

# **Sustainability Appraisal and SEA of North Hertfordshire Local Plan Preferred Options**

## **Appendix 4: Spatial Strategy Assessment**

November 2014

# North Hertfordshire Preferred Options Local Plan

## Spatial Strategy Assessment

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# Spatial Options Consideration

## Introduction

1. There have been a number of assessments of options as the local plan has developed. These assessments have considered a wide range of options including spatial options, policy options as well as individual site options, some of which have been strategic in size.
2. The purpose of appraising alternative options is to compare the sustainability effects of alternative ways of addressing the same issue and as the plan has progressed these issues have been developed, assessed and either used or rejected as the plan has moved forward.
3. With regard to spatial options this has largely involved consideration of macro-scale options relating to the location and distribution of development, although throughout this process smaller-scale development control issues have also been considered which have had spatial implications. Appraisal of site options also has a degree of spatial consideration, although this is pre-determined by the site's location. More fundamentally the development of strategic sites has greater spatial consequences and impacts as can be seen in the sustainability appraisal (SA/SEA) assessment matrices of the individual sites.
4. The sustainability appraisal process has been crucial to the options process and has provided an iterative approach with which to influence the local plan process and arrive at the preferred option in light of reasonable alternatives.
5. In chronological order Part 1 of the report details the emergence and evolution of the preferred spatial strategy as it currently exists in the Preferred Options Local Plan (2014).
6. Part 2 of the report includes an assessment in sustainability terms of reviewing the Green Belt or seeking to meet development needs in areas outside of the Green Belt.

## *Part 1: Spatial Strategy Chronology*

### **Core Strategy and Development Policies Issues and Options (September 2005)**

7. This document was consulted on in September / October 2005 and included a list of key issues and options for guiding development in the district. The SA/SEA of the document listed the policy issues and the potential options for addressing them and scored them in relation to the SA criteria. This part of the SA/SEA process is considered to be crucial in options assessment for the majority of both spatial and policy options as it lists all the reasonable alternatives.
8. For many policies the different approaches for addressing the issues will largely be logical as there are only a limited number of ways of addressing

certain issues, however it is necessary to go through the process to rule out the alternatives if there is a chance that they may be more favourable in sustainability terms.

9. Appendix 6 of the Issues and Options SA/SEA document included a detailed assessment of each of the options considered. Appendix 4 then set out the conclusions for each of the options. The conclusions were designed to assist both decision-makers and those commenting on the Council's issues and options paper to be able to compare the potential effect of alternative options and to assist in defining the preferred option. The key aim was therefore to help decision making.
10. Of the 36 issues considered the following three are considered to be the main Strategic Options, with the corresponding options for their delivery:
  1. Housing Delivery:
    - a) *Continue current policy of focusing development on the four towns and fourteen villages, which may include limited development of greenfield sites;*
    - b) *Focus development on previously developed land (PDL) within existing urban areas;*
    - c) *Urban extensions on greenfield land adjoining existing towns;*
    - d) *Build a new settlement; and*
    - e) *Use smaller greenfield sites in the villages*
  2. Villages and accommodating development:
    - a) *Identify villages which may take further development based on the level of facilities in the village;*
    - b) *Identify villages which may take further development based on the population of the village;*
    - c) *Identify villages which may take further development based on the desires of the parish council and the residents of the village;*
    - d) *Do not identify specific villages and allow some development in all villages; and*
    - e) *Do not allow any development in any village*
  3. Employment:
    - a) *No new Employment areas should be designated;*
    - b) *Completely new Employment Areas should be designated, but only within existing settlements;*
    - c) *Completely new Employment Areas should be designated within or adjoining existing settlements;*
    - d) *There should be extensions to existing Employment Areas but only within existing settlements;*
    - e) *There should be extensions to existing Employment Areas within or adjoining existing settlements;*
    - f) *Other; and*
    - g) *No formal policy (business as usual)*

11. There were a number of additional issues that had spatial elements to them, for example in relation to town centre issues such as “Other uses in town centres” and “How to promote the health and well being of the smaller centres” had a spatial impact in the lists of different options, however, the three key issues above were the main guiding principles of the spatial elements of the emerging plan.

### **Preferred Options Core Strategy / Development Policies (September 2007)**

12. The SA/SEA of the preferred options core strategy and development policies were informed by the options assessment (highlighted above) from the previous issues and options consultation. In Appendix 5 of the SA/SEA document each of the options had a NHDC response, providing reasoning why the options were either pursued or not.
13. **Appendix 1** of this document incorporates the conclusions for the 3 main strategic options detailed above. In the main it concludes that a mix of options for each of the options rather than choosing one option outright was the most appropriate course of action. For example the preferred approach for housing delivery in 2007 was based on a combination of options a, b and c from the above list.
14. At this point the quantum of growth associated with the spatial strategy was defined by the East of England Plan. It identified housing targets for both the area of North Hertfordshire adjoining Stevenage, being 9,600 dwellings, and for the remainder of the district being 6,200 dwellings.

### **Land Allocations Issues and Options (January 2008)**

15. This document was a consultation specifically on sites identified through the land allocations process. It was accompanied by an SA/SEA, which assessed the sustainability impact of development of the sites, splitting the sites into greenfield and brownfield and noting the differences between the two classifications. The consultation document included sites for employment , retail, open space as well as residential uses.

### **Additional Suggested Sites (July 2009)**

16. This document was a consultation on additional sites identified as a result of the 2008 consultation. It was also accompanied by SA/SEA noting the sustainability impacts of development of the additional sites.

### **Housing Growth Targets (February 2012)**

17. Following the Government’s announcement of its intention to revoke the East of England Plan, this document was produced to consult with the general public on a range of housing targets. This type of strategic option relating to the overall quantum of development had not previously been considered through the Core Strategy / Local Plan process, therefore this was an issue that needed consideration both from a sustainability point of view but also by the general public.

18. The document was drafted in advance of the publication of the National Planning Policy Framework (NPPF), which meant that meeting objectively assessed need was not a requirement at this stage.
19. The document identified a range of housing targets as detailed below:
  - East of England Plan – 15,800
  - Normal Migration trends – 14,500
  - Stevenage Growth – 13,000
  - Continue trends including Great Ashby – 11,000
  - Continue trends excluding Great Ashby – 7,700
  - Delivering affordable housing – 7,000
  - Natural change – 5,400
  - Brownfield – 2,500
20. An SA/SEA was produced to support the housing growth targets document. It incorporated a high level sustainability assessment based on assumptions about where sites might come forward and the strategy required to meet each of the housing targets. This document was not a full sustainability appraisal report but assessed each of the targets in turn and summarised the results to help inform decision making regarding which option to choose. It was a high level assessment, concerned with macro-scale issues. Key conclusions were that whilst the higher targets tended to have a more negative impact on those objectives relating to environmental protection, they had a more positive impact upon those objectives relating to economic considerations. Conversely, the lower targets tended to have a more positive impact on environmental considerations and neutral or negative impacts on economic criteria.
21. The SA/SEA was also partly informed by informal consultation that took place towards the end of 2011 with key stakeholders. As part of the consultation process we asked those involved to scope the key economic, environmental and social issues of the different housing targets, which provided a basis for the assessment against the SA criteria.

### **Housing Options (February 2013)**

22. The Housing Options document was more detailed than just an assessment of sites. It included sites previously consulted on in 2008 and 2009, but also seven strategic sites (developments of over 1000 dwellings). It also included potential housing targets from the Council's Strategic Housing Market Assessment (SHMA) as well as a potential target of 10,700 dwellings that the Council was to investigate further. The document also recognised that to meet a figure of 10,700 that at least one strategic site would be required as the non-strategic sites only totalled 9,200.
23. The SA/SEA of this document looked at some strategic options in relation to housing delivery. It included an assessment of each of the strategic site allocations as well as different approaches to the smaller sites using the

priority assessment<sup>1</sup> in the Strategic Housing Land Availability Assessment (SHLAA) as potential strategic options.

24. The use of the priority information in essence built on the housing delivery options from the issues and options SA/SEA report in 2005 and preferred options SA/SEA report in 2007. This SA/SEA assessed the impacts of sites that were either;
  - in towns on brownfield land and on the edge of settlements in accordance with previous preferred options strategy (i.e. Priority 1 and 2)
  - priority 3 sites in or adjacent to towns; and
  - priority 3 sites in or adjacent to villages.
25. These different classifications of the sites provided a broader assessment of delivering housing development, rather than a specific option such as “building a new town”. It enabled an assessment based on different classifications of site taking into account the previous preferred options, but recognising that there were additional sites adjoining towns and villages that weren’t in the Council’s previously preferred strategy that could be delivered.
26. The assessment of strategic sites presented further options of delivering large-scale housing in one particular location and the reported likely impacts associated with each of the sites in turn.

### **Housing Additional Location Options (July 2013)**

27. This document was a consultation on sites suggested as a result of the Housing Options consultation; however it included two additional strategic sites at north Baldock and east of Luton. An SA/SEA was produced which appraised the sites in the same format as those sites considered in the February 2013 Housing Options document.

### **Preferred Options Local Plan (December 2014)**

28. The Preferred Options Local Plan incorporates a spatial strategy to meet the objectively assessed need for housing in the district. Whilst the SHMA is currently being reviewed, the current figure of 12,100 dwellings reflects the most up-to-date assessment of housing need and is met through allocations in the plan<sup>2</sup>.
29. As the East of England Plan has been revoked the Council has been afforded more freedom with where it allocates housing. The current objectively assessed need is much higher than was previously attributed to the “rest of the district” by the RSS (although below the total figure), therefore distribution of sites around the district is more extensive.
30. Whilst the quantum and the locations of the spatial strategy have changed, the constituent parts of the approach chosen is similar to that adopted in

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<sup>1</sup> Priority assessment is a way of categorising sites based on their location i.e. inside or outside settlement boundaries

<sup>2</sup> in addition to those sites that already have planning permission or been built

2007. This is evidenced by the chosen spatial options relating to housing delivery, village development and employment as listed above and detailed in **Appendix 1** of this report.

31. Housing sites are identified in the four main towns and key villages with appropriate services, but also through urban extensions as was the case in 2007. This is identified as a combination of different spatial approaches, only rejecting the potential development of a new town reflecting the options conclusions in 2007.
32. New employment land is allocated adjacent to existing designated employment areas; although it is identified that additional employment land could be considered within urban extensions. The broad locations for employment development have largely remained the same as the 2007 Preferred Options Core Strategy, albeit that the overall quantum of employment land required has decreased. Therefore the conclusions on the options considered in 2007 also remain the same.
33. Whilst the overarching preferred spatial strategy has largely stayed the same as the 2007 Preferred Options Core Strategy, the specific choices on sites, both strategic and non-strategic has been guided by a number of different factors and evidence including:
  - Planning constraints
  - SA/SEA
  - Landscape Assessments
  - Transport modelling
  - Green Belt review
34. The reasoning for the choices of sites is listed in the Site Selection Matrix document, produced alongside the Preferred Options Local Plan.

## **Part 2: Green Belt Assessment**

35. Green Belt is not a sustainability issue in its own right as it is a policy constraint. However, the occurrence of Green Belt presents a spatial sustainability issue as it has the potential to influence the location of development. This is, however, based on the decision of whether the Green Belt is reviewed or not.
36. Paragraph 84 of the NPPF states that *“when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*
37. The Council has undertaken a Green Belt Review which has been produced in two parts. Part 1 assesses the existing extent of the Green Belt, based on its contribution to the Green Belt purposes, together with an assessment of the sites that have been considered as part of the North Hertfordshire Local Plan. Part two looks at areas of non-Green Belt that could contribute to the functions of Green Belt as set out in paragraph 80 of the National Planning Policy Framework (NPPF) as well as defining a new Green Belt boundary.
38. An assessment in accordance with paragraph 84 has not been undertaken as part of the Green Belt review. This assessment is instead undertaken as part of this document, which forms part of the SA/SEA.
39. The totals associated with extent of Green Belt and non-Green Belt sites are considered in table 1 below, which is taken from the Strategic Housing Land Availability Assessment 2013 update (SHLAA) (March 2014).

**Table 1: Potential sources of supply**

<b>Potential Source</b>	<b>Dwellings</b>	<b>Cumulative total</b>
Completions between 1 Apr 2011 and 31 Mar 2013	675	675
Planning permissions as at 1 Apr 2012 considered likely to be implemented	635	1,310
Small sites allowance	510	1,820
<i>Specific sites which passed the tests of the SHLAA:</i>		
Category A: previously developed	560	2,380
Category B: greenfield within existing settlements	311	2,691
Category C: rural area beyond the Green Belt	1,650	4,341
Category D: currently Green Belt	15,546	19,887

40. It is clear that of the sites that have been submitted to the Council and that have passed the three tests of the SHLAA (i.e. the site is deliverable, achievable and suitable) 2,521 potential dwellings are located outside of the Green Belt (Category A, B, C), whereas 15,546 are located within the Green Belt (Category D).

41. The Preferred Options Local Plan identifies a district wide objectively assessed housing need of 12,100. Additional unmet need has been identified for Luton. The Housing Background Paper has identified an allowance of 2,100 dwellings in North Hertfordshire to address some of Luton's unmet need. This provides a total housing figure of 14,200 within the Plan. Clearly this figure can not be met within the district on sites identified in the Local Plan / SHLAA without a review of the Green Belt.
42. In terms of Green Belt policy, there are two realistic options open to the Council: either review the Green Belt to meet the housing need, or do not review the Green Belt and come up with another strategy to ensure the housing figure is met.
43. The Government has indicated both in the National Planning Policy Framework and the Planning Practice Guidance that Green Belt is a consideration that should be taken into account when deciding the housing targets for inclusion in a Local Plan. However, the guidance also makes clear that local planning authorities should make every effort to meet objectively assessed need for housing. Districts elsewhere in the country have found that unless they have carried out a Green Belt review it is not acceptable to merely rely on old Green Belt boundaries as a reason not to accept development.
44. If the Council were to pursue the option of not building in the current designated Green Belt, this would involve developing all available sites and land not located in the Green Belt. However, as set out above this approach falls substantially short of the level of objectively assessed need. To try and meet the needs, the district would have to try and convince neighbouring authorities to accommodate the difference, or identify more sites in areas beyond the Green Belt to accommodate the remainder of need, which may involve compulsory purchase.
45. There are soundness and Duty to Co-operate issues associated with the latter of these two options, which may impact on whether it is in fact a reasonable alternative. Separate from such considerations, the sustainability impacts of these different approaches has been assessed, as included in the matrices in **Appendix 2** to this report. No "business as usual" option was included, as it was not considered to be a reasonable alternative in this context. The specific options considered are:
  - Options A: Review Green Belt to meet development need in the district
  - Option B(i): Focus development in non-Green Belt areas, potentially compulsorily purchasing land to meet identified housing need and do not review the Green Belt.
  - Option B(ii): Focus development in non-Green Belt areas and work with neighbouring authorities to seek to accommodate additional need and do not review the Green Belt.

## Summary of Matrices

46. All matrices illustrate negative impacts on the natural environment and whilst the options that seek to protect Green Belt may have short term benefits for biodiversity, landscape, heritage they involve the development of constrained sites and in the case of Option B(i) require identification of new land in non Green Belt areas to help meet the housing need target. The less favourable

non-Green Belt sites include wildlife sites and sensitive landscapes as well as conservation areas and listed buildings, which will very likely create significant negative impacts, even if under option B(ii) the quantum of development will be less.

47. The economic impacts of Options B(i) and (ii) are negative based on the restriction of locations where development can occur. This means that development, and the benefits of development, are not spread across the district evenly. These options also don't allow for economic development in the Green Belt.
48. Concentrating development in certain areas, away from the major settlements, does not deliver development in sustainable locations where the greatest amounts of services and facilities are located. Options B(i) and B(ii) will not seek to reduce the use of the car.
49. A reduced amount of development under option B(ii) may have positive impacts on waste and pollution in North Hertfordshire, however it is recognised that housing in adjoining authorities will have the same impacts. Moreover, such displacement of needs attributable to North Hertfordshire to locations further afield is likely to increase the need to travel, thus having a greater environmental impact than meeting needs locally under Option A would.
50. Delivering housing need within the district boundary will have positive impacts on affordability as is the case in Options A and B(i), however restricting the spread of development under Option B(i) will mean that this issue is only partially positive. Restricting the spread of development and not meeting the housing need as is the case under Option B(ii) will have significant negative impacts on affordability as well as the delivery of affordable housing.
51. There are a number of unknowns associated with all options based on the uncertainty of sites as they evolve through the local plan process and in the long, with term sites that have yet to be identified.

## **Conclusions**

52. Whilst this assessment has largely been theoretical in nature and there are many unknowns, Options B(i) and (ii) which seek to protect the Green Belt have negative impacts on the majority of the criteria because they are not meeting need or are concentrating development in certain locations.
53. Reviewing the Green Belt under Option A includes negatives for a number of the environmental criteria based on development in green field areas of the Green Belt. It, does, however deliver many positives based on a spread of development and meeting development needs.
54. It is therefore clear from the matrices in Appendix 2 and discussion above that reviewing the Green Belt to meet development needs is more preferable in sustainability terms, than not reviewing the Green Belt.

## Appendix 1: Strategic Options Summary (taken from 2005 Options) and NHDC Commentary

### 1 Location for the required new housing

**Option (a)** Continue current policy of focusing development on the four towns and fourteen villages, which may include limited development of greenfield sites.

*NB. This option reflects the approach taken in the current plan, i.e. it is the “business as usual” option*

#### Conclusions

- This option will still involve significant development on greenfield sites. This in turn is likely to have significant impacts on biodiversity and landscape. The Housing Capacity Study shows that on the Best Fit scenario, around 4120 dwelling units could be provided within the four towns and 14 villages. Including an additional 2264 for planning permissions since 2001, this leaves a total of around 9,400 dwellings to be located on greenfield sites. However it does offer the opportunity to address remediate existing contaminated land sites in the four towns.
- Focusing on existing towns may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth. However, 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town. Locating developments in the villages is likely to increase the need to travel, as there are currently few services and jobs in the villages, and it is unclear whether the new developments would be large enough to provide the new services and jobs needed. However, it is possible that the development could result in the size of the village increasing to a scale where it can support additional services and public transport provision.
- New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District’s ability to respond to climate change.
- The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.

#### Recommendations for changes to this option and need for additional data:

- Undertake detailed research to determine the impacts on landscape, biodiversity and groundwater in specific locations.

No changes are recommended, within the parameters of the requirement to provide extra housing.

#### NHDC response 2007

This option forms part of the solution to the housing question for those parts of the district not affected by the urban extensions to Stevenage and Luton. The proposed policy (Core 8) makes reference to directions of growth for the four towns, based on a detailed study of landscape sensitivity and capacity.

#### NHDC response 2014

This option remains part of the solution to the housing question, albeit the number of villages accommodating some degree of growth has increased.

**DPD Option (b)** Focus development on previously developed land (PDL) within existing urban areas

*Note we have assumed that this means that the required housing provision will still be met (ie that there will be significant greenfield development).*

**Conclusions**

- We have assumed that this option means that the required housing provision will still be met. Despite its emphasis on previously developed land in the towns, it will still therefore involve significant development on greenfield sites and possibly brownfield sites in villages. This in turn is likely to have significant impacts on biodiversity and landscape. The Housing Capacity Study shows that on the Best Fit scenario, around 4120 dwelling units could be provided within the four towns and 14 villages. Including an additional 2264 for planning permissions since 2001, this leaves a total of around 9,400 dwellings to be located on greenfield sites. However it does offer the opportunity to address remediate existing contaminated land sites in the four towns.
- Focusing on existing towns may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth. However, 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town.
- New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District's ability to respond to climate change.
- The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.

**Recommendations for changes to this option and need for additional data:**

- Undertake detailed research to determine the impacts on landscape, biodiversity and groundwater in specific locations.
- No changes are recommended, within the parameters of the requirement to provide extra housing

**NHDC response 2007**

This option forms part of the solution to the housing question (Core 8). Due to the heavily fragmented nature of such sites, detailed work on landscape, biodiversity and groundwater is impractical, but policies E8, E10, D11 and D12 ensure that the effects of development on these issues are properly considered before development goes ahead.

**NHDC response 2014**

This option remains part of the solution to the housing question. Based on the time that has passed since 2007, a large majority of those sites previously identified have been developed, however through the SHLAA and Housing Options / Housing Additional Location Options additional brownfield sites have been identified. Landscape, biodiversity and groundwater have been considered through the constraints matrix, but policies D1 – Design

and sustainability, D3 – Protecting living conditions, D4 – Air Quality, NE1 – Landscape and environmental protection, NE3 - Biodiversity and NE9 - Contaminated in the Preferred Options will also ensure that these issues are considered at application stage.

**Option (c) Urban extensions on greenfield land adjoining existing towns**

**Conclusions**

- This option will still clearly involve major development on greenfield sites. This in turn is likely to have significant impacts on access to green spaces, biodiversity and landscape.
- Impacts on biodiversity will depend on location, but if the development is an extension to Stevenage, the BAP indicates that the area west of Stevenage (Great Offley/Preston/Knebworth) is high in biodiversity.
- Impacts on landscape will also depend on the location of development. If it is an extension to Stevenage or Luton, this is likely to have a significant impact on the landscape of the area which has high recreational and amenity value, and provides an opportunity to be in contact with wildlife and wild places.
- New development will inevitably involve increased light and air and noise pollution from traffic. In particular an extension to Luton or Stevenage would result in significant loss of tranquillity in the area. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
- The impacts on travel are complex. The urban extension will provide an opportunity to include community facilities for the new population and potentially new public transport infrastructure. If this was done, the impact could be positive. If the extension is located next to Stevenage or Luton, and appropriate public transport is provided, this could also have a positive impact in providing sustainable access to services in the two cities. However, 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town.
- New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District's ability to respond to climate change.
- The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.

**Recommendations for changes to this option and need for additional data:**

- Undertake detailed research to determine the impacts on landscape, biodiversity and groundwater in specific locations.
- No changes are recommended, within the parameters of the requirement to provide extra housing

**NHDC response 2007**

This option forms part of the solution to the housing question, as required by the East of England Plan. Detailed works are underway as preparatory work for the Stevenage Area Action Plan which will establish which individual pieces of land are developed.

**NHDC response 2014**

This option remains part of the solution to the housing question, albeit that since 2007 additional urban extensions have been identified in places other than Luton and Stevenage

through the Housing Options and Housing Additional Location Options consultations. The East of England Plan, having been revoked, is no longer prescribing where strategic development should be taking place, therefore the local authority has a greater degree of freedom regarding where it allocates additional housing.

The constraints matrix has identified potential impacts of these additional sites. Detailed landscape assessments have been undertaken for each of the strategic sites as well. A list of supporting evidence undertaken on the preparation of the Preferred Options is attached at Appendix 3.

**Option (d) Build a new settlement**

**Conclusions**

- This option will still clearly involve major development on a greenfield site. This in turn is likely to have significant impacts on biodiversity and landscape.
- Impacts on biodiversity and landscape will depend on the location of development. If it is an area between Baldock and Royston, this area may have a lower amenity and recreational value than some other parts of the District.
- New development will inevitably involve increased light and air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
- The impacts on travel are complex. A new settlement would provide an opportunity to include community facilities for the new population. If this was done, the impact could be positive, provided there is appropriate public transport. If there is rail access, it could support additional commuting by rail. However, 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town
- New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District's ability to respond to climate change.
- The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.

**Recommendations for changes to this option and need for additional data:**

- Undertake detailed research to determine the impacts on landscape, biodiversity and groundwater in specific locations.
- No changes are recommended, within the parameters of the requirement to provide extra housing

**NHDC response 2007**

This option has not been pursued.

**NHDC response 2014**

This option has once again not been pursued. No options for new settlements have been put to the council and with the amount of deliverable land submitted as part the local plan process by developers and landowners, compulsory purchase would not be considered in the public interest.

<p><b>Option (e) Use smaller greenfield sites in the villages</b></p> <p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• This option implies that there would be a number of greenfield developments adjacent to villages, which is likely to have a significant impact on access to green space, biodiversity and landscape. Green space could be provided within the development, but the ability to be in contact with wildlife and wild places will be significantly reduced.</li> <li>• The exact impacts would depend on location, but the BAP indicates that these areas include “areas high in biodiversity”, key areas for farming wildlife and key grassland habitats. Taken together, the developments are likely to have a significant impact on landscape. Some of the areas around villages are in or close to the AONB.</li> <li>• Locating developments adjacent to villages is likely to increase the need to travel, as there are currently few services and jobs in the villages, and it is unclear whether the new developments would be large enough to provide the new services and jobs needed. However, it is possible that the development could result in the size of the village increasing to a scale where it can support additional services and public transport provision</li> <li>• This option should have a positive impact on the provision of services in rural areas.</li> <li>• New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District’s ability to respond to climate change.</li> <li>• The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.</li> </ul> <p><b>Recommendations for changes to this option and need for additional data:</b></p> <ul style="list-style-type: none"> <li>• Undertake detailed research to determine the impacts on landscape, biodiversity, travel and groundwater in specific locations.</li> <li>• No changes are recommended, within the parameters of the requirement to provide extra housing</li> </ul>
<p><b>NHDC response 2007</b> This option has not been pursued.</p>
<p><b>NHDC response 2014</b> This option has once again not been pursued specifically; however there is more development in the district’s villages based on the amount of sites that have been submitted in these locations and the site’s suitability based on the services that exist. This provides an overlap with the villages spatial option below.</p>

**2. How to identify which villages within the rural area might be able to accommodate development**

<p><b>Option (a) Identify villages which may take further development based on the level of facilities in the village.</b></p>
<p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• This option would have a positive impact on the key sustainability issues of minimising development on greenfield land and protecting landscapes.</li> <li>• It would have an adverse impact in terms of generating more and longer car journeys</li> </ul>

and therefore add to greenhouse gas emissions. This would work against the North Herts targets to: reduce the distance travelled per person by 5% by 2021; reduce the car use modal share from 72.07% to 65.5% by 2021.

- But there is uncertainty about the extent to which this option would generate new journeys. This would require more information on: the type of facilities that would be considered; the proposed levels of development and in which villages; and modelling to predict the likely journey generation.
- It is likely that this option would prevent the development of affordable housing in some villages where there is a demand for more affordable housing, but to be certain this would require further analysis of the Housing Needs data.

#### **Recommendations for changes to this option and new data needs**

- Clarify what types of facilities would be considered and therefore which villages would be expected to accommodate development. The choice of facilities should include public transport links and other facilities which studies have shown generate longer and the most frequent journeys.
- Clarify if certain types of development, e.g. tourism, affordable housing, or housing to meet local needs, would be favoured in the villages.
- Based on the above information model the likely impact on journeys and modal share. Use the Housing Needs study database to analyse which (if any) villages with a significant demand for more affordable housing would be prevented from accommodating more affordable housing under this option.

#### **NHDC Response 2007**

This is the preferred option. The Preferred Options Paper defines a list of villages based on those which have schools: Ashwell, Barkway, Barley, Graveley, Hexton, Ickleford, Kimpton, Breachwood Green, Great Offley, Oaklands/Mardley Heath (part), Pirton, Preston, Reed, Sandon, St Ippolyts/Gosmore, Whitwell, Therfield, Weston and Little Wymondley.

New development is not anticipated to be in significant numbers. In essence, these villages will have a boundary drawn around their existing built up areas within which infill development is acceptable. Where this is inadequate to meet local needs, land will be released outside that village boundary. The North Hertfordshire villages tend to be more expensive than the towns and are therefore finding it harder to retain young families, which is leading to a skewed age population.

On the need to travel, modelling to show modal share arising from new development in these villages would give an incomplete answer. One justification for allowing additional development in these villages is in order to safeguard existing facilities. Using the schools as an example, villages without schools export all their children every day to other villages or towns for schooling. If the schools in any of these villages closed, there would be a significant increase in journeys to and from these villages. A small amount of additional development as infill or for local needs (which would by definition be for people who already live or work in the area) will therefore give a small increase in travel, but may prevent the even larger increase in travel that would arise if the schools closed.

On social and economic aspects of sustainability, village schools act as a focus point for the villages and ensure that villages continue to attract and retain young families, which prevents them stagnating as dormitories for older families and retirees. Schools also provide local employment.

#### **NHDC response 2014**

This is still the preferred option. The preferred options local plan in HDS2 Settlement Hierarchy lists the villages where general development will be allowed, based on those which have schools: Category A villages 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 and Whitwell.

HDS2 Settlement Hierarchy also allows infilling in the built core of the village in category B, based on facilities within the villages which are Balckmore end, Clothall, Great Wymondley,

Hinxworth, Holwell, Kelshall, Lilley, Newnham, Old Knebwoth, Peters Green, Radwell, Rushden, Wallington; and Willian.  
HDS2 Settlement Hierarchy also allows only affordable housing in category C villages where there is a proven need in Bygrave, Caldecote, Langley and Nuthampstead.

**Option (b)** Identify villages which may take further development based on the population of the village.

**Conclusions**

- This option would have a very similar impact to option (a) if there is a significant correlation between villages with larger populations and villages with more services and facilities.
- If there are a number of villages with higher populations but relatively poor access to services and facilities, then this option is likely to have a more severe impact on the key sustainability issue of trip generation than option (a). However, if the villages with higher populations are also those with better public transport links, then this option could have a less severe impact on trip generation than option (a).
- It is likely that this option would prevent the development of affordable housing in some villages where there is a demand for more affordable housing, but to be certain this would require further analysis of the Housing Needs data.

**Recommendations for changes to this option and new data needed**

- Clarify which villages, on the basis of population size would be expected to accommodate development and how much housing they could accommodate without damaging character. (This information could probably be derived from the Housing Capacity Study.)
- Investigate the availability of facilities and public transport links in these villages.
- Clarify if certain types of development, e.g. tourism, affordable housing, or housing to meet local needs, would be favoured in the villages.
- Based on the above information model the likely impact on journeys and modal share.
- Use the Housing Needs study database to analyse which (if any) villages with a significant demand for more affordable housing would be prevented from accommodating more affordable housing under this option.

**NHDC response 2007**

This option has not been pursued.

**NHDC response 2014**

This option has once again not been pursue, based on the potential allocation of sites in locations without the appropriate services and facilities, this would not constitute sustainable development.

**Option (c)** Identify villages which may take further development based on the desires of the parish council and the residents of the village.

*Note: This option reflects the approach taken in the current plan, i.e. it is the “business as usual” option.*

**Conclusions**

- It is very difficult to predict the impact of this option because it would depend on the decisions of parish councils and residents. There is no guarantee that their decisions would be based on the need for housing, rural diversification, services or facilities.
- This option could have an adverse impact on the objective of “sharing access to services and the benefits of prosperity fairly” if the parish council and residents did not consider the needs of the more deprived members of their community.

**Recommendations for changes to this option and new data needed**

- Include an explanation of how parish councils and residents would be expected to reach

decisions, e.g. if there decisions should be backed up by evidence of need, availability of facilities, and how they would involve and consider the needs of the more deprived members of their community, as well as the needs to protect biodiversity and local character.

**NHDC response 2007**

This option has not been pursued.

**NHDC response 2014**

This option has not been explicitly pursued, although through neighbourhood plans, there is the opportunity for parishes to bring forward development as long as the neighbourhood plan is in accordance with the local plan.

**Option (d) Do not identify specific villages and allow some development in all villages.**

**Conclusions**

- This option would have a positive impact on the key sustainability issues of minimising development on greenfield land and protecting landscapes. The extent of this impact would depend on the amount of development allowed in the villages.
- It would have an adverse impact in terms of generating more and longer car journeys and therefore add to greenhouse gas emissions, especially as this option would allow development in villages with poor public transport and facilities. This would work against the North Herts targets to: reduce the distance travelled per person by 5% by 2021; reduce the car use modal share from 72.07% to 65.5% by 2021.
- It could also increase the number of households with poor access to services and facilities.
- It is not clear if this option would support the key sustainability issues of providing more affordable housing. This would depend on the kind of development that was permitted or encouraged under this option.
- There is uncertainty about how much this option would generate new journeys. This would require more information on: the amount of development allowed in each village; modelling to predict the likely journey generation.

**Recommendations for changes to this option and new data needed**

- Clarify how much new development would be allowed in each village under this option, and what proportion of the development would be for affordable housing.
- Based on the above information model the likely impact on village character, journeys and modal share.

**NHDC response 2007**

This option has not been pursued.

**NHDC response 2014**

This option has once again not been pursued based on the potential allocation of sites in locations without the appropriate services and facilities, this would not constitute sustainable development.

**Option (e) Do not allow any development in any village.**

**Conclusions**

- This option is likely to have a very negative impact on the key sustainability issues of promoting rural tourism, protecting greenfield land and landscapes, providing affordable housing, and improving access to facilities in rural areas, including health and educational facilities.
- It would have a positive impact on the key sustainability issues of minimising new trip generation and greenhouse gas emissions.
- It may also have a negative impact on community cohesion.

**Recommendations for changes to this option and new data needs**

- This option is adapted to allow the development of small scale community services, facilities and meeting places, including schools and health facilities, designed to serve

the needs of existing village residents only.

**NHDC response 2007**

This option has not been pursued.

**NHDC response 2014**

This option has once again not been pursued as it would not allow villages to grow and support local services and facilities.

#### 4.1 Location of additional employment land

**Option (a)** No new Employment Areas should be designated and there should be no expansion of existing ones.

**Conclusions:**

- Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.
- The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result increased travel to work by car, and increased impact on global warming. This would work against the District's targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. It is recommended that the employment land study examine this issue.
- Likewise it is difficult to assess the impact on disadvantaged communities. This depends whether provision of sites in Letchworth and Hitchin is sufficient to meet employment needs of those communities. It is recommended that the employment study address this issue. However, provision of sites alone will not ensure that the jobs go to local people.
- This option will have a positive impact on the protection of greenfield land.

**Recommendations for changes to this option and need for additional data**

- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
- The need for additional employment land to ensure that the increased population from the new housing is able to work locally
- How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.

The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.

**NHDC Response 2007**

None required.

**NHDC response 2014**

This option has once again not been pursued as it would not allow for growth of the North Hertfordshire economy. The Employment Land Review (2013) and Employment Background Paper (2014) identifies a requirement for employment land over the plan period. Not identifying enough land to meet this requirement will be damaging to the economy and wont deliver jobs alongside residential development.

**Option (b)** Completely new Employment Areas should be designated, but only within existing settlements.

**Conclusions:**

- Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.
- The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result increased travel to work by car, and increased impact on global warming. This option would therefore have a positive impact. This

would contribute to the District's targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. It is recommended that the employment land study examine this issue.

- If this option includes the 14 villages, it could help improve access to village employment (if there are any available sites within the villages), and improve village services.
- This option will have a positive impact on the key sustainability issue of use of greenfield land, assuming that "within existing settlements" means on brownfield sites .
- New employment provision will use water and other resources.
- The impact on town centres depends on location of new sites and the employment classes allowed

**Recommendations for changes to this option and need for additional data**

- Clarify that "within existing settlements" means on brownfield sites
- Clarify whether "existing settlements" includes the 14 villages

It is recommended that the employment study examine the following issues:

- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
- The need for additional employment land to ensure that the increased population from the new housing is able to work locally
- How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.

The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.

**NHDC Response 2007**

The Preferred Options policy on the scale and location of new employment provision will clarify where any additional employment land may be allocated.

**NHDC response 2014**

This option forms part of the preferred options. There is no additional need for new employment areas, but within the strategic sites we will work with neighbouring authorities if appropriate to potentially identify new employment areas. No additional requirement has been factored into the calculations for the urban extensions identified in the draft local plan. It is unlikely that employment land is likely to be delivered in the Letchworth, North of Stevenage or Baldock strategic sites based on discussions with landowners / developers. A large part of the East of Luton area has a detailed planning application, which mostly encompasses housing. The location of the remainder of the site and its associated access routes does not lend itself to employment development. Therefore if any additional employment land does come forward it is unlikely to be large in scale.

**Option (c)** Completely new Employment Areas should be designated within or adjoining existing settlements.

**Conclusions:**

- Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.
- The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result increased travel to work by car, and increased impact on global warming. This option would therefore have a positive impact, which would be increased by provision of adequate public transport to the sites. This would contribute to the District's targets to reduce the distance travelled per person by 5% by

2021 and reduce car use overall. It is recommended that the employment land study examine this issue.

- If this option includes the 14 villages, it could help improve access to village employment and services(if there are any available sites within the villages).
- This option will have a negative impact on the key sustainability issues of use of greenfield land and protection of biodiversity.
- New employment provision will use water and other resources.
- The impact on town centres depends on location of new sites and the employment classes allowed

**Recommendations for changes to this option and need for additional data**

- Clarify that “within existing settlements” means on brownfield sites
- Clarify whether “existing settlements” includes the 14 villages

It is recommended that the employment study examine the following issues:

- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
- The need for additional employment land to ensure that the increased population from the new housing is able to work locally
- How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.

The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.

**NHDC Response 2007**

The Preferred Options policy on the scale and location of new employment provision will clarify where any additional employment land may be allocated.

**NHDC response 2014**

This option has once again not been pursued as no sites have been submitted that meet this criteria.

**Option (d)** There should be extensions to existing Employment Areas, but only within existing settlements.

**Conclusions:**

- Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.
- The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result increased travel to work by car, and increased impact on global warming. This option would therefore have a positive impact, which would be increased by provision of adequate public transport to the sites. This would contribute to the District’s targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. It is recommended that the employment land study examine this issue
- It is also difficult to assess the impact on disadvantaged communities. Current sites are in the four main towns. In theory, new sites this could provide more jobs for unemployed people in Hitchin and Letchworth particularly but there is no guarantee that the jobs would go to local people.
- This option will have a positive impact on the key sustainability issue of use of greenfield land, assuming that “within existing settlements” means on brownfield sites .
- New employment provision will use water and other resources.
- The impact on town centres depends on location of new sites and the employment

classes allowed

**Recommendations for changes to this option and need for additional data**

- Clarify that “within existing settlements” means on brownfield sites
- It is recommended that the employment study examine the following issues:
- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
  - The need for additional employment land to ensure that the increased population from the new housing is able to work locally
  - How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.

The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.

**NHDC Response 2007**

The Preferred Options policy on the scale and location of new employment provision will clarify where any additional employment land may be allocated.

**NHDC response 2014**

This option has once again not been pursued in isolation as whilst there is one site that fulfils this criteria it doesn't provide enough employment land to meet the requirements for employment land as set out in the Employment Land Review (2013) and Employment Background Paper (2014).

**Option (e)** There should be extensions to existing Employment Areas within or adjoining existing settlements.

**Conclusions:**

- Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.
- The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result in increased travel to work by car, and increased impact on global warming. This option would therefore have a positive impact, which would be increased by provision of adequate public transport to the sites. This would contribute to the District's targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. It is recommended that the employment land study examine this issue
- It is also difficult to assess the impact on disadvantaged communities. Current sites are in the four main towns. In theory, new sites could provide more jobs for unemployed people in Hitchin and Letchworth particularly but there is no guarantee that the jobs would go to local people.
- This option will have a negative impact on the key sustainability issues of use of greenfield land and protection of biodiversity.
- New employment provision will use water and other resources.
- The impact on town centres depends on location of new sites and the employment classes allowed

**Recommendations for changes to this option and need for additional data**

- Clarify that “within existing settlements” means on brownfield sites
- It is recommended that the employment study examine the following issues:
- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
  - The need for additional employment land to ensure that the increased population from the

<p>new housing is able to work locally</p> <ul style="list-style-type: none"> <li>• How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.</li> </ul> <p>The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.</p>
<p><b>NHDC Response 2007</b></p> <p>The Preferred Options policy on the scale and location of new employment provision will clarify where any additional employment land may be allocated.</p>
<p><b>NHDC response 2014</b></p> <p>As was the case in 2007, this is the preferred approach. Preferred sites are identified adjoining existing employment areas inside and outside of current settlement boundaries.</p>

<p><b>Option (g) No formal policy</b></p> <p>Note: this is an additional option, reflecting current practice, added to the options included within the Options report. The SEA Directive requires that current practice (“business as usual”) be appraised.</p> <p>In the appraisal of this option, we have assumed that having no formal policy would therefore result in the designation of no new employment land.</p> <p>It should be noted also that there is no option (f) to appraise, as option (f) is simply “other” in the options report</p>
<p><b>Conclusions:</b></p> <ul style="list-style-type: none"> <li>• Although there is currently an overall surplus of employment land at County level, the key issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land. It is recommended that the employment study address this issue.</li> <li>• The impact on journeys by car depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. It seems likely that without provision of additional employment land, the increased population will result increased travel to work by car, and increased impact on global warming. This would work against the District’s targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. It is recommended that the employment land study examine this issue.</li> <li>• Likewise it is difficult to assess the impact on disadvantaged communities. This depends whether provision of sites in Letchworth and Hitchin is sufficient to meet employment needs of those communities. It is recommended that the employment study address this issue. However, provision of sites alone will not ensure that the jobs go to local people.</li> <li>• This option will have a positive impact on the protection of greenfield land.</li> </ul> <p><b>Recommendations for changes to this option and need for additional data</b></p> <p>It is recommended that the employment study examine the following issues:</p> <ul style="list-style-type: none"> <li>• Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land</li> <li>• The need for additional employment land to ensure that the increased population from the new housing is able to work locally</li> <li>• How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.</li> </ul> <p>The sustainability of all the options for this issue depends on the outcome of the employment study. Therefore no changes are recommended at this stage.</p>
<p><b>NHDC Response 2007</b></p> <p>None required.</p>
<p><b>NHDC response 2014</b></p>

This option has once again not been pursued as it would create unplanned development in potentially unsustainable locations.

## Appendix 2: Strategic Development Options in relation Green Belt and non Green Belt Land

<b>Option (A) Review Green Belt to meet development need within District Boundary</b> This option also assumes a degree of development outside of Green Belt areas in addition to the sites within the Green Belt.				
	<b>What is predicted effect of the option on each SA objective?</b>			<b>Explanation and suggestions for how the option could be made more compatible with the SA objectives.</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	√	√	<p>The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing.</p> <p>Strategic Green Belt sites may also contribute to viability of local services.</p> <p>New employment development in the Green Belt will deliver new jobs in North Hertfordshire.</p>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	X	XX	This option will involve significant development on greenfield sites. Most Green Belt sites are located in greenfield locations.
2(b) Provide access to green spaces	?	√ ?	√ ?	<p>Many of the Green Belt sites adjoin existing settlements, meaning that open countryside is further away for existing residents.</p> <p>All new development will be required to provide greenspace as defined in policy HC2: Green space and to provide green infrastructure as outlined in policy NE2: Green infrastructure, and policy ID2: Masterplans requires masterplans for key strategic sites which will address open space provision. There are significant opportunities for the strategic sites to enhance and improve links to the countryside and to connect with new and existing green infrastructure.</p>
2 (c) Deliver more	√ ?	√ ?	√	Development located in and around

sustainable location patterns and reduce the use of motor vehicles				<p>existing towns may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth. The strategic sites are likely to be able to support new or improved bus services, footpaths and cycleways. They are also likely to be able to provide significant levels of service within the site.</p> <p>The provision of additional employment land in areas removed from the Green Belt could increase the possibility that more residents may work locally.</p>
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	X?	XX	This option will involve significant greenfield development around towns and villages. The BAP indicates that these areas include "areas high in biodiversity", key areas for farming wildlife and key grassland habitats.
3(b) Protect and enhance landscapes	0	X?	XX	The precise impact of the Green Belt development will depend on the location of development. Some of the sites around towns and villages are in or close to the AONB. The likelihood is that large sites adjoining existing settlements in the Green Belt will have a significant impact on landscape
3(c) Conserve and where appropriate, enhance the historic environment	?	X?	X?	The precise impact of the Green Belt development will depend on the location of development. However, development, wherever located, is likely to have some affect on the historic environment.
3(d) Reduce pollution from any source	X	X	X	New development will inevitably involve increased light, air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X?	X?	X?	New development is likely to result in increased car journeys, and add to greenhouse gas emissions.
4(b) Improve the	?	X?	X?	Partly depends on design and location

District's ability to adapt to climate change				of developments. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure, as described below.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√ ?	√ ?	√ ?	Depends whether development contributes to regeneration in Letchworth and Hitchin. Review of Green Belt adjoining these towns has the potential to contribute.
5(b) Provide access to services and facilities for all	√	√	√	Development in villages should support rural services.
5(c) Promote community cohesion	√	√	√	Focusing development in existing settlements should retain community cohesion, provided community facilities are provided for increased population.
5(d) Increase access to decent and affordable housing	√	√	√√	The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.
5(e) Reduce crime rates and fear of crime	?	?	?	Depends on design of new developments
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	× ?	× ?	Could result in increased noise and pollution from traffic in settlements
5(g) Increase participation in education and life-long learning	0	0	0	N/A
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	N/A
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	×	× ×	× ×	New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around

				127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs.
6(b) Reduce waste	?	X?	X?	New households will clearly produce additional waste. Exact impact depends on arrangements for recycling and composting.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Focusing development on existing towns and villages with appropriate services should support the viability of town centres and services provided there.
<p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• This option will involve significant development on greenfield sites. This in turn is likely to have significant impacts on biodiversity and landscape.</li> <li>• Focusing development in and around existing towns may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth.</li> <li>• New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum</li> <li>• The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.</li> <li>• Development in town and village will help support services, facilities and aid with regeneration.</li> </ul> <p><b>Recommendations for changes to this option and need for additional data:</b></p> <ul style="list-style-type: none"> <li>• Need to determine the impacts on landscape, biodiversity and groundwater in specific locations if option is taken forward.</li> <li>• No changes are recommended, within the parameters of the requirement to provide extra housing.</li> </ul>				

<b>Option (Bi) Focus development in non-Green Belt areas, potentially compulsorily purchasing land to seek to meet identified housing need and do not review the Green Belt.</b>				
	<b>What is predicted effect of the option on each SA objective?</b>			<b>Explanation and suggestions for how the option could be made more compatible with the SA objectives.</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	X	X	<p>Meeting provision within the district boundary may mean that there is a positive impact on affordability. However, this option would effectively skew the distribution of growth in the non-Green Belt parts of the district, primarily in the east, whilst limiting growth in other areas. This may lead to distortions, with some areas able to meet needs and others not. It also significantly increases the likelihood that the level of need will fail to be met, by essentially relying on just a couple of parts of the district to meet all the needs. The scale of growth that would be required in the non-Green Belt areas would be so high that the chances of it failing to deliver on time are high.</p> <p>Lack of growth, other than within settlement boundaries and in areas outside Green Belt will not support existing services in most areas of the district.</p> <p>Existing employment areas will come under increasing pressure for residential development in light of Government changes to Permitted Development Rights.</p>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	X	XX ?	<p>Whilst this option will protect large areas of Green Belt in the district, it will involve the development of unfavourable sites in the rural area beyond the Green Belt and in urban areas. A number of these sites have high environmental and amenity value.</p>

				Additional land will be required in areas beyond the Green Belt with unknown impacts on this criterion.
2(b) Provide access to green spaces	?	?	×?	<p>Access to existing countryside will largely remain for existing residents, although for the rural area beyond the Green Belt the quantum of development will impact negatively.</p> <p>All new development will be required to provide greenspace as defined in policy HC2: Green space and to provide green infrastructure as outlined in policy NE2: Green infrastructure.</p> <p>Additional pressure may be placed on existing open spaces within settlements.</p> <p>Additional land will be required in areas beyond the Green Belt with unknown impacts on this criterion.</p>
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√?	×	××? ?	<p>Development located in existing towns and settlements may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth.</p> <p>Assuming the needs for development have arisen evenly from across the district, this option seeks to focus most growth into the non-Green Belt areas. Consequently the likelihood is that people will have increased need to travel into the parts of the district constrained by Green Belt and beyond.</p> <p>This option will involve the development of unfavourable sites in the rural area beyond the Green Belt, some of which are in unsustainable locations without appropriate road network and infrastructure. This will not deliver sustainable patterns of development</p>
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance	√	?	××? ?	Whilst this option will protect the Green

biodiversity				<p>Belt and the areas around the towns and villages, the rural area beyond the Green Belt will be under increased pressure for development as will the urban areas. Therefore impact on biodiversity in these areas may create issues later in the plan as development will not be spread around the district it will be focussed on certain areas.</p> <p>Additional land will be required in areas beyond the Green Belt with unknown impacts on this criterion, however greenfield sites will be required which will very likely have detrimental impacts on the environment.</p>
3(b) Protect and enhance landscapes	√	?	XX ?	<p>Whilst this option will protect the Green Belt and the areas around the towns and villages, the rural area beyond the Green Belt will be under increased pressure for development as will urban areas. Therefore impact on landscapes may occur later in the plan as development will not be spread around the district it will be focussed on certain areas. Given the relatively little scope for urban extensions to the south of Royston, this option would require significant development of what is currently quite remote landscape and countryside.</p> <p>Some of the land around villages not located in the Green Belt are in or close to the AONB.</p> <p>Additional land will be required in areas beyond the Green Belt with unknown impacts on this criterion.</p>
3(c) Conserve and where appropriate, enhance the historic environment	?	X?	XX ?	<p>Ultimately whilst this option will protect the Green Belt and the areas around the towns and villages, the rural area beyond the Green Belt will be under increased pressure for development as will urban areas, which is where the majority of conservation areas and listed buildings are located.</p> <p>Additional land will be required in areas beyond the Green Belt with unknown impacts on this criterion.</p>

3(d) Reduce pollution from any source	X	X	X?	<p>New development will inevitably involve increased light and air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.</p> <p>Rather than a spread of development across the district development will be focussed in certain areas, based on the lack of Green Belt designation, therefore additional pressure will be placed on infrastructure and the environment in these areas.</p>
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X?	X?	X?	<p>New development is likely to result in increased car journeys, and add to greenhouse gas emissions.</p> <p>This option will involve the development of unfavourable sites in the rural area beyond the Green Belt, some of which are in unsustainable locations without appropriate road network and infrastructure</p>
4(b) Improve the District's ability to adapt to climate change	?	X?	X?	<p>Partly depends on design and location of developments. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure, as described below.</p>
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0?	0?	0?	<p>Some development may occur within the settlement boundaries to contribute to regeneration in Letchworth and Hitchin, however unlikely to be a suitable scale to contribute to prosperity.</p>
5(b) Provide access to services and facilities for all	√?	0?	X?	<p>Development in villages could support rural services, although it will not involve all villages as development adjoining villages in the Green Belt and those villages without a current boundary in the Green Belt will be excluded.</p>

5(c) Promote community cohesion	√ ?	0 ?	× ?	Focusing development in existing settlements would retain community cohesion, provided community facilities are provided for increased population, however this will not be spread across the district.
5(d) Increase access to decent and affordable housing	√	√	√√	The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.  This will be concentrated in certain areas rather than spread across the district.
5(e) Reduce crime rates and fear of crime	?	?	?	This will depend on design of new developments
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	×?	×?	Could result in increased noise and pollution from traffic in settlements
5(g) Increase participation in education and life-long learning	0	×	×	The district's main further education college, North Hertfordshire College, is based in Hitchin, Letchworth and Stevenage. This option would therefore be diverting growth away from areas where access to further education is greater, thus potentially increasing the need to travel.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	×?	Long term investment in facilities in the towns and villages surrounded by the Green Belt may be lost.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	×	××	××	New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. Environment Agency water

				<p>strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs.</p> <p>This option will involve the development of unfavourable sites in the rural area beyond the Green Belt, some of which are in unsustainable locations and difficult to service without significant investment in infrastructure.</p>
6(b) Reduce waste	?	X?	X?	New households will clearly produce additional waste. Exact impact depends on arrangements for recycling and composting.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	X	X X	<p>Focusing development on existing towns should support the viability of town centres and services.</p> <p>The concentration of development in rural areas beyond the greenbelt will create development in locations away from main settlements, which will not be in sustainable locations.</p>
<p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• Whilst this option will protect Green Belt land in the district it will put additional pressure on rural area beyond the Green Belt and will very likely mean the development of unfavourable, high value sites which may have negative impacts on biodiversity and landscape especially in the long term.</li> <li>• The concentration of development in rural areas beyond the greenbelt will create development in locations away from main settlements, which will not be in sustainable locations increasing the use of motor vehicles.</li> <li>• This option hampers the ability of settlements surrounded by Green Belt to meet their own needs.</li> <li>• The provision of large amounts of new housing is likely to have a positive impact on affordability, particularly if it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers</li> <li>• Increased housing will mean significant increase water use in the District, concentration of development in certain areas of the district will also put increased pressure on infrastructure and the environment.</li> <li>• The requirement to identify sites outside the Green Belt areas to meet housing need will put huge pressure on all criteria. These impacts are largely unknown at this stage, however the land and infrastructure required to meet the housing need will be significant.</li> </ul> <p><b>Recommendations for changes to this option and need for additional data:</b></p> <ul style="list-style-type: none"> <li>• Need to determine the impacts on landscape, biodiversity and groundwater in specific</li> </ul>				

- locations if option is taken forward.
- Unknowns regarding additional land and sites to meet housing need in non-Green Belt areas.
  - No changes are recommended, within the parameters of the requirement to provide extra housing.

**DPD Option (Bii) Focus development in non-Green Belt areas work with neighbouring authorities to accommodate additional need and do not review the Green Belt.**

	What is predicted effect of the option on each SA objective?			Explanation and suggestions for how the option could be made more compatible with the SA objectives.
SA Objectives	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>0</b>	<b>X</b>	<b>X X</b>	<p>The lack of provision of housing to meet an identified need in the district is likely to have a negative impact affordability.</p> <p>Lack of growth, other than within settlement boundaries and in areas outside Green Belt, will not support existing services.</p> <p>Existing employment areas will come under increasing pressure for residential development in light of Government changes to Permitted Development Rights.</p>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	<b>X</b>	<b>0</b>	<p>Whilst this option will protect large areas of Green Belt in the district, it will involve the development of unfavourable sites in the rural area beyond the Green Belt. A number of these sites have high environmental and amenity value.</p>
2(b) Provide access to green spaces	?	√ ?	√ ?	<p>Access to existing countryside will largely remain for existing residents apart from in areas beyond the Green Belt.</p> <p>All new development will be required to provide green space as defined in policy HC2: Green space and to provide green infrastructure as outlined in policy NE2: Green infrastructure although seeking development in neighbouring</p>

				authorities will not facilitate delivery on new open space facilities in North Hertfordshire.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√ ?	× ?	× × ?	<p>Development located in existing towns may reduce the need to travel, as local services will be more accessible, and new residents will be able to use existing public transport, particularly the trains from Hitchin and Letchworth.</p> <p>This option may involve the development of unfavourable sites in the rural area beyond the Green Belt, some of which are in unsustainable locations.</p> <p>Development outside of North Hertfordshire may or may not be in sustainable locations, however, as it is located outside the district it may in fact increase greenhouse emissions as potential residents of North Hertfordshire (our housing need) are forced to other locations to live.</p>
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	×	× ×	<p>This option will involve greenfield development around towns and villages not in the Green Belt. The BAP indicates that these areas include “areas high in biodiversity”, key areas for farming wildlife and key grassland habitats.</p> <p>Development of all sites outside of Green Belt and will mean development of some unfavourable sites, which may have a negative impact on biodiversity.</p>
3(b) Protect and enhance landscapes	0	× ?	× ×	<p>Whilst this option will protect the Green Belt and the areas around the towns and villages, the rural area beyond the Green Belt will be under increased pressure for development as will urban areas. Therefore impact on landscapes may occur later in the plan as development will not be spread around the district it will be focussed on certain areas.</p>

				Some of the land around villages not located in the Green Belt are in or close to the AONB.
3(c) Conserve and where appropriate, enhance the historic environment	?	X?	X	The precise impact of the development will depend on the location of development. However, development of all sites outside of Green Belt and will mean development of some unfavourable sites, which may have a negative impact on the historic built environment.
3(d) Reduce pollution from any source	X	X	X	New development will inevitably involve increased light and air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.  The reduced quantum of development in North Hertfordshire may mean less pressure on receptors, however this
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X?	X?	X?	New development is likely to result in increased car journeys, and add to greenhouse gas emissions.  The location of most development away from major centres in areas beyond the Green Belt will increase car usage. Depending on how far away from the district the needs end up being met, the increased emissions could be highly significant.
4(b) Improve the District's ability to adapt to climate change	?	X?	X?	Partly depends on design and location of developments. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure, as described below.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√ ?	X?	X?	Depends whether development contributes to regeneration in Letchworth and Hitchin.  Development will be located in areas beyond the Green Belt and in adjoining authority's settlements, which may or may not be deprived.

5(b) Provide access to services and facilities for all	√	0	×	Development in villages should support rural services, however the quantum of development in North Herts does not meet needs, therefore appropriate facilities may not be provided.
5(c) Promote community cohesion	√	×	×	Focusing development in existing settlements should retain community cohesion. The reduction in growth in North Herts may mean community facilities are not provided for increased population.
5(d) Increase access to decent and affordable housing	√	×	× ×	The lack of provision of large amounts of new housing to meet identified need in the district is likely to have a negative impact on affordability and will not deliver affordable housing.  Small amounts development in specific locations will not meet housing needs.
5(e) Reduce crime rates and fear of crime	?	?	?	Depends on design of new developments
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	×?	×?	Could result in increased noise and pollution from traffic in settlements.  The quantum of development within the district will be reduced, which may mean impacts are not as large.
5(g) Increase participation in education and life-long learning	0	0	×	Large-scale developments provide the opportunity to deliver schools and additional education facilities. Reduced growth in North Hertfordshire will not deliver this.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	×	Longer term, not meeting identified need may reduce provision of cultural / leisure facilities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	×	×	×	New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian, which covers most of the District of around 127 litres per person per day for metered properties, this would be an

				<p>increased use of 1.838 billion litres per annum. Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs.</p> <p>Development outside the district will still place demands on natural resources.</p>
6(b) Reduce waste	?	X?	X?	<p>New households will produce additional waste. Exact impact depends on arrangements for recycling and composting.</p> <p>Development outside of the district will still produce waste, which will need to be managed.</p>
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	0	X	<p>Focusing development on existing towns and villages should support the viability of town centres and services provided there although this will only be in locations outside the Green Belt.</p> <p>Pushing development outside the district will not aid with sustainable living in North Hertfordshire.</p>
<p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• Not meeting identified need for development within the district will have a significant negative impact on economic growth and affordability of housing.</li> <li>• Development of all non-Green Belt sites will have negative impacts on biodiversity and landscape.</li> <li>• This option hampers the ability of the towns and villages within the Green Belt to meet their own needs.</li> <li>• The reduction in growth in North Herts may mean community facilities and services are not provided for increased population. Having development concentrated in certain areas will also mean that infrastructure is not provided across the district.</li> <li>• Development outside of the district will not aid with sustainable living in North Hertfordshire.</li> </ul> <p><b>Recommendations for changes to this option and need for additional data:</b></p> <ul style="list-style-type: none"> <li>• Need to determine the impacts on landscape, biodiversity and groundwater in specific locations if this option is chosen.</li> <li>• Need to understand the impacts of potential locations in adjoining authorities for development if this approach was accepted.</li> <li>• No changes are recommended, within the parameters of the requirement to provide extra housing.</li> </ul>				

### Appendix 3: List of Background Documents

- Planning Constraints Matrix (NHDC, November 2014);
- Green Belt Review (NHDC, November 2014);
- Housing and Settlement Hierarchy Background Paper (NHDC, November 2014);
- Strategic Housing Land Availability Assessment 2014 Update (NHDC, November 2014);
- Retail Background Paper (NHDC, November 2014);
- Employment Background Paper (NHDC, November 2014);
- Green Space Standards Paper (NHDC, November 2014);
- Gypsy & Traveller Accommodation Assessment (Opinion Research Services, November 2014);
- Whole Plan Viability Study of Local Plan Preferred Options paper (Dixon & Searle Partnership, November 2014);
- Transport Modelling for cumulative impacts of Local Plan Preferred Options paper (AECOM, November 2014);
- Summary of Representations to Previous Consultations (NHDC, November 2014); and
- Site Selection Matrix (outlining how all the other studies have informed the choices of sites proposed in the plan) (NHDC, November 2014).
- Strategic Housing Market Assessment (Opinion Research Services, January 2013);
- Employment Land Review (Regeneris Consulting, February 2013);
- Retail Study (Nathaniel Lichfield and Partners, December 2013);
- Strategic Flood Risk Assessment (July 2008);
- Rye Meads Water Cycle Study (Hyder Consulting, October 2009);
- Royston Sewage Treatment Works Water Cycle Study (NHDC, August 2012);
- Green Space Study (Land Use Consultants, August 2009);
- Green Infrastructure Plan (Land Use Consultants, August 2009);
- Landscape studies for South West of Hitchin, North of Letchworth, East of Luton, Rush Green, North of Stevenage, North East of Stevenage, West of Stevenage, Baldock and Little Wymondley (various authors and dates);
- Habitats Regulations Assessment Screening Report (NHDC, February 2013);
- Infrastructure Delivery Plan (NHDC, January 2013); and
- Infrastructure for larger Additional Location Options (NHDC, July 2013).