requirement for 13,600 and 200 homes for those parts of the District within the respective housing markets identified above;

³ Updating the Housing Requirement (ORS, 2016);

⁴ Employment Background Paper (NHDC, 2016)

⁵ Housing market areas Bedfordshire and surrounding areas (ORS, 2015)

⁶ Functional Economic Market Area Study (NLP, 2015)

⁷ See Paragraph 47 of the NPPF and Planning Practice Guidance on Housing and economic development needs assessments (Paragraph: 008 Reference ID: 2a-008-20140306)

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- The entirety of North Hertfordshire along with Stevenage and the eastern part of Central Bedfordshire⁸ can be considered as forming a single Functional Economic Market Area;
 - Many of the authorities with which North Hertfordshire share market areas experience similarly high levels of objectively assessed need and / or potential constraints to development including the presence of tightly drawn Green Belt boundaries; while
 - This is replicated across other authorities within the wider Metropolitan Green Belt.

Green Belt

- 4.12 Green Belt is one of the oldest and best known planning policies. The friction between meeting development needs and preservation of existing Green Belt has proved to be one of the most frequently recurring issues in consultation responses to the District over a number of years.
- 4.13 The NPPF is clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with essential characteristics of Green Belt being openness and permanence⁹.
- 4.14 Notwithstanding this advice, the NPPF does allow for change to Green Belt boundaries to be made through Local Plans. However, it also states that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”¹⁰.
- 4.15 A number of objectors to Green Belt release have cited ministerial letters and planning guidance. These state that “*unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green belt*”¹¹.
- 4.16 However, the need to demonstrate ‘very special circumstances’ relates to decision taking only, and not to plan making. It is the test of ‘exceptional circumstances’ that must be met when proposing change to the Green Belt through the Local Plan. This applies to proposals to put land into the Green Belt as well as proposals to remove land from the Green Belt.
- 4.17 There is no definition of what constitutes ‘exceptional circumstances’ in either the NPPF or in the accompanying Planning Practice Guidance.
- 4.18 However, it can be seen that a number of recent local plan examinations have seen Green Belt releases approved, including at Bath & North East Somerset, Knowsley, Lichfield and, most recently, Bradford.
- 4.19 This matter has been further considered by the courts. In the case of Calverton Parish Council v Greater Nottingham Councils, the judgement dealt specifically with this issue. It set out a number of matters that should be identified and dealt

⁸ The A6 road is broadly used to denote the westernmost extent of the FEMA within Central Bedfordshire

⁹ Paragraph 79 of the NPPF

¹⁰ Paragraph 83 of the NPPF

¹¹ Planning Practice Guidance: Housing & Economic Land Availability Assessment, paragraph 034, Reference ID: 3-034-20141006

with in order to ascertain whether ‘exceptional circumstances’ exist to justify rolling back the Green Belt:

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent¹².

4.20 The situation in North Hertfordshire has been considered with these criteria in mind.

Green Belt and housing

4.21 It is considered that the objectively assessed housing need of 13,800 homes within North Hertfordshire over the period 2011-2031 can reasonably be described as both ‘acute’ and ‘intense’ having regard to both:

- The number of existing homes in the District: There were approximately 55,000 homes in the District at 2011. The OAN suggests that the number of homes in the District needs to increase by around a quarter; and
- Historic delivery rates: An average of 480 homes a year were built in the twenty-year period to 2011. Meeting OAN would require 690 new homes a year to be built between 2011 and 2031, an uplift of more than 40%.

4.22 Having regard to the changes to the SHLAA outlined in Section 3 above, a total of 115 specific sites remain available for allocation with a total potential for 14,420 homes. Of these, 11,857 (82%) are on sites currently within the Green Belt.

4.23 Taking into account completions, permissions, windfalls and broad locations, a maximum of 6,343 homes could be delivered on non-Green Belt sites in North Hertfordshire over the plan period. This represents less than half (46%) of the District’s objectively assessed needs for housing.

4.24 Against these numbers, it is worth noting three further points:

- Firstly, this is based on a simple assumption that all identified completions, permissions and windfalls occur on non-Green Belt land;
- Secondly, it assumes that all non-Green Belt sites identified in the SHLAA are delivered regardless of other potential constraints; while
- Thirdly, the SHLAA assesses sites on current policy meaning any sites on land which the Council may be minded to add to the Green Belt in the future would presently count as non-Green Belt land.

4.25 Having regard to the analysis above, there is plainly an ‘inherent constraint’ on land availability in North Hertfordshire without resort to Green Belt land.

¹² Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015) with the approach taken from paragraph 51 of that judgement

- 4.26 It is important to additionally set these numbers within their wider context. Many of the authorities with which North Hertfordshire shares identified housing market areas, including Stevenage, East Hertfordshire, Welwyn Hatfield, Luton and Central Bedfordshire all contain areas of Green Belt land and have significant levels of identified housing need. They therefore face similar constraints on future development capacity with regards to Green Belt land.
- 4.27 Some consideration has already been given to this issue within the Stevenage HMA. The supporting evidence for Stevenage's local plan considers the capacity of the wider housing market area to accommodate development without resort to Green Belt. This analysis is reproduced in Table 4 below, though with the figures for North Hertfordshire updated to match the figures discussed above.

Table 4: Indicative capacity within functional Stevenage HMA

	OAN 2011-2031	% of population in HMA	Indicative OAN in HMA	Estimated capacity in HMA (ex-Green Belt)	Estimated capacity in HMA total
North Hertfordshire	13,800	99%	13,600	6,343	16,093
Stevenage	7,300	100%	7,300	6,800	8,200
Central Bedfordshire	29,500	29%	8,400	5,900	5,900
East Hertfordshire	16,400	6%	1,000	0	500
Welwyn Hatfield	13,200	52%	6,900	2,700	4,900
Total	80,200		37,200	21,743	35,593

Source: Stevenage Borough Council Housing Technical Paper (SBC, 2015) / NHDC analysis

- 4.28 On this basis, it can be seen that, against a need for around 37,000 homes across the wider HMA, there is considered to be capacity for less than 22,000 homes on sites outside the Green Belt. This information will be kept under review as a number of authorities' plans are progressing on similar timetables to North Hertfordshire.
- 4.29 A similar picture is emerging within the Luton HMA.
- 4.30 North Hertfordshire cannot meet identified needs for that part of the District in the Luton HMA without use of Green Belt land. A total capacity of just 22 homes is identified for non-Green Belt sites in this area, consisting entirely of completions, permissions and windfalls.
- 4.31 There is also a substantial housing shortfall arising from within Luton itself. The Borough has an objectively assessed need over the period 2011-2031 of almost 18,000 homes. The submitted Luton Local Plan makes provision for 6,700 homes citing its constrained boundaries and lack of available sites.
- 4.32 Within other parts of the Luton HMA, Central Bedfordshire would need to find land for more than 13,000 homes to meet its own share of OAN before it would be making a 'net' contribution to any unmet needs for Luton while an indicative pro-rated requirement for 400 homes has been identified within that small part of Aylesbury Vale in the Luton HMA.
- 4.33 Luton's own Local Plan is currently progressing through examination. The Inspector has, to date, concluded that on the evidence in front of him, the Duty

to Co-operate has been met. Further examination sessions will continue to explore the key strategic issues including the assessment of housing needs, the housing capacity of Luton and potential solutions to address unmet housing needs.

- 4.34 Joint work is currently ongoing between all authorities within the Luton HMA under the Duty to Co-operate to develop a growth study which explores these issues in greater detail and inform respective authorities' plans and examinations. However, the District Council accept as a matter of principle that, even if additional capacity can be found from within Luton, a substantial shortfall will remain when measured against their objectively assessed needs.
- 4.35 It is concluded that, without any use of Green Belt sites, there would be significant housing shortfalls both within North Hertfordshire District and across the wider housing market areas which it lies within.
- 4.36 This is replicated across the wider Metropolitan Green Belt north of London. A number of authorities in Hertfordshire and beyond would be unable to meet their objectively assessed needs within the constraint of existing Green Belt boundaries. A wholesale, consistent approach across all of the affected authorities – that resolved not to release existing Green Belt land for development - would result in a shortfall of tens of thousands of homes. If this unmet need were to be addressed (either in part or in whole) these homes would have to be 'sent' to locations beyond the Green Belt. In some cases this would result in housing requirements being addressed a significant distance from their point of origin.
- 4.37 As such it is considered there would be significant difficulties in achieving, in particular, the social role of sustainable development without resort to the Green Belt. This would be likely to impinge upon the economic role.
- 4.38 Notwithstanding the above, it is recognised that a policy of constraint would have environmental benefits in ensuring the continued protection of land and this is a factor which needs to be balanced.
- 4.39 If North Hertfordshire resolved not to meet its housing requirements on Green Belt grounds, it would be difficult to approach other authorities within the HMA for assistance under the Duty to Co-operate without taking an inconsistent, or even illogical, approach.
- 4.40 Stevenage's published local plan takes the position that *exceptional circumstances* to review the Green Belt within its Borough do exist whilst the emerging plans of East Hertfordshire and Welwyn Hatfield have taken the same position.

Green Belt and employment

- 4.41 The evidence base supporting the Plan recognises a requirement for up to 20 hectares of B-class employment land to meet the likely needs arising from North Hertfordshire over the plan period. Within the wider market area, Stevenage Borough Council has confirmed that they do not have sufficient capacity to meet their own identified requirements for employment land. A potential shortfall of 14 hectares is identified¹³.

¹³ Employment Background Paper (NHDC, 2016)

- 4.42 Unlike residential-based calculations of housing requirements, employment forecasts are workplace-based. In this regard, some of Stevenage's employment demands are driven by existing patterns of commuting including those currently living in North Hertfordshire crossing the administrative boundary for work. This means that, in addition to meeting the positive obligations of the Duty to Co-operate, there are also potential sustainability benefits associated with meeting some of Stevenage's shortfall within the District. Such an approach would provide greater opportunities for people to both live and work within North Hertfordshire.
- 4.43 There is limited capacity within existing settlements and / or Green Belt limits to deliver additional employment land within the District whilst some of those potential sites identified within existing settlement limits could require significant infrastructure interventions to be deliverable. Of the 81.3ha of land considered through the local plan process for additional employment, 18.4ha was located outside of the Green Belt and is allocated in the Local Plan, The additional requirement is made up of Green Belt land adjoining non-Green Belt land in a well contained, flat location in Baldock.
- 4.44 Consideration also needs to be given to the existing, and potential future, balance between residential and employment development. Baldock, in particular, has a relatively low quantum of employment land. It is also where a significant proportion of the housing potential identified through the SHLAA is located.
- 4.45 There is a further cross-over here with housing requirements. The figures for the SHLAA above include some sites located outside of the Green Belt on land currently used or allocated for employment purposes.
- 4.46 It is anticipated that these could deliver approximately 350 homes. If it was decided to retain these sites in their current use to alleviate pressure for additional employment releases, it would further exacerbate the likely shortfall in housing.
- 4.47 The conclusions in relation to employment and Green Belt are intertwined with the approach taken for housing. If a policy of restraint is followed, then the future need for employment land will be similarly tempered.

Green Belt harms and mitigation

- 4.48 A comprehensive Green Belt review has been undertaken to support the Local Plan and should be referred to for further information¹⁴. This identifies the contribution that areas and potential development sites make to the purposes of Green Belt.
- 4.49 At a strategic level, it concludes that parcels of Green Belt around Hitchin, Letchworth Garden City and Knebworth make the most significant contribution to Green Belt purposes. Other areas of existing Green Belt generally make a moderate contribution. Only one parcel of land, to the east of Weston is considered to only make a limited contribution to Green Belt purposes.
- 4.50 The analysis of finer parcels and individual potential development sites follow a broadly similar basis.

¹⁴ North Hertfordshire Green Belt Review (NHDC, 2016)

- 4.51 The majority of Green Belt sites identified in, and passing the tests of, the SHLAA are judged to make a moderate contribution to Green Belt purposes. However, it is notable that some sites are judged (in whole or in part) to make a significant contribution to Green Belt purposes. This includes:
- Land to the north of Baldock (SHLAA site ref 200, part of Preferred Options site BA1)
 - Land to the east of Knebworth (SHLAA sites 55 and 58); and
 - Land to the east of Hitchin (SHLAA sites 39 [Preferred Options ref HT1] and 326)
- 4.52 Any decision to release these sites, in particular, therefore requires clear justification. However, it is equally noticeable that simply removing all three of these sites from further consideration would immediately leave the District Council facing a housing shortfall within the Stevenage HMA. Taking into account the amendments to the SHLAA set out in Section 3, these sites have a total potential of 2,824 new homes. Removing these would leave a maximum potential within that part of the District in the Stevenage HMA of approximately 13,300 homes. This would be 300 homes below the identified need.
- 4.53 Potential mitigation can broadly be viewed as taking one of two forms:
- Site specific measures to alleviate impacts upon the wider Green Belt that would arise from removal of a particular area of land; and
 - Compensatory provision
- 4.54 Site-specific measures might take the shape of structural landscaping or screening to provide a new Green Belt boundary that is both clear and defensible. It might involve stipulating that certain areas of a site remain undeveloped.
- 4.55 Such measures are informed by landscape assessments, the sustainability appraisal or the detailed site planning processes. At this point in the analysis, it is considered sufficient to acknowledge that such measures exist.
- 4.56 The Green Belt review considers the potential to increase the coverage of Green Belt in North Hertfordshire. This might be viewed, in part at least, as compensatory provision for any sites which are removed by the Local Plan. However, it is equally acknowledged that
- any such proposal must stand up to scrutiny in its own right; while
 - simply re-providing an equivalent (or greater) amount of Green Belt in an alternate location doesn't automatically make the release of an existing site acceptable. This is particularly the case where any replacement provision is geographically or functionally remote from the land to be removed from the Green Belt.
- 4.57 The Green Belt review sets out potential justification for the addition of further land to the Green Belt around Offley, Preston and Whitwell acknowledging the contribution this land makes to Green Belt purposes but also recognising the development pressure that this area is under from both Stevenage and Luton .

Green Belt - conclusions

4.58 The analysis above considers a range of issues in relation to Green Belt policy. Referring back to the five criteria identified at the outset:

- The need for additional housing, both within North Hertfordshire itself and the wider housing market areas within which it lies, is acute;
- The need for employment land is, in itself, not as pressing. However, a balanced strategy which aligns housing and employment provision could lead to pressures in certain locations whilst unmet employment needs exist in adjoining Stevenage Borough. This is driven, in part, by an existing pattern of net commuting from North Hertfordshire to Stevenage;
- The supply of land outside of existing Green Belt in North Hertfordshire is significantly constrained. The District could meet less than half of its own housing needs if a policy of Green Belt restraint was pursued. It would not be able to make positive contributions to unmet housing needs arising from the Luton HMA. It would be challenging to make any contribution towards unmet employment needs from Stevenage;
- These constraints are replicated across the wider market areas with which the District is associated as well as the broader swathe of Metropolitan Green Belt authorities to the north of London;
- There would be particular difficulties in meeting the social and economic roles of sustainable development without resort to use of Green Belt land within the District. This position would be exacerbated if surrounding authorities in shared Market Areas were to adopt the same position;
- The majority of sites under consideration for development make a moderate contribution to Green Belt purposes. Some sites are judged to make a significant contribution; while
- Mechanisms do exist to ameliorate the potential impacts, though the nature of these will largely come down to site specific considerations. There is scope to make compensatory Green Belt provision within the District but this should not automatically be seen as a panacea to the release of existing Green Belt land.

Other potential constraints

4.59 As set out above, the NPPF identifies a number of other constraints in addition to Green Belt which might be used to restrict development. These are considered below.

4.60 The broad approach of assessing the extent to which needs might be met with / without the use of land in each category provides a useful benchmark to guide decisions on the Plan.

River and surface water flood risk

4.61 Paragraph 100 of the NPPF is clear that “inappropriate development in areas at risk of flooding should be avoided”. The assessment of sites in the SHLAA has considered the risk of both river and surface water flooding.

4.62 Six sites have been identified where there is a risk of river flooding on parts of the site:

- Site 225 - Land west of Hitchin Lane, adj. Hitchin (St Ippolyts parish)
- Site 110 - Oakfield Farm, Stevenage Road, Hitchin (St Ippolyts parish)

- Site 331 - Land at Ramerick, nr Lower Stondon
- Site WSN - Stevenage West
- Site 121 - Land north of Stevenage Road, Little Wymondley
- Site 232 (Preferred Options ref WY1) - Land south of Little Wymondley

- 4.63 In three instances (sites 331, WSN and 232) it is considered that the site size and / or layout provide sufficient opportunity to design a scheme around the risks. Adjustments have already been made to the dwelling estimates to take this into account.
- 4.64 In the remaining three instances (sites 110, 121 and 225), the SHLAA sets out that suitability, in urban layout terms, is largely contingent on development occurring within the area of flood risk. This equally means that, should it be possible to locate development entirely in Flood Zone 1 having regard to other types of flooding, then these sites would not be required under the Sequential Testing approach set out in the NPPF.
- 4.65 These three sites have a combined estimated capacity of 439 new homes. Removing these sites from consideration would not, by itself, prejudice the Council's ability to meet its Objectively Assessed Needs and it is therefore considered highly unlikely that these sites would be required. All three sites are within the Stevenage HMA and in the Green Belt.
- 4.66 Surface water flood risk is more prevalent across the District though it should be noted that, on some sites, surface water flood risk may be limited to a small area. Table 5 below shows that restricting development on the basis of surface water flood risk would severely limit options for the Local Plan.
- 4.67 The sequential approach requires that development should preferably be located in areas of lower risk. However, half of all potential future housing numbers are on sites containing at least some high surface water flood risk.

Table 5: Potential housing sites by risk of surface water flood risk¹⁵

	Total homes	Of which	
		Ex-Green Belt	Within Green Belt
No surface water flood risk on site	4,490	1,205	3,585
Low surface water flood risk on at least part of site	1,642	228	1,414
Medium surface water flood risk on at least part of site	763	327	436
High surface water flood risk on at least part of site	7,225	791	6,434
Total	14,420	2,551	11,869

- 4.68 There is a general expectation that all major sites will incorporate sustainable urban drainage systems (SUDS) to manage run-off. These are subject to the approval of Hertfordshire County Council as the lead local flood authority for the management of surface water.

¹⁵ A common sense approach has been taken. Where only a de-minimis area of the site is affected by surface water flood risk, it has not been considered at risk for the purposes of this analysis.

4.69 SUDS provide opportunities to address existing surface water concerns as part of the design of any scheme. The presence of surface water flood risk on a site does not necessarily render it inappropriate for development. In terms of the Local Plan, detailed policies and / or site-specific criteria can be used to ensure that any risks are appropriately addressed at the planning application stage.

Higher grade agricultural land

4.70 High quality agricultural land is not a restraint specifically identified by footnote 9 of the NPPF. However, paragraph 112 of the NPPF does require that this issue be taken “into account” and that sites on lower grade land be identified in preference to higher grade land.

4.71 Maps produced by Natural England show that the majority of agricultural land within North Hertfordshire is, in common with the remainder of Hertfordshire classified as Grade 3 – good to moderate¹⁶. There is, however, an intermittent ‘seam’ of Grade 2 land across much of the north of the District. This connects to much wider tracts of Grade 2 land in neighbouring East Hertfordshire, Essex and Cambridgeshire.

Table 6: Potential housing sites by agricultural land quality

	Total homes	Of which	
		Ex-Green Belt	Within GreenBelt
Urban	839	839	0
Site containing at least some Grade 3 land	7,797	1,123	6,674
Site containing at least some Grade 2 land	5,784	589	5,195
Total	14,420	2,551	11,869

4.72 Table 6 above shows that, as with the other constraints, restricting site selection on the grounds of agricultural quality would significantly impact on the District’s ability to meet its housing needs.

4.73 Natural England has a statutory role in advising local planning authorities about land quality issues. No substantive concerns have been raised in their previous representations on this issue.

Heritage impacts.

4.74 The NPPF sets out that substantial harm to heritage assets should generally be avoided, unless specific exception criteria are met. Where proposals will lead to less than substantial harm, it is necessary to weigh any harm against the public benefits of the proposal¹⁷.

4.75 The District has a rich built heritage with many ancient monuments (many being associated with the prehistoric Icknield Way), 44 conservation areas and nearly 2,500 listed buildings.

¹⁶ <http://publications.naturalengland.org.uk/category/5954148537204736>. This mapping does not subdivide between grade 3a and 3b

¹⁷ Paragraph 134 of the NPPF

- 4.76 As a consequence, most of the sites identified for have at least some potential impact upon heritage assets. 83 of the 115 sites are considered to contain, be adjacent to, or within the setting of, a heritage asset.
- 4.77 Some sites will provide opportunities to enhance heritage assets by improving their setting. Others will have no, or only minimal, impacts.
- 4.78 Historic England (formerly English Heritage) are a statutory consultee for local plans. Their comments to past consultations have been used as a guide to determine where impact upon heritage assets might be a more substantial issue.
- 4.79 24 of the sites to which Historic England have made substantive comments have not passed the SHLAA tests. Comments have been made on a further 45 sites which are currently under consideration. Table 7 below shows that these have a total potential to deliver more than 10,000 homes within the District.

Table 7: Potential housing sites where Historic England have raised concerns

	Total homes	Of which	
		Ex-Green Belt	Within Green Belt
Substantive comments made by Historic England	10,385	762	9,623

- 4.80 To respond to the issues raised, a number of heritage impact appraisals have been carried out by the Council¹⁸. These have been supplemented by appraisals submitted to the Council through the planning (pre-)application process or in response to the local plan process.
- 4.81 These identify one site (329, Arnolds Farm, Chambers Lane, Ickleford) which is considered inappropriate for allocation. On the remaining sites investigated, it is considered that these demonstrate there are no absolute constraints which would prohibit any individual site from being taken forward subject to the inclusion of appropriate mitigation measures. However, this does not preclude a requirement for the public interest balance to be considered in the setting of the overall development strategy and selection of sites.
- 4.82 It has been noted from ongoing monitoring of other Local Plan examinations that the balance between future development needs and heritage is an issue that has been explored. In some instances, the public interest balance has concluded that accepting some harms to heritage assets in order to address (a greater proportion of) development requirements is an appropriate strategy.

Site of Special Scientific Interest

- 4.83 There are a number of designated Sites of Special Scientific Interest (SSSI) within North Hertfordshire. No proposed sites are within, or contain any land designated as SSSI.

¹⁸ Heritage Assessment – Ashwell; Heritage Assessment – Baldock; Heritage Assessment – Barkway; Heritage Assessment – Hitchin; Heritage Assessment – Ickleford; Heritage Assessment – Little Wymondley; Heritage Assessment – North Stevenage (AMEC Foster Wheeler, 2016) (all studies)

- 4.84 The NPPF identifies that, where an adverse effect on a SSSI's notified special interest features is likely, an exception should only be made where the benefits clearly outweigh the impacts¹⁹.
- 4.85 Two potential housing sites lie immediately adjacent to SSSIs. These are the land west of Ivy Farm, Royston (Site ref 218 / Preferred Options site RY1) and Stevenage West (WSN). These adjoin Therfield Heath and Knebworth Woods SSSIs respectively.
- 4.86 Following the advice of Natural England, a high-level appraisal of Site 218 has been completed to inform the local plan process. It identifies a potential 11% increase in recreational walking on Therfield Heath as a consequence of the allocation. The report identifies a number of specific mitigation and management measures which should be pursued²⁰.
- 4.87 This land is currently subject of a planning application and further information on impacts and mitigation is being obtained through this process.
- 4.88 Five further sites lie within relevant impact zones. These are areas defined by Natural England where potential impacts on SSSIs should be taken into account. Whether a site is captured by an impact zone will be contingent on its site and proposed use. These sites are:
- 304 – Land north of Ashwell Street and south of Lucas Lane, Ashwell for its proximity to Ashwell Spring SSSI;
 - 330 – Land at Bedford Road, Ickleford for its proximity to Oughtonhead Lane SSSI;
 - 52 (Preferred Options KB1) – Land at Deards End, Knebworth for its proximity to Knebworth Woods SSSI
 - 53 (Preferred Options KB2) – Land at Gypsy Lane, Knebworth for its proximity to Knebworth Woods SSSI
 - 67 – Land north of Chequers Lane, Preston for its proximity to Wain Wood SSSI
- 4.89 Table 8 summarises this information in relation to potential housing numbers.

Table 8: Potential housing sites that might affect SSSIs

	Total homes	Of which	
		Ex-Green Belt	Within Green Belt
Sites adjoining SSSI	779	279	500
Sites within Natural England's SSSI impact zones	602	41	561

- 4.90 All of these sites are within the Stevenage HMA. Removal of those sites adjacent to SSSIs from further consideration would not, in their own right, mean that OAN within this area could not be met. However, it will be necessary to further consider these sites in the context of the evidence base, and conclusions reached, as a whole.
- 4.91 It is generally considered that, for sites within wider impact zones, the potential affects on the SSSI can be dealt with through site-specific criteria and / or

¹⁹ Paragraph 118 of the NPPF

²⁰ Recreational impacts on Therfield Heath Site of Special Scientific Interest (BSG ecology, 2016)

incorporation of appropriate measures or conditions at the planning application stage.

Area of Outstanding Natural Beauty

- 4.92 Part of the District lies within the Chilterns Areas of Outstanding Natural Beauty (AONB). No potential development sites have been identified within the AONB.

Conclusions

- 4.93 This section has examined a range of policy constraints which might be used to justify restricting future development within the District.
- 4.94 It is clear from both the SHLAA and this analysis that a number of potential development sites in North Hertfordshire are constrained by policy, heritage, ecological or other considerations. It is equally plain that, if the Council were to impose blanket restrictions upon development on many (combinations) of the grounds above it would face severe challenges in meeting the identified needs for housing and, albeit to a lesser extent, employment.
- 4.95 It is identified that these issues are not unique to North Hertfordshire. Other authorities in shared market areas, and across a wider swathe of authorities, face similar constraints, particularly in relation to Green Belt. A shared or consistent policy position that sought to restrict development across these wider areas would severely impact upon large parts of Hertfordshire and Bedfordshire.
- 4.96 There would be very limited scope for North Hertfordshire to impose restrictions within its own area and then ask other authorities to help meet unmet needs through the Duty to Co-operate as they would likely need to use sites covered by (some of) the same restrictions that North Hertfordshire relied on to justify its position of restraint.
- 4.97 On balance, and as a general principle, it is therefore considered that the necessary *exceptional circumstances* do exist to justify the release of land from the Green Belt in North Hertfordshire having regard to:
- The intensity of objectively assessed needs both within the District and across wider market areas;
 - The inherent constraints upon land suitable for sustainable development both within the District and across wider market areas;
 - The difficulties in achieving, in particular, the social and economic roles of sustainable development, both within the District and across wider market areas and authorities lying (partially) within the Metropolitan Green Belt, without resort to Green Belt land;
 - The fact that the Green Belt Review provides a strong evidential basis for identifying the potential harms to the Green Belt of releasing individual land parcels for development; and
 - The fact that potential mitigation measures, on either a site-specific or wider compensatory basis, are available to the Council to ameliorate harms to the fullest reasonably practicable extent.
- 4.98 Given the number of sites affected, it is similarly considered that any blanket policy of restraint on the grounds of agricultural land quality, surface water flood risk and / or heritage would be likely to impinge on the achievement of sustainable development for the same reasons.

- 4.99 Following further investigation of key issues, it is considered that, in most instances, any harm can be reduced or mitigated against through site-specific criteria and / or additional investigation at the planning application stage.
- 4.100 The consideration of sites potentially impacting upon SSSIs is more finely balanced as their removal from consideration would not, in their own right, prejudice the Council's ability to meet OAN should it desire to do so. However, this view needs to be seen in the wider context and it may still prove preferable to make some use of these sites to achieve overall policy objectives.
- 4.101 In reaching these conclusions, it is recognised that the best approach to be taken will need to be considered on a site-by-site basis. The subsequent sections therefore set out the approach to site selection and the setting of an overall housing strategy.

5 Developing a housing strategy

- 5.1 The Preferred Options consultation established a proposed housing target of 12,100 new homes for North Hertfordshire over the plan period, with a further allowance of 2,100 homes to meet needs arising from Luton.
- 5.2 Subsequent to the Preferred Options consultation, further analysis has been carried out to determine the overall number of homes required and the geographical areas across which needs should be met.
- 5.3 In 2015, Stevenage and North Hertfordshire jointly carried out an update to the Strategic Housing Market Assessment²¹. This followed Government practice guidance and used the most up-to-date information available to establish a revised Objectively Assessed Need (OAN) for North Hertfordshire of 14,400 homes over the plan period 2011-2031.
- 5.4 This study remained the key driver of housing need evidence as much of the strategy in the plan was developed. The results from this study were used to inform the 'Volume Two' study in 2016 which sought to break this OAN figure down into different house tenures and types²².
- 5.5 On 12 July 2016, the Department for Communities and Local Government (DCLG) published new 2014-based subnational household projections. Following an initial review of the new figures for North Hertfordshire, it was considered that the new figures fell within a reasonable 'tolerance' of the preceding projections used to inform the SHMA. At this point, it was therefore the Council's intention to proceed on the basis of the 2015 SHMA update, acknowledging that the issue of the new projections would need to be addressed but that this could reasonably occur within the framework of the examination process.
- 5.6 However, in August 2016, the Inspector appointed to conduct the examination into Stevenage's local plan specifically requested that additional work be carried out to understand the implications of the latest DCLG projections. Given the nature of past joint working between Stevenage and North Hertfordshire on this matter, and the issues associated with updating one authorities' figures without the other, it was considered most appropriate to address the implications for both authorities.
- 5.7 This work is contained in a short paper²³. It provides an updated assessment of the 'headline' OAN figures but does not otherwise update or address other issues contained in the SHMA. The revised OAN figure for North Hertfordshire is assessed as 13,800 homes over the period 2011-2031. Given the relatively small variation in OAN between the 2015 and 2016 reports – the difference for North Hertfordshire equates to around 4% - it is considered that the remaining findings of the SHMA remain a robust basis for the plan.
- 5.8 This analysis of demand-side factors has been supplemented by additional work to better understand the nature of constraints affecting many of the sites identified. The preceding sections set out a number of the key conclusions arising from this work with links to individual studies that form part of the Local Plan evidence base.

²¹ Stevenage and North Hertfordshire SHMA Update (ORS, 2015).

²² Stevenage and North Hertfordshire SHMA Update 2015: Volume II (ORS, 2016)

²³ Updating the Housing Need (ORS, 2016)

5.9 From the conclusions at the end of Section 4, it is clear that any housing strategy will need to balance demand-side and supply-side considerations. That is to say, it is necessary to have regard to the potential harms and benefits of allocating housing sites on a case-by-case basis in the context of:

- An established OAN for North Hertfordshire of 13,800 homes (subject to the discussion in paragraphs 5.5 to 5.16 below);
- An acute shortage of housing in adjoining Luton Borough which requires positive consideration under the statutory Duty to Co-operate;
- The lack of options for securing housing delivery in any other authority to make good any shortfall in North Hertfordshire, particularly if this District pursued a policy of restraint;
- The emphasis placed upon the delivery of housing and ensuring a ‘significant boost’ in supply in a number of recent local plan examinations; and
- The ‘in principle’ acceptance above that sites within North Hertfordshire currently within the Green Belt and / or potentially affecting or affected by other constraints should be considered.

Other demand-side factors taken into account

5.10 The Objectively Assessed Needs for housing of 13,800 homes is established through this paper and the evidence base. Until this point it has been used as the general benchmark against which potential housing delivery has been considered.

5.11 Relevant guidance, examination decisions and judgements, however, are clear that it is not necessarily appropriate to take OAN as the final measure of housing requirements.

5.12 Two further considerations have been identified that should be taken into account.

5.13 Planning Practice Guidance identifies that Councils should also consider “*an increase in the total housing figures included in the local plan*” where this could “*help to deliver the required number of affordable homes*”. This would not be an adjustment to the OAN but a policy response through the plan itself²⁴.

5.14 At the same time, relevant examination decisions show that Inspectors have, to date, taken a relatively pragmatic approach. They have not necessarily sought to ensure all identified affordable housing needs are accounted for in policy. This recognises both the ‘multiplier’ effect, whereby any additional affordable homes require the provision of further market homes to support their delivery and / or consideration of the further harms likely to arise.

5.15 The ‘Part 2’ SHMA considers the likely housing mix arising from the Objectively Assessed Needs identified in the 2015 SHMA update²⁵. It concludes that there is a total need for 4,296 net additional affordable homes over the plan period, approximately 1/3rd of the total requirement.

²⁴ Planning Practice Guidance: Housing and economic development needs assessments, paragraph 29, reference ID: 2a-029-20140306

²⁵ This study was commissioned and completed prior to the request from the Inspector examining Stevenage’s local plan to update the assessment of Objectively Assessed Needs to take the 2014-based population and household projections into account.

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- 5.16 At the same time, it is important to robustly test any emerging affordable housing targets to ensure that they do not compromise viability.
- 5.17 The Council's viability evidence continues to demonstrate that development sites within North Hertfordshire can generally afford to support the provision of up to 40% affordable housing²⁶. It recognises that some flexibility may be required for certain development types or in certain locations.
- 5.18 Applying these broad assumptions to the sites identified to date suggest that the Council could reasonably anticipate in the order of 35% of all new homes being delivered as affordable housing over the plan period if all sites were developed.
- 5.19 This would tend to suggest that an additional uplift would not be required. In saying this, it should be noted that the previous SHMA did identify that affordable housing requirements tend to increase as housing targets decrease²⁷. It may be necessary to revisit this assumption following the site selection process.
- 5.20 The second area to be considered is accommodation requirements for older persons. Housing projections are, as standard, based on a statistical convention which assumes that the proportion of older persons requiring specialised (i.e. care home) accommodation remains constant.
- 5.21 This leads to a requirement for additional bed-spaces in communal establishments. These are over and above the OAN. The SHMA identifies a requirement for an additional 650 bed spaces of communal accommodation for older persons over the plan period²⁸.
- 5.22 However, as people live for longer and live in their own homes for longer it may be appropriate to challenge the assumptions behind this. An additional 200 homes have been added to the revised OAN housing requirements, raising the total from 13,800 to 14,000. This is offset by a decreasing the communal establishment requirement from 650 to 350 bed spaces.

Overall housing delivery vs five-year requirements

- 5.23 As well as establishing an overall level of delivery, it will be essential for the Local Plan to establish a five-year land supply.
- 5.24 Local Plans must be able to demonstrate a five-year supply of deliverable sites at the point of adoption. Based on an anticipated adoption date of 2018, this would cover the period 2018-2023²⁹.
- 5.25 It is also critical to address current housing land supply issues within the District. Until such time as the Council identifies and justifies a housing target and the draft allocations and allowances which are proposed to meet it, it is not possible to identify a five-year land supply in North Hertfordshire.

²⁶ Local Plan Viability Assessment – Update (DSP, 2016)

²⁷ Strategic Housing Market Assessment 2012: Part 2 (ORS, 2013)

²⁸ Stevenage and North Hertfordshire SHMA Update (ORS, 2015). See Figure 24 and discussion in paragraphs 4.17 to 4.23.

²⁹ The definitions of 'deliverable' and 'developable' housing sites are set out in footnotes 11 and 12 of the NPPF.

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- 5.26 The NPPF is clear that “policies for the supply of housing should be considered not up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable sites”³⁰. The lack of an up-to-date plan and adequate supply of new housing land has significantly hampered the Councils ability to give clear planning advice and make effective decisions.
- 5.27 It is acknowledged that any substantial housing target for the District will require housing completions rates in North Hertfordshire to accelerate significantly.
- 5.28 Between April 2011 and March 2016, 1,455 new homes were built at an average of 291 homes per year. Meeting the adjusted OAN would now require the completion of 820 homes per year until 2031.
- 5.29 As such, the ability of sites to contribute towards five-year land supply – both now and at the anticipated adoption of the plan – has been accorded significant weight in the decision-making process

Site selection

- 5.30 The selection of draft housing allocations has taken into account all of the matters set out in this paper and across the evidence base. A site-by-site selection matrix is set out in Appendix 2 of this report detailing the summary reasoning as to why sites have, or have not, been carried forward for allocation.
- 5.31 The site list in Appendix 2 contains the 115 potential housing sites remaining once the SHLAA results have been adjusted in accordance with Section 3 of this paper.
- 5.32 The SHLAA categorised sites into one of four groups:
- Previously developed land within existing town or village boundary;
 - Greenfield within urban area;
 - Beyond settlement boundary outside the Green Belt; and
 - Green Belt
- 5.33 Although this might be viewed as a broad indication of preference, it is not necessarily appropriate to simply view these categories as a ‘sequential test’ that has been rigidly followed in the final selection of sites for the Local Plan. Government guidance recognises that the supply of new homes can sometimes be best achieved through larger formats of new development, such as urban extensions³¹. The overall contribution of new homes and the presence of other constraints have also been taken into account.
- 5.34 In coming to a view on sites it has further been recognised and concluded that:
- In light of the issues identified in this paper, the Council should seek to reasonably maximise housing provision within the District;
 - It will be particularly important for the Plan to allocate any suitable sites that are currently beyond existing settlement edges. These sites are presently reliant upon a pro-active change in policies or boundaries to achieve policy-compliant development;

³⁰ Paragraph 49 of the NPPF

³¹ Paragraph 52 of the NPPF

-
- This is essential where sites are proposed to be identified beyond existing inner Green Belt boundaries. Green Belt boundaries can only be set through a Local Plan.

Site selection: Luton HMA

5.35 A total of 2,116 homes are identified for allocation within that part of North Hertfordshire lying within the Luton HMA. Taking into account completions and permissions increases this figure to 2,123.

5.36 This includes a positive contribution of 1,950 homes towards unmet needs arising from Luton. The proposed allocations to the east of Luton have been critically appraised³². It is considered that this study, and the site-specific criteria included in the draft plan, clearly demonstrate that this is the maximum level of development that can be accommodated in this part of the District without causing significant harm to the wider landscape and Green Belt.

Site selection: Stevenage HMA

5.37 A total of 10,444 homes are identified for allocation within that part of North Hertfordshire lying within the Stevenage HMA. Taking into account completions and permission increases this figure to 13,129 homes.

New settlement and safeguarded land

5.38 As this Local Plan has been progressed, a number of respondents suggested that a new settlement be pursued as an alternate to large-scale Green Belt release around existing settlements in the District.

5.39 The Council resolved in February 2015 to explore options for a new settlement within North Hertfordshire. A first stage evidence study has been completed³³. Importantly for this Local Plan, it recognises that:

- Any such settlement would likely be at least a decade in the making;
- Long-term projections suggest significant continued housing demand in the District beyond 2031;
- Any new settlement is likely to be one part of a longer term solution which supplements, rather than replaces, the sites identified in this plan; and
- It would be unrealistic to expect a substantive contribution from any new settlement in the current plan period to 2031.

5.40 The Government has put in place initiatives to support the identification, planning and delivery of new settlements. The Council is actively engaged in seeking support from these programmes. If the Council was minded to pursue a new settlement in the District, it is therefore equally accepted that it may be possible to realise some development from this source in the period after 2026.

5.41 National policy is clear that, where a review of Green Belt is being undertaken through the current plan, authorities should satisfy themselves that boundaries will not need to be altered again at the end of the plan period³⁴.

³² Luton HMA and Site Selection Assessment Report (Peter Brett Associates, 2016)

³³ North Hertfordshire New Settlement Study (ATLAS, 2016)

³⁴ Paragraph 85 of the NPPF

- 5.42 In order to achieve this, authorities are encouraged to identify areas of 'safeguarded' land. This is land which is taken out of the Green Belt, but not allocated for development at the time. Development of safeguarded land should only occur following a further local plan review.
- 5.43 The need to safeguard further land in North Hertfordshire needs to be carefully balanced. On the one hand, it is desirable for the plan to conform as closely as practicable to the requirements of Government guidance. On the other, it is recognised that the evidence behind the current plan and, in particular the SHLAA, has not identified significant areas of potential additional land within the Green Belt (over and above that which would be required to meet Objectively Assessed Needs) such as could be said to substantively address long term requirements. It is also necessary to allow considerations around new settlement options to reasonably 'run their course'. At this point in time it cannot be said with any certainty;
- Whether the District Council will pursue a new settlement at all;
 - Whether the District Council might pursue one or more new settlements within the District;
 - Where any such new settlement(s) might be located and whether the most appropriate locations might lie within or beyond the Green Belt; and/or
 - The extent to which any future settlement(s) might address future needs.
- 5.44 In this context, it is not considered appropriate for North Hertfordshire's Local Plan to make substantial allocations of safeguarded land. It is considered that such an approach might predetermine the most appropriate long-term strategy for the period beyond 2031 ahead of deliberations around a new settlement being concluded.
- 5.45 The exception to this approach is on land to the west of the A1(M) at Stevenage where it is considered that sufficient surety does exist at this point in-time to safeguard land for future development.
- 5.46 This land has a long-standing planning history and has been identified in previous statutory plans as a suitable and sustainable location for development. Stevenage Borough Council additionally recognise that their current plan for the period to 2031 will exhaust all currently known and substantive opportunities for development within their area. They are likely to need to seek the assistance of nearby authorities for the next plan period and this land might provide opportunity to address (some of) that need close to source.
- 5.47 It is fully recognised that all of these issues will need to be considered in a future review of this plan before development can take place. It is similarly recognised that, given the ongoing commitment to explore new settlement options in the District alongside the Government's expectation that local plans will be subject to regular update, the next review of this Plan will need to occur well before 2031.
- 5.48 It is therefore considered prudent within this approach to make a modest allowance of 500 homes within the overall housing numbers for some additional housing supply to be realised in the period after 2026 as a consequence of these processes.

Overall housing target

5.49 Taking all these matters into account, sites and allowances totalling 16,902 homes have been identified in the Plan. These are summarised in Table 9 below.

Table 9: Total sites and allowances identified in draft local plan

Source	Stevenage HMA	Luton HMA	Total
Completions & permissions	2,684	8	2,692
Windfall allowances	1,085	15	1,100
Site allocations	10,444	2,116	12,560
Broad locations	50	0	50
Sites to be identified for post-2026 period at review	500	0	500
Total	14,763	2,139	16,902

5.50 These are measured against an overall housing target of 15,950 homes to be set through the Plan, consisting of 14,000 homes for North Hertfordshire and 1,950 homes towards unmet needs from Luton. The allocated sites therefore include a small buffer for flexibility³⁵.

5.51 The draft allocations anticipate 7,700 homes being delivered from just six Strategic Housing Sites on land to be released from the Green Belt. This represents more than 60% of all new homes to be delivered through the draft allocation sites. The strategic housing sites are:

- BA1 - North of Baldock for 2,800 homes (2,500 to be delivered by 2031);
- LG1 - North of Letchworth for 900 homes;
- NS1 - North of Stevenage in Graveley parish for 900 homes;
- HT1 - East of Hitchin for 700 homes;
- GA2 - North-east of Great Ashby in Weston parish for 600 homes; and
- EL1 / EL2 / EL3 - East of Luton for 2,100 homes

5.52 As set out in the site-selection matrix, the ability of these sites to contribute substantially to both overall housing numbers and also to housing requirements in the first five years following adoption of the plan has been a key determinant in concluding that the necessary exceptional circumstances exist to release these, and other, sites from the Green Belt. The site-specific policies for each sites set out mitigations that will help to reduce harms to the Green Belt.

5.53 These sites are also affected by other constraints. On a public interest balance it is considered that the substantial benefits of delivering homes in these locations outweigh those potential harms whilst site-specific criteria will help ensure mitigation to contain any adverse impacts below the levels at which the NPPF would advise restraint.

5.54 The Council is positively engaged with the scheme promoters of all the strategic sites. Subject to a positive outcome of any future local plan examination, it is anticipated that delivery of these sites could begin relatively quickly following adoption of the new Plan.

³⁵ There is a buffer of approximately 7% over the housing targets identified for North Hertfordshire's housing needs

- 5.55 Similar considerations apply on a number of other sites proposed.
- 5.56 All the proposed local housing allocation sites that are currently in the Green Belt around existing towns and villages make at least a moderate contribution towards Green Belt purposes. However, they make a substantial contribution towards the Council's ability to meet its housing requirements in full.
- 5.57 The contribution towards five-year supply is a key factor in the inclusion of the land at Ivy Farm, Royston. Although potential impacts on both heritage assets and the SSSI at Therfield Heath are identified, it is considered that the public benefits of this site, and its contribution towards a 'significant boost' in short-term housing supply, outweigh the potential adverse impacts, whilst further investigation has concluded that, with the application of site-specific criteria setting out a number of important mitigation measures, any harms on this site should be limited to within acceptable parameters.

Housing trajectory and five-year land supply

- 5.58 A housing trajectory based upon these draft allocations and setting out the currently anticipated delivery of new homes over the plan period is set out in Appendix 3. It can be seen that delivery is expected to accelerate rapidly from the relatively low levels experienced at the start of the plan period and peaking in 2022 as the proposed strategic sites come to fruition.
- 5.59 It can be seen from the trajectory that achieving the overall housing numbers relies on a significant increase in housing delivery rates from a relatively low base. This is, in large part, due to the plan's strategy of relying on a small number of strategic sites to deliver a substantial proportion of future delivery and the fact that the first five years of the plan period have already elapsed within the context of the existing, constrained policy environment and the after-effects of the financial crash and associated tightening of access to mortgage finance.
- 5.60 Having regard to the likely pattern of future development, and past development rates, it is considered most appropriate to set a phased housing target for the Local Plan.
- 5.61 The Plan makes every endeavour to meet objectively assessed needs from within North Hertfordshire and beyond over the period to 2031. It would be perverse to undermine that by setting unrealistically high targets for the first half of the plan period (which would also be backdated to cover development which has already occurred) and stymie the Council's ability to identify a five-year land supply either now or at the point of adoption.
- 5.62 On balance, it is considered most appropriate to establish a phased target of:
- 500 homes per year for the period 2011-2021; and
 - 1,100 homes per year for the period 2021-2031.
- 5.63 Even at these rates, the Council has accrued a fairly significant shortfall against this target over the first five years of the plan period to 2016. So as not to undermine the purposes and strategy of the Plan, it is considered appropriate to adopt the *Liverpool* method for the calculation of five-year supply. This

enables the accrued shortfall to be spread across the remainder of the plan period³⁶.

- 5.64 It is acknowledged that the Council has 'persistently under delivered' against the 500 homes per year target since 2011 and a 20% buffer is applied.
- 5.65 This leads to a total five-year housing requirement of 3,438 homes for the period 1 April 2016 – 31 March 2021. By reference to the housing trajectory in Appendix 3, a total projected delivery of 3,734 is anticipated over the period.
- 5.66 This equates to a 5.5 year supply of land for housing. These workings are summarised in Table 10 below.

Table 10: Five-year land supply at 1st April 2016

A.	Housing target 2011-2031	15,950
B.	Completions April 1 2011 – 31 March 2016	1,455
C.	Target April 1 2011 – 31 March 2016	2,500
D.	Shortfall against target at 1 April 2016 (B – C)	-1,095
E.	Target 1 April 2016 – 31 March 2021	2,500
F.	Shortfall to be addressed in five-year period (Liverpool method) (-D * (5 / 15))	365
G.	Buffer to be applied	+20%
H.	Total five-year requirement (E + F) * G	3,438
I.	Projected delivery over next five years	3,734
J.	Years land supply (I / H) * 5	5.5

³⁶ The alternate *Sedgefield* method requires the existing backlog to be met within the next five years. It is established that there is no preference in law for either method.

6 Other housing issues

- 6.1 The setting of an overall housing strategy is fundamental to the shape of the new local plan. Having established this, it is necessary to consider some of the other issues surrounding detailed housing policy.
- 6.2 As set out above, the 'Volume 2' SHMA establishes a requirement for around one-third of new homes to be affordable to meet requirements. The Council's viability evidence shows that, by setting appropriate targets for sites of different size, this can be achieved or even slightly exceeded.
- 6.3 On this basis, no additional policy adjustment to the housing target is considered necessary to address affordable housing need.
- 6.4 In terms of housing tenure and size, the SHMA suggests that, dependent on the income thresholds used, between 80% and 90% of future affordable housing need would be for rented products. It also suggests a broadly 50:50 split between smaller (1- and 2-bed) and larger (3+ bed) units for affordable housing.
- 6.5 Within the market housing sector, the house size results are significantly skewed towards a requirement for larger properties, with more than 80% of future market homes requirements identified as being for three or more beds.
- 6.6 Combining the housing size requirements across both market and affordable tenures would suggest a broadly 30:70 split between the provision of smaller and larger units in the future.
- 6.7 This is accepted as the pure evidence finding of need. However, in arriving at a policy position, regard has to be had to viability and also to how these figures, especially in terms of house size, have been arrived at.
- 6.8 In recent years there has been a clear drive towards the promoting of intermediate housing products, and funding streams have reflected this. There needs to be a pragmatic recognition that delivery of 80% rented units could prove challenging on this basis and it is essential that any affordable housing requirements set through the plan are deliverable.
- 6.9 The Local Plan therefore pursues a policy approach of 65% rented / 35% intermediate. This has been tested, and shown as deliverable, through the Council's viability work.
- 6.10 It is similarly necessary to apply some interpretation to the SHMA finding on household sizes. The SHMA is clear, at paragraph 3.17 that
- “When considering future need for different types of housing, the [Housing Mix] model assumes that the housing mix needed by households of each household type and age will reflect current patterns.”*
- 6.11 It is accepted that this is a perfectly valid and robust approach for the modelling of future requirements, not least as it enables results for different areas to be produced on a consistent and comparable basis. However, it is also acknowledged that, in both the market and affordable housing sectors in North

Hertfordshire, there is evidence of 'under-occupation' of existing stock³⁷ and that simply rolling forward existing occupancy patterns is likely to lead to inflated estimates. Furthermore, approximately 80% of households in the top two preference bands on the Council's Housing Register require smaller (1- or 2-bed) homes.

- 6.12 It is considered that seeking to achieve a broad balance between smaller and larger units across the market and affordable sectors as a whole is considered the most appropriate policy response. Boosting the supply of smaller units will provide greater choice, including the opportunity for some existing, under-occupying households the chance to downsize thereby freeing up existing larger stock.

³⁷ 2011 Census Table DC1402EW. This shows, for example, more than 5,700 single person households occupying 3-bed or larger homes in the District at the start of the plan period. It is accepted that there can be perfectly valid reasons (including personal choice and preference) behind any decision of a smaller household to remain in a larger home.

7 Other Green Belt issues

Employment

- 7.1 As identified in Section 4, there is an inevitable overlap between employment and housing issues. Having resolved to allocate sufficient sites to meet identified housing requirements, it is necessary to ensure that the Local Plan strategy takes an appropriately balanced approach.
- 7.2 The SHMA explores the relationship between housing and employment provision whilst the analysis in the employment background paper is predicated on housing growth occurring within the District.
- 7.3 It is therefore considered that, similarly to housing, the necessary *exceptional circumstances* exist to justify release of land from the Green Belt at Baldock to meet future employment needs. This decision has had regard to:
- The identified scale of employment requirements for North Hertfordshire;
 - The inability of Stevenage Borough Council to meet its own identified employment needs and a subsequent requirement to, under the Duty to Co-operate, seek to make good that shortfall;
 - The absence of substantive opportunities for new employment development on sites within current Green Belt limits;
 - The sustainability advantages derived from
 - The pursuit of a balanced approach between new housing and new employment having regard to the social and economic roles of sustainability; and
 - The provision of greater opportunities for (future) residents to both live and work in the District and / or in Baldock, thereby reducing the need to travel having regard to the environmental role of sustainability; and
 - The need to create a coherent Green Belt boundary around Baldock.

Provision of new Green Belt

- 7.4 It does not necessarily follow that, if land is to be taken out of the Green Belt, additional land must be added in to the Green Belt by way of compensation. Any proposals to increase the Green Belt must stand on its own merits and similarly demonstrate *exceptional circumstances* in accordance with the NPPF.
- 7.5 The Green Belt review undertakes extensive analysis of land within the District, broadly between Whitwell and Offley, which lies outside of existing Green Belt designations surrounding Hitchin and Stevenage to the east and Luton to the west.
- 7.6 It concludes that it would be appropriate to designate this area, as far north as the A505, as Green Belt (with the exclusion of certain villages which should be inset, or excluded). This area of Green Belt is included within the draft Plan and shown on the accompanying maps.
- 7.7 In reaching the decision to include this area of land within the Green Belt, regard has been had (as set out in Section 6.10 of the Green Belt review) to:
- The creation of a more durable and defensible area of Green Belt between Hitchin, Stevenage and Luton having regard to the areas which are

proposed to be removed from the Green Belt to accommodate development;

- The need to retain a meaningful area of Green Belt beyond the boundary of the safeguarded land to the west of the A1(M) at Stevenage;
- The need to provide clearly defined boundaries and coherent areas of Green Belt;
- The rationalisation of subsequent additions to the Metropolitan Green Belt in Hertfordshire and Bedfordshire; and
- The appropriateness of compensatory provision and the need to maintain the overall value of the Green Belt in North Hertfordshire as a measure for maintaining the separation of towns and the openness of the countryside.

Appendices

Appendix 1 – Extract from 2014 Housing & Settlement Hierarchy Background Paper

Appendix 2 – Summary site selection matrix

Appendix 3 – Housing trajectory

5. Settlement hierarchy

- 5.1 The draft Local Plan includes a proposed settlement hierarchy (as Policy HDS2). Effectively this allows for development to take place in the towns and larger villages, whilst allowing for more limited growth in the smaller villages and more rural areas.
- 5.2 It is fairly uncontroversial that development within towns should be allowed (subject to all other policies on matters such as design, access and living conditions). Less clear-cut is how much development should be allowed in the villages and the rural areas. These areas are less accessible to public transport and tend to be heavily dependent on the private car. However, a policy of preventing any further growth in the villages may lead to currently viable facilities closing. Given the generally more limited range of rural facilities to begin with, any closure of a shop, public house, hall or school can have a significantly detrimental impact on the social fabric of that community, far more so than in towns where alternatives generally exist.
- 5.3 This section therefore considers the evidence which has informed the settlement hierarchy in the draft Local Plan and discusses the policy and sustainability judgements which have been made, particularly with respect to the villages.

Policy from 1996 Local Plan

- 5.4 A useful place to start is to look at the policy from the old Local Plan. The District Local Plan No.2 with Alterations (1996) identifies nineteen settlements in the district which have settlement boundaries of some form drawn for them – either a Green Belt boundary, an excluded village boundary, a selected village boundary or Royston’s development limits. For the purposes of this report all these types of boundary will be described as settlement boundaries. Within these settlement boundaries development is generally encouraged; outside these boundaries development is generally restricted. The nineteen settlements are listed in the 1996 plan in Policy 5 (excluded villages within the Green Belt), Policy 7 (selected villages beyond the Green Belt) and Policy 8 (towns). The full list of the nineteen is:
 - Ashwell (Policy 7)
 - Baldock (Policy 8)
 - Barkway (Policy 7)
 - Barley (Policy 7)
 - Codicote (Policy 5)
 - Great Offley (Policy 7)
 - Hitchin (Policy 8)
 - Holwell (Policy 7)
 - Ickleford (Policy 5)
 - Kimpton (Policy 5)
 - Knebworth (Policy 5)
 - Letchworth (Policy 8)
 - Little Wymondley (Policy 5)
 - North East Stevenage (Policy 8)
 - Pirton (Policy 7)
 - Royston (Policy 8)
 - Sandon (Church End) (Policy 7)

- Therfield (Policy 7)
- Whitwell (Policy 7)

5.5 As well as these nineteen settlements, policies 3 and 6 of the plan allow for limited infilling of other settlements through single dwellings on small plots within the built core of that settlement.

Sustainability

5.6 These infilling policies have proved some of the hardest to interpret, particularly with the increased importance of sustainability as a concept in planning. A number of schemes have been refused and dismissed on appeal which meet either Policy 3 or Policy 6 guidelines on infilling, yet have been held to be in an unsustainable location, largely centred on the necessity for development to be accessed by the private car.

5.7 This shift has therefore had the effect of limiting infilling to only those larger villages which do have a reasonable range of services yet do not have settlement boundaries under the 1996 Local Plan; places such as Weston. There is also an argument to say that even some of the villages with settlement boundaries under the 1996 are also lacking in facilities and therefore highly car-dependent – notably places such as Holwell.

5.8 Sustainability is a wider concept than simply assessing whether or not a development will be car-dependent. It is summarised as “development which meets the needs of current generations without compromising the ability of future generations to meet their own needs” (Bruntland Commission, 1987).

5.9 The concept of limiting car usage is one way in which the planning system may be seeking to avoid the ability of future generations to meet their needs. However, we have to consider whether such a blanket restriction on car-dependent development is actually having the effect of failing to meet the needs of current generations.

5.10 It is usual to consider sustainability implications under three headings:

- Social;
- Economic; and
- Environmental.

5.11 We therefore need to consider the implications of policy towards towns and villages under all these headings in order to gain a fuller perspective of the sustainability implications.

Social sustainability

5.12 Each community has a level of social structure. Very few rural homes are completely isolated; most are clustered together in hamlets and villages. Such clustering creates social networks of neighbours even in places which lack formal facilities such as shops and schools.

5.13 A useful statistical framework for assessing the rural area is the parish boundaries. Most hamlets in North Hertfordshire can be seen as part of the wider parish community in which they are located. The parish boundaries in the district are mostly of considerable antiquity, and there is a strong correlation between postal addresses and parishes. Most North Hertfordshire parishes

have one dominant village, which normally has the same name as the parish – the two main exceptions being Breachwood Green as the largest village in King’s Walden parish and Whitwell as the largest village in St Paul’s Walden parish. Each of North Hertfordshire’s 33 rural parishes gives its name to a postal locality, whilst there are only eight North Hertfordshire based postal localities which are not parishes in their own right (Luffenhall, Peters Green, Breachwood Green, Willian, Cockernhoe, Gosmore, Whitwell and Bendish). We can therefore use statistics for the parishes as a reasonable proxy for communities.

Figure 9: Usual resident population and dwelling increase 2001-2011

Parish	2001	2011	Difference 2001-2011	Population growth	Net increase in dwellings 2001-2011
Ashwell	1660	1870	210	13%	68
Baldock	9866	10280	414	4%	284
Barkway	656	775	119	18%	24
Barley	659	662	3	0%	27
Bygrave	271	304	33	12%	3
Caldecote, Newnham & Radwell ¹²	215	209	-6	-3%	5
Clothall	161	150	-11	-7%	2
Codicote	3161	3344	183	6%	68
Graveley	475	487	12	3%	10
Great Ashby ¹³	1256	5706	4450	354%	1634
Hexton	134	123	-11	-8%	0
Hinxworth	316	313	-3	-1%	10
Hitchin	29985	32731	2746	9%	1615
Holwell	392	361	-31	-8%	0
Ickleford	1848	1833	-15	-1%	21
Kelshall	149	163	14	9%	4
Kimpton	2113	2167	54	3%	38
King's Walden	957	1015	58	6%	6
Knebworth	4433	4496	63	1%	58
Langley	164	175	11	7%	4
Letchworth	32932	33249	317	1%	828
Lilley	374	386	12	3%	8
Nuthampstead	139	142	3	2%	1
Offley	1307	1398	91	7%	48
Pirton	1217	1274	57	5%	21
Preston	481	420	-61	-13%	4
Reed	290	310	20	7%	10
Royston	14570	15781	1211	8%	931
Rushden	242	242	0	0%	3
Sandon	493	495	2	0%	6
St Ippolyts	2014	2047	33	2%	24
St Paul's Walden	1205	1293	88	7%	39

¹² Although Caldecote, Newnham and Radwell remain separate parishes, the ONS does not publish data for these three neighbours separately due to their small size.

¹³ Great Ashby was part of Graveley parish at the time of the 2001 census, but the 2001 census data identified it as a separate output area, allowing the 2001 data to be split between Graveley village and Great Ashby to allow direct comparison with the 2011 census areas.

Parish	2001	2011	Difference 2001-2011	Population growth	Net increase in dwellings 2001-2011
Therfield	539	556	17	3%	13
Wallington	159	150	-9	-6%	0
Weston	965	1054	89	9%	31
Wymondley	1110	1153	43	4%	15
TOTAL	116908	127114	10206	9%	5863

Source: Derived from Office for National Statistics data and NHDC monitoring

- 5.14 Figure 9 above shows how each town and parish grew between the 2001 and 2011 censuses. Whilst the general trend was growth of about 9% over this decade, six areas saw a decline in their populations (highlighted in the table). The greatest reduction was Preston, where the population contracted by 13%, despite the fact that there was a net increase of four dwellings in the parish over the same period. Hinxworth is another interesting case; despite seeing ten extra homes over the decade, its population still saw a slight decline.
- 5.15 Three areas saw no net additional dwellings recorded for 2001 to 2011 (Hexton, Holwell and Wallington), and each of them saw a decline in population of between 6% and 8%.
- 5.16 The neighbouring villages of Barkway and Barley make an interesting comparison – they had almost identical populations in 2001 (656 and 659). Over the period 2001-2011 Barkway saw an increase of 24 dwellings and Barley saw an increase of 27 dwellings. It therefore would seem reasonable to expect them to have similar populations again in 2011 – but in fact Barkway’s population had grown by 18%, whilst Barley’s had grown by less than half a percent. Clearly the increase in the number of homes is not the only factor in whether or not a place grows.
- 5.17 In particular, the number of people per household is falling generally. There is a tendency towards smaller family sizes, with increased longevity and historically higher rates of single or separated people being two drivers behind this trend. Therefore the same number of homes today accommodate fewer people than they did a decade ago. In the rural areas of North Hertfordshire there is the added factor that housing tends to be slightly more expensive, making it less accessible to young families. Consequently the number of children living in the villages is proportionately lower than in the towns.
- 5.18 In a district facing significant growth pressures it seems contradictory that some of the parishes are actually seeing declining populations. Each area which has seen reductions in population includes basic facilities such as village halls, and many have commercial facilities such as public houses, which may struggle to continue in a village where population is falling.
- 5.19 Three of the villages with declining populations (Hexton, Ickleford and Preston) have schools. The Council believes that rural schools play an invaluable role in providing a focal point for their communities, minimising the need for young children to have to travel significant distance to school, and providing rural employment opportunities.
- 5.20 Village halls are also an important social facility, providing somewhere for events to be held and another focus for community life. Most parishes have a village hall. The burden of running and maintaining village halls is harder in small villages where the building only get limited use. Therefore in small

villages, if population is declining, the costs of running the hall will be harder to meet. Whilst there is sometimes financial support available to assist with meeting the costs of improvements, this is not guaranteed. A more financially sustainable long term future for village halls is likely to be secured in areas with larger populations such that the usage of the hall covers the costs of running it.

5.21 Figure 10 shows how five types of facilities are distributed amongst the villages at present, using the Royal Mail's postal localities as a way of defining villages, and arranged by parish.

Figure 10: Facilities in villages

Parish	Postal locality	Food shop	Public house	School	Hall	Surgery
Ashwell	Ashwell	y	y	y	y	y
Barkway	Barkway	n	y	y	y	n
Barley	Barley	y	y	y	y	y
Bygrave	Bygrave	n	n	n	n	n
Caldecote	Caldecote#	n	n	n	n	n
Clothall	Clothall	n	n	n	y	n
	Luffenhall	n	n	n	n	n
Codicote	Codicote	y	y	y	y	n
	Oaklands*	y	y	y	n	n
	Rabley Heath	n	y	n	n	n
Graveley	Graveley	n	y	y	y	n
Hexton	Hexton	n	y	y	y	n
Hinxworth	Hinxworth	n	y	n	y	n
Hitchin	Charlton	n	y	n	n	n
Holwell	Holwell	n	n	n	y	n
Ickleford	Ickleford	y	y	y	y	n
Kelshall	Kelshall	n	n	n	y	n
	Odsey	n	n	n	n	n
Kimpton	Kimpton	y	y	y	y	y
	Peters Green	n	y	n	y	n
	Blackmore End*	n	y	n	n	n
King's Walden	King's Walden^	y	y	n	y	n
	Breachwood Green	n	y	y	y	n
	Wandon Green	n	n	n	n	n
	Wandon End	n	n	n	n	n
Knebworth	Winch Hill	n	n	n	n	n
	Knebworth	y	y	y	y	y
	Old Knebworth	n	y	n	n	n
Langley	Langley	n	n	n	n	n
Letchworth	Willian	y	y	n	y	n
Lilley	Lilley	n	y	n	y	n
Newnham	Newnham	n	n	n	y	n
Nuthampstead	Nuthampstead	n	y	n	n	n

Parish	Postal locality	Food shop	Public house	School	Hall	Surgery
Offley	Offley	y	y	y	y	n
	Cockernhoe~	n	y	y	y	n
	Tea Green	n	y	n	n	n
Pirton	Pirton	y	y	y	y	n
Preston	Preston	n	y	y	y	n
Radwell	Radwell#	n	n	n	y	n
Reed	Reed	n	n	y	y	n
Rushden	Rushden	n	y	n	y	n
Sandon	Sandon	n	n	y	y	n
St Ippolyts	St Ippolyts	y	n	y	y	n
	Gosmore	n	y	n	n	n
St Paul's Walden	St Paul's Walden	n	y	n	n	n
	Whitwell	y	y	y	y	y
	Bendish	n	n	n	n	n
Therfield	Therfield	n	y	y	y	n
Wallington	Wallington	n	n	n	y	n
Weston	Weston	y	y	y	y	n
Wymondley	Great Wymondley	n	y	n	y	n
	Little Wymondley	n	y	y	n	n
	Ashbrook	n	n	n	n	n

Notes:

* *Blackmore End and Oaklands are not postal localities in their own right, but built up parts of postal localities centred outside North Hertfordshire.*

^ *The King's Walden postal locality includes the Ley Green area, where the shop and public house are located. Postal localities in the west of King's Walden parish have little obvious logic. For some reason the Royal Mail classes Wandon End, Winch Hill and Wandon Green as postal localities, but the comparable hamlets of Diamond End and Darley Hall are classed as streets, not postal localities.*

~ *The Cockernhoe postal locality includes Mangrove Green, where the public house is located.*

The facilities of the Baldock motorway service area and the Northway petrol station on the A1 are not counted as village facilities for this exercise.

5.22 It can be seen that only five villages have surgeries: Ashwell, Barley, Kimpton, Knebworth and Whitwell.

5.23 There are 22 villages with schools. There are 14 villages with food shops, of which only two (King's Walden and Willian) do not also have their own school (although Willian is very close to a school in the neighbouring town of Letchworth).

5.24 There are 35 villages with a village hall, 13 of which do not have a school. There are 34 villages with a public house.

5.25 Of the 53 postal localities considered, ten have none of the five types of facility recorded.

Economic sustainability

- 5.26 Economic activity in the rural areas needs to be considered both in terms of businesses located in the rural area and the economic activity undertaken by rural residents.
- 5.27 The most prominent businesses in rural areas are shops and public houses (which also act as social facilities). The rural areas are also home to many small businesses too, both based at people's homes and in businesses premises. Some villages have small business complexes, ranging from converted barns to purpose built light industrial premises, notably at Ashwell, Kimpton, Little Wymondley, Nuthampstead and Weston.
- 5.28 Despite the majority of the district's land area being used for agriculture, the proportion of the population working in agriculture is very small, even in the rural areas. District-wide only 417 people were recorded in the 2011 census as working in agriculture; just 0.6% of the economically active population. Whilst the proportion is higher in the rural areas, it peaks at just 5.3% in Ermine ward, where 71 people worked in agriculture. Even in apparently rural areas like Codicote ward, only 11 people worked in agriculture – just 0.8% of the economically active population. The main industry of employment in rural and urban areas alike is trade (or "wholesale and retail trade; repair of motor vehicles" to give the full ONS description). In this sense, the rural areas are not dissimilar to the North Hertfordshire towns.¹⁴
- 5.29 The National Planning Policy Framework (paragraph 55) notes that "...where there are groups of smaller settlements, development in one village may support services in a village nearby". This policy in itself appears to be a shift away from the narrow interpretation of sustainability as only being about whether or not a development will be heavily car dependent. North Hertfordshire already has several examples of villages which effectively share facilities. Barley has a shop which also serves as the nearest shop to neighbouring Barkway. Therfield has a school which also serves neighbouring Kelshall. Great Wymondley has a village hall which also serves neighbouring Little Wymondley.
- 5.30 In terms of supporting economic activity based in the rural area, it therefore seems reasonable that villages with existing commercial facilities dependent on a local population for trade (notably shops and public houses) should be allowed to grow, in order that the client population for those facilities does not diminish to reduce the viability of those businesses.
- 5.31 For other businesses based in the rural area, identifiable employment areas tend to be small, and of a different scale to the employment areas in the town which are designated. The draft Local Plan does include a policy (ETC4) which seeks to afford a limited degree of protection to non-designated employment areas, which the Council believes is the best way of managing the scattered nature of employment premises in the rural areas.
- 5.32 The other way in which the Council may be able to assist businesses, especially in the rural area, is through economic development work and joint working with the Local Enterprise Partnerships. The Council hopes to try and

¹⁴ Statistics derived from ONS data from table QS605EW of 2011 census.

use these connections to lobby for better broadband connections to the rural areas, which will help businesses there to thrive.

Environmental sustainability

- 5.33 One of the main arguments advanced against increased development in rural areas is that they are more dependent upon the private car, leading to increased greenhouse gas emissions. Intuitively this makes sense; few villages have a full range of facilities, leading to journeys out for shopping, work and other facilities.
- 5.34 However, it is useful to consider what data may be available to substantiate this type of argument. Figure 11 below looks at people's method of travel to work from the 2011 census. Specifically, it looks at the proportion of people who used very low environmental impact methods of travelling to work: walking, cycling or working at home, and compared these proportions to the size of the workforce in that parish or town.
- 5.35 If the intuitive logic that smaller places have more car journeys held good, one would expect to see a clear pattern to this graph, with the largest places having the highest proportion of low environmental impact travel to work, and the smaller places showing much lower levels of low environmental impact travel to work. In fact, as can be seen, there is little or no pattern to the graph at all. Moreover, the extremes of the range at both ends are counterintuitive. By some margin the place with least walking / cycling or working at home is Great Ashby, one of the district's main urban areas. Conversely, the places with the highest levels of walking / cycling or working at home were amongst the smallest villages: Kelshall, Nuthampstead, Hexton, Rushden, Preston and Clothall were the six places with the highest proportions, none of which were deemed large enough under the 1996 Local Plan to have a settlement boundary defined for them.
- 5.36 In part, the reason for the lack of a pattern is due to levels of home working in the rural area, which can be significant. Figure 12 does a similar exercise, but only looks at the proportion of people walking or cycling to work. A more obvious trend is visible, which better fits the intuitive logic – people do tend to walk or cycle to work more in the towns. However, there is still considerable variation. The place with the highest overall proportion of people walking or cycling to work is Hexton, one of the smaller villages. The place with the second lowest level of people walking or cycling is Great Ashby.
- 5.37 As such, in terms of travel to work, it is not considered that a blanket policy seeking to restrict growth in villages that have poor access by modes of transport other than the private car can be supported by the evidence.
- 5.38 Conversely, there is a clear social sustainability benefit in allowing further growth in those villages with facilities so as to ensure the long-term future of those facilities even if those facilities do not provide for the whole range of day to day needs.
- 5.39 Where a village has a school it can educate its younger children locally. If a village school were to those pupils would need to be transported to other towns or villages. The environmental impact of transporting all pupils from a village elsewhere should be compared with the environmental impact of allowing additional homes to bolster pupil numbers and keep the school open. It is hard

to quantify the two levels of environmental impact caused by these alternative levels of transport. However, the Council maintains that the difference will not be so great as to justify a policy preventing villages from growing.

Figure 11: Proportion of workforce walking or cycling to work or working at home by parish by size of workforce

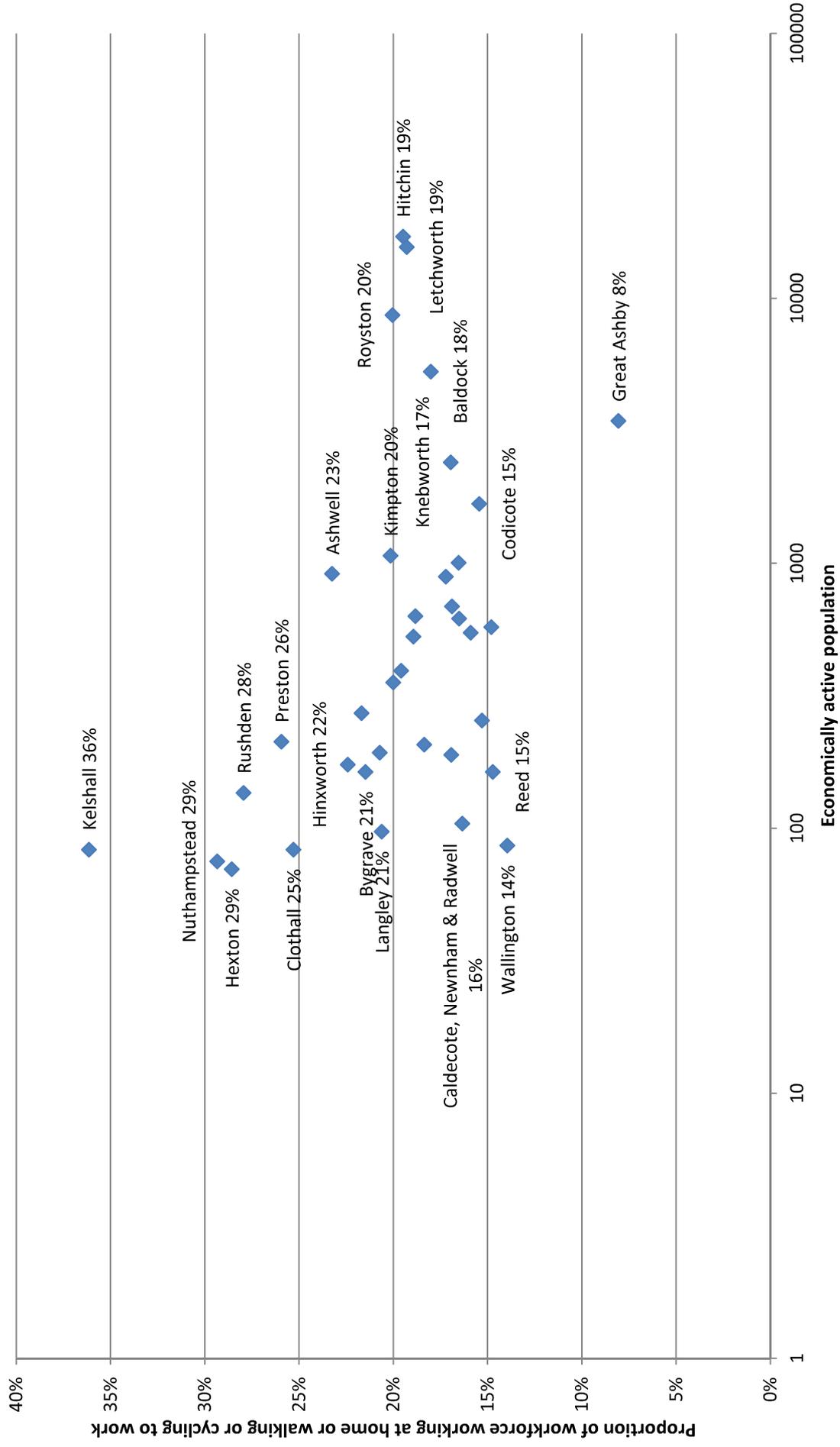
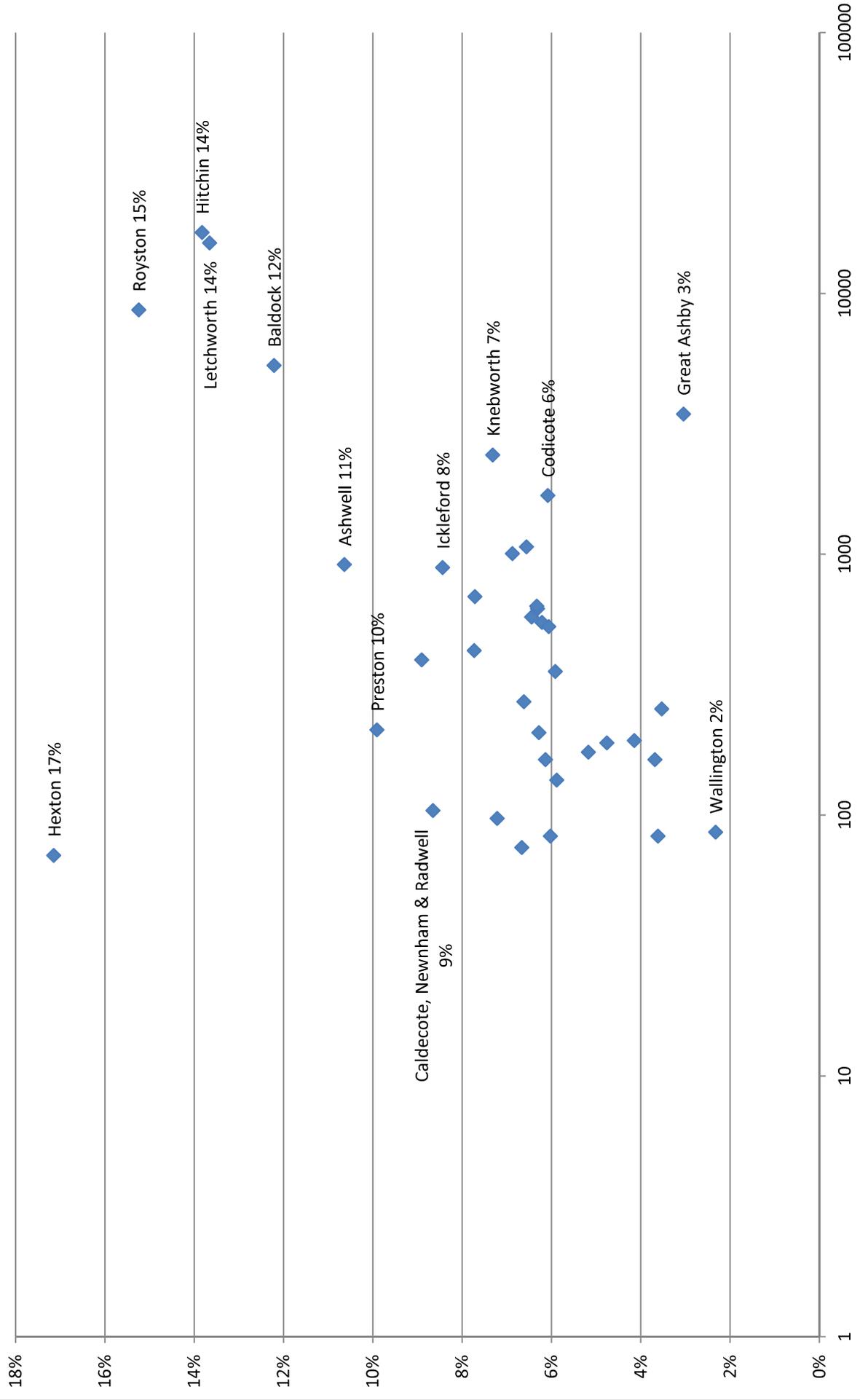


Figure 12: Proportion of workforce walking or cycling to work



Towards a settlement hierarchy

5.41 Having considered the economic, social and environmental impacts of development in the rural areas, the Council concludes that there is a clear social and economic case for allowing further growth in those villages with schools. Whilst this approach may have negative environmental impacts, these are not considered so clear cut or measurable as to warrant a more restrictive approach, which would cause economic and social harm to those villages. For the villages with schools, the Council therefore proposes defining a settlement boundary within which further growth will be allowed. These villages are described in draft policy HDS2 as Category A villages. They are:

- Ashwell
- Barkway
- Barley
- Breachwood Green
- Cockernhoe
- Codicote
- Graveley
- Hexton
- Ickleford
- Kimpton
- Knebworth
- Little Wymondley
- Oaklands
- Offley
- Pirton
- Preston
- Reed
- Sandon
- St Ippolyts
- Therfield
- Weston
- Whitwell

5.42 For those villages which do not have schools but do have a village hall or public house, the arguments are more finely balanced. The Council therefore proposes to allow infilling only in these villages, but only where there is clear built core within which infilling could occur that does not encroach into the surrounding countryside. The draft policy HDS2 terms these Category B villages. This policy allows the possibility of a limited amount of growth to support the more limited range of facilities in these villages, without encouraging significant development that would probably have more harmful environmental effects given that these villages do not have schools.

5.43 The villages with halls (not already listed in Category A above) are:

- Clothall
- Great Wymondley
- Hinxworth
- Holwell
- Kelshall
- King's Walden

- Lilley
- Newnham
- Peters Green
- Radwell
- Rushden
- Wallington
- Willian

5.44 Each of these is considered to have at least a small built up area within which at least small amounts of infilling may be possible, with the exception of King's Walden, which has such a loose knit urban form that it is not considered practical to identify a built core within which infilling could take place.

5.45 For villages with public houses, the plan proposes allowing where there is a clear urban form. Those villages with public houses not already covered are:

- Blackmore End
- Charlton
- Gosmore
- Old Knebworth
- Nuthampstead
- Rabley Heath
- St Paul's Walden
- Tea Green

5.46 Of these, the Council believes some are suitable for further infilling, but not all, as discussed below:

5.47 Blackmore End – clear urban area and already suburban in nature. Allow infilling.

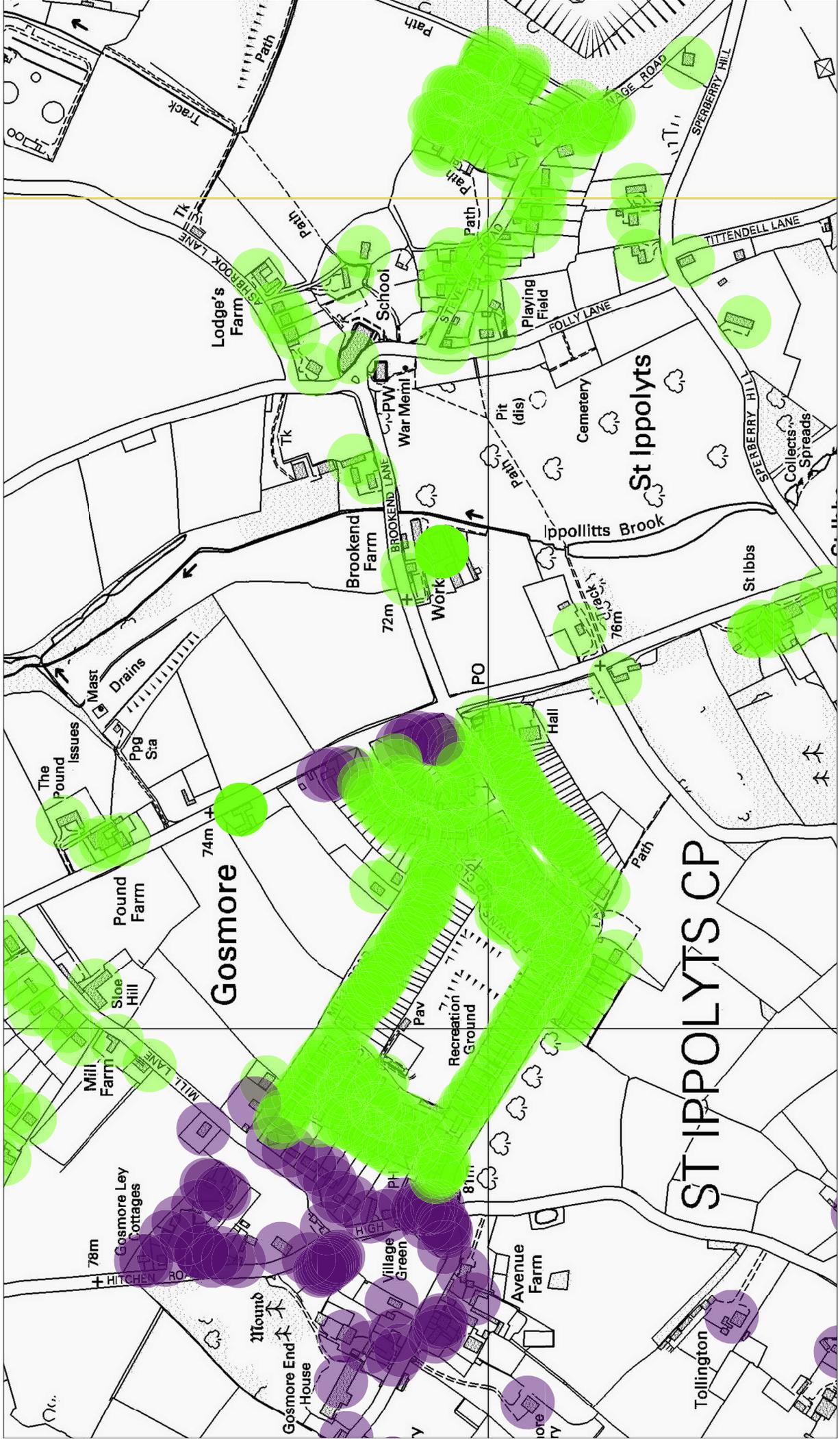
5.48 Charlton – whilst it is a separate postal locality it is very closely related to the neighbouring town of Hitchin, such that the social justification of infilling to support Charlton's public house is less clear cut. Do not allow infilling.

5.49 Gosmore – whilst Gosmore is a separate postal locality, it has a very complicated relationship with neighbouring St Ippolyts. Map 11 shows how Gosmore and St Ippolyts postal addresses are distributed. It can be seen that, whilst there are two apparently separate urban areas, these do not correspond to the names 'St Ippolyts' and 'Gosmore'. The urban area on the hill east of Ippollitts Brook all has St Ippolyts postal addresses, but the urban area to the west of Ippollitts Brook has a mix of St Ippolyts and Gosmore addresses – notably with London Road having Gosmore addresses, yet Waterdell Lane and Mill Road having St Ippolyts postal addresses.

5.50 Based on its own facilities Gosmore would only qualify for infilling, but St Ippolyts on its own facilities is a Category A village. Given the complex relationship between the two, the Council proposes a village boundary for St Ippolyts which also covers Gosmore, and thereby straddles the two urban areas. This village boundary is named St Ippolyts as that is the name of the parish, the larger postal locality, and the part which has the facilities justifying the boundary at all. Effectively the Council believes it makes more sense in planning terms to consider Gosmore a part of St Ippolyts than a village in its own right.



Map 11: Postal addresses for St Ippolyts (green) and Gosmore (purple)



Scale: 1:6500
Date: 22.10.14

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- 5.51 Nuthampstead – too loose knit, no clear built core. Do not allow infilling.
- 5.52 Old Knebworth – the urban area may be small, but it is reasonably coherent. Allow infilling.
- 5.53 Rabley Heath – too loose knit, no clear built core. Do not allow infilling.
- 5.54 St Paul's Walden – too loose knit, no clear built core. Do not allow infilling.
- 5.55 Tea Green – given the close relationship between Tea Green and the east of Luton sites, it is not considered necessary to allow infilling in Tea Green.
- 5.56 The resulting list of Category B villages is:

- Blackmore End
- Clothall
- Great Wymondley
- Hinxworth
- Holwell
- Kelshall
- Lilley
- Newnham
- Old Knebworth
- Peters Green
- Radwell
- Rushden
- Wallington
- Willian

Neighbourhood plans and affordable housing

- 5.57 Having completed the considerations of facilities and sustainability above, it is useful to consider how the resulting list of Category A and B villages relate to the civil parishes. This is because the legislation for neighbourhood plans and the policy for affordable housing in the rural area have links to civil parish boundaries.
- 5.58 Of North Hertfordshire's civil parishes, only four are left with no town or Category A or B village. These are:
- Bygrave
 - Caldecote
 - Langley
 - Nuthampstead
- 5.59 Whilst these four parishes do not contain any village which has been found to have facilities to justify growth (although much of the north of Baldock site is in Bygrave parish), the Council recognises that affordable housing to meet the rural needs of these parishes may still be delivered in these villages. If neighbourhood plans are prepared for these parishes there is the possibility of some neighbourhood-initiated growth, although this would probably be small-scale.
- 5.60 Recognising these factors, the Council proposes to list these four as Category C villages in policy HDS2.

- 5.61 Having thus defined the Category A, Category B and Category C villages, the Council does not propose to consider any other hamlet or locality as forming part of the settlement hierarchy, instead treating them as part of the countryside and therefore subject to whatever countryside policies are applicable to that area – either Green Belt or rural area beyond the Green Belt.

Appendix 2: Summary site selection matrix

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
AS1	3	Land west of Claybush Road	Ashwell	Stevenage HMA	Allocate site	On edge of Category A village beyond the Green Belt. Currently designated as Rural Area Beyond the Green Belt. Ability to contribute to five-year supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts, including upon heritage assets, and address a number of issues raised through consultation
-	304	Land north of Ashwell Street and south of Lucas Lane	Ashwell	Stevenage HMA	Do not allocate site	Site to be brought within proposed village boundary where development supported in principle on unallocated sites. Potential heritage and SSSI impacts best considered through planning application and / or neighbourhood planning process. Any future development would contribute to windfall allowance.
-	305	Land west of Station Road and north of Ashwell Street	Ashwell	Stevenage HMA	Do not allocate site	Site to be brought within proposed village boundary where development supported in principle on unallocated sites. Potential heritage and SSSI impacts best considered through planning application and / or neighbourhood planning process. Any future development would contribute to windfall allowance.
BA1	200 201 310 B/r01a B/r02a B/r11a B/r23 D (part)	North of Baldock	Baldock	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable and an opportunity to commence delivery within five-year period. Development at this scale able to deliver significant supporting infrastructure with wider benefits. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
BA2	B/r04	Land west of Clothall Road	Baldock	Stevenage HMA	Allocate site	Large site on land currently designated as Green Belt. Site critical to overall housing numbers achievable as enabling development to sites BA1 and BA3 and an opportunity to commence delivery within five-year period. Requires holistic approach to land on south side of Baldock to maximise benefits and deliver supporting infrastructure including roads and schools. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
BA3	B/r12	Land south of Clothall Common	Baldock	Stevenage HMA	Allocate site	Large site on land currently designated as Green Belt. Site critical to overall housing numbers achievable as enabling development to site BA1 and an opportunity to commence delivery within five-year period. Requires holistic approach to land on south side of Baldock to maximise benefits and deliver supporting infrastructure including roads and schools. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
BA4	B/r03 202	Land east of Clothall Common	Baldock	Stevenage HMA	Allocate site	Site partly within existing town and partly on land currently designated as Green Belt. Site critical to holistic approach to land on south side of Baldock in facilitating southern link road. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms
BA5	16	Land off Yeomanry Drive	Baldock	Stevenage HMA	Allocate site	Site within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.
BA6	B/e03	Land at Icknield Way	Baldock	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.
BA7	B/r06 B/r14	Land rear of Clare Crescent	Baldock	Stevenage HMA	Allocate site	Site within existing urban settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
BA11	307	Deans Yard, South Road	Baldock	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.
-	14	Land west of Weston Way	Baldock	Stevenage HMA	Do not allocate site	Site in Green Belt parcel which makes significant contribution to Green Belt purposes. Not being promoted for development within five-year period. Proposed allocations in Baldock are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
BK1	BK/r04	Land west of Cambridge Road	Barkway	Stevenage HMA	Allocate site	On edge of Category A village beyond the Green Belt. Currently designated as Rural Area Beyond the Green Belt. The site is quite small and relates well to the existing built area of the village. Site-specific criteria allow for appropriate mitigation of potential impacts.
BK2	BK/r02 BK/r03	Land off Windmill Close	Barkway	Stevenage HMA	Allocate site	On edge of Category A village beyond the Green Belt. The site is quite small and relates well to the existing built area of the village. Site-specific criteria allow for appropriate mitigation of potential impacts.
BK3	19 22	Land west of Cambridge Road	Barkway	Stevenage HMA	Allocate site	On edge of Category A village beyond the Green Belt. Currently designated as Rural Area Beyond the Green Belt. Ability to make significant contribution to additional overall housing numbers identified since Preferred Options stage and deliver supporting infrastructure to benefit of wider village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts.
-	18	Land east of Cambridge Road	Barkway	Stevenage HMA	Do not allocate site	Proposed allocations in Barkway are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	21	Land north of Nuthampstead Road	Barkway	Stevenage HMA	Do not allocate site	Proposed allocations in Barkway are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	23	Top Fields, Royston Road	Barkway	Stevenage HMA	Do not allocate site	Proposed allocations in Barkway are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	203	Land south of Ash Mill	Barkway	Stevenage HMA	Do not allocate site	Proposed allocations in Barkway are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	BLr/02	Land east of Picknage Road	Barley	Stevenage HMA	Do not allocate site	This site is currently part of a larger agricultural field and forms an important open space with views through from the Plaistow and village conservation area towards Chishill windmill and the open countryside beyond.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
EL1	ELW	Wandon Park	Cockernhoe & East of Luton	Luton HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable within Luton HMA and an opportunity to make significant contributions to five-year land supply and unmet requirements arising from within Luton. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
EL2	ELE	Land east of Brickkiln Lane	Cockernhoe & East of Luton	Luton HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable within Luton HMA and an opportunity to make significant contributions to five-year land supply and unmet requirements arising from within Luton. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
EL3	212a	Land west of Cockernhoe	Cockernhoe & East of Luton	Luton HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable within Luton HMA and an opportunity to make significant contributions to five-year land supply and unmet requirements arising from within Luton. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
-	340	Dancote, Cockernhoe Green, Cockernhoe	Cockernhoe & East of Luton	Luton HMA	Do not allocate site	Site to be brought within proposed village boundary where development supported in principle on unallocated sites. Potential impacts best considered through planning application and / or neighbourhood planning process. Any future development would contribute to windfall allowance.
CD1	29	Land south of Cowards Lane	Codicote	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make contribution to overall housing requirements and support vitality of village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through the consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
CD2	205S	Codicote Garden Centre	Codicote	Stevenage HMA	Allocate site	On edge of Category A village on previously developed land within Green Belt. Ability to make contribution to overall housing requirements and support vitality of village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through the consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
CD3	32	Land north of The Close	Codicote	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make contribution to overall housing requirements and support vitality of village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
CD5	31 313	Land south of Heath Road	Codicote	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make significant contribution to additional overall housing numbers identified since Preferred Options stage and deliver supporting infrastructure to benefit of wider village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
-	30	Land at Codicote House, Heath Road	Codicote	Stevenage HMA	Do not allocate site	Proposed allocations in Codicote are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	205N	Codicote Garden Centre (north)	Codicote	Stevenage HMA	Do not allocate site	Proposed allocations in Codicote are considered to represent better opportunities as well as a reasonable maximum of development for this settlement.
-	315	Mansells Farm (B)	Codicote	Stevenage HMA	Do not allocate site	Acceptability of site contingent on delivery of Site 205N which has not been selected.
GR1	208N	Land at Milksey Lane	Graveley	Stevenage HMA	Allocate site	Small site on edge of Category A village on land currently within Green Belt. Whole village presently washed over though proposal to inset provides opportunity to establish long-term boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
GA1	NES3	Land at Roundwood	Great Ashby & NE Stevenage	Stevenage HMA	Allocate site	Large site on land currently designated as Green Belt. Substantial contribution to overall housing numbers achievable and critical to achievable levels of five-year delivery. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through the consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
GA2	226 323	Land off Mendip Way	Great Ashby & NE Stevenage	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable and an opportunity to make significant contribution to five-year land supply. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site and potentially make contributions with wider community benefit. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
HT1	39 326	Land at Highover Farm	Hitchin	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable and an opportunity to make significant contribution to five-year land supply. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
HT2	98	Land north of Pound Farm	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Would contribute to overall housing requirements. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT3	H/r30	Land south of Oughtonhead Way	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT5	H/r25	Land at junction of Grays Lane and Lucas Lane	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT6	H/r14	Land at junction of Grays Lane and Crow Furlong	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT8	H/r52	Cooks Way	Hitchin	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.
HT10	366	Former B&Q	Hitchin	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
-	225	Land west of Hitchin Lane (St Ippolyts parish)	Hitchin	Stevenage HMA	Do not allocate site	SHLAA identifies that, in urban layout terms, suitability is largely contingent on development occurring within area of flood risk. Site not required under Sequential Testing approach. Additional concerns over suitable access.
-	110	Oakfield Farm, Stevenage Road	Hitchin	Stevenage HMA	Do not allocate site	SHLAA identifies that, in urban layout terms, suitability is largely contingent on development occurring within area of flood risk. Site not required under Sequential Testing approach. Additional concerns over suitable access.
IC1	41	Duncots Close	Ickleford	Stevenage HMA	Allocate site	Small site within Green Belt making a moderate contribution to green belt purposes. Known areas of surface water flood risk on site. Site-specific criteria allow for appropriate mitigation of potential impacts.
IC2	40	Burford Grange, Bedford Road	Ickleford	Stevenage HMA	Allocate site	On edge of Category A village on land within Green Belt. Site-specific criteria allow for appropriate mitigation of potential impacts.
IC3	330	Land at Bedford Road	Ickleford	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make significant contribution to additional overall housing numbers identified since Preferred Options stage and deliver supporting infrastructure to meet wider needs. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
LS1	331	Land at Ramerick	Ickleford	Stevenage HMA	Allocate site	On edge of proposed Category A village on land currently designated as Rural Area Beyond the Green Belt. Ability to make significant contribution to additional overall housing numbers identified since Preferred Options stage and five-year land supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
-	329	Arnolds Farm, Chambers Lane	Ickleford	Stevenage HMA	Do not allocate site	Heritage impact assessment advises against allocation of this land.
KM3	K/r01	Land north of High Street	Kimpton	Stevenage HMA	Allocate site	On edge of Category A village beyond the Green Belt. Currently designated as Rural Area Beyond the Green Belt. Ability to contribute to overall housing numbers. Site-specific criteria allow for appropriate mitigation of potential impacts and address a number of issues raised through consultation
KW1	51	Land west of The Heath, Breachwood Green	King's Walden	Luton HMA	Allocate site	On edge of Category A village on land currently within the Green Belt. Ability to contribute to overall housing numbers and meet local needs arising within that part of the district in the Luton HMA. Site-specific criteria allow for appropriate mitigation of potential impacts and address issues raised through consultation.
-	49	Allotments south of Colemans Road, Breachwood Green	King's Walden	Luton HMA	Do not allocate site	Cumulative loss of allotments arising from allocation of this site <u>and</u> site 51 together would be unacceptable and Site 51 considered the better opportunity of the two available options.
KB1	52 335	Land at Deards End	Knebworth	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make contribution to overall housing requirements and five-year supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through the consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
KB2	53	Land off Gypsy Lane	Knebworth	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make contribution to overall housing requirements and provide infrastructure with potential wider community benefits. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through the consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
KB3	KB/m1	Builders' Yard, London Road	Knebworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
KB4	55 57 58 336	Land east of Knebworth	Knebworth	Stevenage HMA	Allocate site	On edge of Category A village on land currently within Green Belt. Ability to make significant contribution to additional housing numbers identified since Preferred Options stage and five-year land supply. Opportunity to investigate infrastructure provision for wider community benefits. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
LG1	NL	Land north of Letchworth	Letchworth	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable and an opportunity to make significant contribution to five-year land supply. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
LG3	L/r13	Land east of Kristiansand Way and Talbot Way	Letchworth	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Contribution to overall housing numbers achievable and 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, positive opportunities afforded by this site are considered to outweigh harms.
LG4	L/r18	Land north of former Norton School, Norton Road	Letchworth	Stevenage HMA	Allocate site	Site within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts and address comments raised through consultation.
LG5	L/r16 356	Land at Birds Hill	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG6	L/r24 337	Land off Radburn Way	Letchworth	Stevenage HMA	Allocate site	Site within existing town, partially previously developed. Site-specific criteria allow for appropriate mitigation of potential impacts and address comments raised through consultation.
LG8	234	Pixmore Centre, Pixmore Avenue	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG9	L/o2	Former Lannock School	Letchworth	Stevenage HMA	Allocate site	Site within existing town, partially previously developed. Site-specific criteria allow for appropriate mitigation of potential impacts and address comments raised through consultation.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
LG10	L/o7	Land off Croft Lane	Letchworth	Stevenage HMA	Allocate site	Opportunity for modest number of additional homes within existing town boundary. Site-specific criteria allow for appropriate mitigation of potential impacts and to address issues raised through consultation.
LG13	339	Glebe Road industrial estate	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG14	354	Nursery, Icknield Way	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG15	355	Garages, Icknield Way	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG16	338	Foundation House	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG17	357	Hamonte	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
LG18	L/r02	Former Depot, Icknield Way	Letchworth	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
PR1	215	Land off Templars Lane	Preston	Stevenage HMA	Allocate site	On edge of proposed Category A village on land currently designated as Rural Area Beyond the Green Belt. Contribution to overall housing numbers and most viable site in village once conclusions relating to other opportunities taken into consideration. Site-specific criteria allow for appropriate mitigation of potential impacts and address comments raised through consultation.
-	65	Land west of Back Lane	Preston	Stevenage HMA	Do not allocate site	Decision to propose extension to Green Belt means Back Lane provides most appropriate defensible edge to west of Preston in this location. Proposed allocation site in Preston represents a better opportunity.
-	67	Land north of Chequers Lane	Preston	Stevenage HMA	Do not allocate site	Decision to propose extension to Green Belt means Chequers Lane provides most appropriate defensible edge in this location. Proposed allocation site in Preston represents a better opportunity.
-	216	Land west of Butchers Lane	Preston	Stevenage HMA	Do not allocate site	Decision to propose extension to Green Belt means Butchers Lane provides most appropriate defensible edge to west of Preston in this location. Proposed allocation site in Preston represents a better opportunity.
RD1	RD/r01	Land at Blacksmiths Lane	Reed	Stevenage HMA	Allocate site	On land currently designated as rural area. Reed proposed as Category A village and allocation would allow definition of coherent boundary along Blacksmith's Lane. Site-specific criteria allow for appropriate mitigation of potential impacts.
-	81	Reed House, Jacksons Lane	Reed	Stevenage HMA	Do not allocate site	Site access via The Joint makes it poorly related to the village in social terms.
RY1	218	Land west of Ivy Farm	Royston	Stevenage HMA	Allocate site	Large site on land current designated as Rural Area beyond the Green Belt. Ability to make significant contribution to overall housing numbers and critical to five-year land supply if housing requirements are to be met in full. Potential impacts, particularly on heritage and SSSI, are fully acknowledged. Site-specific criteria provide mechanism for mitigation of these to within acceptable limits and address comments raised through consultation. On balance, positive opportunities offered by this site are considered to outweigh the potential harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
RY2	85	Land north of Newmarket Road	Royston	Stevenage HMA	Allocate site	Principle of residential development on this site accepted through resolution to grant planning permission. Site-specific criteria ensure key impacts would be addressed in the event of any alternate application.
RY4	R/r11	Land north of Lindsay Close	Royston	Stevenage HMA	Allocate site	Site on land currently designated as Rural Area beyond the Green Belt. Allocation allows for clear definition of town boundary. Site-specific criteria allow for appropriate mitigation of potential impacts and address comments raised through consultation.
RY5	R/r06	Agricultural supplier, Garden Walk	Royston	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
RY7	217	Anglian Business Park, Orchard Road	Royston	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
RY8	R/e2	Land at Lumen Road	Royston	Stevenage HMA	Allocate site	Previously developed land within existing settlement. Site-specific criteria allow for appropriate mitigation of potential impacts.
RY10	346	Land south of Newmarket Road	Royston	Stevenage HMA	Allocate site	Large site on land currently designated as Rural Area beyond the Green Belt. Ability to make significant contribution to additional housing requirements identified since Preferred Options stage. Site-specific criteria allow for appropriate mitigation of potential impacts.
RY11	358	Land at Barkway Road	Royston	Stevenage HMA	Allocate site	Site on edge of existing town on land currently designated as Rural Area beyond the Green Belt. Allocation allows for clear definition of town boundary.
-	R/r07	Royston Football Club, Garden Walk	Royston	Stevenage HMA	Do not allocate site	Appropriateness of site contingent on relocation / replacement of existing use. No formal proposal for a replacement site.
SI1	221	Land south of Waterdell Lane	St Ippolyts	Stevenage HMA	Allocate site	On edge of Category A village on land currently within the Green Belt. Contribution to overall housing numbers and support vitality of the village. Site-specific criteria and dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through the consultation.
SI2	SI/r3	Land south of Stevenage Road	St Ippolyts	Stevenage HMA	Allocate site	On edge of Category A village on land currently within the Green Belt. Contribution to overall housing numbers and support vitality of the village. Site-specific criteria and dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through the consultation.
SP2	348	Land between Horn Hill and Bendish Lane, Whitwell	St Paul's Walden	Stevenage HMA	Allocate site	On edge of Category A village on land currently designated as Rural Area beyond the Green Belt. Proposal to designate additional Green Belt in this area provides opportunity to establish clear boundary whilst site previously supported in this village not under consideration for this iteration of the plan.
NS1	NS	North Stevenage	Stevenage (adjoining)	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.

Plan ref	SHLAA ref(s)	Site	Place	Housing Market Area	Outcome	Summary of reasoning
-	WS	West Stevenage (north)	Stevenage (adjoining)	Stevenage HMA	Remove from green belt and notate as safeguarded land.	Substantial site on land currently designated as Green Belt. Ability to contribute within plan period limited by infrastructure costs of accessing site. However, similarly acknowledged that Stevenage likely to substantively exhaust opportunities within the Borough by 2031 while North Hertfordshire will continue to experience on-going housing needs beyond the plan period. This site has been recognised in previous plans as a suitable location for growth. Land to be removed from the Green Belt and safeguarded pending a future review of this plan which looks at longer-term issues, including options relating to a new settlement, holistically.
TH1	119	Land at Police Row	Therfield	Stevenage HMA	Allocate site	On edge of selected village on land currently designated as Rural Area Beyond the Green Belt. Ability to contribute to overall numbers and vitality of village. Site-specific criteria and proposed dwelling estimate allow for consideration of potential impacts and address issues raised through consultation.
WE1	228 351	Land off Hitchin Road	Weston	Stevenage HMA	Allocate site	Land on edge of village currently washed over by Green Belt but proposed to be inset providing opportunity to create defensible boundary and support vitality of the village. Site-specific criteria allow for appropriate consideration of potential impacts.
-	121	Land west of Little Wymondley	Wymondley	Stevenage HMA	Do not allocate site	SHMA makes clear that acceptability contingent on Sequential and Exception Test if insufficient opportunities identified elsewhere. Sufficient sites identified to meet objectively assessed needs without resort to land in the flood plain.
WY1	122 232	Land south of Stevenage Road, Little Wymondley (see also WY1)	Wymondley	Stevenage HMA	Allocate site	Large site on land currently designated as Green Belt. Important contribution to overall housing numbers and opportunity for substantial contribution to five-year land supply. Site-specific criteria require consideration of key issues, including heritage and flood risk, which assists in addressing identified issues and comments made through consultation process.

