

# Public Document Pack

## NORTH HERTFORDSHIRE DISTRICT COUNCIL



21 October 2022

Our Ref    Cabinet/2 November 2022  
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To: Members of the Cabinet:

Councillor Elizabeth Dennis-Harburg, Leader of the Council and Chair of the Employment Committee and Joint Staff Consultative Committee (Chair)  
Councillor Ruth Brown, Deputy Leader of the Council, Executive Member for Planning and Transport  
Councillor Ian Albert, Executive Member for Finance and IT and Chair of Hitchin & Council Tax Setting Committees  
Councillor Judi Billing MBE, Executive Member for Community Engagement, Chair of Standards Committee and Joint Chair of Cabinet Panel on Community Engagement and Cooperative Development  
Councillor Keith Hoskins MBE, Executive Member for Enterprise and Arts  
Councillor Amy Allen, Executive Member for Recycling and Waste Management  
Councillor Steve Jarvis, Executive Member for Environment and Leisure and Joint Chair of Cabinet Panel on the Environment  
Councillor Sean Prendergast, Executive Member for Housing and Environmental Health  
Councillor Ian Mantle, Deputy Executive Member for Planning and Transport (Deputy Executive Member)  
Councillor Sam North, Chair of the Council, Deputy Executive Member for Finance and IT (Deputy Executive Member)  
Councillor Chris Lucas, Deputy Executive Member for Community Engagement (Deputy Executive Member)  
Councillor Tom Plater (Deputy Executive Member)  
Councillor Tom Tyson, Deputy Executive Member for Recycling and Waste Management (Deputy Executive Member)  
Councillor James Denselow (Deputy Executive Member)  
Councillor Alistair Willoughby, Deputy Executive for Housing and Environmental Health (Deputy Executive Member)

### **NOTICE IS HEREBY GIVEN OF A MEETING OF THE CABINET**

to be held in the

**COUNCIL CHAMBER, DISTRICT COUNCIL OFFICES, GERNON  
ROAD, LETCHWORTH**

on

**WEDNESDAY, 2ND NOVEMBER, 2022 AT 7.30 PM**

Yours sincerely,

Jeanette Thompson  
Service Director – Legal and Community

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**Agenda  
Part I**

**Item** **Page**

**1. APOLOGIES FOR ABSENCE**

**2. CHAIR'S ANNOUNCEMENTS**

Climate Emergency

The Council has declared a climate emergency and is committed to achieving a target of zero carbon emissions by 2030 and helping local people and businesses to reduce their own carbon emissions.

A Cabinet Panel on the Environment has been established to engage with local people on matters relating to the climate emergency and advise the council on how to achieve these climate change objectives. A Climate Change Implementation group of councillors and council officers meets regularly to produce plans and monitor progress. Actions taken or currently underway include switching to green energy, incentives for low emission taxis, expanding tree planting and working to cut food waste.

In addition the council is a member of the Hertfordshire Climate Change and Sustainability Partnership, working with other councils across Hertfordshire to reduce the county's carbon emissions and climate impact.

The Council's dedicated webpage on Climate Change includes details of the council's climate change strategy, the work of the Cabinet Panel on the Environment and a monthly briefing on progress.

#### Declarations of Interest

Members are reminded that any declarations of interest in respect of any business set out in the agenda, should be declared as either a Disclosable Pecuniary Interest or Declarable Interest and are required to notify the Chair of the nature of any interest declared at the commencement of the relevant item on the agenda. Members declaring a Disclosable Pecuniary Interest must withdraw from the meeting for the duration of the item. Members declaring a Declarable Interest, wishing to exercise a 'Councillor Speaking Right', must declare this at the same time as the interest, move to the public area before speaking to the item and then must leave the room before the debate and vote.

### **3. PUBLIC PARTICIPATION**

To receive petitions, comments and questions from the public.

### **4. NORTH HERTFORDSHIRE LOCAL PLAN 2011-2031 REPORT OF THE SERVICE DIRECTOR – REGULATORY**

(Pages 5  
- 674)

To provide Members with a summary of the Examination of the Local Plan and the Inspector's Report and to seek approval for the final version of the Local Plan to be presented to Full Council with a recommendation for its adoption

### **5. THERFIELD HEATH SSSI MITIGATION STRATEGY**

(Pages  
675 -  
762)

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**EXTRAORDINARY CABINET  
02 NOVEMBER 2022**

**PART 1 – PUBLIC DOCUMENT**

**TITLE OF REPORT: NORTH HERTFORDSHIRE LOCAL PLAN 2011-2031**

REPORT OF: IAN FULLSTONE, SERVICE DIRECTOR - REGULATORY

EXECUTIVE MEMBER: CLLR RUTH BROWN, EXECUTIVE MEMBER FOR PLANNING & TRANSPORT

COUNCIL PRIORITY: PEOPLE FIRST / SUSTAINABILITY / A BRIGHTER FUTURE TOGETHER

**1. EXECUTIVE SUMMARY**

The purpose of this report is to provide Members with a summary of the Examination of the Local Plan and the Inspector's Report and to seek approval for the final version of the Local Plan to be presented to Full Council with a recommendation for its adoption.

**2. RECOMMENDATIONS**

**That Cabinet recommends to Full Council that:**

- 2.1. The outcomes of the examination set out in the Inspector's Report (IR), attached as Appendix 1, along with his recommended Main Modifications to the Plan, attached as Appendix 2, be noted.
- 2.2. The final version of the North Hertfordshire Local Plan 2011-2031 ('the Local Plan'), attached at Appendix 3, incorporating both the Inspector's Main Modifications and the proposed Additional Modifications, attached at Appendix 4, be adopted as part of the statutory Development Plan for the District.
- 2.3. The Policies Map, illustrated by Appendices 5a to 5g, is adopted in order to give geographical effect to the policies of the Local Plan.
- 2.4. The updated Local Development Scheme, attached at Appendix 6, be approved.
- 2.5. Delegated authority is granted to the Service Director – Regulatory in consultation with the Executive Member for Planning and Transport to make any minor non-material corrections (including but not limited to cosmetic additions or presentational alterations) to the adopted Local Plan or the adopted Policies Map as considered necessary for their publication and publicity in accordance with the relevant regulations.

**3. REASONS FOR RECOMMENDATIONS**

- 3.1. To provide the District with an up-to-date Local Plan in accordance with the requirements of national legislation and policy.

#### **4. ALTERNATIVE OPTIONS CONSIDERED**

- 4.1. None. The Local Plan has completed all of the necessary legal, technical and procedural steps in its preparation and examination. The Secretary of State, through their appointed Inspector, has concluded that the Duty to Co-operate has been met and that, with the recommended main modifications set out in Appendix 2, the North Hertfordshire Local Plan 2011– 2031 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Planning & Compulsory Purchase Act and is sound.

#### **5. CONSULTATION WITH RELEVANT MEMBERS AND EXTERNAL ORGANISATIONS**

- 5.1. Members, external organisations and the public have been consulted, engaged and kept informed throughout the Local Plan process:

- The Local Plan was subject to a number of public consultations prior to submission to the Secretary of State and has been subject to stakeholder and public engagement during the Examination process;
- Cabinet receives regular reports on Strategic Planning Matters within which updates are provided upon the Local Plan. Both the Full Council decision of April 2017 and the Cabinet decision of December 2018 on the proposed Main Modifications requested that Members be kept informed on the progress of the Examination in this way.;
- A Local Plan Project Board was set up in February 2016 to provide the necessary strategic guidance and direction for the production of the Local Plan within the Council; and
- The relevant Executive Members and Deputies (as applicable at the time) have been and are regularly kept up to date with regard the Local Plan at briefings throughout the process.

#### **6. FORWARD PLAN**

- 6.1 This report contains a recommendation on a key decision that was first notified to the public in the Forward Plan on 20 August 2021.

#### **7. BACKGROUND**

- 7.1. Members will be aware that the Local Plan has been developed over a number of years. A timeline of key events in relation to the Examination is set out below but is not exhaustive. Previous reports to Council and Cabinet are listed as background papers and, along with the Council website which contains full details of the Examination, should be referred to for any additional information.

- 7.2. Following several rounds of public consultation between 2013 and 2016, the Local Plan was presented to Full Council on 11 April 2017 seeking approval to submit it to the Secretary of State for Examination. The accompanying report provided an overview of key issues relevant to the Plan. This included, but was not limited to:

- Officers' opinion that the development requirements and sites in the Local Plan had been appropriately identified, were justified by the evidence and represented

an appropriate strategy for future development (Paragraph 8.12 of the April 2017 report);

- That it was appropriate to proceed on the basis of the identified housing target of 14,000 homes to meet North Hertfordshire's own housing needs (Paragraph 8.18);
- That the starting point of any examination is that the local planning authority has submitted a plan which it considers 'sound' and capable of adoption (Paragraph 9.9); and
- That, legally, the Council must submit a plan it considers ready for independent examination (Paragraph 10.3).

7.3. Following the subsequent resolution, the Local Plan was submitted to the Secretary of State – through the Planning Inspectorate (PINS) – in June 2017. The Secretary of State appointed Mr Simon Berkeley BA MA MRTPI to conduct the examination.

7.4. The purpose of the Examination is to determine whether the plan has met relevant legal requirements and is 'sound'. The National Planning Policy Framework (NPPF)<sup>1</sup> defines the tests of soundness as:

- **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework*

7.5. Examination hearing sessions into the legal compliance and soundness of the Plan were held between November 2017 and March 2018 over a total of 25 hearing days.

7.6. Following the hearing sessions, the Council submitted a wide range of additional papers and draft proposed Main Modifications addressing issues raised through the hearing sessions and identified as requiring further work by Mr Berkeley.

7.7. In November 2018, proposed Main Modifications to the Plan were published. Main Modifications are the mechanism by which the Inspector can fix or 'make sound' those parts of the Local Plan which he considers were not fit for purpose in the version of the Plan submitted for examination. These were reported to Cabinet on 10 December 2018 and approved for public consultation.

7.8. Consultation on the proposed Main Modifications took place between January and April 2019. The responses to the consultation were then returned to the Inspector for his consideration.

7.9. In July 2019, and following review of the responses, the Inspector wrote to the Council identifying a series of 'issues and reservations' with the Plan. This included questions on a series of key issues including housing need, Green Belt and the provision of homes to

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<sup>1</sup> The Local Plan was examined against the original, 2012 version of the NPPF.

meet unmet needs from neighbouring Luton. The Inspector wrote a further letter to the Council in August 2019 setting out a range of additional questions. Responses to the Inspector's letters were prepared in consultation with the Local Plan Project Board and submitted to the Inspector in late 2019 for his consideration.

- 7.10. The Inspector reconfirmed his view – first suggested in the July 2019 letter – that further hearing sessions would be required. These were originally scheduled to take place in March 2020. However, following the emergence of Covid-19 and the associated pandemic, these were postponed.
- 7.11. In the Summer of 2020, the Inspector – along with the Inspectors for the examination of neighbouring Central Bedfordshire's new Local Plan – wrote jointly to both authorities asking for additional information following the publication of the new Government data on populations and households.
- 7.12. The hearing sessions were rearranged to commence on 28 September 2020. However, these were again postponed following the calling of an Extraordinary Council meeting to consider the information that had been produced in response to the Inspectors' request above.
- 7.13. The motion to reconsider the Council's position was not successful and the resumed hearings were rescheduled and held between 23 November 2020 and 2 February 2021 across a further 13 days of hearings.
- 7.14. Following the hearings, the Inspector issued a set of proposed Further Main Modifications to the Council. These were reported to Cabinet on 16 March 2021. Public consultation on these and associated supporting documents was held between May and June 2021.
- 7.15. The Inspector's Report (IR) was received by the Council and published on its website on 8 September 2022.

## **8. RELEVANT CONSIDERATIONS**

### The Inspector's report

- 8.1. There are three potential outcomes from a Local Plan examination. The first is that the Plan is found 'sound' and capable of adoption with no further modifications required.
- 8.2. The second is that the submitted plan is unsound, but that the Inspector can remedy this through recommending main modifications so that the plan (as modified) can be found sound.
- 8.3. The third outcome is that the plan is found unsound or legally non-compliant and the Inspector is unable to remedy this. In this instance, the Inspector will ask the local authority to withdraw the plan and / or issue a report setting out their findings.
- 8.4. The IR is attached as Appendix 1. The overall conclusion and recommendation is at the end of the report:

*823. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-*

*adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.*

*824. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that the Duty to Co-operate has been met and that with the recommended main modifications set out in the Appendix the North Hertfordshire Local Plan 2011–2031 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.*

- 8.5. This conclusion is preceded by the Inspector's detailed consideration of procedural matters, legal compliance and 19 key issues of soundness. These range from significant matters of principle, such as overall housing provision and the release of land from the Green Belt, to detailed matters of policy relating to design or the natural environment. The Inspector's Report should be referred to for the full detail of his findings.
- 8.6. The Main Modifications recommended by the Inspector are attached as Appendix 2. These are substantively the same as those consulted upon during the two consultation periods referenced in paragraphs 7.8 and 7.14 above subject to:
- The removal of those potential modifications consulted upon in 2019 or 2021 which the Inspector concludes do not reach the threshold to be considered as Main Modifications (see paragraphs 8.10 to 8.12 below); and
  - A small number of alterations to the text of individual modifications which are specifically identified in the IR with his reasoning.
- 8.7. The Inspector summarises the main modifications as follows in the non-technical summary of the IR:
- *Reducing the objectively assessed need for housing in the district from 13,800 homes over the plan period to 11,500.*
  - *Reducing the Plan's requirement for new housing to meet the district's needs from 14,000 homes over the plan period to 11,600.*
  - *Introducing an updated housing trajectory.*
  - *Basing the calculation of the five-year supply of land for new housing on a three-stepped approach using the 'Liverpool' method.*
  - *Adding a new policy committing to a review of the whole Plan by the end of 2023 at the latest.*
  - *Introducing an additional tier to the settlement hierarchy.*
  - *Introducing a Key Diagram that properly represents the settlement hierarchy and the spatial distribution of development.*
  - *Requiring all strategic housing sites to create integrated, accessible and sustainable transport systems.*
  - *Removing from the Plan housing allocations where development has commenced or been completed.*
  - *Requiring strategic masterplans for the strategic housing sites (and some others).*
  - *Amending and clarifying the approach to, and requirements for, education provision.*
  - *Ensuring that a number of sites create 'defensible' Green Belt boundaries.*
  - *Setting out Garden City design principles against which developments in Letchworth should be considered.*
  - *Making numerous alterations to site-specific policies to ensure their effectiveness.*

- *Modifying numerous development management policies to ensure their effectiveness and consistency with national policy.*
- *A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.*

8.8. These changes reflect the outcomes of the hearing sessions and the information submitted to the Examination. Notwithstanding the number and scope of main modifications, the strategic direction and key principles of the Local Plan presented to Full Council in April 2017 are supported by the IR. These include, but are not limited to:

- That the Local Plan should meet the identified housing, employment and retail needs of the District in full and that the methods used to identify these needs are appropriate;
- That, in meeting the statutory Duty to Cooperate, the Local Plan should identify land to address the unmet housing and employment needs of neighbouring Luton and Stevenage respectively;
- That the proposed sites and allocations identified in the submitted Plan should be used to meet these aims (other than those where development had commenced or completed in the intervening period as above). Notwithstanding the decrease in the overall housing requirement, the Inspector's view is that all these sites are required to maintain supply and meet the housing requirement (including the need for affordable housing) over the plan period, particularly as a number of sites are now expected to only be partially complete by 2031;
- That the necessary 'exceptional circumstances' exist to justify the release of land from the Green Belt to achieve this and to set or amend adjusted Green Belt boundaries around many of the District's settlements;
- That the same 'exceptional circumstances' exist to justify (i) the designation of a significant new area of Green Belt within the District broadly between Hitchin, Luton, Kimpton and the A505 and (ii) the 'safeguarding' of land to the West of Stevenage for potential future development subject to a review of the plan;
- That detailed policy requirements should be set out, both for individual sites and the plan as a whole, to secure new social and green infrastructure to support new development, secure high-quality design and to help mitigate impacts.

The proposed adoption version of the North Hertfordshire Local Plan 2011-2031

8.9. Officers have updated the version of the Local Plan submitted for Examination in June 2017 to incorporate all of the Inspector's Main Modifications.

8.10. In addition to the Inspector's Main Modifications, a number of additional modifications are included in the Local Plan. Additional modifications are changes that can be made to the plan by the Local Authority following the examination and included in the adopted version of the Plan. Additional modifications must not materially affect the policies in the document and normally relate to factual information, the correction of identified errors in the text or other minor typographical changes.

8.11. As set out in paragraph 8.6 above, the Council consulted upon a number of potential modifications to the plan in 2019 and 2021 which the Inspector, in his final report, has concluded did not amount to main modifications (see Paragraph 6 of the IR). These are included as additional modifications instead along with other typographical, factual and

non-material changes. The additional modifications generally reflect information as it stood at the point of the Plan being examined to ensure consistency with the Inspector's findings.

- 8.12. The proposed adoption version of the Local Plan is attached as Appendix 3 with a schedule of the proposed additional modifications attached as Appendix 4.

### Adoption

- 8.13. The Examination of the Local Plan closed on the day the report was issued to the Council. There is no further recourse to the Inspector. The Council now has a binary choice: to adopt the plan in line with the Inspector's recommendations and modifications, or to not adopt it.

- 8.14. The Council must not adopt the Plan unless they do so in accordance with the Inspector's recommended Main Modifications. There is no power for the Council to:

- adopt the Plan whilst rejecting any of the Main Modifications;
- promote and include any alternate main modifications;
- otherwise choose to only partially accept the Inspector's findings; or
- materially change the Plan from the version incorporating the Main Modifications.

- 8.15. Government Planning Practice Guidance is clear in its advice:

*While the local planning authority is not legally required to adopt its local plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound<sup>2</sup>.*

- 8.16. The Council is under a statutory duty to keep its local plan under review. The current local plan dates from 1996 and is severely out-of-date having originally been intended to cover the period to 2001. Its policies were only partially saved in 2007 following changes to the planning system. In March 2020, the Government set a deadline of December 2023 for all Councils to have up-to-date Local Plans in place.

- 8.17. The new, replacement Local Plan has completed all of the necessary legal, technical and procedural steps in its preparation and Examination. It has previously been approved by this Council to be submitted for Examination on the understanding that this would start from a position that the Council considers its plan 'sound' and capable of adoption (echoed in paragraph 3 of the IR).

- 8.18. The Secretary of State, through their appointed Inspector, has concluded that the Duty to Co-operate has been met and that, with the recommended main modifications the Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Planning & Compulsory Purchase Act and is sound.

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<sup>2</sup> Planning Practice Guidance: What needs to be done to formally adopt a Local Plan?, Paragraph: 058 Reference ID: 61-058-20190315, <https://www.gov.uk/guidance/plan-making>

- 8.19. Upon adoption, the new Local Plan would form part of the statutory Development Plan and have full weight in the determination of planning applications. It would immediately supercede and replace the saved policies of the 1996 District Plan No.2 with Alterations.
- 8.20. In light of the above, professional officers' clear recommendation to Members is that the Plan is adopted.

#### The Policies Map

- 8.21. The Council is required to maintain an adopted Policies Map which details geographically how and where the policies in its plan have effect. A set of proposed Policies Maps were submitted to the examination alongside the plan. Potential changes to the maps, reflecting the proposed changes to the relevant written policies, were consulted upon in 2019 and 2021.
- 8.22. The Inspector has no formal powers to recommend modifications to, or adoption of, the Policies Map. However, his report is clear in his expectation that this will occur (Paragraphs 7 to 10 of the IR with the alterations included for completeness in the additional modifications at Appendix 4). The adoption Policies Map is illustrated by Appendices 5a to 5g. It is recommended these are approved alongside the new Local Plan.

#### Local Development Scheme

- 8.23. The Council is required to maintain a timetable for the production of its Local Plan, known as a Local Development Scheme (LDS). The Local Plan must be prepared in accordance with the LDS.
- 8.24. The LDS was last updated in April 2017 alongside the Full Council decision to submit the Local Plan for examination. Due to the extended period of the examination, the dates shown in the adopted 2017 LDS are incorrect.
- 8.25. A revised LDS has been prepared, and attached as Appendix 6 for approval, to reflect the final timetable for the production of the North Hertfordshire Local Plan 2011-2031. It also shows the commitment contained within the new Plan to conduct a review of the whole plan by the end of 2023 at the latest (see paragraph 8.7).
- 8.26. Every care has been taken to accurately transcribe all of the Main Modifications and additional modifications into the final version of the Local Plan. However, a delegated authority is requested for any final non-material amendments or corrections.
- 8.27. The delegation would also apply to the Policies Map. The Policies Map will not necessarily exist as a single 'fixed' or printed document and it may be necessary to present it in different configurations across different media; Members are being asked to approve the geographical extent of the various designations and policies rather than a fixed document. It may also be necessary to make minor corrections to ensure layers precisely follow property boundaries or features, particularly for (e.g.) online maps, land

searches or other digital formats where users can 'zoom in' to much smaller scales than are shown in the appended copies.

- 8.28. Some designations shown on the Policies Map, such as Conservation Areas or Areas of Outstanding Natural Beauty are set under different legislation and / or by organisations other than the Council. These may change as a result of separate processes or decisions that take place over the lifetime of the Plan. These would be updated as required with relevant policies of the Plan applying to their amended extent.

## **9. LEGAL IMPLICATIONS**

- 9.1 The legal framework for the preparation, submission, examination and adoption of Development Plan Documents is set out in the Planning & Compulsory Purchase Act 2004 (as amended) (The Act). Detailed regulatory requirements are contained in the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 9.2 Section 13 of the Act requires the local planning authority to keep under review the matters which may be expected to affect the development of their area or the planning of its development. Section 17 requires that local development documents (of which the Local Plan is one) must also be kept under review and set out the authority's policies relating to the development and use of land in their area
- 9.3 The powers of the Inspector to recommend modifications at the request of the Local Planning authority are established in Section 20 of the Act. The Council requested that the appointed Inspector exercise these powers when the Plan was submitted in June 2017.
- 9.4 Section 23 of the Act states that, where the Inspector recommends Main Modifications, the authority must not adopt the Local Plan unless they do so with those Main Modifications and any additional modifications which (taken together) do not materially affect the policies.
- 9.5 Section 38(3) of the Act sets out that the Development Plan consists of the development plan documents (taken as a whole) which have been adopted or approved in relation to that area along with any neighbourhood development plans which have been made. The associated regulations identify that a local plan is a development plan document.
- 9.6 Section 38(5) of the Act states that, in the event of conflict between policies in the Development Plan, the last document to be adopted takes precedence.
- 9.7 Section 38(6) of the Act states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 9.8 Upon adoption of the Plan, the Council must meet a number of regulatory requirements to publish the Plan and publicise its decision.
- 9.8 There would be a six-week period following any decision to adopt the Plan in which any party aggrieved by the decision could seek to launch a Judicial Review.

## **10. FINANCIAL IMPLICATIONS**

- 10.1. The costs of preparing and examining the Local Plan has been funded through approved budgets set through the annual budget setting process. Where circumstances have meant that spend has been delayed the funding has been put in to a reserve, to then be released when it is needed. In addition to the approved budgets, a potential overspend of approximately £38,000 was estimated in the First Quarter Revenue Budget Monitoring report to Cabinet in September 2022. This is contingent on the final fees from the Inspectorate and parties supporting the Council. Overall since the Full Council decision in April 2017 the total expenditure to date on the Local Plan Examination has been £997k excluding officer time. Since the start of the plan process in 2012, total expenditure excluding officer time is in excess of £1.5 million.

## **11. RISK IMPLICATIONS**

- 11.1. Officers preparing the report are bound by their professional code of conduct to provide their impartial professional judgement. For the reasons given above, officers do not consider there are any reasonable planning or technical grounds to recommend non-adoption or to explore this as a meaningful alternate course of action. Adoption of the Plan is the course of action that best mitigates and removes the risks faced by the Council, as well as providing the opportunities to best shape planning policy.
- 11.2. However, a brief summary of potential implications should Members be minded not to support the recommendation provided. Many issues were explained in depth in the report to Extraordinary Full Council in October 2020 and remain relevant. The following points are by no means exhaustive.
- 11.3. In the absence of an up-to-date plan, the Development Plan for decision-making would remain the saved policies of the 1996 District Plan Second Review with Alterations, (alongside the County Council's Waste & Minerals Plans and any made neighbourhood plans). The District Plan is significantly out-of-date having originally been intended to only cover the period to 2001.
- 11.4. Should the Council resolve to not adopt the Plan as recommended and consequently seek to start again on a replacement, it would not be possible to meet the Government deadline to have an up-to-date plan in place by the end of 2023; the entire evidence base would need to be updated in order to support any new proposals that would need to proceed once more through the statutory stages of preparation and examination. The Secretary of State retains a wide-ranging power to intervene in authorities' whose progress is considered inadequate.
- 11.5. Any replacement plan would need to be prepared against current requirements of national policy and legislation and over a longer period of time (to at least the late 2030s) likely resulting in a pressure to consider further development needs and potential sites to cover this longer period than have already been identified in the Plan as recommended.
- 11.6. The Council would continue to fail to meet key Government measures in relation to both housing supply and housing delivery and would be obliged to consider planning

applications for development favourably under the requirements of national planning policies.

- 11.7. Planning applications have been received on a number of sites proposed for inclusion in the Local Plan and it is officers' professional view that many of these – and potentially other developments in less sustainable locations - would be likely to succeed at appeal. As per 11.4 and 11.5 above, it would be some time before the Council could apply material weight to any replacement strategy. In allowing an appeal on Green Belt land at Heath Lane, Codicote in 2021, the Inspector was clear that the Council's record of housing delivery was "critically inadequate and deteriorating" to the extent that they considered the application was justified "irrespective" of the site's proposed allocation in this Plan as recommended. The costs of trying to resist developments are generally far higher than the cost of proactively negotiating developments with an up-to-date Local Plan.
- 11.8. Without the recommended Plan, the Council would not be able to apply the detailed policies it contains. These require (for example) the provision of up to 40% affordable housing on development sites – compared to the minimum 10% set out in national policy – nor apply detailed site-specific criteria aimed at mitigating potential impacts.
- 11.9. In pursuing Members' direction, Officers and consultants or other representatives would remain bound by their relevant, professional codes of conduct. Officers would objectively explore any matters but could not guarantee that they would ultimately be able to present any recommendations that differed significantly from the current contents and / or principles of the Plan.

## **12. EQUALITIES IMPLICATIONS**

- 12.1. In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.
- 12.2. An Equality Impact Assessment has been produced assessing the plan's compliance with relevant legislation and requirements. The Planning Inspectorate specifically requested that this document accompanied submission of the local plan.
- 12.3. No issues with the Equality Impact Assessment were raised by the Inspector. Paragraph 11 of the IR states:

*I [the Inspector] have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of traveller sites to meet need and accessible and adaptable housing.*

## **13. SOCIAL VALUE IMPLICATIONS**

- 13.1. The Social Value Act and "go local" requirements do not apply to this report.

## **14. ENVIRONMENTAL IMPLICATIONS**

- 14.1. The Local Plan is subject to extensive, statutory environmental assessments which consider the social, economic and environmental implications of proposed policies and allocations.
- 14.2 Under the heading “Assessment of other aspects of legal compliance”, paragraphs 22 and 23 of the IR state:

*22. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under Regulation 19. The appraisal was updated to assess the main modifications.*

*23. The Habitats Regulations Assessment (September 2018) [ED164] includes an Appropriate Assessment. This concludes that subject to main modifications – MM047, MM049 and MM185 – the likely significant effects of the Plan would be mitigated. The addendum to this Assessment supports those conclusions.*

- 14.3 The environmental assessments which informed the examination are available through the website links provided in the background papers below.
- 14.4 A soon as practicable after adoption, the Council is required to publish and publicise the sustainability appraisal / environmental report.

## **15. HUMAN RESOURCE IMPLICATIONS**

- 15.1 None, subject to acceptance of the recommendations. The final steps associated with the adoption and publication of the Plan and publicity would be completed by existing Council staff.

## **16. APPENDICES**

- 16.1 Appendix 1 – North Hertfordshire Local Plan 2011-2031 Inspector’s Report, September 2022
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## 18. BACKGROUND PAPERS

18.1. [Report to Full Council 11 April 2017 - Submission of the Local Plan](#)

18.2. [Report to Cabinet 10 December 2018 - Main Modifications Consultation](#)

18.3. [Report to Extraordinary Full Council 8 October 2020 – Consideration of substantive motion regarding the Local Plan](#)

18.4. [Report to Cabinet 16 March 2021 – Further Main Modifications Consultation](#)

18.5. [North Hertfordshire Local Plan Examination Library](#)

18.6. [North Hertfordshire Local Plan Examination Documents](#)

18.7. [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

18.8. [Sustainability Appraisal Addendum – Proposed Main Modifications](#)

18.9. [Sustainability Appraisal Addendum – Proposed Main Modifications Appendices](#)

18.10. [Sustainability Appraisal Addendum – Further Proposed Modifications](#)

18.11. [Sustainability Appraisal Addendum – Further Proposed Modifications Appendices](#)

- 18.12. [Habitats Regulations Assessment 2018](#)
- 18.13. [Habitats Regulations Assessment 2018 – Appendix 5](#)
- 18.14. [Habitats Regulations Assessment – Addendum Note](#)
  
- 18.15. [National Planning Policy Framework 2012](#)
- 18.16. [National Planning Policy Framework 2021](#)
- 18.17. [Planning Practice Guidance on Local Plans](#)
- 18.18. [Planning Inspectorate Procedure Guide for Local Plan Examinations](#)



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# **Report to North Hertfordshire District Council**

**by Simon Berkeley BA MA MRTPI**

**an Inspector appointed by the Secretary of State**

**Date: 8 September 2022**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the North Hertfordshire Local Plan 2011 - 2031**

The Plan was submitted for examination on 9 June 2017

The examination hearings were held between 13 November and 13 December 2017, 23 January and 27 March 2018, 23 November and 10 December 2020, and on 1 and 2 February 2021

File Ref: PINS/X1925/429/4

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## Abbreviations used in this report

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BCIS	Building Costs Information Service
BRMA	Broad Rental Market Area
EEFM	East of England Forecasting Model
ELR	Employment land review
HMA	The housing market Area
FEMA	The functional economic market area
IDP	Infrastructure Delivery Plan
IDS	Infrastructure Delivery Schedule
LEA	The local education authority
MoU	Memorandum/a of Understanding
NPPF	The National Planning Policy Framework published in 2012
OAN	The objective assessment of housing need
PPG	The Planning Practice Guidance supporting the NPPF published in 2012
SuDS	Sustainable drainage systems
WwTW	Wastewater Treatment Works

## Non-Technical Summary

This report concludes that the North Hertfordshire Local Plan 2011 – 2031 ('the Plan') provides an appropriate basis for the planning of the district, provided that a number of main modifications are made to it. North Hertfordshire District Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings in 2017/2018 and those held in 2020/2021, the Council prepared schedules of the proposed main modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The main modifications were subject to public consultation for periods of at least six weeks. In some cases I have amended the detailed wording of the main modifications and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment, and all the representations made in response to consultation on them.

The main modifications can be summarised as follows.

- Reducing the objectively assessed need for housing in the district from 13,800 homes over the plan period to 11,500.
- Reducing the Plan's requirement for new housing to meet the district's needs from 14,000 homes over the plan period to 11,600.
- Introducing an updated housing trajectory.
- Basing the calculation of the five-year supply of land for new housing on a three-stepped approach using the 'Liverpool' method.
- Adding a new policy committing to a review of the whole Plan by the end of 2023 at the latest.
- Introducing an additional tier to the settlement hierarchy.
- Introducing a Key Diagram that properly represents the settlement hierarchy and the spatial distribution of development.
- Requiring all strategic housing sites to create integrated, accessible and sustainable transport systems.
- Removing from the Plan housing allocations where development has commenced or been completed.
- Requiring strategic masterplans for the strategic housing sites (and some others).
- Amending and clarifying the approach to, and requirements for, education provision.
- Ensuring that a number of sites create 'defensible' Green Belt boundaries.
- Setting out Garden City design principles against which developments in Letchworth should be considered.
- Making numerous alterations to site-specific policies to ensure their effectiveness.
- Modifying numerous development management policies to ensure their effectiveness and consistency with national policy.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 182 of the National Planning Policy Framework 2012 (NPPF) makes it clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. A revised National Planning Policy Framework was published in July 2018 and further revisions were published in February 2019 and July 2021. Paragraph 220 of the latter includes transitional arrangements which indicate that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised national policy, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The North Hertfordshire Local Plan 2011 – 2031, submitted in June 2017, is the basis for my examination. It is the same document as was published for consultation in October 2016.

## Main modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications necessary to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended main modifications are necessary. The main modifications are referenced in bold in the report in the form **MM1**, **MM2/FM1**, **FM2** etc, and are set out in full in the Appendix.
5. Following the various examination hearings, the Council prepared schedules of proposed main modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. Each schedule was subject to public consultation for at least six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken.
6. Some of the modifications put forward by the Council are factual corrections or updates, changes which are consequential to main modifications, or amend typographical or other errors in the Plan. These do not amount to main modifications necessary for soundness, and so I have not recommended them. The Council is entitled to make these and any other additional modifications which (taken together) do not materially affect the policies that would be set out in the Plan if it was adopted with the main modifications.

## **Policies map**

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the "*Proposed Submission Proposals Maps*" [LP2a, b, c, d and e].
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
9. These further changes to the policies map were published for consultation alongside the main modifications. Notwithstanding the preceding paragraph, they were labelled as main modifications, provided with a reference number and included in the draft schedule of main modifications.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the draft schedules of main modifications as identified and explained in this report.

## **Public Sector Equality Duty**

11. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of traveller sites to meet need and accessible and adaptable housing.

## **Assessment of the Duty to Co-operate**

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
13. North Hertfordshire is a generally rural district, much of which is within the Green Belt encircling London. Letchworth Garden City and Hitchin are the district's two largest towns. Luton and Stevenage are broadly to the west and southeast of North Hertfordshire respectively. The local authority administrative areas of both Luton and Stevenage Borough Councils are drawn quite tightly to the built-up area of the two towns, as is the boundary of the Green Belt around them.
14. Housing and employment matters are among the strategic, cross boundary issues of greatest relevance to this Plan. As the Council's hearing statement and its Duty to Co-operate Compliance Statement (June 2017) [SOC1] ('the compliance statement') indicate, the key issues include the identification of the

housing and economic market areas, quantifying the need for development and ensuring that those needs are met. Closely linked to this are the questions of identifying the most appropriate locations for the new development required, and the existence or otherwise of the exceptional circumstances needed to 'release' Green Belt for development.

15. While I consider issues concerning the Housing Market Area (HMA) later, for present purposes it is sufficient to note that the vast majority of North Hertfordshire district is within the Stevenage HMA. A slender tranche to the west lies within the Luton HMA. It is clear that the Council has engaged actively with its neighbours in this regard. North Hertfordshire District, Stevenage and Luton Borough Councils are among a wider consortium of local authorities that jointly commissioned a study to identify and delineate HMAs in the area. Following on from this, the Council and Stevenage Borough Council jointly instructed the undertaking of a Strategic Housing Market Assessment to objectively assess the need for housing across the HMA. Helpfully, it also sets out a recommended apportionment of housing for each of the two local authority areas.
16. There are numerous other strategic, cross-boundary issues relevant to the Duty to Co-operate. They are set out in the Council's compliance statement, as are some of the details about meetings held with the relevant prescribed bodies. The latter provide a good indication that engagement has been constructive, active and ongoing.
17. Perhaps the most telling indicators in relation to the Duty to Co-operate, though, are the number, scope and content of the Memoranda of Understanding (MoU) the Council has entered into with prescribed bodies, along with the actual outcomes in terms of the content of the Plan. It sets out to deliver its portion of housing such that the needs of the Stevenage HMA are met. It also provides land for approximately 1,950 new homes to the east of Luton to help address the unmet needs of that neighbouring borough. Furthermore, it includes sufficient employment land to compensate for the identified shortfall in Stevenage of 11.5 hectares.
18. The provision of new school places required because of the housing proposed by the Plan is an important issue in relation to both the Duty to Co-operate and the soundness of the Plan. Hertfordshire County Council, as the Local Education Authority (LEA), objects to the Plan's proposals for providing school places on various counts and has argued that there has been a failure in relation to the Duty to Co-operate. I disagree. It is clear from the Council's compliance statement that it was fully aware of the LEA's stance at the point of the Plan's submission. The Duty to Co-operate does not demand agreement. Consequently, and considering the evidence of engagement between the two authorities, I do not regard the differences between them, irreconcilable though they may be, to amount to any shortcoming in relation to the Duty to Co-operate. The issues involved are, though, significant soundness matters. I consider them in detail later in this report.
19. In view of the above, and the evidence set out in the Council's compliance statement, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan. I consider that the Duty to Co-operate has therefore been met.

## **Assessment of other aspects of legal compliance**

20. The Plan has been prepared in accordance with the Council's Local Development Scheme.
21. Consultation on the Plan and the main modifications was carried out in compliance with the Council's Statement of Community Involvement.
22. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under Regulation 19. The appraisal was updated to assess the main modifications.
23. The Habitats Regulations Assessment (September 2018) [ED164] includes an Appropriate Assessment. This concludes that subject to main modifications – MM047, MM049 and MM185 – the likely significant effects of the Plan would be mitigated. The addendum to this Assessment supports those conclusions.
24. The Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
25. The Plan, taken as a whole, includes policies designed to ensure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change, notably through its policies relating to flood risk, sustainable drainage systems (SuDS), water efficiency and renewable and low-carbon energy developments.
26. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations (as amended).

## **Assessment of soundness**

### **Main issues**

27. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 19 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors.

### **Issue 1: Whether the Plan's provision for new housing is justified, effective, consistent with national policy and positively prepared**

28. In planning for housing under the transitional arrangements outlined above, local plans should be based on a strategy which seeks to meet objectively assessed housing needs (OAN), including unmet requirements from neighbouring authorities, where it is reasonable to do so and is consistent with achieving sustainable development. The starting point here is to identify the housing market area (HMA), as it is the housing need arising within the HMA that the NPPF says local plans should address. It is then necessary to consider the question of assisting with any unmet needs from neighbouring areas, and any other factors which might lead to setting a housing requirement in the local plan that is different – one way or the other – to the OAN.

29. Having established the housing requirement it is the function of the local plan to provide sufficient land to enable it to be met, including a 'rolling' supply of sites sufficient to provide five years' worth of housing when measured against the overall housing requirement. I consider each of these steps in turn below.

### **The housing market area**

30. The Council considers North Hertfordshire to be predominantly within the Stevenage HMA, but that a limited area of the district to the west is within the Luton HMA. According to the Council's evidence, set out in *Housing Market Areas in Bedfordshire and Surrounding Areas: Report of Findings* (December 2015) [HOU2] ('the HMA Report'), and *Updating the Evidence on Migration* (June 2016) [ED25] ('the Migration Update'), between 98% and 99% of the district falls within the former.
31. The PPG says that HMAs can be broadly defined using information about house prices and their rates of change, household migration and search patterns, and contextual data such as travel to work areas and school and retail catchment areas. The HMA Report considers such factors in line with the PPG.
32. Travel to work patterns are analysed in the HMA Report, using the Travel To Work Areas published by the Office for National Statistics and commuting flow data from the 2011 census as a starting point. It also undertakes more refined modelling using census output areas. These exercises lead to the identification of commuting zones. The vast majority of North Hertfordshire is within the same zone as Stevenage, and a sliver of the district to the west lies within a zone that includes Luton.
33. Turning to household migration, the PPG indicates that, typically, a level of 70% 'containment' – that is, where 70% of household moves are confined within any particular area – represents a high degree of containment. Drawing on information about house moves from the 2011 census, the Migration Update considers the degree to which households are 'contained' within migration zones. Although not especially fresh data, I am told that it is the most up to date available and I have no compelling reason to suppose it is not representative.
34. Of relevance here is that Stevenage and Luton are among the migration zones identified, and North Hertfordshire is predominantly within the Stevenage zone. These zones are broadly reflective of the HMAs ultimately identified. The assessment, in effect, 'tests' the appropriateness of the zones through considering the degree to which they are or are not contained. For each, the analysis takes into account 'supply side' moves (where people already living in the area stay in the area), and 'demand side' moves (where people have moved to the area from elsewhere). To exclude long distance moves as the PPG suggests, moves involving distances of up to 20 miles and up to 50 miles are the focus of consideration.
35. For the Stevenage migration zone, the Migration Update shows that supply side moves exceed 70% containment irrespective of the distance involved. For the demand side, containment is at 80.6% based on the 2011 census data for moves of up to 20 miles. For moves of up to 50 miles, containment is at 68%. For the Luton migration zone, containment is more than 70% 'across the board'.

36. I consider all this analysis to be adequately robust, and that it represents a good indicator of migration trends. While containment for moves of up to 50 miles within the Stevenage migration zone is below 70%, it is only marginally so and, in any event, the PPG does not set this level out as any sort of policy demand or threshold to be applied rigidly. In my view, it clearly indicates a high degree of containment within both the Stevenage and Luton migration zones identified, including within North Hertfordshire.
37. House prices and rental values are considered in the HMA Report, which also draws on the Valuation Office Agency's Broad Rental Market Area (BRMA) boundaries. From Figure 37 of the HMA Report, it is apparent that there are similarities between the BRMA boundaries, and the commuting zones discussed above.
38. Looking at all of this in the round, I am satisfied that the evidence sufficiently supports and justifies the HMA boundaries identified by the Council insofar as they relate to North Hertfordshire. The basis on which the need for housing has been considered is therefore appropriate.

### **The objectively assessed need for housing**

39. On submission of the Plan, the OAN identified by the Council was for 13,800 homes over the Plan period, being 2011 to 2031. This figure stems from 'Updating the Overall Housing Need' (August 2016) [HOU3] ('the OAN Update'). This is, in itself, an update of the Stevenage and North Hertfordshire Strategic Housing Market Assessment Update 2015 [HOU4] ('the SHMA') and is informed by it.
40. The PPG says that:

*"Wherever possible, local needs assessments should be informed by the latest available information. The [NPPF] is clear that local plans should be kept up to date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued."*
41. The OAN figure in the Plan as submitted is founded on 2014-based projections. The soundness of this figure, and the methodology that led to its identification, was considered during the initial hearings in 2017. As set out below, this figure has been superseded by the release of more up-to-date projections and data that support my final findings. However, for the purposes of reaching the conclusions that follow, I consider the original OAN figure of 13,800 was robust on the basis of the evidence at the time.
42. As indicated above, during the examination, national 2016 and 2018-based household projections were published. Consistent with the guidance in the PPG, the Council has considered both. On the basis of 2018-based projections, the Council identifies an updated OAN figure of approximately 11,500 homes and concludes that this represents a meaningful change in the housing situation. Its assessment and reasoning are both set out in its paper 'The 2018-based household projections and Objectively Assessed Need' (August 2020) [ED191A] ('the OAN paper'). I turn now to consider the methodological approach taken to arriving at this new figure and whether the degree of change involved is meaningful in the terms of the PPG.

43. It is clear from the PPG that the nationally published household projections should provide the starting point estimate of overall housing need. The OAN paper considers the 2018-based household projections. Three projections are given. The principal projection is based on a two-year migration trend. The other two are based on five- and ten-year migration trends. There is no indication in national policy or guidance about which is to be preferred in any given situation. The Council has used the ten-year migration trend.
44. Migration is the key factor affecting the projections. At the hearing, the Council described migration levels in the district over the last two years – the length of time used by the national principal projection – as “*close to zero*”. From Figure 8 of the OAN paper, that is not too wide of the mark. But it is evident from the OAN paper that migration in the last two years is far from representative. Neither is the last five years especially characteristic, given the influence of the last two years within that period. It seems to me that if either of these trends were replicated it would likely lead to household formation being suppressed. That would not be appropriate, or consistent with the aim of ensuring that housing needs are met.
45. Additionally, one must bear in mind that the start date for this Plan is 2011. Migration levels during the earlier parts of the Plan period have been significantly higher than the average of the last two and five years. Rather than a projection, this is a reality relating to the first half of the period being considered here and cannot be ignored.
46. Considering these factors, it would be illogical to project forward either the two- or five-year migration trends, and to do so would risk stifling household formation going forward. Taking account of migration figures over a longer period is likely to reduce any skewing of the forward projections by unrepresentative short-term trends. The ten-year trend would be the most effective of the three in this regard. It is therefore, in my view, the most appropriate basis for identifying the OAN for North Hertfordshire.
47. Imbedded within the 2018-based household projections are estimates concerning household formation that draw on census data from the 2001 and 2011 census. The Council's approach, however, is to instead use census data from 1971 to 2011 to determine household representative rates. This reflects the method that was until recently used by the Government in its projections. On the Council's analysis, this leads to the need for an adjustment to the OAN, increasing it by 1,470 households. I consider this to be reasonable and necessary to help ensure that any suppressed household formation within the projections is addressed.
48. I recognise that the United Kingdom's exit from the European Union, along with the Covid 19 pandemic, may affect migration and/or household formation into the future. However, the precise nature and degree of any such effects, and their geographical impacts across the country, cannot currently be determined. To base North Hertfordshire's housing need on such factors at this point in time would be unsubstantiated and unreasonable. In any event, the Council has committed to undertaking a review of the whole Plan by the end of 2023 and has put forward a new policy setting out the detail of this commitment. I discuss this further later in this report. Any significant

changes as a consequence of these or other factors will be addressed through that early review process.

49. A 10% uplift is added to the figures in response to market signals. The SHMA undertakes a 'benchmarking' exercise, comparing house prices, rents, affordability, overcrowding and rates of development in the HMA to a number of identified 'comparator' areas and England as a whole. While the Stevenage HMA is under less housing market pressure than the areas used for comparison, these areas are themselves under greater pressure than the national average. So too is the Stevenage HMA in relation to several indicators, including house prices, rents and affordability. Taking these indicators together, I consider that it is appropriate to include an uplift to the demographically derived household projections in line with the PPG.
50. National planning policy and guidance do not specify the level of uplift that might be appropriate in relation to market signals. However, the analysis in the SHMA considers the whole HMA. The OAN for Stevenage informing its now adopted local plan is predicated on a 10% uplift, and the SHMA indicates that although different, the housing pressures in Stevenage and North Hertfordshire are broadly comparable. In this context, I consider the level of uplift to be reasonable and appropriate.
51. Finally, the SHMA considers any need to alter the OAN in the light of employment trends. On the assumption that out-commuting will remain at roughly the present rate, the SHMA concludes that the demographic projections would provide enough economically active residents to fulfil the jobs in the area. I recognise that this conclusion is drawn on the basis of the OAN and housing requirement on which the Plan was founded on submission. Both have been reduced through the course of the examination. But the proposed supply and anticipated delivery of housing has not. Given this, the SHMA's conclusion remains relevant and is not undermined. In the light of this, I consider that the Plan would lead to an appropriate balance between employment and housing, and therefore no further uplift is required.
52. Overall, much work has been done to assess objectively the need for housing in the HMA and to disaggregate an OAN figure for North Hertfordshire. As the PPG points out, establishing the future need for housing is not an exact science. Assessing objectively the need for housing is not and cannot be an endeavour involving any significant degree of precision – no single approach will provide a definitive answer. In arriving at an OAN of 11,500 homes the Council's analysis has drawn on relevant and appropriate sources, and the inputs and assumptions made are reasonable. In my view, the methodological approach is consistent with national policy and guidance and is satisfactorily robust.
53. The Council says that the 2018-based OAN figure represents a meaningful change in the housing situation when considered against the OAN of 13,800 upon which the Plan as originally submitted was founded. I agree. It is a reduction of 2,300 dwellings, amounting to a change of around 17%. As I see it, this is significant, and I regard it to be meaningful in the context of the figures involved. Consequently, the original OAN figure of 13,800 is not justified, and I consider the OAN for North Hertfordshire to be 11,500 homes for the period 2011 to 2031.

54. The Council has put forward **FM028** and **FM058** to clearly set out the revised OAN within the Plan. Both are necessary to ensure that the Plan is justified.

### **The Plan's housing requirement**

55. Policy SP8 sets out the Plan's housing requirement. It:

- a) adds to the OAN an uplift for older persons' housing;
- b) sets out the resultant figure as the Plan's overall requirement for meeting the district's housing need and commits to releasing sufficient land to meet that requirement;
- c) disaggregates the aforementioned overall requirement for the district into two separate geographic requirements, one for each of the HMAs that North Hertfordshire lies within; and
- d) includes a separate housing requirement to help meet the need for housing in Luton.

I consider each of these elements of the Plan's housing requirement below.

#### The uplift for older persons housing

56. Based on the original OAN of 13,800, the Plan as submitted set an overall housing requirement of 14,000 (excluding the requirement to help meet Luton's housing need). An uplift of 200 homes was added to reflect a proportion of the need identified for communal establishments. In effect, this is an increase to address the need for older people, in recognition of the fact that people are increasingly living in their own homes for longer. I discuss and explain this point in greater detail later. I understand that this is a need for housing that is not otherwise encompassed within the OAN. Whether this increase should be added to the OAN figure or regarded as solely part of the requirement is somewhat academic. It is a type of housing that the Plan must cater for, and I consider the approach taken by the Council to be suitable.
57. In the light of the revised OAN identified, the Council has put forward a revised housing requirement for the district. I consider this shortly. Rather than 200 dwellings, the uplift to address the need for care home bed spaces is reduced to 100. Taking account of the institutional population in the 2018 based projections, this level of uplift is broadly commensurate with that in the Plan as originally submitted and caters for a similar proportion of the identified need. In my view, it is reasonable and justified to include this level of uplift to the OAN within the housing requirement.

#### The housing requirement identified for meeting North Hertfordshire's housing need

58. Paragraph 14 of the NPPF sets out the 'presumption in favour of sustainable development'. For plan making, this means that local plans should meet objectively assessed needs unless:
- a) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF; or

- b) specific policies in the NPPF indicate that development should be restricted.
59. As I have already said, this Plan sets out a housing requirement that aims to meet the objectively assessed need for housing in the district. In the light of the NPPF and, in particular, considering the extent to which land that is currently in the Green Belt is proposed in the Plan for new housing, the fundamental question here is whether it should.
60. I consider Green Belt issues in detail later in this report. For now, it is sufficient to note that:
- a) I consider that land proposed to be 'released' from the Green Belt for new housing would, in many instances, lead to adverse impacts – in the Council's own evidence, many of the proposed housing sites make a significant or moderate/significant contribution to the purposes of including land in the Green Belt; and
- b) notwithstanding the above, I conclude that the exceptional circumstances necessary to justify the alterations proposed to the Green Belt boundaries to facilitate the housing sites proposed in the Plan do exist.
61. On the one hand, it is clear to me that much of the new housing development proposed in this Plan would cause significant harm to the Green Belt. This is a very important factor, and I give substantial weight to it. Some of the new housing would also lead to other negative effects, and I consider these in detail later in this report.
62. On the other hand, though, there are clear benefits to the Plan's approach. It is wholly apparent to me that the need for new homes in North Hertfordshire is both acute and pressing. Delivery has fallen short of identified need for some considerable time, including from 2011 until now – that is, the first half of the plan period. Allowing this pattern to continue would doubtlessly lead to a continued squeeze on the housing market, rising house prices and the continuation of household formation being suppressed. In short, many people seeking to live in their own home within the district would be unable to do so.
63. On this point, there is no realistic or present prospect of neighbouring local authorities helping to meet North Hertfordshire's housing needs. No such assistance has been volunteered in the plan preparation stage, and both Luton and Stevenage have similar Green Belt constraints to new development and little land in their administrative areas beyond that which is already built-up.
64. Moreover, I cannot see how North Hertfordshire's needs could be met within the district without resorting to a significant level of Green Belt 'release'. According to the Council's calculations, the district's 'non-Green Belt capacity' is a little under 6,350 dwellings, including a capacity of around 4,600 within existing urban areas. This is well short of the OAN identified.
65. Perhaps as important as the question of meeting the need for housing is the issue of where those needs are met. This Plan aims to meet them in the district – that is to say, where they arise – and to meet them in a sustainable way. I consider the distribution of new housing below. In summary, I conclude that the Plan aims to locate new homes in the most sustainable

places in the district, and that the distribution proposed represents a sustainable pattern of housing development.

66. The NPPF does not rule out the 'release' of Green Belt land for housing through the plan making process. Paragraph 83 says that "... *Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan*". Whilst this is a high bar, it is not an absolute preclusion. Given my conclusion later in this report that such exceptional circumstances do exist, there is nothing in national planning policy to indicate that the housing allocations proposed in the Plan should be prevented or reduced on Green Belt grounds.
67. Overall, the benefits of meeting the identified need for new homes here, along with those of achieving a sustainable spatial distribution of housing, are factors which I give substantial weight. In my judgement, the adverse impacts to the Green Belt, even in combination with other harm the new housing would potentially cause, would not significantly and demonstrably outweigh these benefits when assessed against the policies in the NPPF taken as a whole, having regard to the conclusions I set out later in this report.
68. It seems to me that the Council's chosen approach of aiming to meet the identified OAN for the district is bold in the face of the adverse Green Belt and other impacts involved but is also justified and consistent with the NPPF. Consequently, I consider the element of the housing requirement that relates to meeting North Hertfordshire's housing needs, including the geographical disaggregation discussed below, to be justified and consistent with national policy, in principle at least.
69. Main modifications are needed, though, to reflect the revised OAN for North Hertfordshire that the requirement aims to meet. Main modification **MM035/FM057** sets this overall figure at 11,600. This is necessary to ensure that this aspect of the Plan's housing requirement is justified. This main modification also clarifies that the figures concerned are net figures, which I agree is necessary for effectiveness.

#### Dividing the district's overall requirement between the two HMAs

70. As originally submitted, Policy SP8 stipulates that of the overall 14,000 housing 'target', 13,800 homes should be within the part of the district that falls within the Stevenage HMA, and 200 dwellings within the sliver of the district that is within the Luton HMA. In my view, this disaggregation of the overall requirement figure between the two HMAs involved is appropriate. It divides the overall requirement for the district based on the resident population of North Hertfordshire living within each of the two HMAs at the time of the 2011 census. As I see it, this exercise is necessary to ensure that housing delivery meets needs where they arise geographically. In the absence of any more scientific or rational method, that is a reasonable approach and is suitable and proportionate to the task.
71. A revision to this split is necessary, though, altering the figures for the Stevenage and Luton HMA areas to 11,500 and 100 respectively. This is because of the revised OAN identified and the consequent reduction in the overall requirement for housing to meet the district's needs. Main modification **MM035/FM057** introduces this change and is necessary.

### Helping to meet the need for housing in Luton

72. As part of the Plan's housing requirement, Policy SP8 commits to providing 1,950 new homes in the part of North Hertfordshire that lies within the Luton HMA to assist with meeting the housing needs of Luton. Of these, as **MM035/FM057** clarifies, around 1,400 are now expected to be delivered in the Plan period. All the part of the Luton HMA that is within North Hertfordshire is within the Green Belt.
73. The Luton Local Plan (2011-2031) was adopted in November 2017. Policy LLP2 identifies the housing need in the borough as 17,800 over the plan period. It makes provision for the delivery of 8,500 homes and recognises that there is an unmet need of 9,300 net additional dwellings. This conclusion was not arrived at lightly – it was justified by Luton Borough Council and subject to scrutiny by an Inspector during an examination where it is clear from the Inspector's report [ED3] that it was key issue. The policy also sets out Luton Borough Council's commitment to work with neighbouring local authorities to help ensure delivery of the borough's unmet needs under the Duty to Co-operate. It says that this work is to be informed by the Luton HMA Growth Options Study (November 2016) [HOU7] ('the growth Options Study').
74. It is clear that there has been a standing commitment both from North Hertfordshire District and Central Bedfordshire Councils to assist Luton Borough Council in relation to meeting its housing need. This has been unambiguously agreed under the Duty to Co-operate. I note the opposition of many in this examination to the Council's offer of assistance. But that is a matter for the Council, providing the approach is adequately justified and therefore sound.
75. However, bearing in mind the guidance in the PPG that I have previously mentioned, it is necessary to consider whether there has been a meaningful change in the housing situation in Luton. This is relevant because if there were to have been a material reduction in the level of unmet need identified in the Luton Local Plan – either because the need itself had reduced or the supply had increased – then this could:
- a) undermine the justification for the element of the Plan's requirement that is intended to assist meeting Luton's needs; and
  - b) affect the existence or otherwise of the exceptional circumstances necessary to 'release' Green Belt land for housing that is intended to address the unmet need.
76. I should say here that it is not for me to determine or reach conclusions about the precise level of housing need or supply in Luton. It is the role of Luton's development plan to set the OAN for the borough and set out the supply anticipated to meet it, and that is not the local plan I am examining. My considerations are limited to a broad 'sense check' of the housing situation in terms of need/unmet need and supply for the reason set out in the preceding paragraph. The following paragraphs should be read in that context.
77. On the question of need, the Council has worked jointly with Luton Borough and Central Bedfordshire Councils to assess the implications of the 2018 projections on housing need in Luton – in effect, to consider what Luton's

housing need figure might be if calculated on the basis of projections that are more recent than those on which the Luton Local Plan is founded. In short, this concludes that a figure of 16,700 would be the most robust at the level of analysis undertaken. That would equate to an unmet need of 8,200 homes, based on the supply anticipated within the Luton Local Plan. Clearly, this is lower than the 9,300 set out in the Luton Local Plan.

78. This exercise has not used the 'standard method' for calculating need that is set out in current national policy and would be used to establish need if Luton Borough Council were to submit a local plan for examination now. However, as I see it, the methodology used allows for a more direct comparison with the established OAN for Luton. As that is the purpose of the task, I consider the approach used to be appropriate and reasonable.
79. Regarding housing delivery in Luton, the agreed position of North Hertfordshire and Luton Borough Councils is set out in a Statement of Common Ground (December 2020) [ED224]. This points to figures in Luton's Strategic Housing Land Availability Assessment (November 2019) [ED189], being the most recent published by Luton Borough Council. It identifies 4,325 net dwelling completions in Luton between 1 April 2011 and 31 March 2019 and anticipates a further 6,578 new homes up to 2031. This amounts to a total of 10,903, which is clearly more than the 8,500 provided for in the Luton Local Plan.
80. I have been provided with volumes of detailed evidence from interested parties about housing delivery and planning permissions granted in Luton. I have taken account of all of this. However, Luton Borough Council is the authority charged with monitoring housebuilding in the borough and collating and analysing relevant associated data. As it is the responsible public authority concerned, I have based my considerations on the figures it has supplied through the Statement of Common Ground.
81. On the one hand, these housing need and supply figures indicate that the housing situation in Luton may have taken a favourable turn since the adoption of the Luton Local Plan, to one degree or another. On the other, though, all these figures remain untested through the scrutiny of examination and, as I have said, drawing firm conclusions on this evidence is outside the scope of my appointment. Consequently, considerable uncertainty remains, particularly regarding future levels of housing delivery in Luton until the end of its plan period.
82. Moreover, I note the point set out in ED189 and reiterated at the hearings. Simply put, while more housing has been delivered in Luton than expected, they are largely the wrong kind of homes. According to Luton Borough Council, 83% of all dwellings completed since 2011 have been for small one- and two-bedroom properties, when the acute need is for three- and four-bedroom family homes and affordable housing. From the Statement of Common Ground, this trend seems likely to continue, and the position in respect of affordable housing delivery also appears equally challenging. Overall, some of the supply provided may not have materially reduced the actual housing need, or at least not to the extent that might be supposed from simply comparing the raw overall numbers.

83. Looking at this issue in the round – albeit through a somewhat cloudy lens – I consider that, for the specific and limited purpose of this examination, the extent of any change in the housing situation in Luton should not be regarded as meaningful. To conclude otherwise would demand a leap of faith that denies the uncertainties involved here and could undermine the attempts of Luton's Local Plan to ensure the delivery of much needed family and affordable housing.
84. Establishing housing need and forecasting future housing delivery is not an exact science and the position and evidence can evolve and change on an almost daily basis, fluctuating one way or the other. However, at some point judgements have to be made. Continually delaying decisions to allow issues to be reconsidered and to wait for new data would mean it would be very difficult to ever adopt a local plan. It would also delay the much-needed delivery of new housing to meet the needs of real people in sensible and appropriate locations as well as prolonging affordability problems.
85. In this context, I consider that neither the 2018 projections nor the updated housing supply position in Luton render outdated the Luton Local Plan or the assessments underpinning it – at least not for the specific and restricted purposes of this examination. It is, therefore, the need and supply position set out in the Luton Local Plan that should form the basis of my considerations. Should it become clear at some point that there has been a significant change it is open to the Council to review the situation and to seek to formally update and change the Plan. Indeed, as I discuss later, the Council has committed to an early review of the whole Plan and the position in relation to this issue will be considered at that time.
86. Policy SP1 of the Central Bedfordshire Local Plan, adopted in July 2021, provides for 7,350 new homes to contribute to addressing Luton's unmet housing need of 9,300 dwellings. The 1,950 new homes committed to in Policy SP8 would ensure that the remainder of Luton's shortfall would be met. As a consequence, I consider this element of the Plan's requirement to be justified, in principle. Moreover, given my views set out above, I consider that the changes in the housing situation in Luton do not affect the existence or otherwise of the exceptional circumstances necessary to 'release' land in North Hertfordshire's Green Belt to help meet housing needs in Luton.

#### Overall and in summary

87. In light of the above, I draw the following principal conclusions.
- a) In the context of my conclusions below concerning the exceptional circumstances necessary to 'release' land from the Green Belt, the aims of Policy SP8 to meet the need for housing in the district, and to provide 1,950 homes to help address the unmet needs of Luton are justified, appropriate and consistent with national policy.
  - b) The OAN and housing requirement on which the submitted Plan was based are now unjustified.
  - c) The OAN for North Hertfordshire of 11,500 homes over the plan period is justified.

- d) The Plan's housing requirement (excluding the requirement relating to Luton's unmet need) of 11,600 is justified.
- e) The disaggregation of the Plan's housing requirement (excluding the requirement relating to Luton's unmet need) into two parts, being 11,500 for the part of the district that is within the Stevenage HMA and 100 for the portion in the Luton HMA, is justified.
- f) The Plan's housing requirement for 1,950 new homes within the Luton HMA to help address Luton's unmet housing needs is justified.

### **The supply of land for new housing**

88. Paragraph 47 of the NPPF is central to this matter. It says, among other things, that to boost significantly the supply of housing, local authorities should:

- a) ensure that their local plan meets the full OAN in the HMA, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- b) identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing, when considered against requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market, although where there has been a persistent record of under delivery the buffer should be increased to 20%; and
- c) identify a supply of specific, developable sites or broad locations for growth, for years 6 to 10 and, where possible, for years 11 to 15.

The terms 'deliverable' and 'developable' are defined in footnotes 11 and 12 respectively.

89. The sufficiency of the overall housing land supply and the five-year housing land supply are therefore two strands that require separate deliberation. I consider them below.

#### The housing land supply overall

- 90. As I have already indicated, the Plan seeks to ensure that the need for housing, and the requirements set out within the Plan itself, are met. As with other matters, this is an area where the Council's precise position has evolved through the examination as a consequence of the passage of time. The most up-to-date sources of housing land supply on which the Council now relies to achieve this are set out in its paper '*Housing delivery and five-year housing land supply as at 1 April 2020*' (August 2020) [ED191B] ('the delivery paper'), among other places.
- 91. A chart within the delivery paper sets out the projected delivery for every site included within the supply – sites with planning permission and sites proposed in the Plan – on a year-by-year basis. As I understand it, much of this evidence has been produced with the involvement of the landowners and/or

developers involved. This significantly bolsters confidence in the Council's projected delivery estimations.

92. I should mention here that delivery on some sites is expected to continue beyond the plan period. The chart takes account of this. However, to ensure that Policy SP8 is clear about delivery on the sites involved during the plan period, **MM035/FM057** is needed.
93. The overall supply includes around 5,100 homes from sites that have planning permission, sites where development has commenced, and from 'other allowances' – in effect, windfall sites and from a 'broad location' in Letchworth. Main modifications **MM037/FM059** and **MM035/FM057** explain this, along with some further detail, and are necessary for effectiveness.
94. Including sites with planning permission in the supply is consistent with footnote 11 of the NPPF. It is also consistent with national policy to include 'broad locations' for years six to ten, in principle.
95. As submitted, the Plan's housing land supply includes delivery from two broad locations. The first, the aforementioned broad location in Letchworth, is identified to deliver 50 homes. The intention is that this relates to Letchworth town centre boundary as shown on the policies map. A main modification to clarify this (**MM037/FM059**) is necessary for effectiveness, and the policies map will need to be amended accordingly. I consider this to be a reasonable approach. It would allow a degree of flexibility that would, appropriately in my view, enable and encourage the delivery of new homes in the town centre. This is a modest number, and the Council will retain the ability to ensure that new developments are acceptable, including in relation to any effects on the Conservation Area.
96. Delivery from the Letchworth town centre broad location forms part of the supply in 2027. Depending on the precise timing, that may be wholly or partly in 2026/2027, being year five following the likely timing of the Plan's adoption, rather than from year six as the NPPF indicates. That is a result of the delays that have occurred during the examination process. It would be unreasonable to hold up the delivery of new homes in the town centre until 2027/2028 – indeed, to do so would be inconsistent with the wider aims of national planning policy and would be unjustified.
97. The second broad location was intended to deliver an additional 500 dwellings. However, without any meaningful indication of its geographical location whatsoever, this is not justified. Main modifications **MM022** and **MM037/FM059**, which remove reference to this source of supply from the Plan, are therefore necessary.
98. Also within the supply are 440 new houses on small windfall sites, and 257 on large windfall sites. Windfall delivery is planned for in both the first five years of the Plan from adoption and in the remaining years afterwards. The NPPF sets out specific criteria in relation to the former period. I discuss that below and confine my present considerations to the period after the first five years, that is, from 2027/2028 onwards.
99. The Council has set out a detailed justification for including both large and small windfall sites in its paper '*The supply of land for housing*' (November

2018) [ED140]. From this analysis, it is clear that both have provided a consistent source of housing supply since 2011, the beginning of the Plan period. Taking account of historic windfall delivery excluding that on gardens in built up areas, it seems to me that delivery from these sources has been generally consistent and reliable. I see no particular reason why this situation should alter radically in the remainder of the Plan period. The Plan does not introduce unduly stringent policies that would thwart windfall housing on previously developed land. Indeed, it allows new housing development within settlement boundaries and infilling within some villages.

100. The annual allowance of 50 dwellings made for small sites in the supply is well below the average of 63 achieved between 2011 and 2017, and the allowance for large sites reflects the average 43 per year during that period. That is an appropriate response.
101. It is suggested that the NPPF and paragraph 24 of the PPG, taken together, mean that windfall sites can (in certain circumstances) be included in the first five years of a plan but that thereafter any windfall element of supply should be through the identification of a broad location. While I understand the basis for the argument put, I disagree. As I see it, neither the NPPF nor the PPG preclude windfall sites in the supply beyond the first five years. Consequently, I regard the Council's approach to be consistent with national policy and guidance.
102. In any case, removing the windfall contribution from year six of the Plan – that is, from 2027/28 onwards – would have little effect. From the trajectory in the delivery paper, the number of homes involved is 371, and the remaining supply would still exceed the requirements by a margin. In any event, ignoring this source of supply in the figures would not alter the likelihood of delivery. On this basis, I consider it appropriate to take account of the windfall contribution anticipated.
103. Overall, taking account of the main modifications mentioned above, the various sources of housing land supply are anticipated to yield around 14,656 new homes. It is apparent that the Plan's housing requirements would therefore be met. Indeed, the supply stands at around 13% more than the overall requirement. Main modification **MM036** sets this out in the Plan, which is helpful for effectiveness.
104. A critical soundness issue here is whether or not this 'surplus', 'oversupply' or 'buffer' affects the consideration of the existence or otherwise of the exceptional circumstances necessary for the 'release' of land in the Green Belt for housing. I consider this below.

#### The housing land supply 'buffer'

105. I recognise that the Council has not set out to achieve any particular level of 'oversupply'. This is not a case where housing over and above requirements is deliberately sought to achieve some planning policy objective. I also accept that it could be possible to remove from the Plan some smaller proposed housing sites that are on land currently in the Green Belt and still be able to demonstrate sufficient housing numbers to meet the overall and five-year requirements, at least 'on paper' as a theoretical exercise.

106. Nevertheless, I am of the firm view that the level of the proposed housing land supply is fully justified. The last time the Council adopted a local plan allocating housing land was in 1993 – a long time ago. The levels of housing delivery since have been dismal. Notably, during the first ten years of this Plan housing completions have fallen significantly short of the district's annual average need. The picture here is one of prolonged and sustained housing under-delivery set against a background of significant and pressing need. This must not be allowed to continue and any risk to optimising the recovery from this position should be avoided or mitigated against.
107. To my mind, the 'buffer' is such a mitigation. It acts as a safety net. It lends reassurance that if sites prove to be undeliverable, yield less homes than expected or if there should be delays in the anticipated supply, then there is a reasonable chance that housing needs may still be met. Delivery in line with the trajectory cannot be guaranteed. It rests on the simultaneous delivery of a number of strategic sites where inevitably there is a risk of delay due to the complexities of their delivery, including in relation to infrastructure provision. This is something of a challenge, and for effectiveness the Plan should recognise this. Main modification **FM063** introduces appropriate text.
108. Against this backdrop, the buffer is a precautionary, counter-acting measure. It is, perhaps, particularly important in the first five years of the Plan from adoption, when a reduced supply would increase the risk that the Council would be unable to demonstrate a five-year housing land supply, even using the 'three stepped Liverpool approach' – which I discuss shortly – as the yardstick.
109. I note the points about the 'buffer' having altered at varying points during the examination. I also note that some argue for a smaller buffer, others a larger one. The size of this buffer is not a matter addressed in national policy or guidance, and reference to comparable local plan buffers is only of limited assistance. It is not a science; it is a matter of planning judgement.
110. On the whole, it seems to me that the 'buffer' brought about by the difference between housing requirement and supply here is reasonable to avoid jeopardising the priority outcome of meeting need. Taking account of all the points put to me, in the context of the housing situation in North Hertfordshire, I consider the extent to which the housing land supply exceeds requirements to be justified. Indeed, if one is to have the requisite degree of confidence in the Plan's effectiveness, it is a necessity. In addition, without this 'buffer', it is highly probable that the need for affordable housing – which I discuss below – would not be met. As a consequence, I consider that this issue has no material effect on the existence or otherwise of the exceptional circumstances needed to justify altering the Green Belt boundaries to facilitate new housing.

#### The five-year housing land supply

111. Paragraph 47 of the NPPF gives rise to two broad questions. The first is what the five-year requirement is. The second is whether the supply is at least equal to it. On the latter point, it is important to note that this is a 'rolling' five-year supply. It applies at any given point in time, rather than solely during the first five years from the Plan's adoption.

112. The Council's most up to date position concerning the five-year housing land supply is set out in its paper '*Housing delivery and five-year housing land supply as at 1 April 2020*' (August 2020) [ED191B] ('the delivery paper') and in its '*Note on the supply of land for housing*' (December 2020) [ED215] ('the supply note'). The delivery paper contemplates numerous options for setting the five-year requirement. To reflect the record of persistent under delivery, each applies a buffer of 20% moved forward from later in the Plan period. I agree with the Council that this is the most appropriate approach.
113. Of the options considered, the Council proposes to use the 'three-stepped approach' – which sets a requirement of 350 homes per year between 2011 and 2020, 500 per year from 2020 to 2024 and 1,120 per year between 2024 and 2031 – in combination with applying the 'Liverpool' method, spreading the shortfall in delivery since the beginning of the Plan period across the remainder of the Plan period. I shall hereafter refer to the proposed approach as 'the three-stepped Liverpool approach'. I am of the firm view that it is the most appropriate in this case and should form the basis for future calculations of the district's five-year housing land supply.
114. The anticipated timing of delivery is heavily 'back-loaded' – that is to say, the vast majority of new homes are expected to be delivered later in the Plan period. This is not surprising, given that the Plan relies significantly on strategic and other larger sites that are currently in the Green Belt and will inevitably take longer to be built. But the result is that delivery is considerably lower earlier on in the remainder of the Plan period. The 'three-stepped Liverpool approach' generally reflects the expected rates of delivery.
115. Of the approaches considered, it is the most likely to facilitate a positive outcome in terms of the Council being able to demonstrate a rolling five-year supply of land for housing. To demand that a more ambitious five-year requirement be set would increase the probability of failure in this regard, particularly in the earlier years. That could increase the risk of planning permission being successfully secured for less preferable sites not allocated in this Plan. Given that this Plan is providing a reasonable supply margin and is releasing land from the Green Belt to ensure the housing requirement is met, that is a situation that must be avoided.
116. It seems to me that the 'three-stepped Liverpool approach' sets the only measure against which the Plan would not be condemned to fail. In the circumstances, therefore, I agree that it represents an acceptable method of setting the five-year housing land supply requirement in the short term. However, this is not ideal and is a situation that should not be allowed to persist any longer than necessary. Indeed, I consider it appropriate only on the basis of an early review of the Plan.
117. The Council has put forward **FM190**, which introduces a new policy committing the Council to undertaking a whole plan review by the end of 2023 at the latest, to determine whether the Plan needs to be updated in whole or in part. Main modifications **MM043/FM065** and **FM066** reiterate and 'signpost' this commitment as part of the explanatory text in the Plan's housing section. Other main modifications (including but not limited to **FM192, FM193, FM194, FM195, MM375, MM376** and **FM196**) set out some further reasons why the early review is necessary – which I discuss

under separate issues in this report – and the Council's approach to undertaking the review. All these modifications are necessary to ensure that the Plan is justified in relation to the five-year housing land supply provided and the other matters described in the modifications, and for its effectiveness in those respects. I have made some alterations to the wording suggested by the Council in relation to **FM193** and **FM195** to ensure that they are consistent with **FM190** and properly reflect the Council's commitment to the review and update processes. Although these changes have not been the subject of consultation, they do not significantly alter the modifications as published, and they do not undermine the participatory processes undertaken.

118. There are other aspects of the Plan which rely on **FM190** for soundness. I discuss them later in this report. However, the plan period is one such factor. The Plan will cover a nine-year period from adoption. Paragraph 157 of the NPPF expresses a preference for local plans to cover a 15-year time horizon. Paragraph 47 expects local authorities to identify a supply of specific, developable sites or broad locations for years six to ten following adoption. The Plan cannot be said to be entirely consistent with national policy in this regard. The early review proposed is necessary to overcome this.
119. Considering all the above, it is also necessary to add to the Plan a policy which sets out the 'three-stepped Liverpool approach' to the five-year housing land requirement. The Plan should also explain the reasons for undertaking the calculation in the way proposed and replace the submitted housing trajectory chart with an updated one. Main modifications **MM040/FM064**, **MM372/FM187**, **MM373/FM188** and **MM374/FM189** achieve this and are needed for effectiveness.
120. As mentioned above, the five-year housing land supply includes a contribution from both small and large windfall sites. For the reasons given in relation to their inclusion in the overall supply, I consider the inclusion of the windfall allowance proposed to be justified in the terms of paragraph 48 of the NPPF.
121. From the housing trajectory paper, it is apparent that most of the new housing coming forward until April 2023 is expected to be from sites with planning permission. From that point, allocations proposed in this Plan rapidly 'overtake' as the primary source of supply.
122. When judged against the proposed method, and notwithstanding that the Council's figures in the delivery paper only run until April 2024, I consider that the Council will be able to show a rolling five-year housing land supply on the Plan's adoption up to and including the year 2028/29.

### **Conclusion on Issue 1**

123. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision for new housing is justified, effective, consistent with national policy and positively prepared.

## **Issue 2: Whether the spatial distribution of new housing is justified, effective, consistent with national policy and positively prepared**

### **The settlement hierarchy**

124. Policy SP2 introduces a settlement hierarchy. Settlements are categorised as Towns, Category A and B Villages and Category C Settlements. The policy says that the majority of the district's development will be located within or adjoining the Towns. It allows general development within the defined boundaries of Category A Villages, infilling development which does not extend the built core of Category B Villages, and only limited affordable housing and facilities for local community needs in Category C Settlements.
125. The Council's '*Housing and Green Belt Background Paper*' [HOU1] provides a detailed account of the justification for the placing of each settlement within hierarchy. The status of settlements in the extant 'saved' policies of the 1996 Local Plan, and their sustainability credentials – such as the presence or otherwise of shops, services, schools and facilities – have been taken into account. Whether development should be prevented in a village because of the contribution it makes to the openness of the Green Belt has also been considered, as has the need to allow at least some small-scale development in each of the district's parishes. These are all relevant factors to weigh up in this exercise.
126. The hierarchy has evolved to some degree through the Plan's formulation. However, it is evident that Letchworth, Hitchin, Baldock and Royston are the most significant settlements with the greatest range of facilities and services, notwithstanding the variation between them in these respects. In short, it is clear that these are the most sustainable places. As such, their identification as Towns, and the focus for the vast majority of growth, is justified. It is also appropriate to include Stevenage (including Great Ashby) and Luton within this tier. While these towns are outside the Council's administrative area – or substantively are at least – their urban areas adjoin or lie partially within North Hertfordshire and are locations where this Plan proposes new housing.
127. Within each of the tiers there are settlements of different sizes, and some are doubtlessly more sustainable than others. That, though, is inevitable and generally does not indicate any flaw in the method or its outcomes. However, among the Category A Villages are five villages – Barkway, Codicote, Ickleford, Knebworth and Little Wymondley – where the Plan proposes noticeably more new housing than at the other villages within this category. The reasons for this generally relate to a mixture of their sustainability credentials, the location of sites put forward for housing development and the judgements made by the Council through the site selection process – which I consider later – regarding their appropriateness. Their inclusion as Category A Villages therefore does not properly reflect their role or place within the hierarchy. Grouping them in a new tier, between the Towns and Category A Villages, as the Council suggests through **MM010/FM039** and **MM012/FM041**, is an appropriate response and is necessary to ensure that Policy SP2 is justified and effective. For the purpose of this report I shall refer to these five settlements collectively as 'Settlements for Growth'.

128. Overall, with those changes, Policy SP2 clearly sets out a coherent hierarchy of settlements and, generally speaking, directs growth to the most sustainable of them. I am of the firm view that the hierarchy of settlements proposed is justified, and that each settlement is placed within an appropriate category.
129. Permitting 'general development' in the Category A Villages is appropriate. It will allow for some housing and other development to be dispersed around the district's more sustainable smaller villages. Other policies in the Plan will ensure that the Council retains the ability to prevent unacceptable harm being caused.
130. I note the suggestion that residential development should be allowed adjacent to Category A Villages where the land is not in the Green Belt. I see no particular reason why that should be permitted. Defining clearly where new housebuilding should and should not take place is among the primary tasks of this Plan – and one must draw the line somewhere. Given my conclusions about the overall and five-year housing land supply and bearing in mind the Council's commitment to an early review of this Plan, I am not persuaded of the need for further flexibility in the land supply at this stage.
131. That said, where additional housing development in a Category A Village or elsewhere has local support through a Neighbourhood Plan, this Plan should not stand in the way. Main modification **MM010/FM039** is therefore necessary for effectiveness in this respect. It introduces backing for development otherwise not sanctioned by Policy SP2 where this is supported by residents through a Neighbourhood Plan.
132. Oaklands is part of a settlement that is predominantly within Welwyn Hatfield Borough Council's area. It is proposed in this Plan to identify it as a Category A Village to reflect its identification as a 'specified settlement' under the 'saved' policies of Welwyn Hatfield's adopted development plan. No new development sites are proposed at Oaklands. In my view, the approach taken here is the most appropriate.
133. Paragraph 89 of the NPPF says that limited infilling in villages in the Green Belt is not inappropriate development. The approach taken to the Category C settlements is more stringent than this. However, I consider that to be justified. Given the generally small size and/or fragmented nature of the settlements concerned, they should not be regarded as 'villages' for the purpose of this part of paragraph 89 of the NPPF. That said, clarifying that the development allowed under Policy SP2 must also meet the detailed requirements of Policy CGB2, as **MM010/FM039** does, is necessary for effectiveness.

### **The spatial distribution of housing**

134. As submitted, Policy SP2 does not give any indication of the level of new housing directed to each of the tiers or settlements in the hierarchy. Main modifications **MM010/FM039** and **MM038/FM060** add figures for each settlement in the two top tiers of the hierarchy and indicate the percentage of new housing directed to each of those categories. Main modification **MM011/FM040** elaborates on this and adds clarity about the Plan's primary focus for development being the Towns. This is necessary to clearly articulate the distribution of housing and improve the effectiveness of the policy.

135. This modification clarifies that around 80% of the district's new housing will be in the Towns and approximately 13% will be in the Settlements for Growth. From these figures, that the Towns are the focus for growth is unmistakable. So too is the obvious emphasis on the two top tiers of the hierarchy. As I see it, this is a suitable approach.

136. Through the Sustainability Appraisal (September 2016) [LP4], the Council has considered five options for the housing distribution. These are:

- a) Focus development on the four towns and 14 villages which may include limited development on greenfield sites
- b) Focus development on previously developed land within urban areas
- c) Urban extensions on greenfield land adjoining existing towns
- d) Build a new settlement
- e) Use smaller greenfield sites in the villages

The Council says the approach taken in the Plan involves a combination of all options save for option d) but is "*mainly a) and c)*".

137. I acknowledge that there is overlap between the options considered. Options a) and b) are explicitly not exclusive solutions – they invite combining with another approach to deal with provision that is not part of the main focus. None of this, though, represents any shortcoming or renders the work "*meaningless*", as some would have it. As I see it, all the options are reasonable to consider and assess through the appraisal process – all have the potential to be an essential ingredient.

138. The Sustainability Appraisal does not appraise different apportionments of housing between the Towns or the Settlements for Growth, either within each category or between the two tiers. However, in the specific context of this Plan, I do not regard that as a shortcoming. The reality here is that beyond the deliverable/developable sites proposed in the Plan, there is not a generous pool of surplus land rejected for allocation. From the housing and Green Belt background paper it is apparent that land put forward by landowners or developers but not included in the Plan would only yield around 1,860 additional homes – and these sites have been excluded for reasons that are fully justified. This position has not substantively altered through the various updates provided by the Council through the course of the examination. Consequently, the apportionment options are very restricted. The demand of the NPPF is limited to consideration of reasonable alternatives. There is little value in appraising undeliverable or otherwise unrealistic propositions.

139. On this point, I note that many argue for a new settlement as the most appropriate option. The Sustainability Appraisal does contemplate this. Indeed, Policy SP8 includes a commitment to the Council working to identify new settlement options in the district that can provide additional housing supply after 2026. Main modification **MM041** is needed for effectiveness, to ensure that the wording of paragraphs supporting Policy SP8 accurately align with it. Also for effectiveness, the Council's policy pledge in respect of a new

settlement should be embedded into the early review to which the Council has committed. Main modification **FM190** ensures this and is therefore necessary.

140. But local plans must be able to demonstrate that they are deliverable. I note the arguments made about a development company being established as a vehicle to deliver a new settlement, and the other comments and views expressed on this. Nonetheless, there is currently no evidence to suggest that there is a reasonable prospect of a new settlement being deliverable/developable within the period of this Plan – new settlements are not an easy delivery option.
141. I recognise that the level of new housing directed to each of the Towns is not based proportionately on the size of the settlements. Consequently, the extent to which each Town will grow as a result of this Plan varies. For example, the degree of change in Baldock will be far more significant than that in Letchworth. But, setting aside the question of environmental and other impacts which I consider later in this report, there is no reason why that should be a problem as a matter of principle.
142. Moreover, it is clear that the precise distribution of new housing between the Towns is largely the product of the absence of sufficient reasonable alternatives in the potential supply. In an ideal world the apportionment might be different, at least in some cases. But high hopes and wishful thinking cannot conjure deliverable/developable land of the right amount in the perfect location.
143. Indeed, as I see it, the Council has done all that could reasonably be expected of it to identify land for new homes and to set out a realistic and deliverable distribution of new housing development. In the context of the situation here, I consider the option pursued in the Plan to be the most appropriate. The distribution proposed in the Plan is consistent with the settlement hierarchy and is justified.
144. However, to articulate the Plan's approach to the settlement hierarchy and the spatial distribution of housing, among other things, a Key Diagram should be included in the Plan. The diagram put forward by the Council through **MM007** is a satisfactory representation of these aspects and is needed to bolster the effectiveness of Policy SP2.
145. No land for housing is proposed to be allocated in the Category B Villages or Category C Settlements. Given that they have relatively few services or facilities, that approach is entirely justified.
146. Some seek to move the placing of settlements within the hierarchy and/or to alter the level of housing earmarked to each, one way or the other. But neither the hierarchy nor the level of new homes assigned to each settlement has been arrived at on the basis of a wholly scientific methodology. Nor could that be so. Like many aspects within the sphere of town and country planning, the establishment of the hierarchy has inevitably been influenced by professional judgments, taking account of relevant factors such as those I have already mentioned. The precise level of new housing at each settlement is also greatly influenced by a range of considerations, the availability of deliverable land being high among them. I have neither read nor heard any arguments of such force that I am compelled to recommend further alterations

to the hierarchy or the distribution of housing between the settlements. To my mind, the approach taken to all of this is a legitimate one to take and, from the Council's evidence, the conclusions arrived at are reasonable and justified.

## **Conclusion on Issue 2**

147. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the spatial distribution of new housing is justified, effective, consistent with national policy and positively prepared.

## **Issue 3: Whether the Green Belt Review and its update represent an adequately robust evidential basis for determining the existence or otherwise of the exceptional circumstances necessary to alter the Green Belt boundaries**

148. As previously noted, paragraph 83 of the NPPF says that "... *Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan*". This Plan proposes to alter Green Belt boundaries for the following reasons.

- a) To facilitate the allocation of land for housing, including for gypsies and travellers
- b) To facilitate the allocation of land for employment
- c) To facilitate the identification of one parcel of safeguarded land
- d) To identify additional land as Green Belt
- e) To define/redefine boundaries around settlements within the Green Belt

The question, then, is whether the necessary exceptional circumstances for the proposed boundary alterations exist.

149. Neither the NPPF nor the PPG define the term 'exceptional circumstances'. To determine the existence or otherwise of exceptional circumstances, it is first necessary to establish the nature and extent of the harm to the Green Belt. That is the fundamental purpose of the '*Green Belt Review*' (July 2016) [CG1] ('the Review') and the '*Green Belt Review Update*' (September 2018) [ED161A and ED161B] ('the Update'). I turn now to consider the robustness of this work.

150. The Review and the Update consider Green Belt issues in depth. The Review assesses the contribution made by parcels of land to four of the five purposes for including land in the Green Belt. It does not include an assessment against the fifth purpose of including land in the Green Belt, being to assist in urban regeneration by encouraging the recycling of derelict and other urban land. The Council considers that, in effect, the assessments against the other four purposes act as a proxy for this purpose. That is a reasonable stance to take, and I regard the approach taken here to be both suitable and proportionate. Looking firstly at larger swathes of land and then 'drilling down' to analyse much smaller sub-parcels, the Review also presents the view of its authors about the overall contribution made by each individual sub-parcel.

151. Potential development sites are also assessed in the Review, again against the same four purposes of including land in the Green Belt. This includes all the sites currently in the Green Belt that are proposed for allocation in the Plan. Criteria are used to represent each purpose, and a scoring system is deployed. For example, in relation to the purpose of preventing towns merging, one criterion used is the distance from the edge of the site to the nearest built-up edge of a town, and scores from one to three are assigned depending on the distance involved.
152. The Review also reaches a view about the overall contribution made by each potential development site to the purposes of including land in the Green Belt. The scoring for each of the individual Green Belt purposes has been considered and professional judgement applied to reach an overall conclusion as to whether the site makes a significant, moderate or limited contribution.
153. An analysis of the villages in the Green Belt is also performed by the Review. The purpose here is to establish, in the light of paragraph 86 and 89 of the NPPF, whether each of the villages involved should be excluded from the Green Belt or included within it and, if the latter, whether a boundary should be delineated to define where 'infilling' development may be allowed. The analysis includes consideration of village character and the relationship with the Green Belt, and the contribution made by the village and its immediate setting to the five purposes of including land within the Green Belt.
154. Finally, the Review undertakes an assessment of countryside beyond the Green Belt to establish the degree to which such land performs the purposes of including land within the Green Belt. Criteria and a scoring system are again used and applied to each of the parcels of land involved. Ultimately, the output here is a judgement as to whether each parcel makes a limited, moderate or significant contribution overall to the purposes of including land within the Green Belt.
155. The Council produced the Update following the judgement in the case of *Samuel Smith Old Brewery (Tadcaster) & Others v North Yorkshire County Council* [2018] EWCA Civ 489. Its purpose is to undertake an explicit assessment of the effect of proposed development on the visual dimension of the openness of the Green Belt in relation to the existing Green Belt parcels and sub-parcels, and the potential development sites. I note the subsequent Supreme Court judgement in *R (Samuel Smith Old Brewery (Tadcaster) & Others) v North Yorkshire County Council* [2020] UKSC 3. Simply put, the Court of Appeal judgement emphasised the need to consider the visual effects of development in relation to the openness of the Green Belt. The Supreme Court judgement, however, found that the necessity for such an exercise within the consideration of the effects on openness is a matter of planning judgement. Nevertheless, I agree with the Council's view, set out in its 'Note on the Supreme Court Judgement' (March 2020) [ED185]. Because of the nature, location and scale of the proposed allocations in the Green Belt, it is in this case appropriate to consider the visual qualities of the land concerned in relation to the concept of openness.
156. There is no prescribed methodology for undertaking Green Belt assessments of this sort. As I see it, the general approach and methodologies used by the Council are appropriate for the task. All the criteria used throughout the

various assessments are rational and suitable. Although laden with planning judgements on the part of the authors, that is inescapable and does not undermine the work in any way. I note that the assessments do not rely on desk top studies but have included field work and visits to the land in question. This is reassuring and bolsters the confidence one can place in the judgements reached.

157. One consequence of the methodology used is that it is possible for a site's overall contribution to the Green Belt to be judged as less than the contribution it makes in respect of some individual Green Belt purposes. For example, it is possible that a site considered to make a significant contribution in relation to checking unrestricted sprawl could be judged to make a moderate overall contribution. Some suggest that, as a matter of principle, the overall 'score' should reflect the highest contribution to any one of the individual purposes.
158. I disagree. In the absence of prescription, it seems to me logical to 'step back' and reach a rounded judgement taking into account the performance of the land in question in relation to all the Green Belt purposes overall. Without such a 'sense check', one purpose could skew the outcome. For example, almost any incursion of built development into the Green Belt would be at risk of falling foul of the purpose of safeguarding the countryside from encroachment. In an exercise where the purpose is to evaluate the relative value of land parcels to the Green Belt, that would not be helpful. To offer the facility of meaningful comparison, it strikes me as most instructive to consider performance against the purposes of including land in the Green Belt overall. On this point, therefore, I consider the Council's approach to be appropriate for the task.
159. In a number of cases the Update leads to different conclusions from the Review about the overall performance of sites in relation to the purposes of including land in the Green Belt, one way or another. However, this does not undermine the proposed allocations. In my view, taking account of the Council's sustainability appraisal work and the site selection methodology, which I consider later in this report, I am satisfied that the changes involved do not lead to other sites being preferable.
160. Some disagree with the judgements reached in some cases. That is not surprising – even two wholly rational and unbiased individuals can reach different conclusions where judgements of this nature are concerned. Others claim that the methodologies have been applied inconsistently. But I am not persuaded that any inconsistencies undermine the work overall or lead to any wholly unfounded or irrational outcomes.
161. Overall, I am satisfied that the Review and the Update, taken together, properly reflect the fundamental aim of Green Belts, their essential characteristics of openness and permanence, and the five purposes of including land in them. In short, these documents represent a sufficiently robust body of evidence that is comfortably fit for the purpose intended.
162. Having visited all the sites proposed in the Plan, I generally agree with all the conclusions drawn in the Update. There are a few instances where I differ to some extent, and my views are set out on a site-by-site basis later in this

report.

### **Conclusion on Issue 3**

163. Considering the above, I conclude that the Green Belt Review and its update do represent an adequately robust evidential basis for determining the existence or otherwise of the exceptional circumstances necessary to alter the Green Belt boundaries.

### **Issue 4: Whether the proposed housing allocations are justified, effective, consistent with national policy and positively prepared**

#### **The site selection process**

164. The issue here is how the Council has gone about selecting the sites proposed in the Plan for housing development, and whether this process is sufficiently robust. The approach taken to site assessment and selection is set out in a flow chart included in the Council's '*Paper B: Green Belt*' (November 2019) [ED172] ('the Green Belt Paper'). From this, it is apparent that, broadly speaking, a two-stage approach has been followed.

165. Firstly, the Strategic Housing Land Availability Assessment: 2016 Update (March 2016) [HOU9] ('the SHLAA Update') considers the suitability and availability of the 184 sites put forward by landowners or developers and sifts out those that do not meet both 'tests'. Of the remaining 126 sites, seven only passed the suitability and availability tests in part. These were sites of moderate size, such that it was possible to identify within each an area considered to be coherent and meaningful for housing development that met both tests fully. These revised parcels, along with the other 119 sites carried forward, were then considered in relation to achievability. This process of considering suitability, availability and achievability is referred to by some as the 'three tick' approach, and I shall adopt this term as a convenient shorthand.

166. The second stage of the site selection process is rather less linear and straightforward. All the three tick sites are appraised within the Sustainability Appraisal. Whilst those not meeting the three tick criteria are not, that is not a problem – in failing to be suitable, available and achievable, they are not reasonable alternatives. This, along with a wide range of other evidence, including that about the Green Belt, landscape, ecology, viability and heritage, has been taken into account by the Council 'in the round' to arrive at its site selection conclusions.

167. I recognise that the approach taken is not centred around a rigid method, such as some kind of overall scoring or traffic light system. But that is no shortcoming. Any selection process of this sort inevitably rests heavily on individual judgements, irrespective of whether these are expressed as scores or colours.

168. All the sites proposed are confirmed as having willing landowners. While I discuss some site-specific highways issues later, I note that the highways authority has raised no objections to any of the proposed allocations – at least, not as a matter of principle. Considering this and taking account of the need for infrastructure and viability matters, both of which I consider below, I

regard the proposed allocations to be deliverable and/or developable.

169. I recognise that an area of land known as 'Forster Country' – due to its links with the author E. M. Forster – lies within the district and that the site selection process does not consider this as a constraint. I fully understand its cultural interest and that it is consequently an area held dear by many. But it is not a designated heritage asset of any kind, and it is not recognised or protected in any way through planning law or national policy. Given this, there are no grounds upon which the site selection process could have taken the presence of Forster Country into account. To have done so would have been unjustified and inconsistent with national policy. Along with the district as a whole, the value and sensitivity of the landscape of this area has been taken into account. I consider the effects of proposed housing allocations on Rook's Nest – E. M. Forster's childhood home – later in this report.

### Green Belt impacts

170. The three-tick approach does allow for sites to be rejected for suitability reasons whilst sites in the Green Belt are not, as a matter of principle, necessarily prevented from progressing to the second stage of the process. Some suggest, in effect, that this amounts to giving greater weight to other aspects of suitability than that afforded to protecting the Green Belt.

171. That may be so, to some degree. Nevertheless, I consider the Council's approach to be the most appropriate in this case. The context here is one of an acute and pressing need for housing, a somewhat restrained level of deliverable and/or developable land, and a consequently inescapable necessity to build new homes in the Green Belt to meet needs. Against this background, it would be both rash and illogical to rule out land on the basis that it is in the Green Belt, particularly as the NPPF specifically allows for such Green Belt 'release' through the plan-making process where exceptional circumstances exist. The same cannot be said of other site suitability factors, such as where there are unresolvable constraints or where unacceptable impacts cannot be avoided, for example in relation to flood risk.

172. In any event, it is apparent that the Council has not overlooked Green Belt impacts. On the contrary, as I have already indicated, a significant amount of work has been undertaken. Whilst a number of the proposed sites that are in the Green Belt make a significant contribution to it, that should not be a bar to progression through the three-tick process. In the context of the housing situation I have previously described, it is legitimate to conclude that even significant Green Belt impacts are preferable to either not meeting the need for housing or otherwise planning to meet need in less sustainable places.

173. I recognise that some sites, or parts of sites, have been rejected for Green Belt reasons. But as I see it, that is not an inconsistency in the methodology or its application. This is a matter of judgement – as the Green Belt Paper points out, an assessment of a site having significant Green Belt impacts should not be conflated with having an unacceptable Green Belt impact that should preclude development.

### Traffic impacts

174. It is clear that the likely consequences of the proposed housing allocations on

traffic conditions have been considered by the Council. Modelling work has been undertaken that takes account of all of the proposed allocations along with the level of housing growth planned for in neighbouring local authority areas and other known development projects – both within and beyond North Hertfordshire's boundaries – that would likely have an effect. This is set out in the '*Technical Note: North Hertfordshire Local Plan Model Testing*' (September 2016) [TI4] ('the model testing note').

175. Many criticisms have been levelled at the modelling undertaken. But modelling of this nature is very difficult in that key assumptions and other factors that have a bearing can change relatively rapidly over the short to medium term. The work undertaken has gone to significant lengths to capture the cumulative effects of the growth anticipated in the district, and it is difficult to see what more could be done. Whilst this work might have weaknesses – and I discuss some later in this report – modelling of this kind can never be an entirely accurate prediction of future traffic levels in any given location. As I see it, it is a useful gauge for identifying potential significant issues rather than a precise insight into the future.
176. It is possible that the new housing proposed may cause some localised problems. Indeed, the model testing note identifies a number of problem locations. It also indicates potential mitigation measures, and the Plan's policies ensure that these, or any preferable measures identified, will be secured.
177. Overall, it seems to me that the level of new housing growth proposed in this Plan will inescapably have some negative impacts on the road network. It is not realistic to expect that it should not. I recognise that this may lead to more congestion and delays, which will cause inconvenience for drivers. However, nothing that I have read or heard is sufficient to persuade me that any such effects will inevitably be severe in the terms of paragraph 32 of the NPPF. In any event, the critical issue here is to ensure that much needed housing is delivered. The traffic impacts likely to occur should not stand in the way of that or lead to the level of new housing in any of the proposed locations being restricted.

#### Air quality

178. Some suggest that the site selection process has not taken proper account of air quality impacts. Paragraph 124 of the NPPF says:

*"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."*

179. As I understand it, particulate matter and nitrogen dioxide from vehicle exhaust emissions are the primary source of air pollution in the district. These pollutants cause harm to human health – this is a serious and significant issue. The question here, then, is whether the housing allocations proposed in the Plan are consistent with national policy in this regard.

180. Air quality is recognised in the Sustainability Appraisal as a key sustainability issue. Achieving good air quality is embedded in the appraisal framework as a sub-objective of reducing pollution from any source. As a consequence, it is specifically taken into account in the site appraisals. It is clear to me that the effect of the proposed housing sites, and the alternatives considered, has been considered through the Sustainability Appraisal and site selection process.
181. Perhaps most fundamentally, this Plan locates new housing in the most sustainable locations that are deliverable. The point here is that the spatial distribution of housing aims to maximise opportunities for people to travel by means other than the private car. In this regard, it seems to me that it aims to minimise the degree to which additional vehicular traffic is generated by the new homes.
182. In addition, through **MM045/FM001**, the Plan requires all strategic housing sites to create integrated, accessible and sustainable transport systems with walking, cycling and public transport to be the most attractive forms of transport. This modification also requires that the strategic housing sites provide pedestrian friendly streets and well-connected footpaths and cycleways integrated with the wider built and natural environment and communities. Again, these measures seek to minimise additional car trips and, therefore, associated emissions.
183. Notably, the Plan does not propose to allocate any new housing sites within or especially close to either of the district's two Air Quality Management Areas ('AQMAs'). Indeed, one potential site in Hitchin has been rejected based on its proximity to an AQMA.
184. While I consider the matter in more detail later, Policy D4 requires impacts on air quality to be considered through the planning application process and for proposals to include mitigation measures where necessary. As modified by **MM150**, it ensures that unacceptable effects on air quality are prevented.
185. It is recognised in the Sustainability Appraisal that "*air quality issues could become more significant with continued growth in development and traffic*". I do not doubt it. Notwithstanding the measures mentioned above, housing growth of the magnitude required in North Hertfordshire will inevitably lead to more traffic using the district's roads. So long as the vehicles in question emit pollutants at the current levels this will, in turn, affect air quality. But it is difficult to see how this Plan could prevent that. Thwarting or suppressing the delivery of much needed housing on these grounds would be unwarranted and inconsistent with national policy.
186. As I see it, this is a significant national issue, and this Plan should play its part. From the Council's hearing statement [ED62], beyond the aforementioned two AQMAs, there is no evidence that national objectives are being exceeded. As I mention later, the Council has rejected one site on the basis of its proximity to one of the AQMAs. Moreover, it seems to me that the Plan does all it reasonably can to facilitate the choice to not use private motor cars and thereby to address the district's air quality concerns. Overall, in relation to ensuring that compliance with national objectives is sustained, it takes appropriate and sufficient steps. I therefore consider the site allocations to be justified and consistent with national policy in this respect.

187. I have been provided with a significant amount of detailed evidence on this issue. I note all the arguments put, including those about the adequacy of the Council's monitoring of air quality against objectives set out in the Air Quality Regulations 2010 and the exceeding of the air quality levels set out in those Regulations. However, none of the points raised undermine or alter my view set out in the preceding paragraphs, or otherwise persuade me that the proposed housing allocations are unsound.

#### Wastewater treatment

188. I note the arguments about the cumulative impact of the Plan's proposed housing sites, along with other developments outside the district, on Rye Meads Wastewater Treatment Works (WwTW). This WwTW is within the Lea Valley Special Protection Area. The points made raise questions about the capacity of the works, and the effect on the Special Protection Area. I consider the latter in more detail in relation to the Plan's policies relating to the natural environment. In terms of the treatment works' capacity, it is the responsibility of the utilities provider concerned to ensure that wastewater can be satisfactorily dealt with. From the Statement of Common Ground between the Council and Thames Water Utilities Ltd (November 2016) [MOU6] it is apparent that the provider is undertaking regular reviews of capacity and does not object to the sites proposed in this Plan.

#### Other impacts

189. It is clear the proposed housing sites will have a wide range of other impacts. All are assessed through the numerous documents that form the Council's evidence base. These effects have been considered through the Sustainability Appraisal and the site selection process. In short, they have been properly and thoroughly taken into account.

190. I consider the other effects of greatest importance to the soundness of the allocations on a site-by-site basis shortly, although I am not seeking to report on every issue raised in representations. Overall, I consider that there are no impacts of such magnitude that they would be unacceptable, or that any of the proposed allocations should otherwise be thwarted. However, numerous main modifications are necessary to ensure this. I consider and explain the necessity for them below in relation to each of the sites affected.

#### **Education provision**

191. As alluded to previously, the provision of school places is among the more controversial infrastructure planning issues in this examination. Alongside discussion with providers, a formula has been used to help establish the need for school places. That is an approach commonly used by LEAs in their forward planning activities. The Council has assumed that 500 new homes will give rise to the need for one form of entry for both primary and secondary education.

192. I note the arguments for a different formula. However, school place planning is inevitably an area of uncertainty. The formula adopted by the Council is that used by the LEA, which is best placed to understand the likely pupil yields from new housing here. Even if it transpires that it does over-egg the pudding, that may not be consistently so across the district and, in any case,

that is a consideration capable of being addressed on a case-by-case basis at the planning application stage. I am satisfied that the formula used here is suitable for the purpose of informing this Plan.

193. In general, the approach taken in the Plan is to require the provision of new education facilities on sites otherwise allocated for housing where the identified places cannot be provided through the expansion of existing schools. Given the Green Belt constraints in the district, that is the most appropriate and effective path. Moreover, it will help to ensure that the delivery of new housing and school places can be brought forward in a controlled and planned manner, avoiding periods of local school place shortages as much as possible.
194. There has been a dispute throughout the examination between the Council and the LEA concerning the Plan's provision of school places in the Stevenage Secondary Planning Area for the planning of secondary school places. Knebworth and Great Ashby lie within this area. The Plan proposes two new secondary schools – one on Site KB4 in Knebworth and one on Site GA2 in Great Ashby. The Council's intention is that each will comprise four forms of entry. This is a complicated situation affected by school place forecasting, current and anticipated provision, and the control over school admissions. The long and short of it is that taking account of the above factors, and its preference for larger schools, the LEA objects on the basis of the location and size of the two schools involved. However, through a Statement of Common Ground (December 2019) [ED177], both parties have agreed that with various main modifications to the Plan, this matter need not prevent it from being found sound.
195. As I see it, several main modifications are necessary to ensure that the policies affected are justified and effective. Policy SP18 is rather vague about the secondary provision required on Site GA2 and paragraph 4.214 refers to "... a modest level of secondary age provision". Main modifications **MM075/FM008**, **MM077** and **MM238** clarify that four forms of entry are required. Main modification **MM078** adds detail about the likely timing and explains that the school playing fields will need to be beyond the site boundaries on land currently in the Green Belt. That strikes me as an appropriate approach.
196. In addition, a number of modifications are necessary to address the numerous uncertainties which have led to the LEA's objection. Main modifications **FM067** and **FM068** add to Policy SP10 specific reference to monitoring projected demand to inform the review of the Plan in relation to secondary education in the Stevenage area, along with an explanation of the present situation in a new supporting paragraph. Main modifications **FM190** and **FM191** ensure that the local plan early review policy includes reviewing options for long-term secondary education provision in the Stevenage area, and clarify that it is the Government's expectation, rather than preference, that local plans be reviewed every five years.
197. Moreover, **MM288** changes the requirement in Policy KB4 to provide up to four hectares of land for education purposes to demanding that the land within the site to the north of Watton Road be reserved for long-term secondary education. This amounts to an increase in the land to be used for education, and in the circumstances is necessary to ensure that sufficient school places

can be provided. Main modifications **MM293/FM147** and **MM294** remove reference to an 'all through' school in respect of Site KB4 and explain the secondary education situation in Knebworth. In light of the evidence, these changes are appropriate and necessary.

198. Taken together, these modifications ensure that the Plan incorporates an appropriately flexible framework to secure the provision of the secondary school places needed in the Stevenage area. They ensure that sufficient provision can be secured whilst leaving the door open to alternative solutions – including any viewed by the LEA as preferable – being brought forward through the review of the Plan.

### **Sites where development has commenced or has been completed**

199. The development of some housing sites in the Plan has either commenced or, in some instances, has now been completed. The Council has put forward main modifications deleting from the Plan the policies that allocate them for housing. In the circumstances, I agree that that is the most appropriate response, and would assist with the Plan's effectiveness. Main modifications **FM110, FM146, FM150, FM151, FM158, FM159, FM168, FM169, FM170, FM172, MM202/FM102, FM104** and **MM338, MM356/FM179** and **MM399**, which delete the policies and supporting paragraphs concerned, are therefore necessary. It will also be necessary for the Council to amend the policies map accordingly, as shown in the draft schedule of main modifications during the consultation exercise.

### **Restrictive covenants**

200. In relation to two sites – one in Letchworth and another in Reed – I have been told that there is a covenant or some other legal instrument that prevents the housing proposed by the Plan. It is possible, therefore, that in some instances there may be a legal impediment to delivery. However, I see no reason why this should prevent the allocation of the sites in question. To remove these otherwise appropriate sites from the Plan would likely guarantee that they would not come forward and would be unwarranted.

201. Moreover, this issue affects only a relatively limited number of homes – less than 50, based on the figures in the delivery paper. Given this, and the 'buffer' between the Plan's requirement and the overall number of houses planned for, even if all the sites concerned were to be thwarted that would not amount to a soundness problem for the Plan's housing delivery overall. Indeed, uncertainties of this nature add to the justification for the 'buffer'.

### **Strategic masterplanning**

202. I have mentioned previously that the Plan includes a number of strategic housing sites – Sites BA1, LG1, NS1, HT1 GA2, EL1, EL2 and EL3. I consider each in greater detail shortly. However, because of their scale and the consequent impacts they could give rise to, I consider it imperative that each be the subject of strategic masterplanning. Indeed, given the degree to which this Plan relies on these strategic sites, and particularly considering the extent to which these are in the Green Belt, I am of the firm view that the relevant policies should include significantly more detailed stipulations than they do as submitted.

203. Policy SP9 relates to design and sustainability. I consider most of its criteria later, however it is relevant here as it addresses the issue of strategic masterplanning. Main modification **MM045/FM001** adds to it a significant number of wide-ranging additional requirements to be addressed through the strategic masterplanning process. These are, by and large, related to matters of urban design and integrating developments within their urban and rural communities, but also cover issues such as adaptable housing, biodiversity, management and maintenance. These, and other site-specific requirements should also be included in the policies allocating the strategic housing sites.
204. In addition, to ensure the strategic masterplans genuinely shape the developments involved, the contribution made to the strategic masterplan should be taken into account through the planning application process. For the same reason, any planning applications relating to just part of a site should be prevented from prejudicing the implementation of that site as a whole.
205. Main modifications **MM058/FM004**, **MM061/FM005**, **MM068/FM006**, **MM072/FM007**, **MM075/FM008**, and **MM083/FM009** add all of these requirements. Main modification **FM002** introduces new text to paragraph 4.116 of the Plan. This helps to explain the policy's approach to strategic masterplanning. So too does **MM057/FM003**, which clarifies that strategic masterplanning will be undertaken pro-actively and collaboratively with the Council and other key stakeholders. In my judgement, all the demands set out in these modifications are not only reasonable but are also necessary to ensure that the large developments to which they apply provide high quality, sustainable places to live that are successfully incorporated into the surrounding environment.
206. As put forward by the Council, the main modifications mentioned above say that "*any planning applications should be preceded by and consistent with an agreed strategic masterplan*". But neither national policy nor guidance require that informal discussions should take place or that agreements should be reached ahead of submitting a planning application. Indeed, there is nothing to prevent the submission of a planning application at any time. Consequently, while this is all highly desirable in respect of the strategic masterplans involved here, there is no justification for demanding that they be informally agreed before a planning application is lodged, and policies based on this footing would not be effective.
207. That said, it is reasonable to encourage the production of a strategic masterplan for informal agreement with the Council before the submission of a planning application. This approach would allow informal collaboration with key stakeholders at an early stage. Among other benefits, that could lead to a more efficient application process. That, it seems to me, is about as far as the Plan can go in this regard. I have altered the wording of the main modifications accordingly. Although these changes have not been the subject of consultation, they do not significantly alter the modifications as published, and they do not undermine the participatory processes undertaken.
208. These main modifications recognise that planning applications relating to strategic sites may have already been submitted to the Council, which is indeed the case. But that should not prevent the production of the strategic

masterplans sought. Indeed, if they have not already been produced then undertaking the exercise may well help to inform the need or otherwise for alterations to the submitted schemes. In my view, this requirement is justified.

## **The housing allocations in the western and southern part of the district**

### **The East of Luton sites**

209. Sites EL1, EL2 and EL3 (the 'East of Luton sites') are in the Green Belt and in effect form one single land allocation. Extending eastwards from Luton's western built edge, they envelope the villages of Cockernhoe and Mangrove Green, and run up to properties at both Tea Green and Wandon End. In combination, these three sites are expected to deliver 2,100 new homes.

### Green Belt impacts

210. Given their scale and the extent to which they protrude eastwards from the built edge of Luton, they represent a significant incursion into the open countryside. In short, I entirely agree with the conclusion to be drawn from the Green Belt Review Update that they would result in significant adverse impacts on the purposes of including land in the Green Belt.
211. Policy SP19 requires structural planting to help the new housing integrate into the surrounding landscape and to reinforce a long-term 'defensible' Green Belt boundary to the east. It also says that built development must be contained within the Breachwood Ridge and avoid adverse impacts on the wider landscape of the Lilley Valley. These measures will assist in reducing the visual effects of the sites' encroachment into the Green Belt, to some extent.
212. Perhaps more valuable in this respect, though, is the modification to the policy through **MM083/FM009** requiring a comprehensive strategic masterplan. To my mind, this is a key mechanism. It will guarantee that all three sites are planned holistically and as one cohesive whole. To my mind, considering the scale of the development involved here, this is critical to ensuring that the Green Belt impacts are ameliorated or reduced to the lowest reasonably practical extent.
213. It is plain that the development of these sites will lead to other impacts. These have been discussed at length at the hearings and I have been provided with a very significant amount of evidence from numerous parties. I do not address every argument here – rather, in line with the PPG, I focus below on those points which raise the most critical soundness issues.

### Traffic impacts

214. Traffic impacts are considered in two documents from the Council – the '*East of Luton Urban Extension Stage 2 – Traffic Modelling Results*' (February 2016 [TI7] ('the modelling report')) and the '*Local Plan – Transportation – East of Luton Technical Note*' (September 2017) [ED2] ('the technical note').
215. The modelling report is a high-level overview of the potential highways impacts of the three sites. It is based on the Central Bedfordshire and Luton Transport Model, being the same model as that used by Luton to inform its

local plan. It makes a range of assumptions in relation numerous factors, for example the number and location of jobs and traffic levels and directions associated with schooling. On that basis, it models traffic flows in the morning and evening peak times. It compares the 'output' road network statistics – including vehicle speeds and delay times – for two scenarios, one without the East of Luton sites and the other with them, in 2031.

216. From this work, it is apparent that the East of Luton sites would increase traffic flows on all roads, and that most of the additional traffic is likely to be between the sites and Luton, although some school traffic in the morning peak is expected to go to Hitchin. A number of links in the eastern part of Luton's highway network, for example Vauxhall Way and Hitchin Road, are anticipated to be operating over capacity in 2031 even without the East of Luton sites. They would undoubtedly worsen the situation at existing congestion spots, but the modelling report's authors do not expect them to lead to the creation of new ones. Similarly, the modelling indicates that junction delays in the vicinity of the sites will increase because of the new housing, again including at Vauxhall Way and Hitchin Road. Further afield, the difference in flows around Luton town centre ring road is likely to be marginal.

217. The technical note re-evaluates the evidence of the modelling report. It is, in effect, a 'second opinion' about the Council's position that the East of Luton sites will not lead to severe residual cumulative impacts. It concludes that they will not.

218. In the light of the above evidence, it is clear that the proposed allocations will have adverse impacts on the road network in terms of congestion and that such impacts will largely be in Luton. It will, in all likelihood, be necessary to introduce mitigation measures to tackle this, and I understand that the most appropriate solution is actively being considered by the two local authorities. Crucially, though, the sites will lead to a reduction in network speeds of around 1% to 2% and will only increase vehicle delay and queue times by between 3% and 5% – for illustration, that amounts to adding half a minute to a ten-minute queue. To my mind, the degree of change would not be significant.

219. Much criticism has been levelled at numerous areas of the modelling work undertaken by the Council in terms of new development omitted from it. But as I understand it, although a simplification, the approach taken here has been to:

- a) reflect the growth planned for in Luton's Local Plan and in the draft Central Bedfordshire Local Plan as it stood at the point of publishing under Regulation 19,
- b) take account of any other elements of growth with a reasonable likelihood of coming to fruition, and
- c) not include any other, more aspirational projects or plans where there is a significant degree of uncertainty.

Consequently – as an example – the expansion of Luton Airport from 9 million passengers per year to 18 million has been accounted for, as has the number of jobs on which Luton's Local Plan is based, but the airport's longer-term

vision up to 2050 has not been. In my view, that is the most appropriate approach. It would be unreasonable to insist that the long-term aspirations of the airport and other businesses be accounted for unless and until there is a decent degree of certainty about the plans involved and that they will go ahead. Although the Regulation 19 draft of Central Bedfordshire's local plan is relied on, the plan as now adopted does not include any significant additional growth that has not been captured.

220. This modelling is based on 6,905 dwellings being delivered in Luton. The Inspector examining Luton's local plan increased the housing requirement from 6,700 dwellings to 8,500. Consequently, the transport modelling does not take account of approximately 1,600 homes. In addition, the modelling work assumes that traffic will be able to use Eaton Green Road to access Century Park and the airport. But Policy LLP6 aims to ensure that it is not used for this purpose. The traffic levels elsewhere on the network nearby are therefore underestimated. Even though the level of traffic concerned is not anticipated to be high, both these factors do amount to weaknesses in the evidence.
221. However, the Inspector examining the Luton local plan did not demand any update to the evidence before him. For reasons given in paragraph 207 of his report, he found the assessment based on 6,905 dwellings to be adequate. I concur with the rationale set out in that paragraph, and it applies equally here – the effects on the strategic road network have been adequately assessed at this stage and sufficient measures are in place to help mitigate adverse effects.

222. Paragraph 207 also says:

*"This is an issue that should be re-visited in the early review of the [Luton] Plan when proposals to provide for Luton's unmet housing needs in neighbouring authority areas, potentially including in Central Bedfordshire and to the east of Luton are further advanced and the implications on transport infrastructure can be properly evaluated".*

Policy LLP40 of the Luton Local Plan says:

*"The Local Planning Authority will bring forward a full review of the plan. This will commence before the end of 2019 with submission of the review for examination by mid-2021. Specific matters to be addressed by the review include the following issues:*

*i. To address the outcomes of the Growth Options Study and decisions in neighbouring local plans about how and where Luton's unmet housing needs will be provided for including implications for transport infrastructure, as appropriate."*

223. Consequently, it is wholly clear that the implications of these three sites on transport infrastructure in Luton is a matter to be reconsidered through the review of Luton's local plan and will therefore be comprehensively retested through the examination of that review. It is not something to be ignored in this examination – far from it, and I turn to the stance in Policy SP19 shortly – but the evidence produced by the Council must be seen against the background of this unambiguous commitment in Luton's development plan. In

this context, I consider the modelling report to be sufficiently robust for plan-making purposes and to require any re-run of the modelling would be disproportionate.

224. Moreover, and notwithstanding any delay to the progress of Luton's local plan, more detailed and up to date transport assessments will be necessary to support the planning applications for these sites. While the evidence before me is sufficient to persuade me that their allocation should not be resisted on highways grounds, that is not the same thing as granting planning permission. Much will likely depend on the specific schemes put forward and the mitigation measures necessary. The Council will retain the power to prevent severe impacts of the kind referred to in paragraph 32 of the NPPF. Main modifications **MM032**, **MM083/FM009** and **MM119** – which I discuss in more detail elsewhere in this report – introduce additional requirements to Policies SP7, SP19 and T1 to ensure the robust assessment of traffic impacts and provision of any necessary mitigation measures through the planning application process.
225. Although the modelling report indicates that most traffic movements to and from these sites will be to and from Luton, there will be an increase in traffic on North Hertfordshire's roads in the vicinity of the sites. These are generally narrow country lanes, Chalk Hill, Stony Lane and Lilley Bottom notably so. The increase in traffic here is not so much a question of congestion, but rather more one of highway safety. There are stretches where two vehicles cannot pass and I have been made aware of collisions that have occurred during the examination.
226. As I understand it, the Council's attitude here – and, I believe, the sites' developers' – is to avoid encouraging vehicle trips through this part of the network. I agree in principle that that is the most appropriate path. Wholesale widening of the lanes would diminish their rural character, as would the increase in traffic along them that would likely ensue. It has been put to me that the addition of further passing places, most probably along the longest of the narrow stretches, is the probable solution. That may be so. Although again a matter of detail to be decided through the planning application process, this possibility lends confidence that an approach can be found that both secures the safety of drivers – which is my primary concern – and preserves the rural feel of the area. Consequently, whilst an important matter to be resolved, this issue should not stand in the way of allocating the sites.
227. Overall, there are no transport issues that lead me to conclude that the East of Luton sites should be rejected. However, several main modifications are needed to ensure that the Plan properly addresses the issues discussed above. To help limit trips to and from the sites by private car, the local centre to be provided should include a mix of uses that serve a range of day-to-day needs. The sites should be required to provide for sustainable modes of transport and integrate comprehensively into existing pedestrian, cycle and public transport networks. Many of the new jobs in Luton are quite near to the East of Luton sites, and this measure will help to reduce commuting by car. Crucially, Policy SP19 should also include appropriate transport mitigation measures to address impacts on Luton. Main modifications **MM083/FM009** and **MM086** modify Policy SP19 and a paragraph supporting it accordingly and are needed to

ensure that the sites are justified and that the Plan tackles the issues involved effectively.

228. I have considered the need to modify Policy SP19 to address the safety issues in relation to the country lanes previously mentioned. However, Policy T1 (as modified by **MM119**, which I consider later in this report) already requires that developments do not lead to highway safety problems or cause unacceptable impacts on the highway network. No additional text in Policy SP19 is therefore necessary.

#### Landscape impacts and the AONB

229. All the three sites are within Character Area 202 – Breachwood Green Ridge within the '*North Herts Landscape Study*' (2011) [CG16] ('the landscape study'). The landscape character here is described in the landscape study. It reaches three main conclusions about this character area:

- a) It is of moderate sensitivity
- b) It is of moderate/low landscape value
- c) Its capacity to accommodate large urban extensions over 5 hectares is low to moderate.

230. The landscape study says that large urban extensions would not be entirely appropriate here and explains why in terms of the effects that would be caused. The housing proposed will inevitably lead to some but, it seems to me, not all the impacts feared by the landscape study.

231. Large residential neighbourhoods form no part of the landscape character of this area. It is wholly evident that the East of Luton sites will have a significant impact. Features that are characteristic of Breachwood Green Ridge will be lost and replaced by housing. The peace and tranquillity of the area will be substituted for the noise and activity that accompanies residential districts. In the immediate vicinity and other places where visible, the new homes will be legible for what they are – a significant incursion of Luton's built area into the surrounding countryside.

232. However, most of the area proposed for allocation is southwest of the plateau ridgeline and stepped back from it. Whilst the sites do puncture the ridge at some point – generally around Stubbocks Wood – the areas of woodland would help to conceal the housing and blend it into the landscape, at least partially.

233. One area where this is not the case is between Chalk Hill and Stubbocks Wood. The illustrative masterplan provided as Appendix A to the statement of Bloor Homes shows this area as a football pitch and athletics track. Whilst the detailed arrangement of the site is a matter for the planning application process, this lends some reassurance that built development need not overtop the ridge in this more visible location.

234. Overall, I consider that these three sites will have an adverse impact on the character and appearance of the landscape here. That will perhaps unsurprisingly be most keenly felt from areas both within the developments and from areas closest to them where there are viewpoints. In more distant

views the new homes will appear as a visual imposition in the landscape. That said, the blocks of woodland in and around the sites will help to soften the extent of their intrusion.

235. On this point, the Chilterns Conservation Board and others argue that the proposed housing on these sites will have an adverse effect on the setting of the AONB. However, the sites are some way from the AONB – roughly between one and a half and two kilometres at the closest point. It is likely that the new homes could be seen from the AONB. But it seems to me that such views would be limited by the intervening topography, woodlands and other landscape features. The scale of the development would, in all probability, not be discernible. In any event, given the distance involved, I consider that any views of the housing would not erode the otherwise generally rural setting of the AONB or spoil the enjoyment of it.
236. To some extent, matters would be a little different during the night-time. Lighting from the new dwellings and streets would be noticeable. But their illumination would be set against the backdrop of lighting from Luton and the airport. Against this background hue, the effects on the AONB and the pleasure of those present after dark would be limited and would not be unacceptable.
237. Settlements and occasional scattered dwellings are identified in the landscape study as being characteristic of Breachwood Green Ridge. The development of these sites will undoubtedly result in the coalescence of Luton with Cockernhoe, Mangrove Green, Tea Green and Wandon End. The merging of these villages and hamlets with Luton will diminish that aspect of the landscape here.
238. The presence of a large residential district near to the narrow, twisting country lanes will erode their rural character, in the immediate vicinity at least, and the increase in traffic likely will add to that effect. However, this impact can and should be addressed – for example through hedgerow planting along the lanes – to ensure that the adverse effects are reduced insofar as it is possible to do so.
239. Disruption to the rights of way network and reduced access to the countryside is identified in the landscape study as the final aspect affecting the character area's capacity to accommodate development. For these sites, I see no reason why that should be a problem. Indeed, through **MM083/FM009** and **MM086**, requiring comprehensive integration into the pedestrian network, access from the built area of Luton into the countryside around it is likely to be improved.
240. The landscape study sets out a list of built development guidelines for the character area. The development of the proposed allocations would fall short when measured against these. That is not surprising – they are not guidelines aimed at residential development on this sort of scale.
241. Overall, I accept that the housing proposed on these sites would result in quite significant adverse landscape impacts. However, it seems to me that the Plan does all it reasonably can to address these effects. The delineation of the sites' boundaries also helps. Brick Kiln Wood is centrally located between Sites EL1 and EL2 but is not part of them and will be retained. As previously

mentioned, Stubbocks Wood – along with Brick Kiln Wood and other woods and plantations largely to the north – will assist in assimilating the housing into the wider landscape. All in all, the new homes need not undermine the rural character and appearance of this part of the district to an unacceptable degree.

242. I note that that Breachwood Green Ridge, among other land, has been put forward to Natural England to consider the merits of including it within the Chilterns AONB. An application was made in October 2013. The process firstly requires an initial assessment by Natural England of whether the land in question meets the statutory criteria of an AONB. Subsequent stages involve consulting the local authorities concerned and the public, considering those representations, modifying the boundaries if necessary in the light of the comments received, and submitting an order to the Secretary of State for consideration. As I understand it, Natural England's assessment process remains at an early stage.
243. The upshot here is that this area is currently outside the AONB. I cannot tell whether Natural England would consider that it should pass the initial assessment. Either way, there is no clear or present prospect of the AONB boundaries being altered to encompass the proposed housing allocations. Considering my overall conclusions about these sites, I am not persuaded that their allocation should be resisted on this basis. Meeting Luton's urgent need for housing is a matter that should not be put on hold to await the uncertain outcome of the AONB extension process.

#### Other impacts and issues

244. I fully appreciate that the sites' effect of merging Luton with the nearby villages and hamlets will have significant effects over and above those relating to the landscape. The people living here will experience significant changes to their surroundings – most fundamentally, their homes will no longer be in rural or semi-rural hamlets but will in effect be an integral part of a large new neighbourhood. I entirely understand that many do not want this and wish to retain the present, more pastoral living environment and the sense of rural living and community that accompanies it. The degree of change will be palpable.
245. However, the presence of the new housing need not lead to a poor or otherwise unacceptable local environment. On the contrary, the Plan's requirements for green spaces and outdoor facilities, structural planting, and a local centre, should lead to the creation of pleasant and agreeable surroundings once the development is complete. The continued presence of Brick Kiln Wood roughly centrally placed among the new homes will likely help to create a leafy feel, and the open countryside will remain close at hand.
246. I have heard much about the presence of biodiversity on and around the sites. In particular I have been told that there are corn bunting, newts, red kites, badgers, reptiles and bluebells in the area. Much of this, though, stems from a search of Natural England one kilometre grid squares. I therefore cannot tell with any certainty whether this flora and fauna is present on the sites themselves. I have also been told that badgers live in one of the woods. But the proposed allocations exclude the existing woodland. While development

may well have an impact, the loss of the clan is not a foregone conclusion and if necessary, the Council is able to insist on protective or other measures through the planning application process. Hertfordshire Ecology – a County Council service for ecological advice – has not identified any fundamental ecological constraint to the allocation of this site. The Sustainability Appraisal [LP4] has informed the site-specific policy requirements including the need for ecological mitigation to be informed by detailed site-specific assessments. I discuss the relevant development management policies in more detail under Issue 17 later, but Policies SP12 and NE6 in particular, as modified, allow for detailed consideration of these issues. Indeed, given this, it seems to me that there are no biodiversity features here that either in isolation or combination should prevent these sites coming forward.

247. Visiting the sites has confirmed to me the point that a herd of deer runs the land in this area. Although the new housing may well alter the area the herd frequents, that does not amount to a strong reason to resist the proposed allocations.
248. Putteridge Bury Grade II Historic Park and Garden is to the northwest of the three East of Luton sites. Open fields separate its parkland from Site EL3, the closest of the three to its boundary. Considering this and given that the entire southwestern boundary of the registered parkland abuts the existing built edge of Luton, I consider that the new housing would preserve the setting of this designated heritage asset.
249. As submitted, Policy SP19 requires the provision of “*up to 4FE of primary age and secondary age education provision*” on the East of Luton sites. For effectiveness, it is necessary to clarify that this means four forms of entry for each of the two age groups.
250. There has been some confusion between the Council and the local education authority about the level and/or timing of education provision needed on these sites to ensure that the schooling needs related to the Plan's housing growth is sufficiently accommodated. However, the two parties provided a Statement of Common Ground in December 2019 [ED177]. This confirms their agreement that all the Plan's policy requirements relating to education are sound, save for in relation to one matter that is not relevant here. That agreement was reached on the basis that Policy SP19 requires the secondary education solution to be designed to not preclude the potential for future expansion. For effectiveness, I agree that that is a necessary demand. Main modification **MM083/FM009** includes both the changes discussed above.
251. In addition, **MM085** explains that this approach is necessary to ensure the wider education need across the rural west of the district can be met, and that this matter will be kept under review. I see no reason why any school expansion here should not serve the wider education needs of North Hertfordshire. Just because the new homes serve to help address Luton's housing needs does not mean that pupils from parts of North Hertfordshire beyond the sites' boundaries should be barred from attending the school.
252. As submitted, Policy SP19 does not require affordable housing on the East of Luton sites. I have previously discussed the housing situation in Luton. Considering this, it should, and Policy SP19 should also require that

mechanisms are put in place to ensure that these affordable homes are earmarked to address the need arising in Luton. Main modification **MM083/FM009** adds both these requirements to the policy and **MM084** adds further detail to paragraph 4.219 of the Plan. Both are necessary for effectiveness.

253. As I understand it, part of the East of Luton sites has been landfilled in the past. A contaminated land preliminary assessment should therefore be undertaken. Main modification **MM083/FM009** adds this requirement and is needed for effectiveness.
254. Main modification **MM087** adds to the Plan a new paragraph explaining the wastewater drainage situation in relation to the East of Luton sites, being that, in short, upgrades to the existing infrastructure network may be necessary. A requirement for the submission of a detailed drainage strategy is added to Policy SP19 by **MM083/FM009**. In the circumstances, both are necessary for effectiveness.
255. I note the points raised by Luton Airport and others about the effects of noise from the airport in relation to the living conditions of those living nearby and the consequences of that on future airport expansion. However, there are already homes closer to, or at least as close to, the airport than the new housing proposed here will be. None of the proposed allocations are within the current noise contours. It therefore seems to me that the resultant relationship between the two uses would be satisfactory. While the airport may wish to alter flightpaths in the future, including as part of its longer-term expansion plans, decisions about the location of new homes cannot be based on second guessing future flightpaths. While I recognise the economic importance of the airport and its contribution to the UK's air industry, the Council's attempt to help meet the pressing housing needs of Luton should not be obstructed by the possibility that aircraft routes may need to change.
256. It is suggested that there is some overlap between the East of Luton sites with Century Park. The area referred to is not large. Consequently, even if that were to be the case, that would not render the allocations undeliverable as a whole.
257. A vast number of other arguments have been put to me, ranging from air quality issues to Boudica's last stand and many other points besides. I have taken account of them all. However, there are none of such compelling force that I am persuaded that the proposed allocations should be rejected as a matter of principle. Many of the issues raised are detailed matters, and where this is the case, they will be considered and dealt with through the planning application process accordingly.

#### Alternative options

258. The East of Luton sites have not been selected using the same site selection process as the other housing sites proposed in the Plan. They have been put forward under the Duty to Co-operate. However, the question of alternative options nonetheless has a bearing in the ascertainment of the existence or otherwise of the exceptional circumstances necessary to warrant the 'release' of the East of Luton sites from the Green Belt.

259. Under the Duty to Co-operate, the four local planning authorities for the Luton HMA agree that Luton Borough's unmet housing needs should be met on land located as close to the boundary of Luton as possible. The Council's position on this is a little more refined – it says that any such land should be in the sliver of North Hertfordshire that lies within the Luton HMA. Although that narrows considerably the 'area of search', I entirely concur that that is a logical stance and the most appropriate approach to take. This is a question of meeting needs where they arise. To stray beyond the housing market area would give rise to uncertainty about whether the identified need is being addressed.
260. To explore the possibilities of providing sites as close to Luton as possible, the four local planning authorities commissioned the '*Luton HMA Growth Options Study*' (2016) [HOU7] ('the Growth Options Study'). This considers numerous options for housing delivery around Luton. It assesses the sites considered in relation to constraints, access to services and facilities, Green Belt, deliverability and viability. Whilst it does not set out explicit recommendations about the most suitable sites, it provides a 'menu' of sites and notes their various advantages and drawbacks. It indicates that there is potential capacity within the Luton HMA to accommodate Luton's unmet housing needs. To help with effectiveness, the Plan should provide some explanation about the Growth Options Study, the role it has played in plan-making and its outcomes. Main modification **MM410** adds appropriate text accordingly.
261. I recognise that there are matters the Growth Options Study does not take into account such as the level of Luton Airport's growth, and it does not include detailed traffic assessments. It was never intended to be an in-depth exploration of that kind. Rather, it is a high-level study which aims to set out the strategic options for meeting the housing needs of the Luton HMA and to provide some comparison for the Council's concerned to then consider further. As an informed waymarker signalling possible routes for investigation, it is a proportionate and sufficiently robust study.
262. The East of Luton sites are the only potential growth location in North Hertfordshire that is evaluated in the Growth Options Study. Most other land within the Luton HMA is 'screened out' because of primary constraints – notably the presence of the Chilterns AONB and areas of higher landscape value/sensitivity. Taking account of all this, I agree that the East of Luton sites are the only appropriate potential growth location in North Hertfordshire.
263. Looking beyond the district's boundaries to land in neighbouring local authority administrative areas, it is clear that many of the other potential locations considered are not so close to Luton as the sites proposed here. Indeed, some are quite a distance away.
264. From the Growth Options Study, the Council says that there are not sufficient alternative growth locations with strong links to Luton – either through physical proximity or high-quality public transport accessibility – that would allow Luton's unmet housing needs to be delivered on land that is preferable in Green Belt terms to the East of Luton sites. From my reading, that does indeed appear to be the case. Consequently, it seems to me that the East of Luton sites are an essential ingredient of a balanced solution to addressing housing needs in Luton – that is, a solution which takes account of both the

harm to the Green Belt and the sustainability of the location in relation to access to and from Luton. This is a compelling point that points strongly in favour of including the East of Luton sites in the mix.

265. In any case, as I have previously mentioned, the Central Bedfordshire Local Plan has now been adopted. The vast majority of the other growth locations considered in the Growth Options Study are in that local authority's administrative area. The Local Plan includes a number of them, and overall provides sufficient land to deliver the quantum of housing Central Bedfordshire agreed to deliver to help address Luton's needs through the Duty to Co-operate. As a consequence, rejecting the East of Luton sites at this stage would leave Luton with a shortfall for which there would be no mechanism to remedy in this 'round of plan-making'. This housing need would therefore go unmet for a significant period of time.
266. The East of Luton sites perform relatively well in the analysis of the Growth Options Study. They also meet the 'three tick' criteria in the SHLAA Update. They now also represent the only realistic option for ensuring that Luton's unmet housing need is addressed without deferring the matter further. I see no reason to prolong Luton's delivery shortcomings. It is the role of local plans to tackle the thorny issues head on. That is what this Plan seeks to do, and I consider the East of Luton sites to be the most appropriate solution. In summary, in spatial terms, these sites represent an entirely logical extension to Luton.

### **Knebworth**

267. Four sites are proposed for allocation in Knebworth. Sites KB1, KB2 and KB4 are in the current Green Belt. Development on Site KB3 has already started or been completed.
268. Broadly speaking, Knebworth is within a shallow bowl in the landscape. The centre of the village is at its base and is bisected by the East Coast Main Line. Sites KB1 and KB2 – anticipated to yield 200 and 184 new homes respectively – are on the western edge of the village, between it and the A1(M). The 200 dwellings delivered through Site KB4 would be along the eastern edge of Knebworth.
269. The Green Belt Review Update concludes that Site KB1 makes a moderate/limited contribution to the purposes of including land in the Green Belt, and that Site KB2 makes a moderate contribution. The former is a reduction from the conclusion of the Green Belt Review, which puts the contribution of KB1 at moderate.
270. As I see it, relative to the existing built envelope of Knebworth, these are reasonably large sites. Because of this, and the topography here, both would lead to the encroachment of numerous new buildings into the countryside beyond the existing built edge of the village. I consider the harm caused by each would be moderate overall.
271. However, a number of factors would ameliorate or reduce this impact. The new homes would not be so prominent in the wider landscape. The A1(M) and the trees along its route would help to conceal them, as would the undulating nature of both sites, which include depressed areas within the more generally

sloping topography. The northern part of Site KB1 begins to slope downwards, facing out towards Stevenage. Consequently, a visual impact assessment is needed to ensure that the visual aspects of the impact on the Green Belt are reduced to the lowest practical extent. Main modification **MM285** adds a requirement to Policy KB1 accordingly. The requirement in both policies to ensure that 'defensible' boundaries are created where currently they are less robust will also assist in this regard.

272. Site KB4's contribution to the Green Belt is judged by the Green Belt Review Update to be moderate/significant. Unlike Sites KB1 and KB2, it is not contained by the line of the A1(M). In my opinion, it consequently has a generally more open, exposed character. Overall, I agree that the new homes and school proposed here would lead to moderate/significant harm to the purposes of including land in the Green Belt.

273. In effect, this site 'wraps around' the current eastern built edge of Knebworth. Simply put, it is long and narrow, at least relative to its length, and will not extend the village eastwards significantly. There are a few farm buildings and other properties just beyond the eastern site boundary. Along with the structural planting required by Policy KB4, these factors will help to reduce the sense of encroachment into the countryside, to some degree.

274. Site KB4 is within the Green Belt between Knebworth and Stevenage. However, it would not cause the two to coalesce, and there would remain a sufficient Green Belt gap between the two to ensure that their individual identities remain distinct.

275. The level of new housing by the proposed allocations will add to traffic in Knebworth centre. I note that the B197 through Knebworth is quite a busy road, and whilst it is of reasonable width car parking to either side does create something of a pinch point. I do not doubt that this causes delays and inconvenience for many, especially when the A1(M) is busy and people use the B197 as an alternative. Main modification **MM295** explains the issues in more detail, which is necessary to help with effectiveness.

276. But Knebworth is the largest village in North Hertfordshire. It has a railway station on the East Coast Main Line route. All the proposed allocations are not far from the village centre. The new homes – or the vast majority of them at least – would be within a reasonable walking distance of the shops, railway station and other services there. They would certainly be within a short cycle ride.

277. In this context, it seems to me that the cumulative impact of the new housing proposed here need not lead to severe adverse impacts on the local highway network. There is little in the '*Local Plan Model Testing Technical Note*' (September 2016) [TI4], which takes account of all three proposed sites and other growth beyond the district, to indicate otherwise. To ensure that they do not, the policies allocating each of the three sites should require an assessment of their combined effects on key junctions and rail crossing points and the provision of any necessary mitigation measures identified through those assessments. Main modifications **MM285**, **MM286/FM145** and **MM288** introduce appropriate wording accordingly.

278. As I understand it, a scheme is in hand to introduce a 'smart motorway'

arrangement on the A1(M) between junctions 6 and 8, and that this is fully funded by National Highways. If implemented, it seems to me that this will also help to reduce traffic through Knebworth.

279. I have been told that trains from Knebworth station are at capacity and have insufficient carriage space. However, it is difficult to see what this Plan can do about that. Whilst it is possible that the Council may have some influence, these are commercial decisions taken by the train operating companies. It strikes me that the most forceful driver of supply is demand. The new housing proposed here will, in all probability, add to that.
280. I discuss issues relating to secondary education provision later under Issue 10. In terms of primary education, Policy KB2 requires that a one form of entry primary school be provided on that site. Main modifications **MM286/FM145** and **MM291** alter this so that the Plan instead demands that approximately two hectares of land to the south of Gipsy Lane and adjoining the settlement must be reserved for a primary school. I agree that this is necessary. There is some uncertainty about whether two forms of entry might be needed and the amount of land specified introduces suitable flexibility. Identifying the location is also appropriate. It will ensure that the school is away from the A1(M) and in the part of the site closest to existing homes and the village centre.

### **Codicote**

281. Four allocations are proposed in Codicote, all of which are currently in the Green Belt. To the south of the village, Site CD1 is a field earmarked to deliver 73 dwellings. It is not large compared to many allocations proposed in the Plan, and while the homes on it will extend the village southwards, they would not run beyond the collection of buildings at Hollard's Farm. The Green Belt Review Update puts the harm to the Green Belt at moderate. In my view, given the size of the site and the relationship with the existing buildings here, it would be moderate at most. Indeed, it seems to me that the presence of Hollard's Farm would visually contain the new homes within the existing visual envelope of the village. This effect will help to ameliorate their impact on the Green Belt.
282. Site CD2 is at the northern end of Codicote and is expected to deliver around 54 homes. It was previously occupied by Wyevale Garden Centre, and whilst that appears to have now been demolished the site is previously developed land. Although not a large site, new housing here would form a relatively isolated protrusion northwards from the built edge of the village. I consequently agree with the Green Belt Review Update that moderate harm to Green Belt would be caused.
283. Notwithstanding that, the site is reasonably well contained by hedgerows. This will help to reduce the adverse Green Belt impacts. To ensure that outcome, Policy CD2 should require that the hedgerows be retained and strengthened. Main modification **MM225/FM121** adds such a requirement accordingly and is necessary for effectiveness.
284. To the east of Codicote, Site CD3 is a field to the rear of residential properties. It is not a large site and is expected to deliver around 48 dwellings. Initially assessed as making a moderate contribution to the Green Belt in the Green

Belt Review, the Council's position in the Green Belt Review Update has shifted and puts the harm to the Green Belt at limited. Considering its limited size and that it is enclosed on two sides by existing housing, I agree with the overall findings of the Green Belt Review Update.

285. The largest of the proposed allocations, Site CD5 is earmarked to deliver approximately 140 new homes. However, planning permission was granted on appeal (reference 3273701) in September last year for 167 dwellings. I note that this permission does include some 'pre-commencement conditions' which must be discharged prior to development starting. But there is nothing here out of the ordinary or otherwise especially onerous, and there is nothing to stand in the way of this permission being implemented. In his appeal decision, the Inspector concludes that the 'very special circumstances' needed to warrant the grant of planning permission do exist. As the High Court judgement in *Compton Parish Council v Guildford Borough Council [2019] EWHC 3242 (Admin)* makes clear, the exceptional circumstances test that applies in my consideration about the soundness of the proposed allocation is less demanding than the 'very special circumstances' test.
286. Aside from Green Belt matters, it seems to me there are two main issues concerning the proposed sites in Codicote – their effect on the local highway network and parking in the village, and the capacity of Codicote Primary School to accommodate the likely increase in pupils. I consider each in turn.
287. The B656 runs through the village and incorporates the High Street. It links the A1(M) at Welwyn to the south and runs northwards on to Hitchin. It is a busy road, and some describe Codicote as a 'rat run' at peak times. I note that it is used by HGVs travelling to and/or from a quarry nearby. I have no doubt that the proposed allocations will add to traffic and congestion here.
288. However, the Council's 'Local Plan Model Testing Technical Note' (September 2016) [TI4] does not identify any particular junction problems in the vicinity. This takes into account the cumulative effects of all the allocations proposed in this plan and known growth in other areas. At the strategic level, that is reassuring. However, I agree with the Council that the planning applications for each of the allocations should include transport assessments to consider the combined local impacts in greater depth and that any mitigation measures identified as a result should be secured. Main modifications **MM224/FM120**, **MM225/FM121**, **MM226/FM122** and **MM227/FM123** add these requirements to the policies, and **MM233** adds further explanation and detail. All are needed for effectiveness.
289. Site CD2 is adjacent to a sports field and community centre. Providing access to them through the site could help to facilitate shorter and more direct journeys that would otherwise involve travelling through the northern part of the village. Main modification **MM225/FM121** adds this as a policy requirement and is necessary for effectiveness.
290. Car parking is clearly also an issue in Codicote. This does not help with congestion and likely affects the shops and other local businesses in the village centre. However, all the sites proposed here are within a reasonable walking distance of the High Street. That some may park their cars partially across the footway does not alter this. Even if the B656 is not an entirely attractive

prospect for cycling, as some suggest, it remains an option. I note the points about the limited number of bus routes and frequency of services. But in this largely rural district, the fact that Codicote has access to public transport is an advantage.

291. Codicote Primary School is a single form of entry school that is at or above capacity at present. It has no space within its grounds to expand. The proposed housing allocations would lead to the need for something approaching two forms of entry. The Council's intention is that Site CD5, which is to the rear of and adjacent to the school, will provide a new playing field for the school to enable the school to expand onto its existing field. To ensure that the school places needed are provided when they are required, it will be necessary for Site CD5 to be delivered either ahead of or in parallel with the other allocations. For effectiveness, **MM232** and **MM227/FM123** are necessary to ensure that the Plan sets out the position clearly.
292. As I have said, Site CD5 now has planning permission. The appeal scheme is supported by a signed legal agreement securing the land transfer involved with providing the new school field. It therefore seems to me that the school capacity required is deliverable. However, to make sure of this, the policies for each of the four sites should include a requirement for an appropriate solution for the expansion of Codicote Primary School to be secured, along with a requirement for a contribution to that expansion. Main modifications **MM224/FM120**, **MM225/FM121**, **MM226/FM122** and **MM227/FM123** add such requirements.

### **Breachwood Green, Preston, Whitwell, Kimpton and Oaklands**

293. Site KW1 in Breachwood Green is in the Green Belt and is expected to yield approximately 16 dwellings. It is an allotment site between homes to the north and new residential development to the south, with the remainder of the village beyond that. Given its size and position in relation to other properties, I concur with the Green Belt Review that it makes a limited contribution to the Green Belt. Policy KW1 requires that the western site boundary be reinforced, and this will help to ensure that impacts on the Green Belt are minimised. The policy also demands the provision of new allotments subject to an assessment of need. That is a critical requirement in justifying this allocation. The Council has put forward **MM282** to amend the policy requirement concerning the footpath to ensure that two footpaths in the vicinity are linked. I concur that that is necessary for effectiveness, to ensure a cohesive footpath network.
294. Although Kimpton is generally within the existing Green Belt, Site KM3 is not – it is an agricultural field with dwellings to either side and is within the existing Green Belt boundary around the village. It is adjacent to a Conservation Area and Policy KM3 appropriately requires a sensitive design. Main modifications **MM280** and **MM281** are necessary, though. These clarify that it is not only surface water but also groundwater flooding issues that will need to be addressed, and that development will need to achieve the equivalent of 'greenfield' run-off rates to avoid worsening the problem.
295. Preston is in the general swathe of land proposed as new Green Belt – I consider the new Green Belt land proposed under Issue 12 below. Site PR1 in Preston is a largely grassed area surrounded on three sides by residential

properties. Its western boundary faces onto Butchers Lane and comprises a hedgerow and several trees. To ensure that the development blends into the landscape and retains the leafy feel of the lane, it is necessary to retain these features. Main modification **MM327** adds a requirement accordingly.

296. Wain Wood, a Site of Special Scientific Interest (SSSI), is to the north of Preston. Natural England has expressed some concern about the potential impact on the wood. The issue here is that the new housing would increase the number of people visiting the wood, walking their dogs and the like. I fully appreciate the effects this can have on SSSIs. Such effects are considered in the Council's '*Assessment of the potential for recreational impacts on Wain Wood*' (September 2016) [NHE11]. Taking this into account, it seems to me that any additional impacts on the SSSI as a result of the 21 homes proposed for Site PR1 would be limited. The Council has put forward **MM328** adding a new paragraph supporting Policy PR1. This explains the issue and the requirement for mitigation measures. In my view, with this modification, Site PR1 is justified.
297. Whitwell is also within the new Green Belt. However, development of the proposed housing site there, Site SP2, has commenced, and I have already concluded that this site should therefore be deleted from the Plan.

## **The housing allocations in the central part of the district**

### **Letchworth Garden City**

#### Overview

298. Letchworth is the world's first Garden City. I fully recognise the significance of this, and of the importance of the Garden City movement. Ebenezer Howard's garden city principles, upon which Letchworth was founded, form part of the historic roots of the discipline of town and country planning in this country.
299. The town of Letchworth, though, is not in itself a designated heritage asset. Unlike Conservations Areas, for example, it is consequently not afforded any particular protection in law or through the national policies that apply to designated heritage assets. There is, therefore, no reason in principle why housing development in Letchworth should be constrained or controlled. Indeed, rejecting any of the proposed allocations on these grounds would be inconsistent with national policy and unjustified.
300. Whilst it is apparent that not all development in the town since its founding has followed the garden city principles, they have nonetheless shaped the town in a way that remains unambiguously palpable today. Because of this, I concur in no uncertain terms with the Council and others who suggest that future development in the town should have regard to those principles – not necessarily to replicate slavishly the urban form of the past, but to embed the fundamental philosophies of the garden city movement into the fabric of the town's growth.
301. To this end, the Council has put forward several main modifications to the Plan. Most fundamentally, **MM379** introduces a new appendix which provides a set of design principles. From my reading, these are all reflective of Letchworth's founding ideology and are fit to influence and shape future

development in the town. Other main modifications (**MM144**, **MM147**, **MM298** and **MM061/FM005**) require that developments in Letchworth accord with the design principles. This is a justified and effective approach and is necessary.

302. Some of the proposed housing allocations relate to land currently/last used for employment. Some consider this to be contrary to Garden City principles. I recognise that living and working locally is a central premise of the ideology. But the Plan aims to meet employment needs. A significant proportion of the district's employment land is in Letchworth. The Plan will not alter that, and opportunities for people living in Letchworth to also work there will remain. While the balance between homes and jobs in Letchworth might be different to that envisaged by Ebenezer Howard, times, trends and aspirations have moved on. Many living here will choose to travel to work elsewhere – including London – to access different and/or better job opportunities. To endeavour to precisely balance workers and jobs in any one town, including Letchworth, would be to deny the nature of the modern labour market. There is no compelling evidence to support such an attempt, and, in this regard, I consider the Plan to be sound.

303. Paragraph 13.225 of the Plan says that further school provision will be needed in Letchworth but that further work is necessary to determine school capacity and how the need for school places will be accommodated. This work has now been done. Main modification **MM315** alters this paragraph to clarify that aside from the new primary school on Site LG1, which I consider below, additional primary school places can and will be provided through the expansion of existing schools and the need for secondary places will be provided for through the expansion of Fearnhill School. These changes are needed for effectiveness.

304. Two specific junctions are identified in the Council's traffic modelling as requiring works to mitigate the growth in journeys over the plan period.

#### The housing allocations in the Green Belt

305. A strategic allocation, Site LG1 is to the north of Letchworth and is earmarked to deliver around 900 homes. The Green Belt Review Update indicates that the overall contribution made by this land to the Green Belt is significant. I concur – the impact on the Green Belt purposes is significant. To ameliorate this is something of a challenge. The site represents a significant incursion into the Green Belt, and because of its elevated position the housing on it will be clearly visible. However, Policy SP15 (which allocates it) requires structural planting to integrate the housing into the surrounding landscape and to create a defensible boundary. The requirement for a strategic masterplan – introduced through **MM061/FM005** – will ensure that such planting is considered as an integral part of the site's development. This main modification is therefore necessary for effectiveness. To my mind, these measures would address the adverse effects on the Green Belt as far as is reasonably possible.

306. The development of this site would result in housing extending towards the built edge of Stotfold to the north. The Council says the distance between the two would be around 800 metres, others put it at roughly 500 metres.

Whatever the precise figure, I consider that it would be sufficient to prevent them merging. In any event, it is the merging of towns that is among the purposes of including land in the Green Belt. Stotfold is not a town, and in my view the intervening space between it and the new housing proposed would be sufficient to ensure that Stotfold retains its sense of individuality.

307. Anticipated to deliver approximately 120 dwellings, Site LG3 is much smaller. It would not protrude further north-eastwards than the housing and industrial area to the northwest and southeast of it. In short, it would fill the gap between the two and the extent of encroachment into the Green Belt would consequently be much more limited than in the case of Site LG1. I consequently agree with the Council's assessment that the proposed residential development would result in moderate harm to the purposes of including land in the Green Belt. The structural planting required by Policy LG3 will help to ensure that this impact is satisfactorily ameliorated.
308. I disagree with the points about Site LG3 leading to Letchworth merging with Norton village. Development here would not be any closer to Norton than existing housing. While it might affect the separate identity of Norton to some extent, it seems to me that the degree to which Norton is distinct from Letchworth – in the physical sense at least – is already eroded by their proximity, and the proposed housing will not exacerbate matters significantly.
309. It is clear to me that building new housing on both sites will have other adverse impacts not related to the Green Belt. Hedgerows cross parts of Site LG1 – some of ancient vintage – and I have been told that there are numerous endangered and/or rare species on and near the site. However, the SHLAA has taken biodiversity constraints into account, and these have been considered by the Council through the site selection process. With respect to wildlife, the Council has also had regard to information provided by Hertfordshire Ecology. Further ecological investigation will undoubtedly be necessary in relation to Site LG1 as part of the planning application, and the Council will retain the ability to demand any measures necessary.
310. That said, I agree with the Council that the existing trees and hedgerows on Site LG1 should be retained where possible, and that losses should be kept to a minimum. Main modification **MM061/FM005** adds an additional criterion to Policy SP15 to this effect, **MM066** makes it clear that harm to existing green infrastructure should be limited, and both are necessary for effectiveness.
311. Site LG1 is located to the northern extremity of Letchworth and is not especially close to the town centre or the railway station there. It is consequently probable that its development will lead to a worsening of the parking situation in the centre, and at and around the railway station. It may also exacerbate the conditions along roads in the vicinity, including Grange Road. Site LG3 will also add to traffic in the town, including during peak and 'school run' hours.
312. Some impacts of this kind are largely unavoidable – the scale of new housing proposed, particularly through these two sites, will inevitably increase road traffic and parking issues. That said, Policy SP15 aims to tackle these negative effects in respect of Site LG1 insofar as it is possible to do so. It requires neighbourhood level retail and community facilities. For

effectiveness, though, this should clarify that this must include retail and food and beverage floorspace. In light of the evidence, it should also require a GP surgery. Main modifications **MM061/FM005** and **MM064** include these alterations and for the same reason, along with **MM063**, also makes clear that the education solution required is a two form of entry primary school to be provided on the site. It strikes me that providing these facilities on the site will help to limit traffic flows into the town centre.

313. Furthermore, **MM061/FM005** requires that Site LG1 is integrated into the existing pedestrian, cycle and public transport networks. While it may be that current networks are not comprehensive, it is difficult to see what else the development of this site could reasonably achieve. As I see it, this demand, along with the on-site provision of shops, community facilities and a primary school, will ensure that it plays its part in encouraging a shift from reliance on the private car to other more sustainable transport modes. Main modification **MM316** introduces a requirement for other developments in Letchworth to contribute to walking and cycling schemes in the town. This will help the situation and is both justified and necessary for effectiveness.
314. There is a WwTW approximately 600 metres from Site LG1. I agree with the Council and Anglian Water that odour impacts should be properly assessed and addressed if necessary to ensure that the living conditions on the site are satisfactory. Main modifications **MM061/FM005** and **MM067** add this requirement to Policy SP15.
315. Site LG3 abuts Norton Conservation Area to the northwest and industrial units to the southeast. In relation to the former, Policy LG3 requires sensitive design and/or lower density housing, to ensure that the character or appearance of the Conservation Area is not harmed. In terms of the latter, it requires the inclusion of measures to control noise levels within the new properties. This is an appropriate response. While noise and odours from the adjacent uses may be experienced in the gardens of the new homes, I note that there are already dwellings near to the businesses concerned, which suggests that they can co-exist in principle. In any event, anyone moving here would do so in the knowledge of their presence.
316. It is suggested that there is a 'bio-genetic corridor' running northeast to southwest, spanning from the Chilterns possible as far as The Wash, where chalk and underlying boulder clay result in good surface habitats which provide a wildlife corridor. While that may be so, there is little in the way of clear-cut or otherwise unquestionably convincing evidence to support this proposition. In this context, I am not persuaded that this matter should prevent the new housing proposed either in Letchworth or elsewhere in the district.
317. Of the adverse impacts raised through the examination, I consider none to be unacceptable in and of themselves, either in isolation or combination.

#### The housing allocations that are not in the Green Belt

318. Sites LG4 and LG10 both comprise grassed land surrounded by houses backing onto it. As submitted, both Policies LG4 and LG10 require that a justification be made for any loss of open space. However, as I see it, neither of these parcels have a genuine open space function. They are former playing fields that have long since ceased to perform that role. Even if they are used by

some to walk dogs or for other recreation purposes that, it seems to me, is incidental – such activities have been without the landowner's permission and should not be a factor of material influence. Consequently, it is necessary to delete the demand from both policies. Main modifications **MM300** and **MM304** do this and are needed to ensure that these policies are justified.

319. I fully appreciate that the undeveloped nature of both sites is valuable to those who live around them, and that they provide homes with a pleasant outlook. I entirely understand that building houses on them will alter views from the properties concerned. But there is no reason why the relationship between the existing and new housing here should be anything other than acceptable.
320. Some suggest these parcels represent an opportunity for green space – a green lung or a green with houses around. On the former point, the same could be said of any undeveloped, grassed area, and I see no compelling reason to prevent development on land that has no meaningful open space function. On the latter argument, I disagree. The houses here do not face onto the grassed area – indeed, they turn their back to it. To my mind, that is the antithesis of a village or town green and is not an arrangement with strong links to Garden City principles.
321. Earmarked for around 37 homes, Site LG10 is adjacent to a Conservation Area which includes several Grade II Listed Buildings. Access to it is via Cashio Lane and/or Croft Lane. Both are narrow, there are no footpaths in the immediate vicinity of the site access and children walk along the lanes to Norton School nearby. Adding to road traffic here is not ideal.
322. However, the highway authority says that the number of additional vehicular trips would not be significant. Given the relatively modest number of homes proposed, I concur, and any increase in the number of children using the lanes to walk to school would be limited accordingly. It strikes me that people living here would be well aware of the width of the lanes and their use by children during 'school run' times. It is highly likely that they would drive at low speeds and with significant care accordingly. There is no evidence to suggest that construction drivers would be any less considerate or aware of their surroundings and this would be for a very limited period. If need be, the highway authority is able to introduce measures to control driving speeds and calm traffic. I therefore concur with the highway authority and the Council that the allocation of this site would not lead to a highway safety problem.
323. Part of Croft Lane is lined by open fields. Along with its limited width, this lends the lane a rural character which contributes positively to the character or appearance of the Conservation Area. Although the increase in traffic resulting from the new homes would affect this, the increase would not be significant and, in my view, would not lead to a material change in the character of the lane.
324. Policy LG10 requires a sensitive design and lower density of development on the site. Considering this, and considering that only 37 dwellings are anticipated here, they need not materially harm the Conservation Area.
325. Sites LG5 and LG18 are both previously developed land that backs onto the railway line. I do not regard the latter to be a problem. It is common for

housing to be located adjacent to railways, and any noise attenuation measures necessary can be secured by the Council through planning conditions. Nor do I consider the fact that Site LG5 is in an area considered to be a long-standing industrial area to be a drawback. There is already housing in very close proximity and from my site visit I consider the vicinity to be somewhat mixed in terms of uses.

326. Policy LG5 requires the retention of any buildings on the site that are of historic and/or architectural interest. It does not specify which buildings and is consequently not effective. Main modification **MM301** adds to the policy text identifying the buildings concerned and makes clear that they are non-designated heritage assets.
327. Part of Site LG6 is occupied by an abandoned block of flats, while another portion is undeveloped land. This was formerly an orchard and an area of priority habitat. Policy LG6 requires the retention of the priority habitat, but the orchard trees have now been removed, or at least have mostly been.
328. In these rather unfortunate circumstances, the loss of the priority habitat should not go unanswered. However, this is a generally residential area. Thirty-five new homes are proposed on the site, and I see no reason why they should lead to unsatisfactory living conditions in any of the existing dwellings around them. In short, this is a site that is suitable for the new housing proposed. Consequently, I agree with the Council that the priority orchard habitat should be replaced off site. For effectiveness, this requirement is introduced through **MM302**.
329. I have been told that there are legal reasons why the former orchard land must remain undeveloped – either because of a restrictive covenant or through another legal instrument. Whether or not there is an insurmountable legal impediment is unclear to me. If there is, it will not be possible for the site to be brought forward. This does raise a question about its deliverability. However, rejecting this allocation would thwart the opportunity to overcome any legal obstacles and, in the context here, that would be unwarranted. Consequently, deleting it is not necessary for soundness. Even if, in the event, the site cannot be delivered, that would not undermine the supply of land for housing – it would simply lead to a modest reduction in the overall 'buffer' in the housing land supply.
330. Specialist care housing at Garden City Court has been built on part of a former school. Site LG9 represents the remainder, and is currently an open, grassed area. Policy LG9 requires a justification for any loss of open space. However, from all the evidence and my site visit, I am not persuaded that this land has any material function as open space. Consequently, to ensure that Policy LG9 is justified, **MM303** is necessary to remove this demand.
331. Site LG16 is occupied by an office building. Some suggest that it is one of the most up to date purpose-built offices in Letchworth. That may be so. However, it seems to me that neither its architectural qualities nor function are such that they should stand in the way of new housing here. Indeed, I understand that it already has a prior approval consent for conversion to 16 residential units. In the light of these factors, the proposed allocation is justified.

## Hitchin

### The housing allocations in the Green Belt

332. Five sites are proposed in Hitchin on land that is currently Green Belt. The largest by far is Site HT1, a strategic allocation which is expected to deliver around 700 new homes. The Green Belt Review Update concludes that this land makes a significant contribution to the Green Belt.
333. Perhaps the most critical issue here is that of preventing neighbouring towns merging. Some parts of the built area of Hitchin, particularly housing on Roundwood Close adjacent to the site, are quite close to Letchworth. The Green Belt between the two towns is not generous in width. Site HT1 would narrow the distance further, and I accept that this would be perceived for what it is – Hitchin edging closer to Letchworth.
334. Nevertheless, an unmistakable and obvious break would remain. Even though this would be, according to some, less than 300 metres, the distance would be sufficient to ensure that the towns neither merge nor give the illusion of doing so. In short, whilst new housing on Site HT1 would erode the separation between Hitchin and Letchworth to some degree, it would not do so to an unacceptable extent. The delineation of the site's eastern boundary by Stotfold Road would help in this respect. It provides a clear and unmistakable 'defensible' Green Belt boundary. Housing in Hitchin already follows the line of the road to the south of the site. Continuing this line of built form would appear as a natural and logical conclusion to the edge of Hitchin rather than an isolated incursion into the countryside towards Letchworth.
335. I note the comments about the vulnerability of the triangle of Green Belt land to the northwest of the site. That is a question for future development plans. The boundary of Site HT1 in this area is defined by the railway line. Raised above the level of the proposed allocation, it provides an especially strong boundary which is, in my view, capable of enduring. Overall, I consider that Site HT1 would have a significant adverse impact on the Green Belt here.
336. Turning to other impacts, it is apparent that there are localised traffic issues in and around Hitchin. Among others, the signalised junction of Woolgrove Road with Cambridge Road and Willian Road is identified in the Council's 'Technical Note' (September 2016) [TI4] as a 'problem location'. I have been told that traffic 'backs up' here, and the technical note says that "*it does not have sufficient capacity to accommodate the future year level of growth*". Given its location to this junction and Hitchin town centre, it is likely that traffic to and from the site will worsen matters. I note the point about car parking in Hitchin town centre and it is likely that this site will add to the existing difficulties.
337. However, the traffic situation is plainly an issue known to the Council. Mitigation is planned in the form of an optimised signal junction – or 'clever traffic lights' which change in response to the real-time traffic situation. This has been costed, included in the Council's infrastructure delivery chart [ED74] and earmarked for funding through legal agreements in respect of this site and potentially others. That is an appropriate response.
338. Moreover, Policy SP17 requires the provision of neighbourhood level retail

facilities on the site, along with a new primary school. The proximity of these to the new housing will help to limit car journeys to and from the site, to some degree at least. That said, to further reduce the proportion of those trips that are by car, the strategic masterplan should require provision for sustainable modes of transport, and to ensure that the site is comprehensively integrated into existing pedestrian, cycle and public transport networks. Main modification **MM072/FM007** adds this to Policy SP17. With this modification, it seems to me that the Plan does all it reasonably can to minimise the impact of this site on traffic in the town. While some adverse impacts remain likely, I am not persuaded that they would be so severe that the allocation of this site should be prevented.

339. There is some uncertainty about whether the primary school required on Site HT1 will need to be for one or two forms of entry. Given this situation, it is necessary for the Plan to be flexible to ensure that the need for primary school places is met. I agree with the Council that reserving two hectares of land on the site for this purpose is a suitable approach. Main modification **MM072/FM007** alters this aspect of Policy SP17 accordingly and is necessary for effectiveness.
340. This site comprises a farm – Highover Farm – and land associated with it. Highover Farm includes a Grade II Listed threshing barn and other non-designated heritage assets. Policy SP17 does not recognise this. A main modification is therefore necessary to ensure that appropriately sensitive consideration is given to these elements. Also, given the previous use of the land for agriculture, it is possible that there is some contamination present. A contaminated land assessment should be undertaken to identify the need or otherwise to deal with any contamination. Main modifications **MM072/FM007** and **MM074** introduce new text to the policy and explanatory paragraphs accordingly, and these modifications are necessary for effectiveness. This modification also adds a requirement for an ecological appraisal in relation to Stotfold Road Verges and Hitchin Railway Banks Wildlife Sites. Given their relationship to the site, that is reasonably necessary for effectiveness.
341. I recognise that Site HT1 is adjacent to the railway line. However, my conclusions on this point in relation to Sites LG5 and LG18 in Letchworth apply equally here.
342. To the south of Hitchin, Site HT2 is a field enclosed by hedgerows adjacent to the built edge of the town. The Review Update says that it makes a moderate contribution to the Green Belt. On the one hand, being a site for around 84 homes it is of some size. On the other, it would not protrude far beyond the built envelope of houses to the north and west. Overall, I agree that the harm to the Green Belt would be moderate in nature.
343. To ensure that impacts on the Green Belt are ameliorated as much as possible, the hedging along the southern and eastern site boundaries should be retained and reinforced. Along with the road to the western boundary, this will also help to secure a Green Belt boundary capable of enduring. Main modification **MM249** adds this requirement.
344. A portion of site is within Flood Zone 2. Main modification **MM249** prevents residential development in this area. This is necessary to avoid flood risk

problems.

345. I understand that there has been an error on the policies map, and that the site boundaries include part of a neighbour's property. To remedy this, it will be necessary for the Council to amend the policies map as previously shown during the main modifications consultation exercise under the reference MM411.
346. To the west of Hitchin, Site HT3 extends westwards from the rear of Oughton Close Park House Estate. To the south of it are residential properties on Bowlers End and Lucas Land Sports Club. The latter includes a sizeable two storey building and high cricket fencing. While both are in the Green Belt, the sports club nonetheless forms part of the developed edge of Hitchin here. Because of its presence, the housing proposed on Site HT3 would, in effect, continue the rough line of the perceived edge of the town. Nestled between the sports club and housing to the north, the proposed homes would not appear as a significant incursion into the countryside. I concur with the Green Belt Review Update that the consequent harm to the Green Belt would be limited.
347. Policy HT3 says that access to the site should be from Westbury Way or Long Innings. To correct the name of the former, and because the latter involves third party land that may not be deliverable, this should be modified to require access from Westbury Close. Main modification **MM250** makes this alteration and is necessary for effectiveness. It also adds to the policy a requirement to retain and reinforce planting to the western and southern boundaries of the site. This is necessary to ensure that the Green Belt boundary is 'defensible' and capable of enduring.
348. Sites HT5 and HT6 lie to the north and south of Grays Lane respectively. Both are grassed fields earmarked to deliver 16 and 53 homes. The former is partially enclosed by hedging, the latter is more consistently so. To the north of Site HT5 is 'Lavender Fields', a care and nursing home. To the south of Site HT6 is a band of woodland. The new housing proposed by these two allocations would be between the two and would not protrude farther westwards than either. Indeed, there is a property to the west of Site HT5 and Gainsford House is immediately to the west of Site HT6. As a consequence, their impacts on the Green Belt would not be significant. The Green Belt Review Update indicates that the Green Belt harm caused by Site HT5 would be limited, and that of Site HT6 would be moderate. Considering the above and particularly the presence and position of other buildings here, I agree with that analysis.
349. Main modifications **MM251** and **MM252** add to Policies HT5 and HT6 requirements to retain and reinforce planting along specified boundaries of these two sites. For the same reasons given in relation to Site HT3, that is necessary for effectiveness.
350. Access to Sites HT5 and HT6 would be from Grays Lane. At this point, this is a very narrow lane with high hedges to either side. It consequently has a distinctly rural character that adds to the sense of place here. This should be preserved as far as is possible. Main modifications **MM251** and **MM252** introduce this requirement which is needed for effectiveness.

### The housing allocations that are not in the Green Belt

351. Site HT8 was expected to deliver 50 dwellings. However, part of it has now been developed, and another part is no longer available. It is therefore necessary to modify Policy HT8 to indicate the anticipated yield to be 12 homes. Main modification **MM253** introduces this change. The Council will also need to amend the boundaries of the site on the policies map as previously shown under the heading MM390 during the main modifications consultation.
352. Main modification **MM253** also adds a requirement that development should not prejudice the future use of the safeguarded rail aggregate depot. That is necessary to ensure that Policy HT8 is justified and effective.
353. Allocated to deliver around 60 homes, Site HT10 is positioned at the junction of the A505 and B565. Travelling along the A505 from Letchworth to the east, under the railway bridge and up the incline, the site is in a 'gateway' position demarking a sense of arrival in Hitchin. Policy HT10 seeks to capitalise on this by requiring a high quality and innovative design. This is an appropriate response, especially given that the site is in the Conservation Area.
354. It has been suggested that this site should be used for retail or as a cinema. However, these are main town centre uses and the site is not in the town centre. So far as I am aware the site is not available for such uses and, in any event, it is clear to me that the housing proposed would contribute to meeting the pressing need for new homes.

## **Baldock**

### Overview

355. Eight housing allocations are proposed in Baldock. Taking into account the modifications for individual sites which I discuss below, completions and sites with planning permission, this amounts to approximately 3,600 new homes, although a proportion of those are anticipated to be delivered beyond the plan period. Consequently, this relatively small market town will roughly double in size.
356. To my mind, the proposed housing allocations here will give rise to four main issues – the effect on the Green Belt, on the landscape, on biodiversity and on the free flow of traffic in and through the town. The former two I consider on a site-by-site basis below.
357. At the intersection of the A507/B656 in Baldock town centre there is a signal-controlled junction ('Baldock junction'). Much of the traffic through it at peak periods is through traffic, and it is a known bottleneck.
358. The '*Local Plan Model Testing Technical Note*' (September 2016) [TI4] ('the technical note') undertakes road traffic modelling to identify locations where it is expected that mitigation may be required in future years because of all the new development proposed through the Plan. It is not limited to housing development, and so takes account of the employment allocation (Site BA10) in Baldock. The testing is informed by the 'Welwyn & Hatfield and Stevenage and Hitchin' model and uses an extended version of it to ensure that it most

accurately represents the highway network and development areas involved.

359. Baldock junction is identified in the technical note as a 'problem location' in both the morning and evening peak periods. The junction is at capacity during those times, causing queuing on all approach arms. The technical note indicates that during peak times, there is an average delay time of three minutes over that period. It concludes that without intervention, the junction would not be able to accommodate the growth expected in Baldock.
360. As I understand it, the Council plans for three separate measures to tackle this. The most direct of these is a signal optimisation scheme – 'clever traffic lights' which reduce signal stages and adjust to traffic conditions. Policy SP14 requires the provision of a link road through Site BA1 connecting the A507 to the A505. This, in effect, would provide a route for traffic from the north and east avoiding Baldock junction. Similarly, Policies BA3 and BA4 require that these two sites provide a link road through them connecting the B656 with Wallington Road to the south. This would offer drivers from the east and south an alternative to continuing through Baldock junction. The combination of these two link roads would offer an option for north or southbound traffic on the A507 to circumvent the junction, albeit a somewhat convoluted one.
361. To secure the most appropriate solution for the link road, Policy BA3 should allow it to connect directly with the A507 as an alternative to Wallington Road. Moreover, Policies BA3 and BA4 should require suitable vehicle, cycle and pedestrian links between the two sites, and seek to ensure that appropriate routes for all modes of transport are provided between them, Clothall Common estate and the wider transport network. On a different point, to facilitate the most efficient use of Site BA3, the policy should allow for some limited reprofiling of the bund to the east of it, and no new housing should be allowed on or beyond its revised alignment. Main modifications **MM207/FM106**, **MM208** and **MM409** modify these two policies and paragraph 13.30 accordingly and are therefore needed for effectiveness.
362. It has been suggested that queuing at Baldock junction is worse than the Council's evidence suggests – I have heard variously that queues are often a mile long, with delays of 15 minutes to half an hour. Lorries becoming stuck under the railway bridge unquestionably would not help. I do not doubt that the junction causes tailbacks and frustration for drivers. However, as I have said, the technical note sets out average delay times during the peak periods. I fully recognise that matters may be worse at some points during those times.
363. I recognise that the link roads required by the Plan would be used by both residents of the new housing to access their homes and by through traffic. But that is the point, and I see no reason why they should be hazardous or especially unfriendly routes for pedestrians. That depends entirely on their detailed design, and the Council will retain control of that through the planning application process.
364. On the one hand, it is apparent that Baldock junction is an existing pinch-point that causes congestion and delays. There can be no doubt that the new housing proposed will add significantly to traffic in Baldock. On the other hand, though, the Council and the highway authority are both clearly alert to

the issue and intend to improve the signalling at the junction, and that the Plan includes measures to alleviate the pressure that would otherwise mount.

365. Modifications have been put forward by the Council through **MM058/FM004** that will assist. This requires that the local centre on Site BA1 must provide a mix of uses to provide for a range of day-to-day needs. It demands that the site be comprehensively integrated into the existing pedestrian, cycle and public transport networks. As submitted, Policy SP14 already demands the provision of new primary and secondary schools within the site and a rail crossing for pedestrians and cyclists in the vicinity of Ashville Way, not far from the centre of Baldock. It strikes me that all these measures are necessary to help ensure that the number of car trips from Site BA1 are limited insofar as they can be. They will assist in reducing car journeys through Baldock junction and will help to avoid adding to the pressure on the limited car parking spaces in the centre of the town.
366. Moreover, given the distances involved, it is likely that some people will either walk or cycle to the railway station, including for journeys to work. The links proposed through Site BA1 will help to improve this prospect. While I note the points about the effect of Welwyn viaduct on rail services, Baldock station provides decent services – for example, there are numerous services to and from central London stations that take under or around 45 minutes, including during peak periods. While these trains may be busy, it is difficult to see what this Plan could do about that, and this factor should not stand in the way of introducing new housing here.
367. It is likely that construction traffic will have a notable impact on traffic conditions in Baldock while the proposed sites are being developed. It is anticipated that delivery on the largest sites will overlap. However, if necessary to allow the developments, the Council could require the provision of the signal optimisation and/or link roads early in the construction phase. In any event, although not short-lived, these impacts would be time limited, and I see no compelling reason why inconvenience to road users should thwart the provision of much needed housing.
368. Overall, I consider that the new housing proposed in Baldock would lead to adverse effects on the local highway network, particularly at Baldock junction. However, in the light of the evidence produced and the measures planned to tackle the issue, I am not persuaded that the cumulative impacts would be severe in the terms of paragraph 32 of the NPPF.
369. The increase in traffic around Baldock will likely have an effect on air quality. I have already considered this matter in relation to site selection, and I discuss Policy D4, which relates to air quality, later in this report. Baldock has historically experienced air quality issues associated with traffic in the town. The Plan should clearly acknowledge this, and for effectiveness should clarify that the new road and pedestrian links required should help to ensure that air quality objectives are not exceeded as a consequence of growth. Main modification **MM212** introduces an appropriate new paragraph.
370. The development of the housing sites in Baldock will have negative effects on wildlife. The most significant of these impacts would be caused by Site BA1. That is almost inevitable with a site of this size in the countryside,

notwithstanding its present agricultural use. The Council says there is a wildlife corridor along Bygrave Road, which bisects the site, which is used by corn bunting and other protected species. Paragraph 4.185 of the Plan recognises this. Policy SP14 requires mitigation, compensation and/or enhancement of key features of biodiversity on the site.

371. As I understand it, the solution for corn bunting is likely to be the provision of a compensatory area with ongoing management arrangements. It may well be that that is appropriate. By and large, resolving these issues is a matter for the Council to address through the planning application process. For my part, there are so far as I can see no insurmountable ecological reasons to prevent the allocation of this site, or any of the other housing sites proposed here – Hertfordshire Ecology says these other sites are of low ecological value. In any event, there appears to me to be a reasonable likelihood that suitable and effective solutions to manage the wildlife and other ecological issues associated with the site could be found.

372. I note the arguments raised about Baldock lying 'in a bowl' and the effect of this in relation to air quality. However, I have considered air quality in relation to the site selection process above.

373. Considering Baldock's size, I do not doubt that many people living here know one another and that there is a strong sense of community. Notwithstanding the extent of growth proposed, that need not change. It strikes me that residents in much larger towns across the country sustain an active community spirit.

#### The housing allocations in the Green Belt

374. Site BA1 is estimated to deliver 2,800 new homes, around half of which are anticipated to be delivered in the plan period. This is, in short, a site of considerable size. In light of the Green Belt Review Update, the Council concludes that the site makes a moderate/significant contribution to the purposes of including land in the Green Belt. I concur. As I see it, the sheer scale of the incursion into the Green Belt, combined with the degree to which the new homes along the upward slope of the land would be visible from surrounding areas, would lead to a significant adverse impact on the Green Belt.

375. The incline of the hillside rises to a ridge to the north of the northern site boundary. Within the site, to the south of its boundary, is a shallower ridge. Criterion k. of Policy SP14 requires that built development must be contained to the south and southwest of that shallower ridgeline. My concern here is that the hillside's ultimate ridge to the north, beyond the site boundary, is not visually broken by the presence of the new housing, including in longer distance views. To achieve this, an appropriate 'stand-off' distance between the buildings and that ridge is necessary. Criterion k. ensures this and is a critical requirement. Visually breaching the ridge would cause the housing to wholly dominate the hillside and conceal the ridge. This in turn would give the illusion of housing flowing over and beyond the hilltop, leading one to wonder where it ends. That visual effect would, in my view, be unacceptable – it would lead to both the appearance of wholly unrestricted sprawl and a significant adverse landscape impact. Criterion k. provides the Council with

the control necessary to ensure these impacts are prevented and is effective in that regard.

376. Policy SP14 also includes a requirement for structural planting. This is a particularly vital demand for this site. It is necessary to ensure that unambiguous 'defensible' boundaries are created, particularly to the northern and eastern site boundaries. This would assist in minimising the adverse Green Belt and landscape impacts. Again, ensuring this will remain in the Council's control, particularly through the Policy requirement for a strategic masterplan.
377. Baldock lies in the base of a hollow surrounded by low chalk hills, and I agree that the sloping backdrop of the site forms part of the town's historic surroundings. The proposed housing will undoubtedly alter the relationship between the town and the rolling landscape around it, and that amounts to a negative impact. However, the site is not within the Conservation Area and is not a recognised heritage asset of any kind. Moreover, in the light of the preceding paragraphs, the ridgeline of the hill will remain as a clear demarcation between town and country.
378. I note the position of the site boundary in relation to Lower Bygrave to the northeast. In effect, the dwellings here form an enclave of homes to the southeast of, and physically separate from, the main village of Bygrave to the northeast of them. Because of this relationship, there is no question of Bygrave being subsumed within the new neighbourhood, or of the two merging. Even if they were to, that would not amount to a merging of towns, such that the purpose of the Green Belt would be undermined.
379. Some suggest that large areas of this site are subject to flooding. However, it is in Flood Zone 1 and the Council says that there are surface water issues. Addressing these through the provision of SuDS or other measures is a requirement of Policy SP14. That is an effective and necessary approach.
380. As I have already indicated, Site BA1 relies on two railway crossings – one for road traffic and another for pedestrians and cyclists. This gives rise to deliverability issues. From the Memorandum of Understanding (March 2018) [ED122] between the Council and Network Rail, it appears that Network Rail has no objections, is supportive of the project and is committed to working collaboratively on its delivery. A planning application has been lodged with the Council which, among other things, illustrates both rail crossings on the illustrative masterplan accompanying it. Overall, it seems to me that all parties concerned have the commitment necessary to ensure their delivery, and Policy SP14 demands it.
381. To meet the need for secondary school places arising from the new development on Site BA1, Policy SP14 requires primary provision of up to six forms of entry and the same for secondary education. However, there is the possibility that existing secondary school provision serving Baldock's current school population may need to be increased by two forms of entry, and that this could be met on the site. The wording of Policy SP14, as submitted, excludes this option. In my view, whilst demanding eight forms of entry is not entirely justified by the evidence before me, neither is ruling out this option. To enable further exploration of the issue through the planning application

process, up to eight forms of entry should be required by Policy SP14. Main modification **MM058/FM004** makes this alteration. It also requires that any secondary school on the site larger than six forms of entry should be located to the south of the site be provided with safe, sustainable and direct routes to Clothall Common. This is because, as **MM059** explains, any larger school would also serve pupils from Clothall Common. Both these main modifications are necessary for effectiveness.

382. It is estimated that Site BA2, which generally comprises of a number of fields, would deliver approximately 200 new homes. They would extend south-eastwards between a caravan park and the A507. The Green Belt Review concludes that this land makes a moderate contribution to the purposes of including land in the Green Belt.
383. As originally proposed, housing on this site would, in effect, 'round off' the corner formed by the caravan park and existing housing to the northwest. However, there are no clear features along the south-eastern boundary of the site. In addition, it would leave a narrow slither of land between the caravan park and the new housing and the A505. The contribution of this land to Green Belt purposes would be very limited indeed. I therefore consider it more appropriate to extend Site BA2 up to the line of the A505, including the part of the field to the southeast of the caravan park, to secure a Green Belt boundary capable of enduring. It is along this south-eastern perimeter of the site that a defensible Green Belt boundary should be created, rather than along the south-western boundary as Policy BA2 says. Main modification **MM206** alters this reference accordingly and is needed for effectiveness. There is, though, no strong soundness reason to increase the number of dwellings to be provided. The addition of this land would increase the size of the site to only a slight degree and taking account of this I consider the harm to the Green Belt caused by its development would be moderate.
384. Sites BA3 and BA4 are earmarked to deliver 200 and 95 homes respectively. The Green Belt Review Update considers that both make a moderate contribution to the Green Belt. They are separated by an area of 'white land' – that is, land within the settlement boundary that has no policy designation. This is an open, generally grassed, undeveloped parcel that runs broadly eastwards from the current settlement edge up to the A505 where the settlement and Green Belt boundaries are proposed. There are no policies in the Plan that would prevent development on it – indeed, the Plan allows for housing within settlement boundaries. Although this would result in a greater incursion into the existing Green Belt, the difference would be only slight. This has no significant impact on the analysis in the Green Belt Review Update and I consider that the consequent harm to the Green Belt would be moderate.
385. In the circumstances, I consider it more appropriate to include this parcel within one or the other of the two housing allocations, in effect creating one larger site. This is not a question of increasing housing delivery – I see no material soundness reason to demand that. The advantage here is that this will ensure that the development of all the land concerned will be comprehensively planned as a whole, including the 'white land', and will avoid the possibility of incremental development on the latter. This is an important factor, not least of all because the link road through Sites BA3 and BA4 would also cross this area.

386. It is therefore necessary to modify Policies BA3 and BA4. Main modifications **MM207/FM106** and **MM208** alter the estimated number of homes for each site to reflect their altered boundaries, although the overall figure remains the same.
387. The above change results in the merging of Sites BA3 and BA4 through the addition of the land between them and the amendment of the boundary of Site BA4 such that it lies wholly outside of the Green Belt. Given the resulting size of Site BA3 and the consequent degree to which new housing on it would encroach into the Green Belt, the overall impact would be significant.
388. The changes to the boundaries of Sites BA2, BA3 and BA4 discussed above have been consulted on – they were labelled as MM386 and MM387 during the consultation process. The Council will need to alter the policies map accordingly to ensure that Policies BA2, BA3 and BA4 are justified and effective. As I am not empowered to recommend alterations to the policies map, these changes are not included in the appendix to this report.

#### The housing allocations that are not in the Green Belt

389. Four sites are proposed for housing that are not in the Green Belt. Each is expected to deliver between 20 and 26 dwellings, and it is anticipated that they would yield around 91 homes between them in total.
390. Sites BA6 and BA11 are previously developed land. The former comprises a vacant factory building, the latter is a petrol station and a house. Site BA5 is an area of open grass enclosed by the rear of properties. Site BA7 is a largely disused allotment site which the Council confirms is surplus to requirements. All these sites would, to one degree or another, add to traffic, air pollution and other impacts in Baldock. I have already discussed these issues above. Any site-specific effects would be localised and not significant – in relative terms at least – and the policies allocating them include appropriate and necessary criteria to tackle the issues involved. Overall, I consider all these four sites to be justified and the associated policies to be effective.
391. One modification is necessary, though, in respect of Site BA5. The requirement in Policy BA5 to provide appropriate boundary treatment should apply to all boundaries of the site rather than just two of them. In addition, the green corridor that links the public footpath (Baldock 036) to Clothall Common should be retained. Main modification **MM209** alters the text of the policy accordingly and is necessary for effectiveness.

#### **The sites to the north of Stevenage, including Great Ashby and Graveley**

392. Four sites presently in the Green Belt are proposed for allocation to the north of Stevenage. Sites NS1 and GA1 abut the neighbouring local authority boundary, and the former borders land allocated for residential development in the Stevenage Local Plan (Site HO3). Site GA2 is adjacent to the part of the Great Ashby area of Stevenage that is within North Hertfordshire's administrative boundary. Site NS1 is expected to deliver approximately 900 dwellings, while Sites GA1 and GA2 are anticipated to yield around 330 and 600 new homes respectively.
393. Graveley is a village that lies a little to the north of Site NS1, and Site GR1 is

- in the northern part of the village. It is earmarked to provide eight dwellings.
394. Given their size and the extent to which they protrude into the Green Belt, it is clear to me that the development of Sites NS1 and GA2 would result in significant harm to the Green Belt. I agree with the conclusions drawn about them in the Green Belt Review Update, and that reached about Site GA1.
395. It seems to me, though, that either existing vegetation or proposed landscaping will ensure that the Green Belt impacts are reduced to the lowest reasonably practical extent. In relation to Site NS1, Policy SP16 requires structural planting to address various impacts including to create a defensible Green Belt boundary. This will assist in terms of the addressing the visual aspect of the site's openness. In addition, **MM068/FM006** requires a site-specific assessment to mitigate landscape and Green Belt impacts to the fullest reasonable extent. This directly tackles the Green Belt impact, which is necessary in this case. Site GA1 is already enclosed by high hedges and trees, including the block of trees at Round Wood. With regard to Site GA2, main modification **MM075/FM008** requires structural planting along the site boundaries to reinforce them and mitigate landscape impacts. This will help ensure that the impact on the Green Belt's openness is ameliorated and is necessary.
396. Site GR1 is clearly of a wholly different scale to these. It consists of a stable yard, equestrian buildings and a riding arena. While the site itself is quite open, it is reasonably well enclosed in the landscape, largely as a result of the high trees around its boundaries. The Green Belt Review Update concludes that the new homes proposed on it would lead to moderate Green Belt harm. In my view, the Green Belt impacts would be moderate at most, and the trees and other vegetation present will ensure that these effects are ameliorated as much as is reasonably possible.
397. Site NS1 extends northwards towards Graveley. The gap between the edge of the proposed allocation and properties at the Crow End part of the village is not wide. National policy is clear that preventing neighbouring towns merging into one another is among the purposes of including land in the Green Belt. Graveley, though, is not a town. However, it is legitimate to consider, as a separate matter, the question of the effect of new housing on the degree to which neighbouring settlements would retain their own individual identity. I address that issue shortly.
398. Aside from Green Belt matters, this cluster of sites to the north of Stevenage gives rise to several issues. Perhaps at the forefront is the cumulative effects of the housing proposed, along with other housing in the Plan and growth elsewhere, on the highway network.
399. Site NS1 is close to junction 8 of the A1(M). This junction serves north Stevenage. The highway authority says that it is under pressure from traffic to and from a number of places, Hitchin and Baldock among them. I have been told that this stretch of the A1(M) is often heavily congested and that drivers routinely divert onto the local highway network, including Graveley Road, Back Lane and others in the vicinity of the four sites. Adding to local traffic, this exacerbates congestion in the area. The four sites proposed here will increase this further. As the highway authority notes, because of its

narrowness and winding nature, Back Lane is not suitable for an increase in traffic. Overall, on the evidence, it is wholly apparent that something must be done if the three largest sites are to be considered acceptable in this regard.

400. It is apparent that National Highways recognises there are issues in relation to this part of the A1(M). It plans to convert junctions 6 to 8 to a 'smart motorway' and I am told has funding committed to the project. It seems probable that this would significantly improve the situation on the local highway network here. Furthermore, the highway authority is committed to investigating and taking action. It says that it is producing a 'Growth Transport Plan' which will inform a more detailed study with the aim of recommending a "*balanced package of measures*" to encourage modal shift and to urge drivers to use the most appropriate part of the network.
401. This is a reasonably sophisticated approach. It could involve improving some roads or junctions whilst deliberately doing nothing with others to avoid making the route more attractive. As the highway authority says, it is not practical to facilitate the use of the private car in all instances. Indeed, to my mind, neither would that be desirable – it would not further the Government's aim of reducing reliance on cars and encouraging more sustainable modes of transport.
402. Taking account of all this, I am satisfied that the housing allocations proposed here need not cause severe impacts of the sort referred to in paragraph 32 of the NPPF. However, it is vital that analysis of the sort planned by the highway authority is taken forward and that these developments play their part. To ensure that they do, such that the policies allocating these sites are justified and effective, several main modifications are necessary.
403. To help reduce traffic to and from Sites NS1 and GA2, local shops and other facilities serving the new homes should be provided. Policy GA2 already includes a suitable criterion, and I recognise that existing proposals for shops near Site NS1 may have a bearing on what should be provided there. For the same reason, the development of all three sites should have regard to the Stevenage Mobility Strategy and properly provide for sustainable modes of transport. For Site NS1, the development should take into account the cumulative effects on the adjacent road network and communities, including Graveley, and should include mitigation measures. Proposals for Sites GA1 and GA2 should assess traffic flows along Back Lane, and both identify and provide measures to manage them. Main modifications **MM068/FM006**, **MM069**, **MM070**, **MM237**, **MM239**, **MM240**, **MM075/FM008**, and **MM079** introduce suitable wording to the three policies and the paragraphs supporting them covering all these points and are therefore needed.
404. Access to the northern end of Site NS1 is likely to be at or close to the junction of Graveley Road and North Road. Paragraph 4.196 of the Plan recognises that a new junction arrangement will be needed and indicates that this might possibly involve a roundabout. However, this may not be the best solution. Main modification **MM069**, mentioned above, introduces more flexible wording accordingly, and is necessary for effectiveness.
405. Paragraph 13.100 of the Plan recognises that on-street parking is a significant issue in and around Great Ashby. For clarity, main modification **MM241**

points out that some elements of the potential solution lie outside the scope of the Plan, notably traffic regulation orders. Policy T2 sets out minimum parking standards for residential developments. This should ensure that the problem is not replicated in the new housing allocations proposed here.

406. The Infrastructure Delivery Plan suggests that the three larger housing allocations generate a need for two GPs. However, NHS England has not set out any specific requirements. Consequently, whilst it is necessary for the Plan to require the necessary medical infrastructure, it needs to retain flexibility. Main modifications **MM068/FM006**, **MM070**, **MM237**, **MM244**, **MM075/FM008** and **MM076** achieve this, and are necessary for effectiveness.
407. Policy SP16 says that Site NS1 should integrate with adjoining development in Stevenage and include a site wide solution for education. However, for effectiveness, the Plan should be clear that the requirement is for two forms of entry of primary education, to be provided either on the site or in conjunction with the education requirement arising from Site HO3 in Stevenage. Main modifications **MM068/FM006** and **MM070** alter the policy and paragraph 4.196 accordingly.
408. It has been suggested that there are 60 or more protected and endangered species on these four sites. I have been told that the data used to draw this conclusion is from a biodiversity data atlas approved by the Government. However, as I understand it, the search areas used relate to one-kilometre squares. It is therefore difficult to tell from this which species are unquestionably on the sites involved. While I do not doubt that there are protected species which either inhabit, grow on or otherwise use some or even all the sites, that is not to say that the proposed housing developments would inevitably result in unacceptable harm. Much depends on the detail – for example, the nature of the species and their presence on the site, the precise location of the new housing, its relationship to existing woodlands and other areas of existing and proposed vegetation and landscaping, and the mitigation measures deployed.
409. Hertfordshire Ecology has not identified any fundamental constraints. Policy SP18 requires mitigation, compensation and/or enhancement of key features of biodiversity, including identified protected species and priority habitats, on Site GA2. Main modifications **MM075/FM008** and **MM081** will ensure that green infrastructure connectivity and corridors to the wider countryside are retained and are necessary for effectiveness. One such corridor runs below overhead power lines crossing the site. To ensure that this corridor is not eroded in width, the health and safety clearance requirements should inform it. Main modification **MM082** ensures this. Policy GA1 requires the retention and sensitive treatment of priority woodland habitats surrounding the site to north and west. Policy NE6 applies to all developments. As modified by **MM166/FM100** – which I consider later in this report – it demands that adverse effects are avoided and/or satisfactorily minimised, among other things. Overall, whilst some impacts on wildlife and other aspects of biodiversity are unavoidable, I see no reason why unacceptable harm should be caused.
410. As I have indicated, the gap between the northern edge of Site NS1 and the

Crow End part of Graveley would not be wide. This gives rise to two intertwined issues – the effect on the character or appearance of this part of the Graveley Conservation Area and on the individual identity of the village. The boundary of the proposed allocation is not necessarily the same thing as the edge of the new housing. Indeed, criterion e. of Policy SP16 requires that the northern boundary of the site is provided with structural planting to create a defensible Green Belt boundary. This will also serve to further separate the new housing from the built edge of the village and the Conservation Area. In my view, there is no reason why it should not, over time, provide a suitably pastoral border. Consequently, the proposed allocation need not fail to preserve the setting and historic character of the Conservation Area and maintain the discrete identity of Graveley.

411. Aside from the Conservation Area, Policy SP16 aims to ensure that the development of Site NS1 is undertaken with sensitive consideration to other heritage assets. However, it does not refer to Rook's Nest – the childhood home of EM Forster – or St Nicholas Church. Both are Grade I Listed Buildings. Given this and their relationship to the proposed development, the Plan should be unambiguous about considering the impacts on these buildings. Main modifications **MM068/FM006** and **MM071** ensure this.
412. Two public rights of way cross Site NS1, including a stretch of the Hertfordshire Way. Policy SP16 requires their integration into the development. While their rural character will unavoidably be altered as they pass through the new housing, that is no strong reason to prevent the development.
413. I recognise the importance of the land included in these proposed allocations – particularly Sites NS1 and GA2 – to local people as places to walk and experience tranquillity and the natural environment. The housing developments proposed will undoubtedly change that. However, Policies SP16 and SP18 both require that the sites provide routes through to the wider countryside beyond. Local residents will therefore not be deprived of the opportunity to enjoy the rural surroundings here.
414. Site GA2 extends north-westwards towards Tile Kiln Farm. There are several Grade II Listed Buildings there, including the farmhouse and Brooches Barn, and the proposed allocation abuts the boundary of these dwellings, in part. Tile Kiln Farmhouse includes timber outbuildings of an agricultural form and style. Overall, the cluster of buildings have the appearance of a farmstead set in the open countryside. The fields around the buildings and the ancient hedgerows dividing them provide an agricultural setting which adds to this. Some of these fields are within Site GA2.
415. It is clear to me that new housing on the fields concerned will erode the rural setting of the Listed Buildings. This will lead to harm. However, substantial harm need not be caused. The portion of the fields between Site GA2 and Back Lane would remain. Criterion l. of Policy SP18 requires low intensity development and/or green infrastructure in this part of the site for the explicit purpose of minimising harm to the setting of the Listed Buildings. In this context, the Council will retain control through the planning application process to ensure that less than substantial harm results, such that the harm would not outweigh the public benefit of meeting the Plan's housing

requirement.

416. Policy SP18 requires the principal access into to Site GA2 to be from Mendip Way, which will involve providing a new road beneath overhead powerlines. While I note the point raised about electro-magnetic radiation, there are no objections from National Grid. Main modification **MM075/FM008** adds to Policy SP18 a requirement that the safety clearance requirements for pylon lines are respected and will assist with the policy's effectiveness. Overall, I have been given no compelling reason to suppose that this arrangement would be unsafe or otherwise unsatisfactory. For the effectiveness of Policy SP18, it will be necessary for the Council to include the access route within the site allocation on the policies map.

### **Ickleford**

417. Immediately to the north of Hitchin, three allocations are proposed in Ickleford. Site IC1 is a small area of grassed, flat open land bounded by dwellings on two sides and is expected to deliver nine dwellings. Considering its size, its relationship to existing properties here, and given that it would be contained within the general built envelope of the village, I agree with the Green Belt Review Update that the harm to the Green Belt would be limited. Reinforcing the planting along its boundaries would assist in this regard and **MM268**, which requires this, is therefore necessary.
418. Site IC2 consists of Burford Grange and land associated with it which lies to the rear of dwellings on Westmill Lane. It is generally enclosed by hedging and other vegetation, and is expected to provide around 40 new homes. They would result in the village extending southwards towards Hitchin, and the remaining gap would not be wide. National policy is clear that preventing neighbouring towns merging into one another is among the purposes of including land in the Green Belt. Ickleford is not a town. However, it is legitimate to consider, as a separate matter, the question of the effect of new housing on the degree to which neighbouring settlements would retain their own individual identity. I address that issue shortly.
419. That point aside, Site IC2 would represent a relatively modest incursion of built development into the countryside beyond the existing built edge of the village. The vegetation around its southern and western boundaries would help to ensure that the moderate Green Belt impacts I consider would result from it would be ameliorated. To ensure this, those features should be retained, and **MM269** is therefore necessary to impose this requirement in Policy IC2.
420. Anticipated to yield around 150 homes, Site IC3 is somewhat larger. It is predominantly open agricultural fields but includes some dwellings and a large greenhouse structure. In the relatively flat landscape here, the new homes would be prominent, and this would have a considerable effect on the visual aspect of the openness of the Green Belt. That said, from most viewpoints – especially those from the north and west – they would be seen against the backdrop of the existing village. That tempers the impact, and I agree with the Green Belt Review Update that it would be moderate overall.
421. Policy IC3 requires the development to be informed by a site-specific landscape assessment. This will help to inform the best solution for

integrating the buildings into their surroundings, and therefore reduce the impacts on the openness of the Green Belt to the lowest reasonable practical extent.

422. Turning to other issues, many suggest that the proposed allocations are not necessary because of the existence of other 'windfall' sites, including Site LS1 (which I have concluded previously should be deleted from the Plan) and Ickleford Mill. I disagree. The housing land supply on which the Plan is based takes account of all sources of supply, including these sites. In any case, one must look at this issue holistically in the context of the district's housing need. Considering that, the overall housing requirement, and Ickleford's place in the settlement hierarchy, I regard the level of housing proposed here through the allocations to be appropriate.
423. Meeting the need for primary school places is among the most controversial issues raised in relation to Ickleford. Ickleford Primary is a one form of entry school. It has years where it is full and others when it is not, but overall is well attended. The proposed allocations would not lead to the need for one whole additional form of entry – using the formula adopted by the Council, the need generated is around 0.4 forms – but the school does not have sufficient capacity. Policy IC3 includes a requirement for an appropriate solution for primary education, and paragraph 13.161 says that the estimated number of homes for Site IC3 makes allowance for a two forms of entry school to be provided there. The point here is that the Plan seeks to replace Ickleford Primary with a new school on Site IC3.
424. It is wholly apparent from what I have read and heard that for many that live in Ickleford, the current school is the heart of the village and plays an important role in the community. I also appreciate that replacing this school with a new one, even if only four hundred or so metres away, could possibly erode the contribution made by the existing school. In short, I fully grasp the local sentiment and, as I understand it, so too do the Council and the LEA. I am therefore of the firm view that, if at all possible, primary schooling needs here should continue to be met in the existing school.
425. The question, then, is whether Ickleford Primary can accommodate the additional pupils arising from the proposed allocations. From an initial position of significant doubt, it seems that there is the possibility that it could. As well as from the village, the school admits pupils from Hitchin and other outlying rural areas. At the hearings, the LEA said that it is not its intention that Ickleford Primary should serve Hitchin, and that 'pushing back' on admissions from further afield might free up sufficient places. I have also been told that an in-depth assessment of the school's ability to expand has not been undertaken. In addition, notwithstanding the formula, one cannot be certain of the number of pupils the new homes will yield.
426. All in all, it seems to me that there can be some hope that Ickleford Primary might be able to provide sufficient school places but given the uncertainty it is critical that there is a 'Plan B'. For that, Site IC3 remains the only reasonable option. To make sure the Plan is justified and effective in this regard, several main modifications are necessary. Firstly, it is important that the Plan clearly articulates the situation, commits to monitoring the demand for places in Ickleford and ensures that all options for the expansion of Ickleford Primary

are explored. Main modifications **MM273**, **MM274** and **MM275** introduce appropriate text. To guarantee that the school places needed are provided, it is necessary to retain the requirement in Policy IC3. However, for effectiveness, this should be explicit that two hectares of land must be reserved within the site for a two form of entry primary school. Main modification **MM270** makes this modification.

427. Bedford Road – the A600 – is a rather busy road that runs from Hitchin through the western part of Ickleford. There is a mini roundabout at its junction with Westmill Lane and Turnpike Lane, and the latter runs through the centre of Ickleford. Whilst the Council's strategic analysis does not identify this junction as particularly problematic, the Council and highway authority acknowledge that it does get congested especially during peak periods. The proposed allocations will clearly add to this. Consequently, I agree that the development of Sites IC1 and IC2 should be informed by detailed traffic assessments. Each should take account of the impact of the other and that of Site LS1, the development of which has already commenced or been completed. Any mitigation measures necessary should be secured through the planning application process. Main modifications **MM269**, **MM270** and **MM272** add appropriate wording to the two policies and paragraph 13.158 to ensure this and are needed for effectiveness.
428. Access for Site IC2 is from Bedford Road. It is likely that turning right out of the site during peak periods might be something of a challenge. However, anyone choosing to live on the site would be aware of the road's busyness. Whilst this might cause the new residents inconvenience, I see no reason why that should prevent the development.
429. However, there is no footway on the western side of Bedford Road. Those living on Site IC2 would have to cross the road to walk into the village centre. To ensure that safe passage is provided, a pedestrian crossing is needed. Main modification **MM269** adds this requirement to Policy IC2.
430. As I have said, the remaining wedge of Green Belt between the new homes on Site IC2 and the built edge of Hitchin would not be wide. However, the two would remain separated by open land along the line of the River Oughton. Moreover, the requirement to retain the planting on the southern site boundary will help to clearly demark the new edge of the village here. As I see it, the separation distance between the two settlements and this strong, green boundary will be sufficient to ensure that the two remain visually distinct and separate.
431. An issue with sewer flooding in the village has been raised. Although not mentioned by the statutory undertaker, it is necessary to ensure that the new homes proposed do not create or worsen an existing problem of this sort. Consequently, the development of all three sites should include a detailed drainage strategy that identifies any water infrastructure required and the mechanisms for delivery. Main modifications **MM268**, **MM269**, **MM270** and **MM276** add this requirement to the three policies and paragraph 13.163.
432. After the Plan's submission, the County Council informed the Council of a potential mineral resource block and associated buffer to the north of Hitchin. Sites IC2 and IC3 are within this area. For consistency with national policy, it

is necessary to ensure that these potential mineral reserves are not needlessly sterilised by the housing developments. Main modification **MM277** introduces a new paragraph to the Plan explaining the situation and says that the development of these sites will be subject to consultation with the mineral planning authority to determine whether prior extraction of any minerals is necessary. Main modifications **MM269** and **MM270** add to Policies IC2 and IC3 new criteria preventing any unnecessary mineral sterilisation. That is an appropriate and necessary approach.

433. I note the point about badgers foraging in the area of Site IC2. Policy IC2 and Policy NE6, as modified by **MM166/FM100**, will ensure that appropriate measures are taken.

### **Little Wymondley**

434. Site WY1 is the sole allocation proposed in Little Wymondley. It largely consists of agricultural fields. It is in the current Green Belt and is expected to deliver around 300 homes.

435. Stevenage Road runs through the village. Generally speaking, Site WY1 is on land that slopes quite steeply upwards and southwards from Stevenage Road. It is reasonably visually exposed to views from the north. Because of this, and the scale of housing proposed, the impact on the Green Belt would, in my view, be at least moderate overall.

436. As I see it, landscaping will be a critical factor in ensuring that the impact on the Green Belt is reduced to the lowest reasonably practical extent. Policy WY1 requires the submission of a site-specific landscape assessment. It is clear from the assessment that forms part of the Statement of Common Ground between the Council, New Road Property Developments Ltd and Bovis Homes Ltd (November 2017) [ED50] that much work has already been done on this. Indeed, that landscape work identifies a ridgeline to the south of the southern boundary of the proposed allocation.

437. Perhaps counter-intuitively, the Council has proposed that the allocation boundary should be altered to follow this ridge. I consider that that is necessary here. This is not a question of increasing the capacity of the site – the Council does not suggest that Policy WY1 should be modified in this regard. Rather, it will ensure that the ridgeline is within the area to be considered through the landscape assessment, such that any effect of the proposed buildings on the ridgeline are taken into account in the site's landscaping. It will allow greater flexibility to enable the site to be sensitively integrated into the village, as Policy WY1 demands. Consequently, for the effectiveness of Policy WY1, it will be necessary for the Council to alter the site boundary on the policies map. This should be in line with the change labelled as MM384 during the process of consulting on proposed modifications.

438. Access into the site is to be taken from Stevenage Road. Whilst the site itself is in Flood Zone 1, the road is on Flood Zone 3b. As I understand it, the road floods during more extreme weather events largely as a result of Ash Brook and the culvert it runs through. The County Council produced a report in 2014 which sets out recommendations to reduce the risk of flooding on this stretch of Stevenage Road. These relate to measures to be taken upstream. This is a pre-existing problem, and it would be unreasonable to demand that the

development of this site alone should resolve it. However, it is imperative that the new homes here do not make matters worse.

439. Put forward by the Council, main modification **MM367** includes adding to Policy WY1 a requirement for the submission of a site-specific Flood Risk Assessment to address this issue and to inform the provision of a sustainable drainage system or other appropriate solution. I agree that that is the most appropriate response in the circumstances. It is necessary to ensure that the site is provided with a safe and appropriate access, for the justification of the site's inclusion in the Plan and for the effectiveness of the policy. Main modification **MM370** adds more detailed explanation about the situation and possible measures needed. That is necessary for effectiveness.
440. Traffic in Little Wymondley is an issue. The Council says that whilst its strategic analysis does not reveal any significant problems, there is pressure at the junction of Stevenage Road with Arch Road and Blackmore End Road. Because of the traffic, the Council considers that Stevenage Road effectively severs the two parts of the village to either side of it. The proposed allocation would unavoidably add to that effect and exacerbate the problem. I therefore consider it necessary for Policy WY1 to require a transport assessment that identifies measures to mitigate this impact, and that such measures should include addressing accessibility in terms of walking and cycling. Main modification **MM367** includes appropriate wording accordingly, and **MM369** adds necessary detail and explanation to paragraph 13.355 supporting the policy.
441. Little Wymondley is among the villages where there is some uncertainty concerning school places. Wymondley Primary is a 0.5 form of entry school with the potential to expand to a full single form of entry. It is possible, therefore, that it may be able to accommodate pupils from Site WY1, but it is, put simply, a close call. Much will depend on the precise number of homes proposed. Policy WY1 requires that the site provides an "appropriate solution" having regard to up-to-date assessments of need. That is a flexible approach which leaves open the question of whether a new school will need to be provided on the site. The Council will retain the control necessary to demand one if that is necessary.
442. I understand that land within Site WY1 has been subject to landfilling operations, albeit some time ago. Nonetheless, considering this, I consider it necessary for effectiveness to require a preliminary contaminated land risk assessment. Main modification **MM367** introduces this demand.
443. I recognise that this allocation would lead to a significant increase in the size and population of Little Wymondley. But having regard to its relative sustainability credentials and consequent categorisation in the settlement hierarchy, that in itself is no good reason to reject Site WY1. Indeed, it is because of these factors that Little Wymondley is an appropriate place for the level of growth proposed.

### **St Ippolyts, Weston, Pirton, Offley, Sandon, Hexton and Lower Stondon**

444. Immediately to the south of Hitchin are St Ippolyts and Gosmore. In effect, they form one settlement consisting of two built areas with an undeveloped, open swathe of Green Belt between them. One site is proposed in each

cluster. The Plan does not properly reflect the presence of these two distinct areas. Main modification **MM350** rectifies this and is needed for effectiveness.

445. Site SI1 is an agricultural field to the south of the existing housing and is earmarked to deliver around 40 dwellings. There is a hedgerow along the southern site boundary and this gently sloping site is well enclosed in the surrounding landscape. Considering this, and its reasonably limited size, I agree with the Green Belt Review Update that it makes a limited contribution to the Green Belt. A continuous hedgerow to the site's southwestern boundary would ensure that the impact on the Green Belt is satisfactorily ameliorated. This requirement is added through **MM352** and is necessary for effectiveness.
446. As the result of a drafting error, the boundary of Site SI1 does not properly abut London Road as shown on the policies map. It will be necessary for the Council to rectify this on adoption of the Plan, to ensure that Policy SI1 is effective.
447. Proposed to provide around 12 homes, Site SI2 is a somewhat overgrown, generally flat parcel of land that is also largely enclosed by hedges, trees and other vegetation. Between the properties on Sperberry Hill and Stevenage Road, it would not extend this part of St Ippolyts in any direction. The consequent impact on the Green Belt would be limited.
448. The Council says that both Sites SI1 and SI2 are in a flight path for Luton Airport and that both developments should therefore include appropriate noise mitigation measures. In the circumstances, **MM352** and **MM353**, which add such a requirement to Policies SI1 and SI2, are necessary for effectiveness.
449. Weston is a village in the Green Belt between Stevenage and Baldock. Site WE1 consists of a field that is generally enclosed by hedgerows and is estimated to deliver 40 dwellings. The Green Belt Review Update concludes that this land makes a moderate contribution to the purposes of including land in the Green Belt. Considering its size, open and rural nature, and position adjacent to housing to the south, I concur with that evaluation.
450. To reduce the impacts of the proposed housing to the Green Belt, the hedgerow along the western boundary should be maintained and strengthened. Main modification **MM363** adds this requirement to Policy WE1 and is necessary for effectiveness.
451. I note the points about pedestrian connectivity between the site and the village. However, from the Council's note [ED148C] and my site visit, I am satisfied that the provision of footpaths to the village store and post office on Post Office Row, and to the school on Maiden Street, is satisfactory. There are some areas where there are no footpaths. Notwithstanding this, and even though traffic volumes may increase because of traffic from the new housing on Sites GA1 and GA2 using Back Lane, traffic speeds through Weston are not great – the roads are narrow and the speed limit through the village is 30mph. All in all, I consider that the allocation of the site would not lead to safety problems for existing or future residents.
452. No allocations are proposed in several of the Category A Villages in the central area. Whilst Pirton is in the Rural Area Beyond the Green Belt, around 110 homes have been built or granted planning permission in the village since the

start of the plan period. Similarly, planning permission for 73 new homes has already been granted permission in Offley and as discussed later, the settlement boundary to the west of the village presents the possibility of some further new housing. In Sandon, no sites put forward are considered by the Council to meet the 'three tick' tests, and Hexton is in the Green Belt, the AONB, and is almost entirely a Conservation Area. In this context, I am satisfied that further growth in these villages is not necessary for soundness.

## **The housing allocations in the eastern and northern parts of the district**

### **Royston**

453. As submitted, the Plan proposes to allocate eight sites for residential development. However, on Sites RY1, RY2, RY5 and RY8 development has either commenced or been completed.
454. Site RY4 is a large agricultural field enclosed by hedgerows on the edge of Royston to the south of the A505. Policy RY4 estimates that it would deliver 40 homes. However, during the examination, an existing planning permission on part of the site (which was no part of the dwelling estimate for the site) lapsed. The Council is content that 100 homes could be suitably accommodated on the whole site. I have no particular reason to differ, and consequently I agree with the Council that this figure should be reflected in the policy. In addition, taking account of the comments from Anglian Water and the relationship between the site and the water recycling centre, it is necessary to include a requirement demanding a demonstration that future residents' living conditions would not be harmed. Main modifications **MM307** and **MM346** make both alterations and are needed for effectiveness.
455. The Council has granted planning permission for Sites RY7 and RY10 and for part of Site RY11. Consequently, there is nothing to prevent the development of them, and I consider them to be deliverable. For effectiveness, Policy RY7 should be modified to reflect that the site will yield 60 homes rather than the 48 originally anticipated. Main modification **MM339** makes this amendment. Also, it is no longer justified to include in Policy RY10 a requirement that an appropriate solution be provided for education needs arising from this site and Site RY2 – as I understand it, Site RY1 has fulfilled this demand. Main modification **MM341** removes this from the policy.
456. Paragraph 13.301 of the Plan says that transport mitigation schemes in Royston will be identified. However, they now have been. Main modification **MM345** sets out what these are and requires development in Royston to contribute towards them and/or other schemes to improve walking and cycling in the town. This is reasonable and necessary for effectiveness.

### **Therfield, Reed, Barkway, Barley and Ashwell**

457. Generally to the south of Royston are Therfield, Reed, Barkway and Barley. Barkway is identified in Policy SP2 – as modified through **MM010/FM039** – as a 'settlement for growth'. The other three are Category A villages in the hierarchy. Like Royston, all these settlements are in the Rural Area Beyond the Green Belt.
458. As submitted, the Plan proposes three housing allocations in Barkway.

However, Site BK1 has now been built and is among the sites I have already concluded should consequently be deleted from the Plan. Sites BK2 and BK3 are located to the northern part of the settlement.

459. Site BK2 is anticipated to deliver around 20 dwellings. Part of it is a public open space. Policy BK2 says that part of the site should be retained as open space. However, to ensure the effectiveness of the policy in this respect, it is necessary to remove the open space area from the site allocation. The Council will therefore need to alter the allocation as shown under the label MM388 during the public consultation on changes to the Plan. As a consequence, it is also necessary to remove the requirement to retain part of the site as open space from the policy. Main modification **MM215/FM111** does this and is needed for effectiveness.
460. Periwinkle Close and the houses on Site BK1 form a built edge in the northern part of Barkway. Two fields lie to the north. As submitted, the Plan proposes that the southern part of the field immediately to the north of the built edge should be 'white land' within the settlement boundary, and Site BK3 is proposed to deliver around 140 new homes to the north of this strip of 'white land'. The intention here is that the 'white land' is reserved for a new school if one is necessary at some point in the future – there is no clear evidence of such a need during the Plan period.
461. This arrangement gives rise to the question of the visual cohesion of the village. If, in the event, the 'white land' proves to be not necessary for education purposes, the new housing on Site BK3 would be separated from the main body of the village's built area by these fields. However, I do not see that as a problem. The 'white land' would appear as a green gap in the village. That is not an uncommon sight in villages. Moreover, the new housing would not be visually adrift from the village. From Cambridge Road, the social club and village hall would connect them. In northward views along Royston Road, the two pairs of semi-detached houses adjacent to the northwest corner of Site BK3 are clearly visible as one travels up the gentle incline. Because of this, there is already a sense that the 'white land' and the site are fields within the built envelope of a village. The exclusion of these dwellings from the settlement boundary does not alter this visual effect.
462. The difficulty here is that notwithstanding the County Council's ownership of the 'white land', there is nothing in the Plan to prevent its development for housing or any other use, in principle at least. In the circumstances, I agree with the Council that the most appropriate and effective solution is to include the 'white land' within the boundaries of Site BK3 and to add to Policy BK3 a requirement that approximately 1.5 hectares of the site be reserved for primary education. Main modification **MM216/FM112** modifies the policy accordingly. For the effectiveness of that policy, it will also be necessary for the Council to amend the site boundary as shown under the label MM389 during the public consultation exercise. These changes will increase flexibility here in terms of precisely where the housing and reserved land are situated and will improve the scope to ensure the most appropriate arrangement of the two.
463. During the examination, the Council proposed to delete Policy BK3, therefore removing the site from the Plan, and to consequently alter the position of

Barkway from a settlement for growth to a Category A village in the hierarchy. The primary concern here relates to education provision. The primary schools in Barkway and Barley have federated. Consequently, the first two years of primary education is now provided in Barkway, and the remaining primary years education is delivered in Barley.

464. The Council's point here is that Site BK3 may not definitively trigger a requirement for a new school on the reserved land. In the light of this, and given the new schooling arrangement, its development would lead to increased traffic movements between the two villages. I accept that if the new housing proposed on Site BK3 does not lead to the need for a new school on the reserved land, that is an inevitable outcome. That is not ideal, and this factor does reduce the sustainability credentials of Site BK3 and Barkway more generally.

465. However, it seems to me that it is quite common for those living in rural communities to have to travel by car to a neighbouring village for schooling. The distance involved here is not great – somewhere in the region of two to two and a half miles – and the number of additional school trips likely to be generated by Site BK3 would be reasonably limited. I have been told that a minibus service operates between the two school sites. That would undoubtedly help in this respect. Indeed, as I see it, it is necessary to require that both this site and Site BK2 contribute towards sustainable travel between them. Main modifications **MM216/FM112**, **MM215/FM111**, **MM219/FM114** and **FM115** add suitable wording to the policies and supporting paragraphs and are needed to ensure that Policies BK2 and BK3 are justified and effective.

466. Although the smallest of the Settlements for Growth, Barkway still retains some of the services and facilities associated with this tier of the hierarchy. It is not distant from Barley which has other community facilities. On this point, paragraph 55 of the NPPF says:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."*

As I see it, that is precisely what the new housing on Site BK3 would achieve.

467. I recognise that Site BK3 would bring housing close to Newsells Park Stud which is to the north of the site. Newsells Park is one of the largest stud farms in Europe – it encompasses some 1,200 acres, is a major 'global player' in the industry and a significant employer in the area. Because of the soil quality, the paddocks closest to the site are of particular importance to the stud farm operation. I note the concerns raised by Newsells Park about the effects of introducing new housing on Site BK3 on mares and foals in these top paddocks.

468. It seems likely to me that there would be some increase in noise and other disturbances. However, Site BK3 is separated from the paddocks by a rather wide footpath with high hedges to either side. The houses and horses would not be cheek by jowl. That said, to minimise noise and disruption the separation between the two should be maximised. Main modifications **MM216/FM112** and **MM220** require measures to minimise the impact on

Newsells Park Stud in terms of the proximity of built development, noise and increased activity. This is an appropriate and necessary measure. As is often the case, much will depend on the detail – for example in relation to the location and orientation of houses, and the position of internal roads and car parking. The Council will retain control of these aspects, and this main modification suitably equips the Council to resist any scheme that would cause unacceptable harm to the operation of the stud.

469. I note the points about people using the footpaths and bridleways in the area intruding onto the stud's private land and causing problems. But this Plan cannot control or mitigate for the behaviour of people using the public rights of way network. To reject the allocation of Site BK3, or any other, on the basis that the people living there would trespass or otherwise misbehave would be unwarranted.
470. Overall, I consider it unnecessary for soundness to delete Site BK3 or to amend Barkway's position in the settlement hierarchy. The main modification (**MM010/FM039**) identifying it as a settlement for growth therefore remains justified, effective and necessary.
471. In Therfield, Site TH1 is proposed to deliver 12 homes. It is adjacent to the Conservation Area and there are Listed Buildings nearby.
472. This land has been the subject of a planning application which was refused by the Council and a subsequent appeal (reference 3158998) was dismissed. That application was in outline with all matters save for access reserved for subsequent determination. It was originally described as being for 'up to 26 dwellings', but that numerical aspect of the description of development was subsequently removed, and both the application and appeal were decided on that basis.
473. It is clear to me that this site is sensitive in many respects. Both the Council officer's report and the Inspector's appeal decision detail the harm that the development then proposed would have caused in terms of the landscape character and appearance of the area. The Inspector concluded that there was insufficient detail to fully understand how the development would impact on the historic environment – namely the setting of nearby Listed Buildings and Therfield Conservation Area.
474. However, the context for my consideration of the site is different. Policy TH1 estimates that the site could provide approximately 12 dwellings. That number formed no part of the Council's decision on the planning application, and a sketch plan showing a possible layout for 12 dwellings was not taken into account by the Inspector through the appeal process. In addition, it is clear that both the Council and Historic England had serious concerns in relation to the planning application. That is not the case here. The Council has proposed the allocation having assessed it through the site selection process. English Heritage has said that "*In the case of Site TH1, there is an opportunity to enhance the existing site in a sensitive way to act as the entrance to the Conservation Area ...*".
475. Overall, it seems to me that there is a reasonable likelihood that a suitable housing scheme can be found for this site without causing unacceptable harm to the surrounding landscape and the setting of the heritage assets. Much will

depend on the detail in this case, and the Council will retain control through the planning application process. If any schemes coming forward would lead to unacceptable harm, then the Council could and should reject them. Ultimately, should no acceptable scheme be forthcoming that is not a problem for this Plan – failure to provide the 12 homes anticipated here would not lead to any overall delivery shortcoming.

476. However, Policy TH1 should be unambiguously clear that the development of this site should be designed with sensitivity to the nearby Listed Buildings and their setting. It should also require the development to provide a sensitive entrance into the Conservation Area. Both demands are included in **MM359**, and I consider this main modification to be necessary and effective in those respects.
477. The site lies between the main part of Therfield and the slightly separate cluster of homes to the south, which form 'Hay Green'. Although the settlement boundary encompasses both, I recognise that they are two separate and distinct places. The development of Site TH1 would bring them closer together. To retain their individual identities, they should be prevented from merging. It is therefore necessary to provide open space within the site between the two. Main modification **MM359** adds a new requirement to Policy TH1 accordingly. With this measure in place, I am satisfied that Therfield and Hay Green would not coalesce and their sense of individuality and separateness would be sufficiently preserved.
478. At the hearing, the Council conceded that there is no justification for requiring that the new housing should be frontage development facing on to Police Row. In this context, that requirement in Policy TH1 is not justified. As I understand it, the Environment Agency has been undertaking groundwater borehole testing in the vicinity. To avoid causing problems, I agree with the Council that any sustainable drainage or other features proposed should have regard to the boreholes. Main modification **MM359** amends the wording in the policy accordingly and is necessary.
479. Therfield First School is the only school in the village and is full. However, the demand for additional school places as a result of Site TH1 will be very limited. The local education authority says that the school has an inflow of pupils from outside the village, and that it is anticipated that this will be 'pushed back' over time such that those places are taken by pupils from Therfield. If it is necessary to allow the development, then the Council can secure financial contributions to ensure that additional school infrastructure is provided. Overall, considering the above, and given that the local education authority has raised no objections here, I am satisfied that a suitable solution could be found to ensure the provision of any additional school places needed.
480. Consisting of a field facing onto the A10, Site RD1 in Reed is to the west of the village. There is a row of houses to the south side of Blacksmiths Lane, and consequently the proposed homes would not extend the village further westwards. Policy RD1 recognises that the site is near to Reed Conservation Area and that some of the nearby properties are Listed Buildings. It requires that the development be sensitively designed, which will ensure that adverse impacts are avoided.

481. One site is proposed in Ashwell. However, the development of it has either commenced or been completed. It is consequently among the sites that I consider should be deleted from the Plan as previously discussed.

### **Exceptional circumstances**

482. In order for the Council's approach to Green Belt 'release' for housing to be consistent with national policy, exceptional circumstances must exist to justify altering the Green Belt boundaries as proposed. In ascertaining the existence or otherwise of exceptional circumstances, one should – at least ideally – grapple with several relevant factors. I consider each of them below.

#### Acuteness of need and constraints on supply

483. I have already discussed the acuteness of the need for housing in North Hertfordshire and the inherent constraints on supply in relation to the Plan's housing requirement. In summary, the district's need for housing is acute and pressing. The supply of identified deliverable and/or developable land outside of the Green Belt falls well short of the need – indeed, it is less than half. Given this, the constraints in neighbouring local authority areas, the consequent inability of those authorities to assist in meeting the district's housing need and the absence of any agreement for them to do so, it is impossible to see how anything even close to approaching the identified need for housing could be met without a significant level of Green Belt 'release'.

484. Moreover, it is also apparent that the supply of any land for housing that is suitable, available and achievable – whether outside the Green Belt or within it – is limited. With regard to the Towns, no sites other than those allocated meet the 'three tick' approach in Letchworth. In Hitchin, only three sites have been rejected – two because of flood risk issues and another because of its proximity to the AQMA. All sites considered have been allocated in Royston save for the land at Royston Football Club – it has not been possible to identify an alternative site for the football use. In Baldock, one Green Belt site has not been proposed for allocation. Turning to the largest villages in the district, in Knebworth all sites considered have been allocated and none rejected, and only three relatively modest sites in Codicote have not been allocated. From all I have read and heard, it is clear that the picture is similar across the district. Indeed, as I have previously indicated, the existence of suitable, available and achievable sites has in and of itself had a notable influence on the distribution of housing. There is, overall, no plentiful pool of surplus sites that could have been selected in preference to those proposed – quite the opposite, this factor is a significant constraint.

485. With regard to the East of Luton sites, I have already considered the need and supply situation in detail above. The need for housing is acute, particularly in relation to three- and four-bedroom family homes and affordable housing. Within North Hertfordshire there is no preferable land in the Luton HMA and there is no prospect of the remaining portion of Luton's unmet housing need being met either in Luton or in any other local authority area any time soon. A fresh round of plan-making would be required and even then there is no certainty it could deliver given the constraints. In short, the East of Luton sites represent the only suitable, available and achievable land in the current supply in the Luton HMA that can confidently ensure that Luton's unmet need

for housing is fully addressed. These factors amount to a significant supply constraint.

Consequences for sustainable development without impinging on the Green Belt

486. This Plan sets out to meet North Hertfordshire's housing need in North Hertfordshire and provides new homes within the Luton HMA to help address Luton's unmet need. It seeks to deliver the new homes needed on sites that are, for a rural district such as this, well located for shops, services and public transport. In short, the selected sites would provide desperately needed new homes in the places they are needed, and which are, overall, the most sustainable of the locations that have been shown to be deliverable/developable in relation to the number of houses required.

487. Without impinging on the Green Belt, the consequences for sustainable development would be significant. This would involve either building new homes in considerably less sustainable locations – in all probability away from the areas where they are most needed – or not delivering them at all. The former would most likely lead to a significantly greater increase in use of the private car and could lead to the creation of communities that would be relatively isolated, particularly in terms of access to shops and services. The latter would deny many the opportunity to live in their own home close to their family, friends and work, and could stifle the local economy. To my mind, neither proposition would best, or even adequately, serve the achievement of sustainable development, particularly in respect of its economic and social dimensions.

Nature and extent of the harm to the Green Belt and the extent to which the impacts on the purposes of including land in the Green Belt can be ameliorated or reduced to the lowest reasonably practical extent

488. The nature and extent of the harm to the Green Belt, and the extent to which impacts can be ameliorated, are important elements of the environmental dimension of sustainability and are significant factors here. These are site specific matters and I have considered them on a site-by-site basis above.

489. From my site-specific analysis, it is clear that the development of a number of the proposed housing sites will cause significant harm to the Green Belt. Indeed, all the strategic housing sites would lead to significant harm, and the majority of the remaining sites will cause moderate harm. The harm from only seven sites would be limited.

490. That the harm caused by the strategic sites to the Green Belt is significant is perhaps not surprising – they are all large areas of open countryside immediately adjacent to the built-up edge of towns. On the whole, and although on a different scale, the same can be said for the other sites proposed in the Plan – they are, by and large, all sites effectively on the edge of the most sustainable settlements in the hierarchy. It strikes me that the Green Belt function of such land – particularly any parcel of a reasonable size – is almost inevitably significant or, at least, moderate in nature.

491. The impacts of developing the proposed site allocations can be ameliorated or reduced to some degree at least. I have discussed this in detail in relation to each site and in some cases I have required main modifications to assist in

this respect. However, broadly speaking, the landscaping and other measures to help counter the adverse impacts on the Green Belt can only do so much. One cannot conceal the presence of large residential developments in the countryside on the edge of settlements, or entirely prevent their effects on the purposes of including land in the Green Belt. That said, I am satisfied that the Plan, as modified, will reduce the impacts to the lowest reasonably practical extent and, in short, does all it realistically can in that regard.

### Overall

492. On the one hand, it is clear to me that the development of most of the housing allocations proposed in this Plan would cause significant or moderate harm to the Green Belt, even with mitigation. That is a highly regrettable outcome and a very important factor. Indeed, I give substantial weight to it.

493. On the other hand, however, the need for housing both in North Hertfordshire and in Luton is acute. The proposed allocations would ensure that those needs are met where they arise in the most sustainable locations that are deliverable/developable. Rejecting these sites would delay meeting the pressing need for housing further, and not impinging on the Green Belt would mean accepting that those needs would not be met where they arise. Both would choke the local housing market. The home-making aspirations of many people, particularly those requiring affordable homes, would be shattered and the local economy would most likely suffer negative consequences. These too are matters of substantial weight.

494. In my judgement, on balance, the latter considerations outweigh the harm that would be caused to the Green Belt. Consequently, I consider that the exceptional circumstances necessary to alter the Green Belt boundaries to facilitate the allocation of the housing sites concerned do exist both in principle and in each individual case. This aspect, therefore, should not stand in the way of their allocation.

495. The Council argues, in effect, that the addition of land to the Green Belt proposed through the Plan is a matter which contributes to the existence of exceptional circumstances. There is no clear basis for this in the NPPF, and this has not affected my conclusion that exceptional circumstances exist.

### **Conclusion on Issue 4**

496. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the proposed housing allocations are justified, effective, consistent with national policy and positively prepared.

### **Issue 5: Whether the settlement and Green Belt boundaries are justified, effective, consistent with national policy and positively prepared**

497. The policies map identifies settlement boundaries around the Towns, the Settlements for Growth and the Category A Villages. It also identifies the boundaries of the Green Belt around settlements, including some of those within the new Green Belt proposed. Where the settlement is in the Green Belt, the settlement and Green Belt boundaries proposed are one and the same.

498. The Council has taken the boundaries in the Local Plan adopted in 1996 as the starting point. I am told that Council officers have walked around all the settlements, and that this survey work has led to some 'common sense' tweaking of the boundaries here and there – for example, where new developments or other factors have altered the settlement edge, or where the 1996 boundaries are otherwise no longer logical due to factors 'on the ground'.

499. Natural or other physical features – such as watercourses, hedgerows and roads – have also influenced the precise delineation of the boundaries. This is to ensure that the Green Belt boundary is 'defensible' and capable of enduring beyond the Plan period. In some instances the site allocation policies require the strengthening of site boundaries, for example through additional planting. In others, where site boundaries are not already defined by any existing features, the policies demand the provision of structural landscaping. Finally, with all the above factors in mind, the settlement and Green Belt boundaries have been defined around the edge of the proposed development sites.

500. All in all, the boundary setting exercise undertaken by the Council is not particularly sophisticated. But that is not in itself a shortcoming. All the factors considered are relevant, and in my view the approach taken is reasonable and suitable for the task.

501. Within the new Green Belt proposed in the Plan – which I consider under Issue 12 below – the question arises in respect of each settlement of whether to set settlement boundaries or to 'wash over' it, such that the entire settlement is covered by Green Belt policy. Paragraph 86 of the NPPF says the following.

*"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt."*

502. There are only three villages of any significant size in the new Green Belt area – Whitwell, Preston and Great Offley. All are Category A villages in the settlement hierarchy. The Review considers the contribution each makes to the five purposes of including land in the Green Belt and assesses their general character and sense of connection with the surrounding countryside. Perhaps unsurprisingly, given their size, the Review recommends that each of these three villages be 'inset' from the Green Belt rather than 'washed over'. I concur with this analysis. In response, the Plan introduces both settlement and Green Belt boundaries around each, following the method used elsewhere. In my view, this is an appropriate and justified approach.

503. As some point out, the Council could have sought to 'loosen' the settlement and Green Belt boundaries to provide further flexibility for new development to come forward. But this Plan aims to meet needs and the housing land supply exceeds the Plan requirement by some margin. The Plan allows development within the settlement boundaries and within the built core of Category B villages. Policies CGB2a and CGB2b, introduced through **MM108**, provide greater flexibility for the location of affordable housing and community

facilities, in certain specified circumstances. In the light of all this, I am not persuaded that it is necessary for the settlement and Green Belt boundaries to be loosened in any way. Such changes could only be made if exceptional circumstances were shown to exist, and I have been provided with little in the way of detailed or comprehensive evidence to persuade me that they do. Indeed, I consider the Council's approach and the conclusions arrived at to be justified and consistent with national policy, and the Plan has been positively prepared in this regard.

504. However, some changes to the proposed settlement and Green Belt boundaries are needed to ensure that they properly reflect the limits of built development and the land used in association with existing buildings. To ensure that the Plan's policies that rely on these boundaries are justified and effective, it will be necessary for the Council to make the adjustments it has suggested to the policies map in Hitchin, Offley, Whitwell and Therfield. These were labelled as MM391, MM393, MM395 and MM394 in the schedule of main modifications consulted on, although for reasons already explained I do not have the power to recommend them, and they are therefore not included in the appendix to this report.

505. Some other changes to settlement and Green Belt boundaries have been put forward by the Council as a consequence of modifying the precise extent of land allocated for development. I have considered the necessity for these in relation to the alteration to the individual sites in question.

506. Letchworth Hall Hotel is adjacent to the southern Green Belt boundary proposed around Letchworth. The hotel's operator seeks to have it included within the settlement boundary and excluded from the Green Belt. I am not persuaded that this is justified or necessary for soundness. It seems to me that the hotel grounds contribute to the openness of the Green Belt here. The Green Belt boundary has been defined on the basis of the approach I have described above. I note the proximity of buildings that are within the town and not in the Green Belt. But the Green Belt boundaries have not been set to exclude from the Green Belt all buildings around the edge of the district's settlements. One has to draw the line somewhere, and the boundary delineation proposed in this location strikes me as logical and capable of enduring. I have been told that Letchworth Hall is one of only two four-star hotels in Letchworth with conference facilities and that the attractive landscape setting, along with the neighbouring golf course, form part of its attraction. I do not doubt it. But these factors do not amount to the exceptional circumstances necessary to alter the Green Belt boundary.

507. Pirton is in the Rural Area Beyond the Green Belt. The settlement boundary to the west of this Category A Village has been delineated to include a small residential development that was implemented during the course of the examination. In this context and considering Pirton's categorisation in the settlement hierarchy and its general sustainability credentials, I consider the approach taken here to be the most appropriate.

508. In Therfield, the recreation ground to the east of Police Row is included within the settlement boundary. But that does not give any automatic licence to build on it. Indeed, Policy NE4 only allows the loss of open spaces in limited, specified circumstances.

509. Therfield's settlement boundary around the dwellings on Meadow Way in Hay Green is quite loosely delineated on the policies map. The Council has put forward a change to the boundary in the southeast corner of the village, removing the deep area of hedging and other vegetation to the east of Meadow Way from the settlement. This area adds to the rural feel of this entrance into and exit from Hay Green, and I agree that the Council will need to make this change to ensure that Policy SP2, and others which rely on the demarcation of settlement boundaries, are justified and effective. The Council consulted on this change under the label MM394.

510. I note that the boundary to the north of Meadow Way is not snugly fitted to the residential curtilage of the dwellings here. Rather, it follows the line of the field to the north. While it may be that this would leave the land here open to housing development, I do not regard that to be a problem. The area of land in question is rather limited in size, and if a modest number of new homes could be satisfactorily accommodated then I see no particular reason why the Plan should prevent that as a matter of principle.

### **Conclusion on Issue 5**

511. Considering the above, with the changes put forward by the Council and as discussed above, the settlement and Green Belt boundaries are justified, effective, consistent with national policy and positively prepared.

### **Issue 6: Whether the Plan's provision for affordable housing and other types of housing are justified, effective, consistent with national policy and positively prepared**

#### **Affordable housing**

512. The objective assessment of the need for affordable housing is established in the '*Strategic Housing Market Assessment Update: Volume 2 – establishing the need for all types of housing*' (August 2016) [HOU5] ('the SHMA Update'). It considers the range of affordable housing needs, including that arising from homeless households, those in temporary accommodation, concealed households, and households that are sharing accommodation. It takes into account data from the housing register, including the transfer list, and considers the ability of households to afford their housing costs, drawing particularly on figures relating to claimants in receipt of housing benefit. In short, the methodology used in the SHMA Update follows the guidance in the PPG. I consider that the assessment method used is adequately robust.

513. A need for 4,403 affordable homes is identified in the SHMA Update for the plan period. The principal question, then, is whether the Plan will deliver this.

514. Policy SP8 aims to ensure that 33% of all homes are affordable housing. To achieve this, Policy HS2 requires residential schemes to deliver 25%, 35% or 40% affordable housing, depending on the scale of the scheme. As I note later in this report, the viability of these demands has been taken into account and, with the addition of the 'viability clause' introduced through **MM125**, the levels of affordable housing required are justified. Based on the Plan's original housing requirement of 14,000 homes, the affordable housing need would, in all likelihood, be met.

515. As previously discussed, the Plan's housing requirement has been reduced. But the overall supply has not. As already noted, the various sources of housing land supply are anticipated to yield around 14,656 new homes. In the light of this, it seems to me that there is a strong prospect that the need for affordable housing could be met. While it may be that not all sites will deliver the quantum sought – for example because of site-specific viability issues – there is some 'headroom' here.
516. As I see it, the Plan does all it reasonably can to secure the affordable housing needed. In this context and taking account of the early review committed to by the Council through **FM190**, I regard further measures to increase affordable housing delivery to be unnecessary for the Plan's soundness.
517. Policy HS2 sets out the "*Council's starting point for negotiation [being] that 65% of [affordable] homes will be rented and 35% [will be] other forms of affordable housing*". This generally aligns with the conclusions of the SHMA Update and is adequately justified. Among other things, it also requires that regard be had to the housing needs of the area and relevant local authority housing register data. These are relevant factors to consider when making decisions about tenure. So too are Neighbourhood Plans and any local survey or assessments on the issue which, for effectiveness, should be added to the policy.
518. That said, a number of modifications are needed to Policy HS2. Whether or not the precise wording quoted in the preceding paragraph is effective is questionable. For certainty on this, the tenure split indicated should be set as a clear expectation. While it is appropriate to demand that affordable housing be delivered on-site, it is necessary for consistency with the NPPF to add a clause that that be the case unless an alternative arrangement can be robustly justified.
519. The Council has put forward a main modification demanding that affordable housing should be genuinely affordable to local people where rents or prices are linked to open market values. This chimes closely with the NPPF's definition of affordable housing. It is sufficiently consistent with it and introducing this requirement will assist the effectiveness of Policy HS2. In the light of this change, the requirement to take account of the likely affordability of the affordable housing proposed is unnecessary and should be deleted for effectiveness reasons.
520. Main modification **MM125** includes all the aforementioned changes to Policy HS2 and is consequently necessary for the reasons given in each case. It also introduces other changes, all of which I regard as necessary for the policy's effectiveness. Other main modifications (**MM126**, **MM127**, **MM128**, **MM129** and **MM130**) amend and add to the paragraphs supporting Policy HS2, introducing elaboration and clearer explanation. All these modifications are needed as they will help the effectiveness of the policy.

### **Housing mix**

521. The NPPF requires local plans to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. In terms of housing type and size, the Council's housing and Green Belt background paper says that combining the housing

size requirements across both market and affordable tenures would suggest a broadly 30:70 split between the provision of smaller and larger units in the future.

522. Policy SP8 supports a broadly even split between smaller (one and two bedroom) and larger (three bedrooms and more) properties, for both market and affordable homes. This is not entirely consistent with the housing and Green Belt background paper's conclusion. However, the reason for the difference between the two is, in short, to introduce a policy intervention. As the Council points out, there is evidence of 'under-occupation' of the existing housing stock. Increasing the proportion of smaller units as proposed is a measure designed to create opportunities for older households to downsize. In addition, from the housing and Green Belt background paper, most households in the top preference bands of the Council's housing register require smaller homes. In the light of this, I am satisfied that Policy SP8 is justified in this respect.
523. Policy HS3 seeks "*an appropriate range of house types and sizes*" within residential proposals taking into account several factors including the most up-to-date Strategic Housing Market Assessment at the time. That is an appropriate approach. Paragraph 8.19 of the Plan points out that the majority of completions since 2011 have been for smaller units and some sites allocated in the Plan are specifically anticipated to focus on smaller homes. Paragraph 8.20 indicates that some 'balancing up' may be required – it says that on most suburban and edge of settlement sites, applicants should make an initial assumption of 60% larger and 40% smaller homes to ensure an overall mix is achieved. Taken together, I consider the approach here to be justified and effective.
524. However, some modifications are needed to Policy HS3. The overall target in Policy SP8 – that of a broadly even split – should be taken into account when deciding planning applications. So too should the most relevant evidence of housing need aside from the Strategic Housing Market Assessment. Other evidence sources, such as local needs assessments, should not be overlooked. Main modifications **MM131**, **MM132** and **MM133** alter Policy HS3 and the paragraphs supporting it accordingly. These changes are necessary for effectiveness.

### **Supported, sheltered and older persons' housing**

525. The SHMA identifies a need for around 650 bedspaces in communal establishments/residential institutions for people in older age groups. To meet this need, the Plan takes a two-pronged path.
526. Firstly, Policy SP8 aims to ensure that the Plan delivers up to 350 bed spaces in suitable, supported accommodation to meet the needs of those who cannot live in their own home. In parallel, as I have previously discussed, an uplift of 200 homes was added to the OAN on which the Plan as submitted was based. For reasons already explained, the latter has been reduced to 100 homes.
527. The purpose of increasing the OAN rather than simply planning directly for all the identified need for communal establishments/residential institutions is to reflect the general trend for people to live in their own homes for longer. While there is inevitably some uncertainty here, I agree that this is an

appropriate approach. To make sure that the 350-bed space target in Policy SP8 is adequately justified, it should be set as a minimum rather than a maximum. Main modification **MM035/FM057** alters Policy SP8 accordingly.

528. From the Council's note [ED144], it is evident that 280 net additional bed spaces in use class C2 have been provided in the district since the beginning of the plan period. Consequently, it is necessary for the Plan to provide for at least a further 70 spaces.

529. In terms of meeting this identified need, Policy HS4 says that planning permission will be granted for older persons' housing subject to certain criteria, all of which are appropriate. For residential developments of 100 dwellings or more it requires provision of an element of those units to be for older people and it demands that the strategic housing sites provide some accommodation in use class C2. This is reasonable, and the viability of this policy approach has been assessed.

530. However, in relation to the strategic housing sites, the requirement for "*some accommodation in use class C2*" is not especially specific and leads to doubts about the effectiveness of this criterion. Moreover, on the Council's evidence in ED144, C2 uses need to achieve a 'critical mass' to be viable in an operational sense. In this regard, the Council says that schemes need to deliver 50 to 60 bed spaces. I have been given no compelling reason to doubt this.

531. In light of these issues, the Council has put forward **MM058/FM004**, **MM060**, **MM061/FM005** and **MM065**. The former two require that Site BA1 provides an appropriate site for a care home of around 50 to 60 bed spaces in accordance with the criteria in Policy HS4. The latter two introduce a similar requirement for Site LG1, subject to an up-to-date assessment of need and supply. Document ED144 explains that these two sites have been identified for these requirements taking into account a number of factors. This includes consideration of the relative share of accommodation that has been delivered in the two towns since the start of the Plan period. Although not based on a particularly scientific method, I consider the addition of these requirements to Sites BA1 and LG1 to be adequately justified, and they are necessary to ensure the Plan's approach to meeting the need for older persons' housing is effective. With these changes, it seems to me likely that the need for bed spaces could be met. In any event, given the review to which the Council has committed through **FM190**, I see no reason why it ultimately should not be.

532. The main modifications set out in **MM134**, **MM135** and **MM136** are also necessary. These amend Policy HS4 to remove the requirement for all strategic sites to make provision for C2 uses as a consequence of the above and add relatively detailed points of clarification to the supporting paragraphs which will assist with effectiveness.

### **Accessible and adaptable housing**

533. Policy HS5 relates to accessible and adaptable housing. It requires that major residential schemes provide at least 50% of homes to the Government's optional technical standard for accessibility. It also requires that on schemes where 10 or more affordable units will be delivered, 10% of these should meet the wheelchair user standard. For such policies to be sound, they must be

supported by clear evidence of need and evidence that viability has been considered.

534. The SHMA Update considers the question of need in some detail. It recommends that a target requiring all new homes to meet the accessibility standard would be justified, subject to viability. It also identifies that roughly 7% of households living in affordable housing include at least one wheelchair user. The rates of wheelchair use among the older population are higher.
535. The '*Local Plan Examination Addendum (Viability)*' (January 2018) [ED72] ('the Viability Addendum') specifically analyses the viability of these aspects. This applies the same methodology as the main tranche of viability work, which I consider later in this report. For present purposes, it is sufficient to note that I regard the approach taken to be robust. The Viability Addendum concludes that the criteria in Policy HS5 appear to be appropriately judged and have the potential to be deliverable from a viability point of view.
536. Overall, in the light of this evidence and all I have read and heard, I am satisfied that there is a need for these optional standards and that requiring adherence to them is appropriate both in this respect and with regard to viability. I consider Policy HS5 to be justified and consistent with national policy as a consequence.

### **Relatives' and dependents' accommodation**

537. Policy HS6 allows the adaptation or extension of dwellings to form relatives' and dependents' accommodation so long as certain criteria are met. These relate to matters such as the need for the accommodation and its size, including in relation to the main dwelling. The policy also says that the occupation of such accommodation will be restricted through planning conditions. In my view, this is appropriate.
538. Free standing annexes are permitted 'exceptionally' where the criteria are met and where the adaptation or extension of the main house is not possible. While that is reasonable in principle, in those circumstances I see no reason why permission would only be given 'exceptionally'. To ensure the policy is justified and effective, **MM138** deletes this word from it.

### **Self-build housing**

539. The PPG says that the Government wants to enable more people to build or commission their own home and wants to make this form of housing a mainstream housing option. The SHMA Update identifies very limited demand for such properties. In response, Policy SP8 sets a target to provide 100 plots for self-build development over the plan period. Paragraph 4.109 explains that on strategic sites 1% of plots will be reserved for people with a local connection who wish to build their own home. The policies allocating the strategic sites require a specified number of serviced plots on each to be set aside for self-build development. Including 21 plots on Sites EL1, EL2 and EL3 to the east of Luton, this amounts to 80 plots in total.
540. It seems to me that there is a question of timing in play here. The requirement for local authorities to keep a self-build register started in April 2016 and the SHMA Update was produced in August that year. There was

little time for reaction between the two, either for the Council or for anyone else. It is consequently likely that the SHMA Update underestimates demand. Indeed, it is apparent that known interest in self-build had already increased by the time of the examination hearings in November 2017.

541. In the circumstances, in terms of identifying land to meet the quantified demand for self-build housing, the Plan does all it reasonably can. I say this in the context of the review of the Plan that the Council has committed to through **FM190**. Given this review, it would be disproportionate to delay the Plan's progress further because of this issue. Moreover, **MM011/FM040** adds a reference to the possibility of self-build opportunities coming forward through neighbourhood plans. That is appropriate and ensures that the Plan is positively prepared.
542. However, there is little justification for the 100-plot target figure given in Policy SP8. To rectify this, that figure should be replaced to instead reflect the number of plots proactively provided in the Plan. Sites EL1, EL2 and EL3 are allocated specifically to help address the unmet housing needs of Luton. Only 100 of the homes delivered on these sites relate to North Hertfordshire's housing need, and there is insufficient evidence before me about the demand for self-build plots in Luton to justify requiring them here. I note that Luton's Local Plan includes no requirement for self-build plots. Consequently, the 21 plots demanded through Policy SP19, which allocates the three sites to east of Luton, is unwarranted.
543. The rationale for the requirement for 1% self-build plots on the strategic housing sites is set out in the Council's note [ED144]. In summary, it is twofold – to ensure a 'critical mass' of plots that can be located together within a development without undermining its coherence, and to avoid such a proportion of self-build plots that they might disproportionately influence the overall scheme design and appearance. I consider that to be a reasonable stance that strikes a proportionate balance. To apply the 1% requirement to the 100 homes on the East of Luton sites would be inconsistent with the Council's approach and would risk causing problems of the sort the rationale seeks to avoid. Therefore, requiring any self-build plots on these sites would be unjustified and ineffective.
544. Consequently, the plot figure in Policy SP8 should be reduced to reflect the number of plots on the other strategic housing sites. In addition, the demand for 21 plots in Policy SP19 should be deleted in its entirety. Main modifications **MM035/FM057** and **MM083/FM009** do this and are necessary in those respects.
545. Notwithstanding all the above, I agree with the Council that modifications to the Plan are needed to clarify the approach to self-build housing. For effectiveness reasons, these alterations include explaining the distinction between windfall schemes that might constitute self-build projects and those that will not, and highlighting the proactive measures being pursued to address the requirements identified by those on the self-build register and to widen opportunities to access self-build. To this end the Council has put forward several changes through **MM011/FM040**, **MM044**, **MM065** and **MM131**. I agree that these are all necessary for effectiveness.

## **Starter Homes and First Homes**

546. I have considered whether the Plan should do more to provide 'Starter Homes'. However, both the initiative and the guidance have since been withdrawn. This matter therefore has no influence on the Plan's soundness.

547. The current PPG supporting the NPPF published in 2021 introduces the concept of First Homes – a specific kind of discounted market sale housing that should be considered to meet the definition of affordable housing for planning purposes. However, the PPG includes transitional arrangements which mean that this Plan is not required to reflect the First Homes policy requirement. In line with the PPG, it will be necessary for the Council to consider updating the Plan in respect of First Homes when it undertakes the whole plan review by the end of next year.

## **Conclusion on Issue 6**

548. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision of and policies for affordable housing and other types of housing are justified, effective, consistent with national policy and positively prepared.

## **Issue 7: Whether the provision for gypsies, travellers and travelling showpeople is justified, effective, consistent with national policy and positively prepared**

549. Reflecting the needs of gypsies and travellers identified in the '*Gypsy, Traveller and Showperson Accommodation Assessment Update*' by ORS (July 2014) [HOU10], Policy HS7 of the Plan as originally submitted proposes to allocate seven pitches as an extension to an existing site known as Pulmer Water. However, this evidence has since been superseded by the '*Gypsy and Traveller Accommodation Assessment Update*' (January 2018) [ED60] ('the Update'). This takes into account the revised definition of 'traveller' set out in the Planning Policy for Traveller Sites published in August 2015 ('the PPTS').

550. The methodology used in the Update combines a desk-based review of the travelling population in the district and survey work involving interviews with the gypsy and traveller households identified. In relation to the latter, the method aims to secure interviews with all households, re-visiting multiple times where people are not present or unable to conduct an interview at the time of calling. The purpose of the interviews is to establish for each household the demographic characteristics, current and future accommodation needs, whether households are overcrowded or concealed, and the types of pitches that might be needed in the future. They also aim to identify the existence of any households living in bricks-and-mortar accommodation. All of this is appropriate and embeds measures to ensure that all reasonable endeavours are made to capture the views and needs of the district's travelling community.

551. This process revealed that there are four households in the district that meet the definition of 'traveller' in the PPTS. Two occupy pitches at Pulmer Water, the other two occupy the two existing pitches at the district's other gypsy and traveller site at Danesbury Park Road. This site has temporary planning permission until August 2023. Both sites are currently in the Green Belt.

552. The Update concludes that there is a need for ten pitches overall, comprising eight between 2017 and 2022, one further pitch between 2022 and 2027 and, again, one further pitch between 2027 and 2031. As I understand it, this figure can be broken down into need associated with each of the two existing sites. Eight additional pitches are needed at Pulmer Water – six as a result of a temporary planning permissions lapsing, and two as a result of new household formation expected on the site during the plan period. In respect of Danesbury Park Road, there is an overall need for four pitches – two because the existing pitches are regarded in the assessment as unauthorised (the temporary planning permission was granted subsequently), and two to provide for anticipated household formation.
553. However, it became apparent during the hearings that matters are not that straightforward. The planning history and current situation in respect of the Pulmer Water site is complicated, with a number of planning permissions overlapping. The Council's latest evidence on the matter is set out in its paper of December 2020 [ED228] ('the Council's paper'). It says that there is no evidence that the six pitches referred to in the Update have been occupied by households meeting the PPTS definition of 'traveller'. It also states that two other existing pitches at Pulmer Water are vacant and can accommodate household growth at that site. The Council's paper concludes that there is therefore no need to allocate additional land at Pulmer Water for the travelling community and the allocation is proposed by the Council to be deleted from the Plan. Moreover, it argues that the Danesbury Park Road site should instead be allocated to provide four pitches, being the remaining need identified in the Update.
554. As indicated above, I consider the methodology used in the Update to be adequately robust. Relying heavily as it does on the responses given by individuals in interviews, it is not especially sophisticated – but that is no criticism, as it does not need to be.
555. However, in this instance, there are some issues regarding the execution of the process. Paragraph 7 of the PPTS says that "*in assembling the evidence to support their planning approach, local planning authorities should ... pay particular attention to early and effective community engagement with both settled and traveller communities ...*". It appears that neither the original assessment in document HOU10 nor the Update indicate that any engagement has been undertaken with settled communities. The Council suggests that in this respect it relies on engagement with settled community advocates such as Parish Councils. But no such engagement has taken place in relation to producing the Update or putting forward the Danesbury Park Road site for allocation.
556. In addition, in relation to the pitches at Pulmer Water, no interviews have been undertaken with their occupants because they were not available. Instead, an interview has been conducted with the site owner/manager, who answered questions about his gypsy and traveller tenants. The use of a proxy in this way may be common practice and may be better than securing no information at all, but it is nonetheless not ideal. I note the point that the majority of gypsies and travellers at Pulmer Water are part of the site owner/manager's extended family. Although that might be encouraging, one

is nevertheless left to speculate about the extent to which his relations confide in him.

557. As I see it, taken together, and considering the importance of the interviews to the assessment of need, these two factors amount to a weakness in the Council's evidence. This reduces the confidence that can be placed in it, particularly in relation to the need for pitches generated by the community at Pulmer Water.

558. That said, I am satisfied that the evidence demonstrates that there is a need for four pitches brought about by those occupying the Danesbury Park Road site. The interviewing shortcomings relate only to Pulmer Water, and it is difficult to see how any deficiencies in engaging with the settled community could have a bearing on this matter. For effectiveness, the Plan should clarify that the identified need is for four pitches.

559. In addition, I concur with the Council that this identified need is most appropriately met at the Danesbury Park Road site. It is owned by a family resident on it and is therefore clearly deliverable. It is evident from this site's current occupation that there is an immediate need for two pitches, and this site can, as it presently does, meet that need. So far as I can see there are no undeniably deliverable alternatives. Aside from Pulmer Water no other sites have been put forward for gypsy and traveller occupation throughout the plan making process or during the examination. Given the complexity of the planning situation at Pulmer Water and the mistiness surrounding the question of need arising at that site, the Danesbury Park Road site represents the only option where immediate delivery can presently be said to be guaranteed.

560. I turn to the question of whether exceptional circumstances exist to warrant 'releasing' the site from the Green Belt. As I have already indicated, there is a clear and present need for two pitches for which this site is the only option which, on the evidence available, can be said with sufficient certainty to be deliverable. I accept that it may not be in the most sustainable location in terms of access to facilities by modes of transport other than the private car. But it nonetheless provides a settled base to enable the children of the families involved to benefit from local education and healthcare, and also offers access to local employment. Moreover, the site is owned by those occupying it, and so far as I am aware there is no other accommodation in the district available to them. I therefore conclude that the exceptional circumstances necessary to alter the Green Belt boundaries here do exist, such that removing this site from the Green Belt and insetting it as a traveller site only is justified.

561. In the light of all this, several main modifications to the Plan are needed. It is necessary to change references to the number of pitches allocated in the Plan from seven to four. An explanation of the situation concerning need should also be included, and a clear commitment to undertaking a robust and up-to-date assessment of need as part of the early review of the Plan previously discussed is critical. However, these amendments should not include text claiming that this provision would meet needs until the end of the Plan period – that will be a matter for the early review to establish. It is also necessary to delete the allocation of the originally proposed extension to the Pulmer Water site from Policy HS7 and to instead allocate the Danesbury Park Road site for use by gypsies and travellers.

562. Between them, **MM143/FM099, FM190, MM035/FM057, MM039/FM061, MM140/FM096, MM141/FM097, MM142/FM098, MM139/FM095, MM229/FM125, MM230/FM126** and **MM231** achieve all of this and are therefore necessary to ensure that the Plan is justified and effective. For the same reasons, the Council will need to amend the policies map so that the Pulmer Water extension site is within the Green Belt and the Danesbury Park Road site is excluded from it and shown as an allocated site.

### **Conclusion on Issue 7**

563. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the provision for gypsies, travellers and travelling showpeople is justified, effective, consistent with national policy and positively prepared.

### **Issue 8: Whether the Plan's provision for new economic development is justified, effective, consistent with national policy and positively prepared**

#### **The functional economic market area**

564. Based on the '*Functional Economic Market Area Study*' (July 2015) [E3] ('the FEMA Study'), paragraph 4.29 of the Plan identifies North Hertfordshire as lying within a wider functional economic market area ('FEMA') which includes Stevenage and parts of Central Bedfordshire. Among other things, the FEMA Study considers the present stock of employment premises, the geography of the commercial property market, its relationship with other property markets and market signals. In considering the labour market area it analyses travel to work patterns and 'self-containment' – the proportion of people who both live and work in the area. In short, the FEMA Study considers a wide range of relevant factors and is robust in this regard.

565. From my reading of the FEMA Study, there are several principal reasons why it supports the FEMA identified. The economic profiles and core advantages developed in each of the local authority areas involved are relatively complementary in employment and sector terms. There is little evidence to suggest that nearby commercial property market areas – such as Luton, Bedford and Watford – extend as far as the identified FEMA (although some overlap with Welwyn Hatfield to the south is noted). The levels of commuting for work between Stevenage and North Hertfordshire are quite high and around 70% of all workers employed within the identified FEMA also reside in the area. Taking account of all this, I consider it reasonable to regard the FEMA identified as being the most appropriate. That the adopted local plans of Stevenage and Central Bedfordshire have been predicated and found sound on this basis adds to my conclusion.

#### **The need for economic development in the district**

566. One of the primary objectives of local plans is to ensure that enough land is provided to meet the local economic development needs. This is chiefly about 'B Class' development – that is to say premises for offices, manufacturing or storage and distribution facilities – because these are the primary employment uses that require significant areas of land to support growth. I consider retail issues later in this report.

567. To this end, Policy SP3 sets out the Council's aim of providing an adequate supply and range of employment land to meet the requirements of the local economy. The Council considers that the Plan should provide 10.1 hectares of B Class land to meet the district's need during the plan period, and that this is anticipated to support 2,142 net new B Class jobs.
568. The FEMA Study analyses the potential growth in B Class jobs and the consequent need for employment land using the East of England Forecasting Model ('the EEFM') – a set of forecasts undertaken variously by Cambridge Econometrics and Oxford Economics. It compares EEFM projections from 2012 and 2013 with those from 2014. The Council's *'Employment Background Paper'* (February 2017) [E5] also considers these with the addition of EEFM figures from 2016.
569. Nine different scenarios are explored in the employment background paper, each based on EEFM model runs. These are presented in Table 1. It is apparent that the baseline B Class jobs and land requirement figures from the 2014 EEFM are significantly higher than the other baseline scenarios. I concur with the employment background paper that they are "*somewhat of an anomaly*". As the employment background paper points out, the EEFM forecasts are quite sensitive to relatively small shifts in the economy – the modelling, in effect, magnifies those changes because it replicates them over a 20-year period.
570. The need for B Class land identified by the Council – the 10.1 hectares – is derived from a scenario in the employment background paper that represents the average of the EEFM baseline forecasts for 2011 to 2016 ('the chosen scenario'). It is apparent that the identified need figure takes the 2014 EEFM projection into account. Notwithstanding its incongruity, I do not regard that as a problem. While the 2014 forecasts do obviously affect the chosen scenario, that projection does not rely heavily on 2014 alone. Indeed, it incorporates the lower baseline figures of other years, particularly 2011, which is quite a bit more subdued than all the others and indicates a contraction in B Class jobs. The point here is that the chosen scenario does not rely exclusively on the 2014 EEFM or more heavily on it than it does on the forecasts from other years. Consequently, the influence of the 2014 figure is substantially tempered.
571. The Council says that the 2014 EEFM forecast reflects a period of optimism following the 2009 recession, whereas the 2016 projection is less optimistic following the decision for the United Kingdom to exit from the European Union and a view from forecasters that this will have a negative effect on the economy. That may be so, and figures taking into account economic fluctuations experienced because of the Covid19 pandemic might lead to a yet more pessimistic outlook.
572. However, forecasting of this sort is more of an art form, not a precise science. Here, the Council has taken into account projections produced by two reputable forecasting companies and used an average from the figures they have published over a number of years. The chosen scenario encompasses forecasts for both rain and shine. That is not surprising, given that it considers several economic forecasts, each with its own sensitivity to the immediate economic climate at the time. Neither is it problematic. The use of

an average helps to prevent overly sunny or gloomy forecasts from excessively influencing the overall outlook. Whilst the sway of 2014 may well lead to figures that lean towards the former, the Council says that it is deliberately taking a positive attitude towards economic growth. I support that stance. A more negative approach would run the risk of failing to properly support potential growth in the district's economy at a time of significant economic uncertainty. In my view, that would be unacceptable.

573. I recognise that much of the modelling process involves reliance on assumptions. That is inescapable. One area of particular sensitivity is the derivation of employment land requirements from job forecasts. Appendix 5 of the employment background paper sets out the approach and the key assumptions within it. This is quite a sophisticated method which uses the national Standard Industrial Classification for Economic Activities and draws on the latest Business Register and Employment Survey data available at the time. On the face of it, the method adopted is logical and reasonable. Perhaps the key assumption is the conversion of full-time equivalent jobs for each use class into floorspace. For this, employment densities based on the Homes and Communities Agency's Employment Density Guide have been used. This is entirely reasonable and appropriate. In short, I consider that the methodology used is suitable and that it draws on appropriate information sources to inform key assumptions. The inclusion of the safety margins and the allowance of 10% to all floorspace requirements lends confidence that the land requirements arrived at will be sufficient.

574. Overall, I consider the evidence underpinning the need for economic development identified by the Council to be robust and the chosen scenario to be the most appropriate. I therefore regard the district's need for new B Class development over the plan period to be around 10.1 hectares, and I concur that this is likely to sustain somewhere in the region of 2,142 net new jobs.

### **The Plan's economic development requirement**

575. In addition to the above, the Plan sets out to provide seven hectares of employment land to compensate for the loss of existing employment sites to housing. Setting the Plan's requirement for employment land is dependent on both the economic growth forecast and the amount of land in the existing supply. In terms of the latter, the NPPF says that the long-term protection of employment sites should be avoided where there is no reasonable prospect of them being used for that purpose. The '*North Hertfordshire Employment Land Review*' (March 2013) [E4] ('the ELR') undertakes a review of the district's supply, including a qualitative assessment, and considers whether each site should be protected for employment use. This review aspect of the ELR has been updated through the employment background paper. I regard this evidence to be robust.

576. On this basis, the Council has identified seven hectares of land that should no longer be included in the employment land supply. In the light of the NPPF and the Council's evidence, I agree that this should not be protected by the Plan's employment policies. Moreover, the quantum lost should be 're-provided'. As I understand it, the district's identified need figure has in effect been arrived at on the basis of that land being part of the existing supply for economic development. In this context, failure to compensate that loss would

mean falling short of the district's identified need. According to the Council's calculations, this land could host between 300 and 3,500 new jobs, depending on the use class taken up on it. Although this element of the Plan's requirement should possibly be considered as an additional element of the district's need, this is a theoretical point of little consequence. The important thing is that it is recognised as part of the Plan's requirement.

577. The Plan also seeks to provide a further 11 to 15 hectares to help address unmet economic development needs in Stevenage. The Stevenage Borough Local Plan 2011 – 2031 was adopted in May 2019, during the examination. Paragraph 5.23 of that plan was modified by the Inspector to clarify that the borough's need for employment land that is not met by the plan is around 11.5 hectares. It is apparent that the two local authorities agreed that North Hertfordshire would provide for this deficit through the Duty to Co-operate. As both are within the same FEMA, providing for that unmet need in North Hertfordshire is the most appropriate approach, and is justified.

578. Taking account of all the above, I regard the requirement for land for economic development to be addressed by the Plan to be around 29 hectares. The number of new jobs likely to be generated by meeting this requirement is in the range of 3,274 and 6,474, depending on the precise type of B Class development realised on the land and the employment densities achieved.

### **The supply of land for economic development**

579. To meet the requirement for economic development, Policy SP3 proposes to allocate three sites: the former power station in Letchworth (Site LG12, which is 1.5 hectares); land east of Baldock (Site BA10, which is 19.6 hectares); and land west of Royston (Site RY9, which is 10.9 hectares). This amounts to 32 hectares. Table 6 of the employment background paper identifies a further 5.5 hectares of land within the supply, including sites with planning permission. The Council confirms that this figure includes Site LG12, such that 1.5 hectares have been 'double counted'. Consequently, the overall supply, taking account of all sources, is approximately 36 hectares.

580. Considering the above, the Plan includes sufficient land to meet the identified economic development needs of the FEMA. Indeed, the supply exceeds the requirement by roughly seven hectares. To my mind this is reassuring, as it would help to support churn and choice in the market. I therefore consider that the supply of land for economic development provided through the Plan is justified, effective and consistent with national policy.

581. Having said that, some main modifications to Policy SP3 are required. The references under paragraph a) should be re-focused to make it clear that the sites referred to are proposed allocations, and that it is the needs of the FEMA that are being met through their allocation. It is also necessary to delete from Policy SP3 reference to Site LG12 as an allocation, and to delete the policy allocating it – this site now has planning permission and it is more appropriate to identify it as an employment area through Policy ETC1. Other changes are needed to clarify the types of employment use permitted in various locations – including on the proposed allocations and in existing employment areas – and to clarify that the employment areas referred to are those shown on the policies map. Because of the modification to the Category A Villages tier in the

hierarchy and the introduction of the settlements for growth, **FM048** is necessary to clarify that rural businesses will be directed to larger villages. Main modifications **MM014/FM042**, **MM015/FM045**, **MM016**, **FM046**, **FM047** and **MM400** make all these modifications and are therefore needed for effectiveness. It will be necessary for the soundness of Policies SP3 and ETC1 for the Council to alter the policies map in relation to the former power station in Letchworth, as indicated above.

### **The site selection process**

582. Compared to sites for housing, a relatively small number of sites have been put forward for employment uses. All of them have been considered in the Sustainability Appraisal, and this has helped to inform the Council's selection. As I understand it, there has been no site selection process as such, at least not one with any specific parameters. Rather the Council has looked at the sites in the round and applied its judgement. Given the modest scale of the task here, that is a suitable and proportionate approach.
583. The Council has appraised all the sites put forward for consideration. These appraisals are set out in the ELR. It is apparent that the alternatives put forward are few and that the Council's options have therefore been very limited. The reasons for rejecting sites are explained in the ELR. In broad summary, the alternative sites either are no longer available, have significant highways constraints for which no satisfactory mitigation has been found, are adjacent to a wildlife site, are in the Green Belt and make a significant contribution to it, or a combination of one or more of these factors.
584. Regarding availability, I agree that sites with a willing landowner should be preferred to sites without. While it is possible that the other drawbacks need not in and of themselves be a bar to allocation, it seems to me that the disadvantages identified render these alternatives less favourable options than the selected sites.
585. Overall, I consider the approach taken by the Council to selecting the land proposed in the Plan for employment to be reasonable and proportionate. The decisions made have been suitably informed by the Sustainability Appraisal and the exercise overall has been adequately robust.

### **The proposed employment allocations**

586. As mentioned above, and taking account of **MM014/FM042**, the Plan includes two employment allocations. Being at Baldock and Royston, both are at settlements categorised as towns in the settlement hierarchy of Policy SP2. That is to say that both are at locations that are among the most sustainable in the district.
587. As discussed elsewhere, a significant amount of housing growth is proposed for Baldock. However, the town has a relatively low level of employment land per person, which presently contributes to out-commuting. The allocation of employment land here on Site BA10, which is largely in the Green Belt, will help to ensure that the town's residents have decent access to local job opportunities and will likely improve the containment of trips for work purposes. While the designated employment areas to the west of the A1(M)

are not distant, Site BA10 offers new prospects to accompany and compliment the growth of the local population.

588. In addition, the FEMA Study says that "... the key sub-market area that stretches from Stevenage to Letchworth and Baldock along the A1(M) route is considered to be best placed to meet the unmet needs for industrial space from Stevenage". Site BA10 lies squarely within this sub-market area, and 11.5 hectares of it is intended to address Stevenage's unmet need. Its allocation is therefore consistent with the evidence. Moreover, considering its location in the sub-market and its geographical proximity to Stevenage, it may well contribute to reducing out-commuting from the district to the neighbouring town.

589. Positioned towards the northeast corner of the district, Royston is away from the cluster of Letchworth, Hitchin and Baldock. Relatively speaking, it is a little more remote. Consequently, the inclusion of Site RY9 will assist by offering readily accessible additional jobs in the local vicinity. Considering the scale of new housing development proposed here, I consider that to be an advantage.

590. The potential environmental and other effects of developing the two employment sites have been considered through the Sustainability Appraisal, including any mitigation measures necessary. Policies BA10 and RY9 include measures to address identified site-specific impacts. Overall, there are none that indicate that it is necessary to reject either site, and I consider them to be justified.

591. Some additional criteria in relation to Site BA10 have been put forward by the Council. I agree that the development of the site should not impede views of St Mary's Church – it is a local landmark that demarks the historic centre of the town. So the ecological value of the railway corridor to the north of the site is not eroded, landscaping should be required to this boundary. In addition, a contaminated land preliminary risk assessment is necessary to ensure that the state of the land is suitable for employment uses. Main modification **MM211** introduces new criteria accordingly and is necessary for effectiveness.

592. It is confirmed by the Council that the landowners of both sites are willing for them to be developed for employment purposes. Both have existing access infrastructure and there are no insurmountable issues to prevent them coming forward. I therefore consider them to be deliverable.

### **Exceptional circumstances in relation to Site BA10 – land east of Baldock**

593. There is a clear and present need for additional employment land in the district. While the requirement is perhaps not so sizeable in terms of land area, the need to meet it is pressing in the sense that the opportunities to do so are few. Failure to deliver here would be to betray the agreement with Stevenage Borough Council under the Duty to Co-operate. It would also mean forsaking the opportunity to meet the unmet needs of Stevenage in a location clearly supported by the FEMA Study. Indeed, if not through this Plan, it is difficult to see how the unmet needs of Stevenage would then be met at all.

594. On the question of alternative supply, it is apparent that North Hertfordshire has a somewhat limited capacity, particularly in respect of land outside of the current Green Belt. A little over 81 hectares of land has been considered by the Council for employment. Of that, only 18.4 hectares is not in the Green Belt, and all of that has been either allocated or granted planning permission for employment uses.
595. Around 3,360 new homes are anticipated to be delivered through the Plan's housing allocations in Baldock. Housing Site BA1 alone is expected to deliver a new neighbourhood of around 2,800 new homes incorporating a local centre and is immediately to the north. In this context, Site BA10 represents a clear-cut chance to support the Plan's approach of seeking to improve the geographical balance of employment and housing and in so doing to contribute to sustainable development. Simply put, the co-location of Site BA10 and Baldock's housing sites, especially Site BA1, would help to provide opportunities for people to work near to where they live. The advantages in terms of commuting and the consequent environmental impacts are obvious.
596. It is the eastern portion of this site that is currently in the Green Belt. Both the Green Belt Review and the Review Update conclude that this land makes a 'moderate' contribution to the Green Belt. Between the B656 to the south and the railway line to the north it is in a visually contained, relatively low lying and flat location. Once developed, it would be seen in the context of the housing proposed on Site BA1 to the north and on Sites BA3 and BA4 to the south and west. Consequently, it would not appear as unrestricted sprawl or a significant encroachment into the countryside. Neither would it result in the merging of two towns or harm the setting and special character of a historic town – there are no other towns nearby, and this quarter of Baldock is not among its most historic elements.
597. Policy BA10 includes measures to ensure that the consequent impacts on the purposes of including land in the Green Belt are reduced to the lowest reasonably practicable extent. However, requiring a strategic masterplan for the development of the site would significantly assist. Main modification **MM211** adds this to Policy BA10 and is needed for effectiveness.
598. If Site BA10 were to be developed as proposed, then the adjacent Green Belt would continue to serve Green Belt functions. The proposed Green Belt boundaries along the southern and eastern edges of Site BA10 are clearly demarked by the highway and the boundary of The Firs Kennels Cattery respectively. They are clearly capable of enduring beyond the plan period. Indeed, given the presence of the road and cattery, it is difficult to see how any pressure to expand Site BA10 could be accommodated. The site does not include any land which it is unnecessary to keep permanently open.
599. Considering all the above, in particular the need for economic development and the absence of any other alternative sites outside of the Green Belt, I conclude that the exceptional circumstances necessary to warrant altering the Green Belt boundaries to allocate this site do exist. Consequently, the allocation of Site BA10 is justified and consistent with national policy.
600. That said, for reasons related to the Green Belt, two further changes are needed to Policy BA10. To ensure a satisfactory transition from rural to urban,

I agree that requiring the use of 'green roofs' on buildings on the eastern part of the site is a reasonable and necessary step. To make sure the Green Belt boundary to the east endures, landscaping should be required. Main modification **MM211** introduces both prerequisites and is therefore necessary in these respects.

### **Development management policies**

601. Policy ETC1 aims to ensure that existing Employment Areas shown on the policies map are reserved for employment uses and introduces several criteria to be applied when considering specific development schemes. Policy ETC2 relates to employment development outside of the Employment Areas. Taken together, these policies provide a suitable framework for safeguarding employment land and controlling development on it, whilst offering a degree of flexibility for businesses looking to locate outside of those areas. In my view, this is a justified stance.
602. However, neither of these policies refer to development on the two employment sites allocated through the Plan. For effectiveness, the same approach should be applied to these as to the Employment Areas. Main modifications **MM088/FM071** and **MM090** introduce reference to the new allocated sites and therefore ensures this.
603. The Council aims to ensure that, taken together, the Employment Areas and the allocated sites provide a range of uses that meet the need for different types of economic development. To ensure this, **MM088/FM071** and **FM076** spell out the Council's intention to limit uses on individual sites where necessary using planning conditions and legal agreements. That is a justified approach and the modification put forward is necessary for effectiveness. In light of the objective and approach to achieving it, the Plan should not seek to reserve certain areas for specified uses, as paragraph 5.4 suggests. As need, supply and the market fluctuate, this could hinder achieving the overall goal. For effectiveness, **MM089** deletes this paragraph.
604. Some Employment Areas shown on the policies map are also identified as Business Areas. Criterion a. of Policy ETC1 aims to restrict the use in Business Areas to office use. However, the Council concedes that there is no justification for this. Consequently, **MM088/FM071**, **MM398** and **MM377** are necessary. They delete criterion a. and remove the list of Business Areas from the Plan. The policies map will need to be changed to reflect this, and Business Areas will need to be removed from it.
605. Policy ETC2 allows employment uses outside the Employment areas where they are "*located consistently with the principles of sustainable development*". In my view, this is unnecessarily vague. The settlement boundaries and built cores defined in the Plan represent the most sustainable locations. The policy also allows employment uses that are major in scale where there is evidence that there are no more suitable sites within the Employment Areas. But providing for large employment uses is the role of the Employment Areas and the sites allocated in the Plan. As I have already said, the Plan includes sufficient land to meet the identified economic development needs of the FEMA. Therefore, allowing further major development outside of the areas intended for it is unjustified and runs the risk of undermining the Plan's

intention of locating large businesses in the most suitable and sustainable locations. It is therefore necessary to remove this aspect of Policy ETC2. Replacing it with a flexible approach to small scale employment development is reasonable. Main modification **MM090** alters the policy accordingly.

606. The circumstances in which the loss of employment uses on non-allocated sites is justified are set out in Policy ETC2. Among them is where the land or premises is no longer required to meet future employment needs. However, for effectiveness reasons it is necessary to indicate how the judgement about need will be made. Main modification **MM090** requires that that be demonstrated through at least 12 months of active marketing, and **MM091/FM077** sets out further detail. In my view, all of this is reasonable and necessary.

### **Conclusion on Issue 8**

607. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision for new economic development is justified, effective, consistent with national policy and positively prepared.

### **Issue 9: Whether the Plan's provision for main town centre uses is justified, effective, consistent with national policy and positively prepared**

#### **The hierarchy of town and local centres and their capacities for town centre uses**

608. Policy SP4 aims to provide for an appropriate range of retail and service facilities and to protect the vitality and viability of the district's centres. To this end, it identifies a hierarchy of town and local centres where proposals for main town centre uses – as defined in the NPPF and repeated in the Plan's glossary – will be supported, subject to certain criteria.

609. The categorisation of the centres in the hierarchy is based on both telephone and street survey work. The results are unsurprising. Whilst Letchworth, Hitchin, Baldock and Royston do not compete with the likes of Luton, Stevenage or Cambridge, they are clearly the main destinations within the district for shopping and leisure activities. Recognising that function, and that of the 13 existing local centres, along with that of the two new local centres proposed in the Plan on the housing sites to the east of Luton and north of Baldock is both appropriate and justified.

610. The '*North Hertfordshire Retail Study Update*' (June 2016) [E1] ('the Retail Study') projects the district's capacity for comparison and convenience retail floorspace, as well as food and drink outlets and other town centre uses. Some of these figures are re-visited and set out in the Council's note following the hearing session in December 2017 [ED117] ('the Note'). These commercial assessments start with analysis of population, local expenditure, existing retail space, turnover, and shopping/spending patterns. The balance between expenditure and expected turnover is taken into account. They then consider population and expenditure projections alongside estimations of quantitative and qualitative need to identify surplus expenditure capacity. Taking account of the ability of vacant floorspace to meet needs, the question of how growth should be accommodated is assessed. It seems to me that

these are all relevant factors to consider, and the methodology used is robust.

611. One fundamental aim of the Plan is to ensure that the district's towns maintain their role and market share of convenience and comparison retail, and of food and drink outlets. This is a fitting objective and is consistent with the national policy of ensuring the vitality of town centres. It is not, however, made plain in the Plan as submitted, and a main modification to Policy SP4 is necessary to set this out. To achieve this goal, Policy SP4 sets out the level of floorspace to be provided for these uses. The figures quoted are based on those in the Retail Study and the Note. However, for consistency with that evidence, the amount of convenience floorspace to be provided should be 8,600 square metres rather than 8,500, and the reference to 7,000 square metres of 'other town centre uses' should be modified to 'food and beverage outlets'. It is also necessary to alter the measure of floorspace from 'm<sup>2</sup>' in the submission version of Policy SP4 to gross 'square metres'. Although a simple drafting error, these are different things.
612. There has been some confusion about the projected retail capacity of the towns and precisely how the Plan seeks to deal with this. Through the hearings and the Note, it is clear that Letchworth, Hitchin and Baldock have significant leakage in terms of spending. Baldock lacks the physical space within the centre to accommodate its projected retail capacity, and there is uncertainty around the deliverability of the proposed allocations at Churchgate and Paynes Park in Hitchin, especially in the shorter term. The Council's intention is that whilst provision across the four towns should meet the district's identified capacity overall, there should be some skewing of provision. Put simply, this would mean that the identified retail capacity of some towns would be provided for in others, primarily in Letchworth and to a lesser extent in Royston. Considering the relationships between Letchworth and nearby Hitchin and Baldock, and as this approach would ensure that the district overall would retain its market share, I consider this to be a justified and effective stance.
613. However, the Plan as submitted does not clearly articulate the situation explained in the preceding paragraph. Neither does it indicate the level of new floorspace anticipated at each of the four towns, or the provision anticipated at the new local centres proposed on the strategic housing allocations. The Council has put forward **MM017/FM050** which introduces the clarity necessary for effectiveness to Policy SP4. It also includes the other modifications I have concluded are necessary in the preceding paragraphs. The further explanation set out in **FM051, MM018, MM255, MM256, MM306** and **MM403** is also necessary for effectiveness.
614. Notwithstanding all the above, I have some concerns about the retail capacities identified. As the Council itself points out, retail projections are rarely reliable beyond five years, and the Retail Study is now beyond that vintage. In addition, it strikes me that there have been notable changes in the national economy since the Retail Study was produced. Any effects on retailing and other town centre businesses resulting from either the United Kingdom's exit from the European Union or the Covid 19 pandemic have not been reflected in the projections. That is no criticism of the Council or its work – these factors could not have been accounted for at the time.

615. Nonetheless, I consequently agree with the Council that the uncertainty involved should be reflected in the Plan. It is necessary for the Plan to acknowledge the uncertainty and commit to the production of updated retail studies. The site allocation policies should include a caveat that town centre use floorspace requirements are subject to an up-to-date assessment of capacity and supply. Most fundamentally, the Council's commitment to a review of the Plan by the end of 2023 should include a pledge that the review will have particular regard to the identification of the needs for retail, leisure, office and other main town centre uses, among other things. Main modifications **MM021/FM055**, **MM262/FM131**, **MM263/FM132**, **MM310/FM153**, **MM311/FM154**, **MM312/FM155** and **FM190** introduce suitable changes accordingly. It is only on the basis of these modifications that I consider the main town centre use capacities and provision set out in the Plan to be justified.

616. Supporting Policy SP4, paragraph 4.48 of the Plan says that "*further allocations and broad locations are identified within our main towns ...*". However, the policies map does not identify any such broad locations for the purpose of Policy SP4, and this is not the Council's intention. This reference to broad locations should therefore be deleted. Main modification **MM022** does this and is therefore required.

### **The Plan's approach to meeting the need for main town centre uses**

617. National policy is clear the identified need for main town centre uses should be met through the allocation of land. That is precisely what the Plan sets out to achieve.

618. Two primary strands of supply are included in the Plan – site allocations that are specifically aimed at delivering town centre uses as part of a wider mix of uses, and the provision of main town centre uses within new neighbourhood centres required on the strategic housing sites identified in Policy SP8. That is an appropriate path to take and is consistent with national policy.

### The proposed site allocations

619. Sites in Letchworth (Sites LG19, LG20 and LG21), Hitchin (Sites HT11 and HT12) and Royston (Site RY12) comprise the former strand and collectively would provide most of the land. The site selection process has been similar to that for choosing employment sites. In short, all the sites put forward have been considered by the Council. All of those regarded as reasonable alternatives have been assessed through the Sustainability Appraisal and constraints have been taken into account, as have the Town Centre Strategies for each of the towns. Judgements have been made in the light of all this and the adopted Town Centre Strategies, and the reasons for selecting or rejecting sites are set out in the '*Retail and Town Centres Background Paper*' (September 2016) [E2]. By and large, lack of availability has proved a decisive factor. In my view including sites which are not available for the proposed use would not be justified or effective.

620. All in all, site selection has been undertaken in an appropriately straightforward manner proportionate to the task. From the retail and town centres background paper and bearing in mind the analysis in the Sustainability Appraisal, I consider the sites selected to be the most

appropriate options.

621. That said, I recognise that there are questions around deliverability in relation to the proposed allocations, perhaps most particularly in respect of Hitchin and Site HT11 at Churchgate. I have heard and read much evidence about this, and it is apparent that the situation is long running and rather complicated, involving various issues such as leasing arrangements, car parking and the operation of Hitchin market. Furthermore, and perhaps more fundamentally, it is apparent that the adopted Town Centre Strategies have had influence in the process. Rightly so, in principle. But none of these are recent. All pre-date the Retail Study by some considerable time – the most up to date is that for Royston, which was adopted in June 2008. Bluntly put, the Council's evidence and thinking about the district's town centres – at least insofar as it is expressed in these strategies – is outdated.

622. The Council recognises this. It has put forward **MM017/FM050**, **MM019/FM052** and **MM313** committing to commencing work on the preparation of new Town Centre Strategies within twelve months of this Plan's adoption, to using these to inform the approach to town centres through the early review, and to monitoring and reviewing these strategies throughout the life of the Plan. It has also committed to initiating a concept framework/masterplan to address the requirements of the Churchgate and Payne's Park sites in Hitchin. Main modifications **MM258**, **MM260**, **MM262/FM131** and **MM263/FM132** embed the production of the concept framework/masterplan in Policies HT11 and HT12 and their supporting paragraphs and introduce other appropriate alterations to them.

623. As submitted, the policies allocating the proposed sites, and the paragraphs supporting them, refer to the provision of main town centre uses and some all-ward residential accommodation on upper floors. The Council has put forward main modifications (**MM257**, **MM259**, **MM262/FM131**, **MM263/FM132**, **MM310/FM153**, **MM311/FM154**, **MM312/FM155**, **MM314** and **MM404**) seeking redevelopment led by main town centre uses and introducing the possibility of residential development on upper floors for all the sites and on basement floors where applicable. In my view, these changes introduce greater flexibility in terms of uses – there is no compelling reason to rule out elements of residential development – and will ensure a more holistic approach to development on these sites. That is necessary for effectiveness, especially considering the uncertainty involved here. From the evidence, I agree that a site-specific flood risk assessment is also needed in relation to Site LG19. Main modification **MM310/FM153** introduces this requirement and is needed for effectiveness.

624. The modifications referred to in the preceding paragraphs ensure that the Plan includes a framework for allowing town centre uses to come forward in the shorter term whilst also enshrining within it a more positive and proactive route forward. This is critical to the justification for the proposed allocations. Although far from ideal, it is the most appropriate response in the circumstances. Demanding that this work be done through this examination would lead to yet further delay including to the progress of housing delivery and would be disproportionate and unwarranted.

625. I have previously discussed traffic issues in Hitchin and the Council's plans for

tackling them. It is appropriate that schemes for main town centre uses in the town should contribute to the solutions, including walking and cycling projects which aim to influence 'modal shift'. Main modification **MM264** adds this requirement and is necessary for effectiveness.

626. I note the concern that allocating Sites LG19, LG20 and LG21 could prevent other schemes coming forward in Letchworth until the review process has taken place. But I see no particular reason why acceptable schemes should be thwarted. To ensure that they are not, the Plan should spell this out. Main modification **MM313** does this and is necessary for effectiveness.

#### The provision for main town centre uses on strategic housing sites

627. It is clear to me that the strategic housing sites should provide local neighbourhood centres, as the Council proposes. These sites are of such significant scale – between 600 and 2,800 new homes – that some residents, particularly those occupying the outer reaches, would otherwise be undesirably distant from day-to-day shopping and other local services and facilities. The centres for the two largest sites – at Baldock and to the east of Luton – should include a wider range of retail facilities, and **MM020/FM054** is necessary to clarify this.

628. In addition to addressing the scale of floorspace needed, the Plan also sets out to tackle the question of the type of floorspace. District-wide figures for comparison and convenience goods, and for other town centre uses, are set out in Policy SP4. At the site-specific level, though, different types of uses are generally not disaggregated. The intention here, as I understand it, is that this would allow flexibility depending on both the detail of the schemes that come forward and the prevailing market. That is a legitimate stance, in principle.

629. Policies relating to the two largest strategic housing sites, being Site BA1 for 2,800 houses in Baldock and Sites EL1, EL2 and EL3 which, in effect, combine to form one site for 2,100 homes in total to the east of Luton, already set parameters regarding the types of different town centre uses required. Because of their scale and the consequent distance of more peripheral homes from existing shops and other facilities, I consider the greater degree of direction appropriate to ensure a wider range of uses are provided.

630. Overall, taking account of all the sources of land identified by the Council, I consider there to be a reasonable likelihood that the provision needed for main town centre uses, being that set out in Policy SP4 as modified, could be met. In any event, given the process of reviewing both capacity and provision embedded within the Plan through the modifications I have described above, I regard the Plan to be adequately justified and effective in this respect.

#### **The town centre boundaries and the primary and secondary shopping frontages**

631. The policies map defines town centre boundaries and, within them, primary and secondary shopping frontages. This is necessary for the operation of Policies SP4, ETC3, ETC4 and ETC5, and represents an appropriate approach consistent with national policy.

632. As I understand it, the precise delineation of these boundaries and frontages has been arrived at drawing on a range of evidence sources, including the district's Local Plan adopted in 1996, the Town Centre Strategies and, perhaps most pertinently, from site visit and survey work. The Retail Study also considers the demarcation of the town centre boundaries and shopping frontages. The aim here has been to define the concentration of current main town centre uses to inform and set suitable locations for new uses. Although this exercise has involved professional judgements about precisely where to draw the line – literally in this case – that is unavoidable in a task of this kind and is no drawback.
633. Overall, I regard the approach taken by the Council to be sufficiently robust. In the light of this, and from my site visits, I am satisfied that the Plan's policies that identify the boundaries and frontages defined on the policies map are adequately justified for the purpose of this Plan.
634. However, the concerns I have already expressed about the datedness of the Retail Study and the Town Centre Strategies apply equally in relation to the setting of the town centre boundaries and the primary and secondary frontages. However, as I understand it, it is the Council's intention that these should be re-visited as part of the production of new Town Centre Strategies and the review of the Plan's approach to the town centres. I am of the firm view that they should be.

### **Development management policies**

635. Policy ETC3 sets out the criteria against which applications for main town centre uses will be assessed. It is necessary to clarify that the uses in question are those set out in the Plan's glossary, to ensure the policy is effective. Criterion b. requires the submission of impact assessments "*based on locally set thresholds*". For consistency with the NPPF this should be modified such that impact assessments are only demanded where the development is outside of any town centre. The locally set thresholds are set out in paragraph 5.19 of the Plan. However, it would improve the effectiveness of the policy to include those thresholds within it. For the same reason, the Council's intention to use planning conditions or legal agreements to limit uses to ensure that the provision of main town centre uses identified in Policy SP4 (as modified) are met, should be included within the policy. Main modifications **MM092/FM078**, **MM094** and **FM081** set out all these changes and are therefore necessary.
636. The NPPF specifically allows the use of locally set thresholds of this sort. Those proposed here stem from the Retail Study. I agree that considering the scale and relative health of Hitchin town centre, it would be difficult to justify a threshold lower than the NPPF's default of 2,500 square metres. Bearing in mind the relative sizes of the other three centres and the higher vacancy rates in Letchworth and Royston, the 1,000 square metre threshold proposed for Letchworth and the 500 square metre threshold assigned to Baldock and Royston are all justified.
637. Paragraph 5.13 of the Plan aims to explain the preferences for the location of main town centre uses under the 'sequential approach' set out in the NPPF. However, for consistency with national policy, no distinction should be made

between the primary and secondary frontages and elsewhere within the defined town centres, and the latter should also be the first preference for leisure facilities. Main modifications **FM079**, **MM093/FM080** and **MM407** rectify these inconsistencies and are therefore necessary.

638. Policies ETC4 and ETC5 set out criteria to be applied to applications for development in the primary and secondary shopping frontages respectively. As with Policy ETC3, references in each to town centre uses should be clearly linked to the definition in the Plan's glossary. Both policies state that some specified main town centre uses will be granted planning permission but that permission for others will only be granted "exceptionally" and provided that certain other criteria are met. I see no reason for the former caveat, given the latter stipulations. Main modifications **MM095/FM082** and **MM096/FM083** provide suitable remedy to all these matters and are therefore needed to ensure that the two policies are justified and consistent with national policy.
639. A further modification to Policy ETC4 is also necessary. This is to clarify that main town centre uses other than retail will be allowed in the primary shopping frontages so long as the use would not detract from the centre's vitality and viability or undermine its daytime function. Main modification **MM095/FM082** achieves this and is therefore also needed in this regard.
640. Paragraph 5.25 of the Plan explains when evidence about predicted footfall, opening times and linked trips will be required as part of planning applications. For effectiveness, it is necessary to clarify that this relates to applications seeking to meet part b. of Policies ETC4 and ETC5, and to make it clear that the reason for this evidence is to assess the impact of the proposed development on the daytime function, vitality and viability of the shopping frontage. This illumination is set out in **MM098/FM087**.
641. As submitted, paragraph 5.25 of the Plan required a shop unit within the primary and secondary shopping frontages to have been vacant for six months before a change of use to one of the other main town centre uses listed in part b. of both policies would be permitted. The Council now suggests that one year would be a more appropriate period. I agree that this would provide a more robust test. It would help to avoid the loss of shops that could, given time, prove viable and successful. Main modification **MM098/FM087** alters this time period and is consequently necessary for effectiveness.
642. Policy ETC6 sets out the criteria to be applied to applications for development in local centres. For effectiveness, it is necessary to clarify that this also applies to those local centres proposed on the strategic housing sites allocated in the Plan. Main modification **MM099/FM088** does this and is therefore needed in this regard.
643. As submitted, this policy demands that the majority of units in local centres are and remain in retail use. However, it seems to me that this degree of prescription is unjustified. Whilst one or more shops is a key ingredient of a thriving local centre, so too is the provision of a mix of other main town centre uses. Main modification **MM099/FM088** alters the wording, introducing a greater degree of flexibility and placing the onus on meeting day-to-day needs and ensuring the vitality and viability of the local centre concerned. That is a

more appropriate policy response and is necessary for the policy's effectiveness.

644. I recognise that paragraph 5.29 of the Plan says that "*a predominance of shops is considered to be necessary ...*". But to my mind a 'predominance' of shops is not the same as most units within the centre being shops – for example, one local supermarket could lead to a predominance of retail use in a local centre. However, local retail needs should be met as a priority and to be effective the Plan should be unambiguous on that point. Main modification **FM089** adds text to this effect and is therefore needed.
645. Supporting Policy ETC6, paragraph 5.32 indicates that other uses may be appropriate in local centres, such as surgeries or other community and leisure uses, where they would meet a local community need. That strikes me as an appropriate position to take. While the Council has put forward a main modification to delete this paragraph, I consider this to be unnecessary.
646. Policy ETC7 sets out criteria for considering proposals relating to local community shops and services that are not in local centres. As submitted, it allows small scale shops and services within existing settlements. I regard this to be an appropriate stance. However, to ensure that the policy is properly effective, it is necessary to introduce greater certainty about the term 'small scale'. Reflecting the threshold in the Use Classes Order, 280 square metres represents an appropriate level. To ensure flexibility and allow for the application of professional judgement, this should be used as a guide rather than a stringent rule. In addition, to ensure that such new units are appropriately located, they should be within defined settlement boundaries, within the built core of Category B villages or, in the case of Category C settlements, the 'rural exception' criteria in Policy CGB2 – which I consider later in this report – should apply.
647. This policy also aims to prevent the loss of shops, services or facilities unless there is another such use "*within a convenient walking distance*" or where the unit in question has been vacant for a year or more. In my view, this is a reasonable objective. For effectiveness reasons, though, the walking distance referred to should be defined. I concur that the 800 metres suggested by the Council is reasonable. Moreover, it would be unreasonable to resist the loss of premises where the use is demonstrably no longer required to meet local community needs. Evidence of unsuccessful active marketing should be shown to establish this and demanding that this be undertaken for at least 12 months is appropriate and will assist the policy's effectiveness.
648. Main modifications **MM100/FM092**, **MM101** and **MM408** include all the changes discussed above. For the reasons given these modifications are necessary.
649. Tourism related development is covered by Policy ETC8. This policy is supportive of such development. While that is appropriate, there is no justification for allowing tourism related development as an exception to the sequential test in Policy ETC3. Moreover, there is no reason why tourism schemes should be required to show why they could not be accommodated within existing settlements. Rather, the NPPF says that planning policies should enable sustainable rural tourism and leisure developments which

respect the character of the countryside. It says that policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. This element of Policy ETC8 should therefore be deleted. Main modifications **MM102** and **MM103** alter the policy and paragraph 5.41 supporting it accordingly. They are necessary to ensure consistency with national policy and effectiveness.

### **Conclusion on Issue 9**

650. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision for main town centre uses is justified, effective, consistent with national policy and positively prepared.

### **Issue 10: Whether the housing and other development proposed in the Plan is deliverable, having regard to the infrastructure requirements and other policy obligations**

651. Based on the Council's assessment of infrastructure requirements, the Plan's policies allocating land for development include site specific demands for the provision of various types of infrastructure. This transparent approach aids certainty and effectiveness. However, the NPPF is clear that local plans should be deliverable. While the Plan should ensure that it provides for the infrastructure necessary to deliver the development identified, the costs of that infrastructure and meeting other policy obligations in the Plan should not threaten viability. It is consequently necessary to consider the robustness of the assessment of infrastructure requirements, and the effect of the cost of providing it on the viability of the development planned for, taking account of other policy requirements in the Plan.

### **The assessment of infrastructure requirements**

652. The Council's Infrastructure Delivery Plan has been updated during the examination, and the latest iteration is the January 2018 Update [ED73] ('the IDP'). This considers the full range of potential infrastructure likely to be needed to enable the growth anticipated in the Plan, and specifically considers the baseline requirements in relation to highway improvements. An Infrastructure Delivery Schedule ('the IDS') is set out in Appendix 1 of the IDP.

653. It is clear from the IDP and the hearing sessions that consultation and dialogue has been ongoing between the Council and the key infrastructure providers. This has informed both the IDP and the IDS. The latter lists the infrastructure identified as necessary, and provides an estimate of the likely costs, funding sources, delivery partners and timescales.

654. In addition to this, the Council produced an '*Infrastructure Table*' (November 2017) [ED74], which it subsequently updated in 2018 [ED142] and in its 2020 hearing statement. These show each of the proposed housing allocations, the year-on-year level of housing delivery from each, along with the specific infrastructure required and the timing of its delivery relative to the associated housing. Several Statements of Common Ground between the Council and

site promoters have been provided, agreeing the infrastructure needed in relation to the Plan's strategic allocations on a site-by-site basis.

655. I recognise that the Infrastructure Table does not include windfall sites. However, as I see it, it need not. The overall level of windfall delivery anticipated is not so significant in scale, and it is likely that it would be more dispersed around the district rather than in one place where it might materially increase pressure on local infrastructure. In any event, any infrastructure improvements necessary to make any given windfall site acceptable can be secured through legal agreements or planning conditions through the planning application process.
656. Overall, the Council's evidence sets out what infrastructure is needed, where and when it is needed, how it will be delivered and who is expected to pay for it. In my view, these documents and the evidence underpinning them amount to a detailed 'deep dive' assessment of the district's infrastructure needs. Involving infrastructure providers and site promoters as the Council has done is a laudable approach which lends confidence that the delivery of necessary infrastructure has been properly thought through.

### **Viability**

657. Paragraph 173 of the NPPF says that the judgements to be made about viability are whether:
- a) the normal development costs, and the costs arising from policy and other requirements have been accounted for;
  - b) there will be a competitive return for a willing landowner and willing developer; and, taking account of all this, whether
  - c) the viability of the development will be threatened.
658. Viability has been considered through the plan making process. A viability assessment was produced in November 2014 based on the emerging preferred options for the Plan. Building on this work, the Local Plan Viability Assessment – Update (August 2016) [TI2] ('the Viability Update') supports the Plan as submitted. The Local Plan Examination Addendum (Viability) (Proposed Policies HS4 and HS5) (January 2018) [ED072] ('the Viability Addendum') has also been produced by the Council.
659. The Viability Update is based on the residual valuation method. To summarise, for a range of modelled development site scenarios, or 'typologies', development costs are subtracted from completed sales values to arrive at a residual value. This is compared with a benchmark value, referred to as the threshold land value. The threshold land value is the value required for the land to come forward for the development concerned. This sort of methodology is commonly used to support local plans, and I consider this an appropriate approach.
660. From information sources such as the Land Registry, Rightmove and Zoopla, it is apparent that there is a significant variance in house prices across the district. The Viability Update sets eight house value levels to reflect this. Each of the site typologies have been tested against each of these value levels.

This satisfactorily ensures that the house type mix and geographical distribution of new residential development planned for is adequately considered.

661. Numerous assumptions are made in relation to key factors influencing the residual value. Building Cost Information Service (BCIS) data has been used to inform build costs. The figures have been re-based to reflect costs in North Hertfordshire. To account for external works, 10% has been added to the BCIS build cost and for small sites an allowance of £4,500 per dwelling has been used. A build cost contingency of 5% has been added, and so too has an additional 2% of build costs to support sustainable design and construction. Marketing and sales costs are assumed at 3% of the gross development value (GDV), and £750 per unit is included for legal fees.
662. In respect of planning obligations, £3,000 per dwelling plus £100 per square metre has been used as a fixed cost assumption. The Council says that this is based on what is happening locally and experience of the local obligations regime.
663. Also included is an assumption that schemes will be wholly debt financed at a rate of 6% interest until the point at which the return is sufficient to support the development costs. To put it another way, no allowance is made for equity at the point of commencement. This is a cautious presumption and is appropriate.
664. Developers' profit is set at 20% of GDV for market housing and 6% for affordable housing. It is reasonable to distinguish between the two in this way.
665. It is clear that the Plan's policies have been taken into account, notably in relation to affordable housing and the accessible and adaptable housing. Regarding the latter, the Viability Addendum makes sure that both strands of Policy HS5 are considered – that is, the 'tightest' point at which both sets of requirements apply.
666. Overall, it is clear to me that the range of relevant costs have been considered and that both the value levels and costs used are based on relevant and adequately reliable sources of information. Moreover, it strikes me that an appropriate degree of caution has been exercised – for example, through the assumption about debt financing – and that the undertaking of this 'high level' appraisal work has included a decent dose of realism.
667. While the Viability Update includes site-specific appraisals for four of the six strategic sites, the remainder of the sites proposed within the Plan are not explicitly considered in the modelling. However, I do not regard that as a problem. The scheme typologies and site sizes (in terms of number of dwellings) broadly reflect the residential developments planned for and anticipated during the plan period, and a good range of potential development scenarios have been considered.
668. The outputs of the appraisals are set out in Appendix II of the Viability Update and the appendix attached to the Viability Addendum. On the whole, the tables presented paint a positive picture of development viability in the district. While some types of development in some parts of the district are

shown to be unable to bear the full policy requirements, most are. As I see it, there is little here to indicate that the viability of the housing development set out in the Plan will be threatened. By and large, on the evidence, it is reasonably probable that it will not be.

669. That said, it is important to bear in mind that appraisals of this kind are very 'high level'. They are based on a wide range of assumptions and are sensitive to many of the assumed inputs. The work undertaken here does not purport to reflect properly the full realities of developing sites. While perfectly adequate for the purpose of plan making – that is, the intended purpose – one should not rely on the outputs of the appraisals without question or take them as absolute proof of viability. A measure of circumspection is prudent.

670. Consequently, it is important that the Plan's policy demands – at least, those with the potentially most significant impacts on development viability – are framed to allow for the consideration of viability issues. This is necessary for effectiveness, to ensure that developments are not rendered unviable by policy burdens. Main modifications **MM032** and **MM034** amend Policy SP7 and paragraph 4.83 of the Plan accordingly. Main modification **MM125**, which adds a 'viability clause' to the affordable housing requirements in Policy HS2, is therefore also necessary. Main modifications **MM145** and **MM179** ensure that viability issues are taken into account when applying the Plan's sustainable design and drainage requirements. For the reasons set out, that is an appropriate and necessarily flexible approach.

### **Conclusion on Issue 10**

671. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan is based on a sound assessment of infrastructure capacity and requirements, and the implications for the deliverability of strategic housing growth. In this respect I regard it to be adequately justified and effective.

### **Issue 11: Whether the Plan's provision for safeguarded land is justified, effective, consistent with national policy and positively prepared**

672. The NPPF says that when defining Green Belt boundaries local authorities should, where necessary, identify in their local plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. Policy SP8 identifies one such area. It "*seeks to provide long term certainty by safeguarding land to the west of the A1(M) at Stevenage for up to 3,100 dwellings in the period beyond 2026 subject to a future review of this Plan*". This safeguarded land abuts the western edge of Stevenage and is currently in the Green Belt. The question of the existence or otherwise of the exceptional circumstances necessary for the alteration of the Green Belt boundaries involved is at the heart of the justification for including it in the Plan.

673. I have previously described the acuteness of the need for new housing and the pressing need for employment development in the district. There is no formal assessment of the need for housing beyond the plan period. However, it strikes me as highly likely that the need for new homes will continue to bring significant pressure to bear here and in the wider HMA. This Plan 'steps up to the plate' in terms of meeting needs. But it only achieves this until 2031 – a

period of nine years, which is short of the ten or fifteen years of supply indicated in the NPPF. It is highly likely that the Council will need to bring further land forward at that point.

674. It is possible that the early review of the Plan may reveal a more urgent situation. The Plan only provides a rolling five-year supply of land for housing on the basis of the 'three-stepped Liverpool approach' which, as I have said, is a situation that cannot be prolonged. The need to continually demonstrate a five-year housing land supply will undoubtedly add to the difficulties.
675. Moreover, it is apparent that the need for housing and economic development is pressing across the wider Stevenage HMA. While the Stevenage Local Plan does meet its identified housing need, that plan also runs only until 2031. This Plan has already assisted in meeting Stevenage's need for employment land.
676. There are significant constraints on supply in North Hertfordshire and the wider HMA. This district is largely rural and a significant portion of it is in the Green Belt. The Plan introduces new Green Belt land. There are sound reasons for this which I set out later, but this nonetheless adds to the future challenges.
677. The Stevenage built edge is at the limits of the local authority area in several locations. In others the town effectively crosses the administrative limits, such as at Great Ashby. This is a significant constraint for Stevenage Borough Council. In terms of plan-making beyond 2031, it seems to me there is a strong likelihood that North Hertfordshire will again be asked to assist with future development needs under the Duty to Co-operate.
678. In terms of future plans, then, the options for growth are somewhat limited. The Council is clearly committed to exploring new settlement options – but that is unlikely to be a swift process leading to early delivery. In this regard, the safeguarded land would provide a further option for consideration. Given the limited range currently foreseeable, that is a distinct advantage.
679. So far as I am aware, there are no alternative options for safeguarding land – of any meaningful scale at least – that are not in the Green Belt. The land in question here is recognised in the SHLAA as a suitable location for potential development. It is quite close to one of Stevenage's main employment areas and is not distant from the town centre and railway station.
680. The Green Belt Review Update concludes that this area of land makes a significant contribution to the purposes of including land in the Green Belt. However, this Plan does not propose that it should be developed, only that it should be removed from the Green Belt and safeguarded. Although the land would no longer be in the Green Belt it would be protected from development as safeguarded land and would remain open for the plan period.
681. Taking account of all this, I consider that it is justified to include safeguarded land in this Plan and that the exceptional circumstances necessary to warrant 'releasing' the area proposed from the Green Belt do exist.
682. However, I see no reason why this Plan should seek to specify the type and quantum of any future development on the land. As I understand it,

Stevenage Borough Council argues that this Plan should specify that the land is safeguarded to meet the future development needs of Stevenage. To my mind, prescription of this kind would rather 'jump the gun'. Much will depend on the needs and land supply in future plan-making, both in North Hertfordshire and in Stevenage, and any agreements reached through the Duty to Co-operate or any successor arrangements. In this context, it is most appropriate for this Plan to avoid pre-emptive direction, and there is no justification for any greater degree of specificity. Main modification **MM035/FM057** removes the reference to 3,100 dwellings in Policy SP8 and replaces it with alternative suitable wording accordingly.

683. Whilst Policy SP8 refers to safeguarding the land identified and paragraph 4.104 says that the Plan safeguards it for future use, there is nothing that makes it explicitly clear that it is not land for development. Main modification **MM042** rectifies this and is necessary for both the justification for 'releasing' the land from the Green Belt and for effectiveness.

684. Some suggest that this land should be allocated for development in the Plan, either as an alternative to one or more of the allocations proposed or in addition to them. I disagree. It is apparent that there are some delivery issues to be overcome, notably in relation to access which will involve crossing the A1(M). Land to the east in Stevenage is allocated for housing through Policy HO2 of the Stevenage Local Plan. That requires the development there to demonstrate that it can be expanded into this safeguarded land in the future. It is therefore evident that development on the safeguarded land is dependent on that site coming forward. Moreover, the Council, Stevenage Borough Council and the majority of landowners concerned have agreed through a Statement of Common Ground [ED71] that identifying it as safeguarded land is the most appropriate path at the present time. I concur. It will provide greater certainty for future plan-making and will help incentivise investigation into tackling the barriers to future delivery.

### **Conclusion on Issue 11**

685. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision for safeguarded land is justified, effective, consistent with national policy and positively prepared.

### **Issue 12: Whether the Plan's provision for new Green Belt land is justified, effective, consistent with national policy and positively prepared**

#### Exceptional circumstances in relation to identifying additional land as Green Belt

686. The Green Belt in North Hertfordshire is part of the Metropolitan Green Belt around London. It covers most of the district. To the west is a band of Green Belt around Luton. Much of the eastern part of the district comprises Green Belt around the Stevenage, Hitchin, Letchworth and Baldock areas. However, these two expanses of Green Belt are separated by a relatively narrow, long swathe of land that is not Green Belt. This strip – the width of which, according to the Council, ranges from between just over one mile to nearly three miles – is predominantly countryside but includes a number of settlements, including Great Offley, Preston and Whitwell. This is shown on the *Current Green Belt Map* [ED44a]. As illustrated on the *Proposed Green*

*Belt Map* [ED44b] and shown on the policies map, the Plan proposes to include this swathe within the Green Belt. To my mind, the combination of several factors leads to the existence of the exceptional circumstances needed to justify this.

687. I have already described the intense need for housing in the district. It is apparent that the situation in neighbouring authorities is similar, and the pressure for new housing in this part of the country is acute. There is no reason to suppose that this is likely to wane in the future, beyond the plan period. To ensure that Green Belt boundaries are capable of enduring beyond then, it is reasonable and consistent with national policy to consider whether land that is not Green Belt actually performs Green Belt purposes.
688. That is precisely the exercise undertaken by the Review. For the purpose of analysis, it divides the area considered into smaller parcels. Each is considered against four of the five purposes of including land in the Green Belt. It does not assess the fifth purpose for reasons I have already explained, and I consider the stance taken to be reasonable.
689. The Review's analysis is geographically limited to the countryside between the two existing areas of Green Belt in the district. It does not consider the area ultimately identified in the Plan as the Rural Area Beyond the Green Belt. That is because this is a significantly more remote part of the district where pressures for growth are less and where the land has less potential to contribute to Green Belt purposes. In my view, that is an appropriate and proportionate approach.
690. All in all, I regard the Review's assessment of the swathe of land in question to be robust. While it relies on professional judgements, they are arrived at through addressing a consistent set of criteria and the opinions reached have been informed by site visits.
691. For the new Green Belt area proposed in the Plan, the Review concludes that all the constituent parcels would make a moderate contribution to Green Belt purposes overall. However, all the parcels are judged to make a significant contribution in relation to the purpose of safeguarding the countryside from encroachment. As I see it, these conclusions underpin the justification for the new Green Belt proposed.
692. Stepping back and looking at this at the strategic scale, this ribbon of countryside is generally open. Considering this, and its position between the built-up areas of Luton and Stevenage/Hitchin, its openness does contribute to checking unrestricted sprawl and preventing these towns from merging. Indeed, the Review concludes that "*In particular, the parcels to the south of the A505 Luton to Hitchin dual carriageway which are directly between the towns of Hitchin and Luton and Luton and Stevenage could perform a key role in maintaining the separation of these towns*". This refers to the area in question, and I concur with this analysis.
693. According to the Council, the Green Belt to the eastern edge of Luton is typically less than 2.5 miles wide. Around Hitchin's western edge it is less than 0.75 miles wide in places. In short, neither has an especially wide Green Belt. Adding the remaining land between them to the Green Belt would bolster the ability to maintain the separation of these two towns and help to

retain the openness of the land dividing them.

694. The fundamental point here is that this land serves Green Belt purposes. It is, therefore, most appropriate that it be identified as Green Belt. To do otherwise would risk eroding the Green Belt functions performed by it. Understandably, unlike the Green Belt policy regime, the Plan's 'normal' development management policies do not seek to protect openness by restricting certain types of development, and do not set out other policy demands specifically related to openness. Realistically, only the imposition of Green Belt policy can assure the continuation of the openness of the area and the role this plays in restricting sprawl, preventing the merging of towns and especially in checking countryside encroachment.
695. It strikes me that the degree of pressure for new housing in the district, both from within North Hertfordshire itself and areas beyond, is a significant change in circumstances since the present Green Belt boundaries were set. It is highly doubtful that pressure of this magnitude was foreseen at that point in time. Either way, against this background, it seems to me that adding to the width of the existing Green Belt as proposed would help to counter the pressure for new housing development or, perhaps more accurately, redirect it to preferable locations.
696. On this point, the approach is wholly harmonious with the Plan's housing strategy. Indeed, as I see it, simultaneously directing new development to the most sustainable settlements while severely restricting development in less sustainable areas – such as this swathe of open countryside – amounts to a twin pronged, cohesive strategy for achieving sustainable development. It would contribute towards meeting related, more specific objectives set out in the NPPF, such as ensuring the vitality and viability of centres, and promoting sustainable communities and sustainable transport.
697. Finally, it is apparent that the proposed Green Belt boundary alterations would be consistent with the development plans of adjoining local authority areas. The new area of Green Belt created would only abut one neighbouring local authority – Welwyn Hatfield Borough Council – along the short stretch of its southern boundary. At this point, the land in Welwyn Hatfield is also identified as Green Belt, such that this new addition would represent a northwards extension of it.
698. I recognise that this will result in settlements, individual buildings and gardens or other associated land being brought into the Green Belt. Extensions, new buildings and other developments will be subject to more stringent controls than those presently in place. But that is the whole point here – to apply Green Belt policy to ensure the continued openness of the general area. The inclusion of existing buildings and associated land in this policy regime will help to achieve this aim. In any case, there is no indication in national policy that Green Belt boundaries cannot or should not be re-drawn to incorporate existing properties or land related to them. Indeed, the NPPF explicitly recognises that there are buildings in the Green Belt.
699. The Plan does exclude some settlements from the new Green Belt. I have considered this under Issue 5 in relation to the setting of settlement and Green Belt boundaries.

700. Overall, taking into account the above factors, I consider that the exceptional circumstances necessary to add land to the Green Belt by altering the Green Belt boundaries as proposed do exist.

701. Two of the parcels considered through the Review are not proposed for inclusion as new Green Belt in the Plan. Parcel H is assessed as making only a limited contribution to Green Belt purposes overall, and on this basis I concur that its inclusion would be unjustified. Parcel G is considered to make a moderate contribution overall. Whilst that is the same outcome as the parcels that are included in the proposed new Green Belt, the primary difference here is that this land lies within the Chilterns AONB. As such, it is already covered by significant policy protections in relation to new development. Paragraph 82 of the NPPF is clear that if proposing a new Green Belt, the local planning authority should demonstrate why normal planning and development management policies would not be adequate. I concur with the Council that those policies which are relevant to the AONB – particularly Policy NE3 – would be sufficient and, consequently, it would be inconsistent with national policy to include this parcel. Moreover, this area lies to the north of the A505. This road creates a clear and unambiguous defensible boundary for the new Green Belt proposed, and there is no evidence to suggest that another boundary within Parcel G would be more appropriate.

### **Conclusion on Issue 12**

702. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's provision for new Green Belt land is justified, effective, consistent with national policy and positively prepared.

### **Issue 13: Whether the policies relating to the Green Belt, Rural Areas Beyond the Green Belt and Urban Open Land are justified, effective, consistent with national policy and positively prepared**

703. Policy SP5 provides the Plan's strategic steer in relation to the countryside and the Green Belt. Among other things, it introduces onto the policies map both the Green Belt proposed in the Plan and the Rural Areas Beyond the Green Belt. All of this is appropriate.

704. However, it says that only development that is not inappropriate will be permitted in the Green Belt. For consistency with the NPPF it is necessary to clarify that this is the position unless very special circumstances exist. Main modification **MM023** achieves this.

705. Some local plans set out a suite of policies regarding Green Belt that, by and large, repeat paragraphs in the NPPF. That is not the case here. Aside from the very broad approach to inappropriate development mentioned in the preceding paragraph, the Plan instead relies on the application of national policy. That is a reasonable response and I see no reason why this approach should not be effective. Although paragraph 6.3 explains this, paragraph 4.56 – which supports Policy SP5 – says that proposals will be considered against national guidance. For effectiveness, this reference to guidance should be changed to refer to policy. Main modification **MM025** makes this modification and is there needed.

706. In relation to the identified Rural Areas Beyond the Green Belt, Policy SP5 says that a "*policy of restraint*" will operate. For effectiveness, it should be explained that this will be brought about through the application of the related policies in the Plan. Main modifications **MM023** and **MM027** add appropriate text covering these points and are therefore necessary.
707. In the Rural Areas Beyond the Green Belt, Policy CGB1 provides much of the 'restraint'. It allows development of different kinds in certain circumstances, for example where it is necessary for the needs of agriculture or is a modest scheme for rural economic development or diversification. On the whole, the criteria of this policy are reasonable. They do not, though, seek to cover every type of development in detail. Consequently, it is necessary for the Plan to be unambiguous about this and to be clear that where schemes fall within one or more of the types of development mentioned in this policy then other policies in the Plan specific to the kind of development proposed will also apply. Main modification **MM106** provides appropriate remedy in these respects.
708. It is, though, necessary for effectiveness to avoid confusion between these areas and 'rural areas' as referred to in national policy. They are not necessarily the same thing. Main modification **MM105** explains this and is consequently needed for effectiveness.
709. Criterion a. of Policy CGB1 relates to 'infilling' development in Category B villages. The intention is that the built core of these settlements should not be expanded by such development. I agree that infilling development should not result in any expansion of the existing built core, but the policy does not directly prevent this. Main modification **MM104** introduces modified wording to make it effective in this regard. It also modifies criterion b. which, as submitted, allows 'rural housing' which meets a proven local need. This gives rise to the question of what constitutes rural housing. It is intended that this should be restricted to affordable housing. In my view, allowing affordable housing in the Rural Area Beyond the Green Belt would be justified, so long as it is in an appropriate location. Main modification **MM104** makes this clear and is required to render the policy justified and effective on this point.
710. As submitted, Policy CGB2 was entitled 'exception sites in rural areas' and set out the circumstances in which community facilities, services and affordable housing would be permitted. It was intended to apply in both the Green Belt and the Rural Area Beyond the Green Belt. However, in a number of ways the policy as submitted is not consistent with national policy concerning Green Belt and is attempting to address too many scenarios, rendering it confusing and ineffective. In relation to Category C settlements, it sought to restrict development to locations within the settlement concerned. But that was not the intention in respect of affordable housing where exception sites on the edge of settlements, but outside the settlement boundary, might be permissible. The Council has re-visited this policy across the board and put forward **MM107** and **MM108** deleting it and replacing it with two new policies, CGB2a and CGB2b.
711. New Policy CGB2a deals exclusively with affordable housing in the Green Belt, and permits such development adjoining Category A villages and beyond the built core of Category B villages where either the land is identified in a

Neighbourhood Plan or where certain criteria are met. Broadly speaking, these criteria relate to the need for the development, the absence of more suitably located alternatives, the impact on the Green Belt and the balance between public benefit and harm. I consider these criteria to be justified, and I agree that they should also be applied in respect of affordable housing in Category C settlements in the Green Belt.

712. Almost identical wording is used in new Policy CGB2b, which applies to schemes for community facilities, services and affordable housing in the Rural Area Beyond the Green Belt. Again, it seems to me that these are relevant and suitable criteria to apply and will affectively restrict development to that which is crucially necessary. New Policy CGB2b permits limited market housing to cross-subsidise schemes where this is necessary for viability. That is a fitting approach in the Rural Area Beyond the Green Belt.
713. Overall, the two new policies brought about by **MM107** and **MM108** are justified and appropriate. Those two main modifications are therefore necessary. Consequential modifications (**MM109**, **MM110/FM093** and **MM111**) are also needed to the Plan's paragraphs supporting them. The latter says that in considering criterion b. of the two policies, which relates to reasonable alternative locations for the development in question, the Council will have regard to potential sites within both a 15-minute drive time and a 30-minute passenger journey time where there are at least five services each weekday. This strikes me as a reasonable approach and will assist with the effectiveness of the policies.
714. Policy CGB3 sets out the instances in which isolated dwellings for rural workers will be allowed in the countryside. It includes criteria relating to whether there is a functional need for the dwelling, the length of time the business involved has been established and profitable, the existence or otherwise of a dwelling that could meet the need and to matters of design. It is right that the policy should rely on these factors to control such development.
715. The Council has put forward **MM112** regarding new businesses. This would obviate the need to show that the business has been established for three years and profitable for at least one, and would instead require a demonstration that the business is viable with secure future prospects. This main modification also says that where a new home is allowed, it should first be temporary accommodation such as a caravan or be permitted through a time-limited permission. I concur that this is necessary to ensure that only durable, resilient enterprises can benefit from a permanent residence in the countryside. Moreover, it is essential to demand, as **MM112** does, that the home is occupied by a worker associated with the business. To allow otherwise would defeat the purpose entirely.
716. As I have previously noted, most of North Hertfordshire is in the Green Belt, where new dwellings – including those for rural workers – are inappropriate development. Considering this, I agree with the Council that a scheme's compliance with Policy CGB3 should be taken into account when considering the existence or otherwise of the very special circumstances necessary to justify such a dwelling. For effectiveness, this should be embedded within Policy CGB3 itself, as the Council has proposed through **MM112**.

717. To my mind, taken together, the package of changes within **MM112** establish an appropriate balance between providing opportunities for suitable rural enterprises to establish and flourish whilst recognising and protecting the intrinsic character and beauty of the countryside. It is consequently necessary to include those alterations, to ensure that Policy CGB3 is both positively prepared and effective.
718. Although much of this approach is set out in paragraph 6.17 of the Plan, it should for effectiveness reasons be included in the policy itself, as set out in **MM112**. It would also help with effectiveness to delete paragraph 6.17 as a consequential modification, and I agree that **MM113**, which does just that, is required.
719. The re-use, replacement or extension of buildings in the Green Belt and Rural Area Beyond the Green Belt is permitted by Policy CGB4, provided that several conditions are met. However, in a number of ways the policy as submitted is not consistent with national Green Belt policy.
720. At the hearings, the Council said that this policy is attempting to grapple with too many factors. I agree. The Council has put forward **MM114**, **MM115** and **MM116** to rectify matters. As modified through **MM114**, the policy relates only to the Rural Area Beyond the Green Belt, and a supporting paragraph is introduced through **MM115** clarifying that the policies of the NPPF are relied on in relation to proposals in the Green Belt. I consider these modifications to be appropriate and necessary for both effectiveness and consistency with national policy. The upshot here is that the policy resulting from the alterations provides an approach to the re-use, replacement or extension of buildings in the Rural Area Beyond the Green Belt that is broadly similar to that in the Green Belt, but which is generally a little less stringent. That strikes me as a reasonable position, and the policy and supporting paragraphs as modified are justified.
721. Policy CGB5 introduces to the policies map three areas of Urban Open Land, being at Baldock, Royston and to the south of Little Wymondley. As I understand it, these land parcels are situated between development allocations proposed in the Plan and dual carriageways along which the boundary of the Green Belt, or in the case of Royston the boundary of the Rural Area Beyond the Green Belt, is proposed to be defined, but which the Council considers do not perform a Green Belt or countryside function. The Council's stance here is that the dual carriageways represent defensible boundaries that will endure. From the evidence and my site visits, I concur that it would be difficult to demonstrate the exceptional circumstances needed to justify including these parcels within the Green Belt or the Rural Area Beyond the Green Belt.
722. Development is permitted by Policy CGB5, but this is generally limited to low intensity uses such as outdoor sport and recreation facilities, cemeteries and rural land uses appropriate in urban fringe locations. Built facilities are restricted to those that are ancillary to these uses. This is an appropriate approach. However, bearing in mind the position of these areas of land in relation to both settlements and nearby dual carriageways, transport infrastructure such as access roads should not be precluded. Main modifications **MM117** and **MM118** add this to the policy and paragraph 6.28

supporting it and are necessary for effectiveness.

### **Conclusion on Issue 13**

723. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to the Green Belt, Rural Areas Beyond the Green Belt and Urban Open Land are justified, effective, consistent with national policy and positively prepared.

### **Issue 14: Whether the policies relating to transport and infrastructure are justified, effective, consistent with national policy and positively prepared**

#### **Transport**

724. Actions that the Council is committed to pursuing to promote sustainable transport are set out in Policy SP6. These range from complying with the provisions of the Local Transport Plan to working with other authorities to ensure that sustainable transport options are available to the district's residents. All of these are consistent with the thrust of national policy and will help to ensure that decisions about development proposals embed sustainable transport measures.

725. To assist in the latter regard, though, the policy should reference the Council's Transport Strategy, as this provides the overarching strategic steer on such matters. Considering the cross-boundary transport issues involved, perhaps most particularly in relation to Luton and Stevenage, the policy should unequivocally commit the Council to working with neighbouring local authorities on sustainable transport matters. Moreover, the policy's pledge about seeking the early implementation of sustainable transport infrastructure should not be limited to the strategic housing sites. It should be sought at the earliest opportunity for any housing site where such infrastructure is required. Main modifications **MM028**, **MM030** and **MM031** includes these changes along with a detailed explanation of the Council's approach and are necessary for effectiveness.

726. Stevenage Borough Council has adopted a Mobility Strategy to which it has regard when considering planning applications. Sites NS1, GA1 and GA2 are near Stevenage and would have a clear functional relationship with that town. Consequently, proposals for developing those sites should also have regard to the Mobility Strategy. Main modification **MM030** introduces explanatory text supporting Policy SP6 to this effect. Main modifications **MM068/FM006**, **MM070**, **MM075/FM008**, **MM079**, **MM237** and **MM239** add to the policies allocating these sites a requirement that regard be had to it and provide further elaboration in the paragraphs supporting those policies. These modifications are necessary for effectiveness and to make sure that the Plan is positively prepared.

727. Paragraph 4.66 of the Plan supports Policy SP6. Along with paragraph 2.56, it refers to Local Transport Plan 3. This has been superseded, and for effectiveness reasons **FM034** and **MM029/FM056** are needed to alter these references.

728. Policy T1 specifies how the Council will assess transport issues when considering planning applications. The requirements for the submission of

transport statements and assessments are appropriate, and will ensure that the Council can demand the information necessary to make a properly informed judgement about the impacts of development schemes.

729. The policy says that permission will not be granted where the development will not adversely impact upon highway safety. Through **MM119**, the Council has suggested modifying the detailed wording of this and introducing a requirement that developments should not cause safety problems or other unacceptable impacts upon the highway network. In particular, this modification will provide the Council with a basis in the development plan to refuse permission where the residual cumulative impacts of development are severe. This includes considering the baseline situation and how that is affected by factors outside the district. That is appropriate, consistent with national policy and necessary for effectiveness.
730. Criterion d. sets out the requirements for major developments. In addition to ensuring such schemes are served by public transport where that is practicable and providing safe, direct and convenient routes for pedestrians and cyclists, the policy should also require that they are comprehensively integrated into the existing pedestrian, cycling and public transport networks. Main modification **MM119** adds this demand as a new criterion. It is necessary for effectiveness, to ensure that the occupants of major developments have decent opportunities to use modes of transport other than the private motorcar.
731. Parking requirements are specified in Policy T2. Criterion a. demands that development schemes provide parking in accordance with minimum standards stipulated in Appendix 4 of the Plan, have regard to relevant supplementary planning documents and clearly identify how they provide for all likely types of parking demand.
732. National policy allows the setting of local parking standards. Those presented in Appendix 4 relate to both car and cycle parking and are set as minimum standards. The Council says that maximum car parking standards have led to problems in the district – it is an area of high car ownership and difficulties have been experienced with overspill on-street parking for some time. In this local context, I am satisfied that it is appropriate here to demand minimum standards.
733. For dwellings of one or two plus bedrooms, one and two car parking spaces respectively are required. As a minimum, that seems to me a reasonable ask and allows for higher levels to be sought in areas of particular parking stress. One secured and covered cycle parking space is sought for each dwelling in a development unless a garage or other secure area within the curtilage is provided. That strikes me as suitable, given that it is a minimum. That said, to avoid new developments leading to on-street parking problems, the Plan should be clear that reductions from these standards will only be allowed where the accessibility, type, scale mix, use, local car ownership levels and local on-street parking conditions justify it. Main modifications **MM122** and **MM378** add text to the paragraphs supporting Policy T2 and to Appendix 4 which clarifies this.
734. As submitted, Appendix 4 includes car and cycle parking standards for visitors

to retirement developments, aimed at warden assisted independent living accommodation and similar schemes. It does not, though, explicitly require any spaces for residents – the appendix relies on reference to Use Class C3, but not all such developments fall unquestionably within this class of use. To address this, the Council has put forward **MM378** which unambiguously sets out the level of parking required for retirement developments, being a minimum of one car parking space per dwelling and one secured and covered cycle parking space per five units. I consider these requirements appropriate to ensure that the occupants of such schemes have sufficient parking to help support active lifestyles in retirement. Consequently, this element of **MM378** is necessary.

735. For visitors, the car parking requirements in Appendix 4 are given as a range. The lower standard is said to apply where there are no garages, the higher where there are. That is the wrong way around. Main modification **MM378** rectifies this and is necessary for effectiveness.

736. Neither Policy T2 nor Appendix 4 provide any parking standards for other types of development. The Council has put forward **MM120** requiring that non-residential schemes have regard to the standards set out in relevant supplementary planning documents. That is a reasonable approach and is necessary for effectiveness.

737. Main modification **MM120** also adds to Policy T2 a requirement that applications demonstrate not only how sufficient parking is provided, but that the parking will be safe and function satisfactorily. That is necessary for effectiveness.

738. Variations to the standards in Policy T2 should be permitted where various factors such as accessibility and on-street parking conditions justify it. Main modification **MM120** adds an appropriate clause and is needed to ensure effectiveness.

## **Infrastructure**

739. The Council's approach to securing necessary infrastructure is set out in Policy SP7. The fundamental aim here is to ensure that any need for infrastructure brought about by new development is met, either by being provided for directly through the development itself or through financial contributions. Refusing planning permission where schemes do not achieve this is both reasonable and appropriate.

740. Several changes to Policy SP7 have been put forward by the Council. I agree that it is not always possible to mitigate all adverse impacts of development. The Council suggests that the policy should instead require that such effects are mitigated where it is appropriate to do so. That is an appropriate demand, and this modification is necessary for effectiveness. For the same reason a change is also needed regarding the timing of essential infrastructure delivery. It seems to me that it should be provided and operational at the earliest point in time possible, either on completion of the development or during the phase of development that brings about the need for it. Policy SP7 should also confirm that the Council will work with landowners, developers and other agencies in respect of infrastructure delivery specifically, rather than just on the delivery of sites as the submitted wording requires. The revised wording

in **MM032** addresses these points and consequently is necessary.

741. Main modification **MM032** also clarifies that the Council will have regard to relevant national guidance – rather than “*any guidance*” – in relation to planning obligations and in its operation of any Community Infrastructure Levy (CIL) it may choose to introduce. This is necessary for effectiveness and consistency with national policy. Adding to the policy a reference to any funding tariff that might succeed the present CIL regime will help to ensure that this aspect of the policy remains effective in the event of future change.
742. Criterion f. of Policy SP7 says that the Council will “*take a stringent approach where developers consider that viability issues impact the delivery of key infrastructure and/or mitigation measures*”. The point here is that the policy burdens relating to infrastructure provision and mitigation measures should not be such that the developments planned for are rendered unviable, but the policy demand to meet these requirements should not be waived or reduced lightly. In my view, the wording of the policy as originally submitted does not properly reflect this stance. It is necessary to re-frame this requirement around the submission of robust evidence about viability and taking that into account when determining whether the infrastructure or mitigation measure in question can be viably secured. Main modification **MM032** changes criterion f. of the policy along these lines and is necessary for effectiveness. With these modifications I consider that Policy SP7 sets out an appropriate ‘viability clause’. Moreover, **MM034** adds to paragraph 4.83 of the Plan a demand that the viability evidence required be undertaken by a suitably qualified person and explain the rationale behind the approach to assessing viability. I consider this reasonable and necessary, again for effectiveness reasons.
743. On the largest development sites, the Plan’s policies include specific requirements for transport infrastructure. However, all sites should make proportionate contributions to the additional burden they place on the transport network. Main modification **MM033** clarifies this and makes it explicit that such infrastructure will need to address cumulative impacts. This is necessary for effectiveness.

#### **Conclusion on Issue 14**

744. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to transport and infrastructure are justified, effective, consistent with national policy and positively prepared.

#### **Issue 15: Whether the policies relating to design (including air quality) are justified, effective, consistent with national policy and positively prepared**

745. Policy SP9 is a strategic policy that sets out the overarching approach to design and sustainability. It says that the Council will support developments that are well designed and located where it responds positively to its local context and will require masterplans for significant developments. It says that the Council will assess proposals against the Plan’s detailed policies and the Design Supplementary Planning Document, and it says the Council will adopt the Government’s technical standards for the size of new homes and water efficiency and, in specified circumstances, accessibility.

746. I have already discussed the need for the submission of strategic masterplans in relation to the strategic housing sites. Main modification **MM045/FM001** clarifies that for the purposes of Policy SP9, residential development considered to be 'significant' such that a strategic masterplan is required relates to schemes of more than 100 homes. It says that, exceptionally, smaller housing developments will be considered significant if there are site specific complexities and sensitivities that require a strategic masterplan-led approach. I consider this to be a reasonable threshold, and it is necessary for effectiveness to include it. However, as drafted, the threshold would not apply to projects of exactly 100 dwellings. I have therefore altered the wording accordingly for the effectiveness of that modification, which sits alongside the other changes introduced as set out earlier in this report.
747. As previously mentioned, Policy SP9 requires adherence to the Government's nationally described internal space standards for dwellings and the optional national technical standards for water efficiency. This is reiterated in Policy D1. For such policies to be sound, they must be supported by clear evidence of need and evidence that viability has been considered. I consider each in turn below.
748. The Council's paper '*Technical housing standards – nationally described space standard*' [HOU12] reviews a number of planning permissions granted in the district to evaluate whether residential schemes are already complying voluntarily with the nationally described space standards. Of the ten projects analysed, only three fully comply. That amounts to 48% of the homes assessed. The Council considers this to amount to clear evidence of need.
749. Taking account of the conclusions in the Council's paper, and the further exploration set out in the Council's hearing statement, I agree. It is quite apparent that a notable proportion of residential developments which could have readily met the standards have not. I see no reason why this should be allowed to continue. Subject to the question of viability, I consider it most appropriate in these circumstances for the Plan to provide a proactive policy intervention.
750. With regard to the national technical standards for water efficiency, it is clear that the district is an area under serious water stress. Water supplies here have relied heavily on abstraction from the chalk aquifer. The Environment Agency says this has been causing environmental harm and has closed the aquifer to new water supply options. It also points out that Hertfordshire has some of the highest domestic water consumption figures per person in the country, but is an area where rainfall is generally lower than many other parts of the UK. The Environment Agency, Anglian Water Services Ltd and Affinity Water Limited support the inclusion of the higher standard. In the light of all this, I concur that there is clear evidence of need for this requirement.
751. From the '*Local Plan Viability Assessment – Update*' (August 2016) [TI2], it is apparent that the viability of both the nationally described space standard and the optional national technical standard for water efficiency has been considered. In respect of the former, the density assumptions have been set on the basis of the space standard being met, and the assessment's authors conclude that it could be adopted without undermining viability. In the light of this and all I have read and heard, I consider the requirement to meet both

the space and water efficiency standards to be justified.

752. It is, though, necessary for effectiveness to alter Policy SP9 and paragraph 4.117 supporting it, and Policy D1, to clarify that it is the additional optional standards that are referred to. Main modifications **MM045/FM001**, **MM046** and **MM144** change the wording accordingly. Main modification **MM146** explains the situation in relation to water stress and is also needed for effectiveness.
753. Policy D1 says that planning permission will be granted for development proposals that respond positively to the site's local context, and where all reasonable opportunities are taken to meet specified criteria. This relates to a range of aspects from creating public realm to reducing energy consumption and waste. These are all appropriate expectations considering the terms sought.
754. The requirement to maximise connectivity, though, should clarify that this relates to both physical and social connectivity both internally within the scheme and with neighbouring areas. Main modification **MM144** adds appropriate text accordingly and is necessary for effectiveness.
755. Policy D2 sets out criteria for house extensions, replacement dwellings and outbuildings. Criterion a. requires that extensions are sympathetic to the existing house in height, form, proportions, window details and materials. This is appropriate. Indeed, to ensure that extensions properly integrate visually with the host dwelling, roof type and the orientation of the existing house should be added to this list. Criterion b. seeks pitched roofs, where appropriate. Considering the above alteration, it is necessary to remove this requirement to avoid conflict within the policy. Main modification **MM148** does all of this.
756. Criterion c. aims to ensure that rear extensions do not dominate adjoining properties and are well related to the levels of adjoining properties, the direction the house faces and the distance between the extension and the windows in the next-door properties. Criterion d. demands that side extensions at first floor level or above are at least one metre from the boundary of any adjoining residential plot, to ensure there is no adverse impact on the street scene. In relation to the latter, I consider it unjustified to specify one metre – much depends on the existing pattern of development and the relationships between buildings in the street scene involved. Moreover, it strikes me that the requirements in criterion c. should also apply to all extensions. Main modification **MM148** amends the wording of criterion c. and deletes criterion d. accordingly. These changes are necessary to make sure that any house extensions take proper account of neighbouring properties and do not appear awkward or out of place.
757. Criteria e. and f. relate to replacement dwellings and outbuildings. Both focus on ensuring that such developments do not harm character. For effectiveness, avoiding harm to the appearance of the locality should be included. In addition, I see no justification for demanding that such developments result in a visual enhancement. Preventing harm should be the objective. Main modification **MM148** also introduces these alterations, and is necessary in terms of the justification for, and effectiveness of, these criteria.

758. Policy D3 seeks to preclude developments that would cause unacceptable harm to living conditions, taking account of any mitigation measures. That is wholly appropriate to ensure that residents can enjoy their own homes. The presence of London Luton Airport adjoining the district to the west clearly creates noise from air traffic. Development that may be affected by that should incorporate appropriate mitigation measures. For effectiveness, the Plan should be clear about this. Main modification **MM149** introduces a new explanatory paragraph and is necessary for effectiveness.
759. The impact of new development on air quality is dealt with under Policy D4. In summary, it requires impacts on air quality to be considered and for proposals to include mitigation measures where necessary. This is reasonable and appropriate. However, to ensure that unacceptable effects on air quality are prevented, Policy D4 itself, rather than solely the paragraph supporting it, should be unequivocal that where this is the case then permission will be refused. Main modification **MM150** introduces text to this effect into the policy and is necessary.
760. Paragraphs 9.30 and 9.31 supporting this policy. The former sets out a list of development types, and says they are the types of development "*the Council would expect consideration to be given*" to the submission of an air quality impact assessment. But it is not the giving of consideration that is the aim here, it is the submission of an assessment. For effectiveness, the words 'consideration to be given' should be deleted. Similarly, the requirement for the submission of an air quality impact assessment is expressed as an 'expectation' in paragraph 9.31. That is not properly effective. Main modifications **MM153** and **MM154** provide suitable remedy for both shortcomings. The latter also adds to paragraph 9.31 text explaining that for developments not included in the list an air quality impact assessment may be required to address the cumulative impacts of smaller, or less sensitively located developments that nonetheless will contribute to the emission of air pollutants. That is a reasonable and appropriate stance to take, and this clarification is needed for effectiveness reasons.

### **Conclusion on Issue 15**

761. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to design (including air quality) are justified, effective, consistent with national policy and positively prepared.

### **Issue 16: Whether the policies relating to healthy communities are justified, effective, consistent with national policy and positively prepared**

762. Policy SP10 sets out a list of overarching policy commitments all aimed at providing and maintaining healthy, inclusive communities. These are broad and strategic in nature and overall amount to an adequately comprehensive framework to guide and inform a range of other policies in the Plan.
763. New community facilities are permitted by Policy HC1 subject to the need for them, their scale and their accessibility. This is a suitably supportive stance. Conversely, the loss of community facilities is resisted. It is only permitted where there is demonstrably no need for the facility, it is justified by the provision of replacement facility, or where the facility in question, or any

reasonable replacement, is not and will not be viable on the site. To my mind, all of this is appropriate and consistent with the general thrust of national policy.

764. However, I agree with the Council that the redevelopment of sporting facilities should be allowed where it is for alternative sports and recreation provision, and when the need for it clearly outweighs the loss of the existing facilities. This will help to ensure that sports facilities are flexible and that the district's sporting needs are met. Main modification **MM155** is therefore necessary for effectiveness. For the same reason, I consider it appropriate for the Plan to encourage the shared use of facilities, such as the dual use of school facilities for sport and other community uses. Main modification **MM156** adds a sentence to this effect to paragraph 10.5. This is both reasonable and necessary to make sure this aspect of the Plan is positively prepared and effective.

### **Conclusion on Issue 16**

765. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to healthy communities are justified, effective, consistent with national policy and positively prepared.

### **Issue 17: Whether the policies relating to the natural environment are justified, effective, consistent with national policy and positively prepared**

766. Under the broad heading of 'natural environment' the Plan includes two strategic policies and numerous detailed policies. Of the former, Policy SP11 relates to natural resources and sustainability. In seeking to meet the challenges of climate change and flooding, it sets out the Council's commitment to supporting proposals for renewable and low carbon energy development in appropriate locations. It says that the Council will take a risk-based approach to development and flood risk, directing development to the areas at lowest risk in accordance with the NPPF and ensuring the provision of SuDS and other appropriate measures. This is all consistent with national policy and is appropriate.

767. It is necessary for effectiveness to replace references to the Water Framework Directive with reference to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, as these are the domestic regulations that continue to apply since the withdrawal of the UK from the European Union. Main modifications **MM047** and **MM048** make this alteration and are therefore necessary in this regard.

768. I have read and heard much about the district's water supply and treatment of wastewater at Rye Meads WwTW. On the whole, these are matters for the utilities providers concerned – they operate within a legislative context that is wholly separate to the planning regime. That said, I recognise the importance of achieving sustainable water management to the natural environment. Rye Meads WwTW is within the Lea Valley Special Protection Area, albeit some way outside of North Hertfordshire. Its continued protection is a legitimate aim that falls squarely within the realm of town and country planning. I have considered the Council's legal obligations on this matter earlier in this report. The Council has put forward **MM047** and **MM049** setting out its commitment

to working with utilities providers and other relevant bodies to ensure that wastewater treatment capacity is delivered without harm to European sites (such as the Lea Valley Special Protection Area). This is necessary for effectiveness, and it seems to me that with this alteration Policy SP11 does all it realistically can to tackle the issue.

769. Policy SP12 is a strategic policy which sets the Plan's general approach in relation to green infrastructure, landscape and biodiversity. It covers a broad range of factors and perhaps consequently, as submitted, is drafted in a very general way. Because of this, there are several areas where, in my view, it is not adequately effective or reflective of national policy.
770. Part a. of the policy says the Council will protect, enhance and manage the green infrastructure network and seek opportunities to create new green infrastructure. Part b. sets out the Council's commitment to protecting, enhancing and managing biodiversity networks and part c. aims to ensure that landscape character and locally sensitive features are respected. As a broad principle, all of that is consistent with national policy. But it overlooks the numerous nuances in the NPPF, particularly the hierarchy of designations relating to the natural environment from international, national, local designations through to no designation at all. Each of these are afforded different levels of protection in national policy. So too are other aspects of the natural environment, including ancient woodlands and hedgerows, sites of ecological value and protected species.
771. Through **MM050/FM069**, **MM051**, **MM053**, **MM054** and **MM055**, the Council has put forward numerous alterations to Policy SP12 and the paragraphs supporting it. These introduce the hierarchy of designations and features and add reference to specific elements of the natural environment as discussed above along with explanatory text providing context and further illumination. For effectiveness and consistency with national policy, all the changes set out in these main modifications are necessary.
772. In addition, **MM052** is needed for effectiveness, to clarify that the Plan's detailed policies concerning the natural environment, which I shall turn to shortly, are not solely related to the provision of green infrastructure in new developments. Indeed, many have wider applications.
773. Policy NE1 relates to landscape. Part a. allows development that "*respects the sensitivities of the relevant landscape area and accord with the guidelines identified for built development and landscape management*". The guidelines referred to are set out in the '*North Hertfordshire Landscape Study*' (2011) [CG16 and CG16a]. But this would, in effect, confer development plan status to the guidelines in this document. That is not justified – they have not been submitted for scrutiny through this examination as part of the Plan, and consequently have not subject to such analysis. To rectify this, **MM158** alters the wording to require that regard be had to these guidelines, and **MM159** clarifies the guidelines being referred to. These changes are necessary for the justification and effectiveness of this part of the policy.
774. Part b. aims to prevent developments having "*detrimental impacts on the appearance of their immediate surroundings and the landscape character area unless suitable mitigation measures can satisfactorily address the adverse*

*impact*". It seems to me, though, that the point here is not whether detrimental impacts will occur – if future development needs are to be met, some detrimental impacts are, frankly, inevitable – but rather whether such effects result in unacceptable harm. Any such harm should be considered in respect of the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this. This is a different point, albeit subtly so. Main modifications **MM158** and **MM160** modify the wording of Policy NE1 and paragraph 11.4 accordingly and are necessary for effectiveness.

775. Policy NE2 concerns green infrastructure. At its heart is the aim of permitting developments so long as they protect green infrastructure, avoid its fragmentation, retain its function and where possible enhance it. These are laudable objectives which are appropriate and consistent with national policy.
776. The Council has put forward **MM161** and **MM162** deleting both the policy and the paragraphs supporting it in their entirety, and **MM157** which re-introduces the policy and paragraphs with some changes. The overall effect is to replace Policy NE2 with a new policy which clearly relates to 'strategic' green infrastructure and adds to the examples given of such infrastructure that exist in the district. The intention here is to better distinguish between this and other types of green infrastructure and will assist with effectiveness. In Part c. of the policy, the modifications shift the emphasis to more proactively seeking the creation of new strategic green infrastructure through development schemes – the original wording is rather passive and does little to secure contributions from new developments. Additional text is also included in one of the supporting paragraphs requiring that, where possible, new development should be connected to strategic green infrastructure networks which provide high quality, direct linkages across the development. All of this is reasonable and is required to ensure that the Plan effectively achieves its aims in respect of this element of the natural environment. Main modifications **MM161**, **MM162** and **MM157** are therefore necessary.
777. Part of the district lies within the Chilterns Area of Outstanding Natural Beauty (AONB). Policy NE3 sets out criteria against which development proposals within the AONB will be considered. Main modification **MM164** clarifies that the policy relates to development within the AONB boundaries and is necessary for effectiveness. The criteria are, on the whole, consistent with the NPPF. However, to demand that developments enhance the special qualities of the AONB is one step beyond the protection afforded to such areas through national policy, which says that great weight should be given to conserving their landscape and scenic beauty. I agree with the Council, though, that it is reasonable to seek enhancement "*where possible*". Main modification **MM163** adds this caveat and is necessary to achieve consistency with the NPPF.
778. Parts d. and e. of Policy NE3 require that development meets the aims of the Chilterns AONB Management Plan and complies with the Chilterns Building Design Guide. But neither document forms part of the Plan for examination before me, and it is consequently not for me to reach judgements about their soundness. It would therefore be inappropriate to confer development plan status to them, as the submitted policy effectively proposes. Main modification **MM163** alters the wording to require that regard be had to the

aims of the management plan and the design guide and is necessary.

779. Policy NE4 relates to publicly accessible open space, and prevents the loss of open space unless, in summary, the space is surplus to requirements or its loss is justified by one of a number of specified factors, and then only when a new replacement space or a financial contribution to a new or existing space is provided. This is consistent with the aims of national policy and is reasonable. However, I see no particular reason why this policy should relate only to open space that is publicly accessible, as its title suggests. Main modification **MM167** rectifies this by deleting the words "*publicly accessible*".

780. In addition, as submitted, the Plan's policies are silent on the question of built facilities on open spaces, such as changing rooms and the like. The Council has put forward **MM167** requiring that any such buildings must be ancillary to the primary use, of an appropriate scale and design, and integrated into the landscape. I consider that an appropriate response and is needed to fill the gap in policy. However, rather than adding this to Policy NE4, I consider that it would be more appropriate for this element of the main modification to be incorporated into the new policy concerning new and improved open space through **MM168**. This would clearly distinguish between policy relating to the provision of new and improved open space – including any built facilities – and policy relating to the loss of open space. I have altered the wording of the main modifications accordingly. Although these changes have not been the subject of consultation, they do not alter the overall content of the two modifications involved as published and they do not undermine the participatory processes undertaken.

781. Policy NE5 aims to secure new and improved public open space and biodiversity. Policy NE6 relates to proposals that affect designated biodiversity and geological sites. Through **MM173**, **MM174**, **MM175** and **MM176** the Council has suggested deleting both policies along with their supporting paragraphs and replacing them. Part of the reasoning here is related to re-ordering the natural environment policies. As I have previously indicated, the Council is free to do this as it wishes on adoption of the Plan. However, it is clear to me that both policies do require modification in line with the revisions put forward by the Council.

782. As submitted, Policy NE5 appears to relate solely to public open space. Part a. in particular seeks to ensure that new spaces are fully publicly accessible. I see no reason why spaces that are not public should not be either provided or improved through new developments. Indeed, depending on the circumstances, it may be more appropriate.

783. The fundamental point here is that the type of space to be provided should depend on the need. The Council's '*Open Space Review & Standards*' (2016) [OSC4] outlines where there is under-provision of certain types of open space. It is, in my view, more appropriate to frame the requirement in Part a. around meeting need, having regard to that document and any other guidance the Council may produce. In respect of these points, the changes to Policy NE5 brought about by **MM173** and **MM168**, and the alterations to the paragraphs supporting them in **MM169**, **MM170**, **MM171** and **MM172** are all reasonable and necessary to ensure that these aspects of the Plan are justified and effective.

784. I recognise that **MM168** results in the deletion from Policy NE5 the demand for net gains to biodiversity. But the former will be covered under the modified Policy NE4 as mentioned above, and the latter will similarly be dealt with through the changes to Policy NE6, which I now turn to.
785. Policy NE6 is entitled "*designated biodiversity and geological sites*". However, quite rightly, it also relates to non-designated sites. Modifying its title would help remove any ambiguity.
786. More crucial, though, is that while the policy focusses on habitats, there is an absence of reference to protected species. That is a shortcoming in terms of effectiveness. Linking the requirement to protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12, as modified by **MM050/FM069**, provides adequate remedy – this includes important species. So too does adding a demand that proposals show how habitats supporting protected or priority species will be retained, safeguarded and managed during the construction phase.
787. In addition, for clarity, the requirement to submit an ecological survey with planning applications should demand that the survey be commensurate to the scale and location of the development and the likely impacts on biodiversity. This will ensure that the Council can reach its decisions on the basis of appropriate and proportionate evidence.
788. As submitted, the policy appears to presume that developments will cause adverse effects that will need to be minimised. To my mind, the starting point should be to seek avoid any such impacts, where possible. Indeed, for consistency with the NPPF, developments should provide net gains in biodiversity if that can be achieved.
789. For effectiveness, it is necessary for Policy NE6 to provide greater clarity regarding the Council's stance to the avoidance and mitigation of adverse impacts, and the compensation likely to be demanded for them. Taking an approach whereby the requirements are commensurate with the status of the asset(s) concerned is reasonable. So too is setting down a marker that compensation is unlikely to be acceptable where nationally or internationally designated sites are concerned.
790. Main modification **MM166/FM100** includes all the alterations discussed above. It also includes the addition of detail regarding buffers of complimentary habitat around designated sites and other assets of the natural environment. This is a suitable approach, and for effectiveness the 12 metres specified in respect of wildlife sites, trees and hedgerows is reasonable and appropriate. In short, all the changes brought about by **MM175** and **MM166/FM100**, both to Policy NE6 and the paragraphs supporting it, are necessary to ensure these aspects of the Plan are justified, effective and consistent with national policy.
791. Policy NE7 relates to flood risk. As submitted, it relies on direct reference to the sequential and exception tests in the NPPF. For clarity and effectiveness, I agree that the policy should embed those tests within its wording. For the same reason, the policy should unambiguously require that site specific flood risk assessments consider the lifetime of the development, climate change impacts and safe access and egress (in flood risk terms). Main modification

**MM177** introduces appropriate text that is consistent with national policy and is necessary. Along with **MM178**, this main modification also alters the detailed wording of the policy and the paragraph 11.55 which supports it, to ensure that the location, design and layout of development reduces flood risk, and that any residual risk is minimised through flood resistant, resilient design and construction, taking account of downstream flood risks. Overall, all the changes put forward by the Council are necessary to make sure Plan's approach to flood risk is effective and consistent with national policy.

792. Sustainable drainage systems are sought in new development through Policy NE8. That is reasonable, in principle. However, while it is logical to demand that the most appropriate solution is used, technical, viability and design issues should be considered. Demanding a solution that was not technically or financially viable would be unwarranted. In addition, while it is perhaps desirable for developers to consult with the Lead Local Flood Authority at the earliest opportunity, it would be unreasonable to refuse planning applications on the basis that this course had not been followed. Main modifications **MM179**, **MM180** and **MM181** amend Policy NE8 and its supporting paragraphs accordingly and are consequently needed to ensure the policy is justified and effective.

793. Policy NE9 permits new developments where they make appropriate space for watercourses. It requires the maintenance of a nine-metre undeveloped buffer zone from all designated main rivers, and a buffer of five metres in respect of other watercourses. The Council has put forward **MM182** to change the former to eight metres, to align the policy with advice from the Environment Agency. With that change, I consider the policy to be justified and effective. A further main modification (**MM184**) suggested by the Council introduces a new paragraph explaining the hierarchy of watercourses in the district, among other things. This will assist with effectiveness and is necessary.

794. The broad aim of Policy NE10 is to protect watercourses and to ensure that any necessary new or improved water infrastructure is provided as part of development schemes. The criteria it sets out are all justified and reasonable. However, in the context of this district, where I understand most of the waterbodies are failing, it is necessary for effectiveness to address water issues in more detail than might otherwise be the case.

795. To this end, I agree that several modifications put forward by the Council are necessary. Adding a new paragraph briefly explaining the present situation regarding the state of the district's waterbodies will assist the understanding of the Plan's particularly detailed approach. More vitally, perhaps, achieving the objectives of the Anglian and Thames River Basin Management Plans should not be limited to matters of flood management. They are wider ranging than that, and new development should not undermine their goals. For similar effectiveness reasons, the requirement for mechanisms to deliver any necessary new or improved water infrastructure should be expanded to cover wastewater, and it is right that adequate foul water treatment and disposal measures are provided in time to serve the development in question. As with my discussion of Policy SP11 above, I have considered the Council's legal obligations on this matter earlier in this report. In addition, references within the policy to the Water Framework Directive should be replaced by reference

to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, for reasons previously explained in relation to Policy SP11. Consequently, **MM185**, **MM186** and **MM187** are needed, as they set out all these changes accordingly.

796. Policy NE11 aims to ensure that developments affecting contaminated land assess the condition of the land and deal with the contamination where necessary to ensure that the site is in a suitable state for the use proposed. This is, in principle, a sound approach that is consistent with national policy. It should, though, also apply to development affected by contaminated land. To deal with the risks arising from any contamination, it is first necessary to understand what those risks are. Consequently, for effectiveness, the policy should require that the risks are firstly characterised, and that any contamination is remediated to remove the risks identified or to reduce them to an acceptable level, bearing in mind the final use of the land.
797. Throughout the process, groundwater vulnerability and potential pollution from previous land uses should be considered. When considering the suitability of the site for subsequent use, relevant guidance, including any published by the Government, ought to be taken into account.
798. Man modification **MM188** amends Policy NE11 in light of the above, and **MM189** adds appropriate explanation and elaboration. Both are consequently required for effectiveness.
799. Policy NE12 supports renewable and low-carbon energy projects, including wind energy developments, subject to their wider impacts. In the latter regard, the criteria listed are all appropriate and the policy overall is, with two exceptions, both justified, effective and consistent with national policy.
800. Two Written Ministerial Statements were published in 2015, one in March, the other in June. The former says that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence. The latter makes it clear that planning permission should only be granted for wind energy developments if:
- a) the site is in an area identified as suitable for wind energy development in a local or neighbourhood plan; and
  - b) following consultation, it can be demonstrated that the planning impacts identified by affected communities have been fully addressed and therefore the proposal has their backing.
- The PPG reflects this. I note that the NPPF 2021 includes this approach.
801. Consequently, the Council has put forward **MM190** and **MM191**. The first alters Policy NE12 so that it explicitly states that proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy. The second adds reference to paragraph 11.77 of the Plan to considering the balance between the benefits of renewable energy and constraints in accordance with the PPG. That is an effective response and will ensure that these aspects of the policy remain consistent with national policy.

## **Conclusion on Issue 17**

802. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to the natural environment are justified, effective, consistent with national policy and positively prepared.

## **Issue 18: Whether the policies relating to the historic environment are justified, effective, consistent with national policy and positively prepared**

803. Policy SP13 is the strategic policy dealing with matters relating to the historic environment. It says that the Council will balance the need for growth with the proper protection and enhancement of the historic environment. It sets out ways in which the Council will pursue a positive strategy for the conservation and enjoyment of the historic environment including, in Part a. of the policy, maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting. The general approach here is consistent with national policy and is appropriate.

804. The NPPF introduces the notion of 'significance'. Indeed, affording varying degrees of weight to the conservation of designated assets according to their significance is central to the approach taken in national policy. As submitted, Policy SP13 is silent on this. Main modification **MM056/FM070** rectifies this by adding text to the opening paragraph of the policy and to Part a. In this regard it is both appropriate and necessary for consistency with the NPPF.

805. It is also necessary for effectiveness to clarify that the local risk register referred to – both in Policy SP13 and in Policy HE2 – is the district's 'At Risk' register. Main modifications **MM056/FM070** and **MM193** do this and are needed in this respect.

806. Policy HE1 is the Plan's detailed policy for dealing with development proposals that relate in one way or another to designated heritage assets. It does embed the concept of significance and adequately reflects national policy in that regard. However, paragraphs 133 and 134 of the NPPF, in effect, create a 'two-tier' approach to designated heritage assets – one where there would be substantial harm, another where the harm would be less than substantial. As submitted, Policy HE1 does not reflect this.

807. To remedy this shortcoming, the Council has put forward modifications to the policy through **MM192**. These changes are consistent with national policy and are necessary in that regard. It is also necessary to ensure that heritage assessments are submitted where planning applications relate to the setting of a designated heritage asset, so that the Council can properly assess the impacts on the setting as well as the designated asset itself. It is also necessary to clarify that criterion ii. of the policy relates to designated heritage assets, for the avoidance of doubt. Main modification **MM192** introduces appropriate changes accordingly and is needed for effectiveness and consistency with national policy.

808. National policy is clear that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage

assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. Policy HE2, mentioned above, supports proposals that seek to restore or provide new uses for designated heritage assets identified on the national register or on the local 'At Risk' register. It also aims to resist proposals that would harm the significance of assets on those registers, unless the benefits clearly outweigh the harm, taking account of the asset's significance and so long as all feasible solutions to avoid and mitigate the harm have been implemented. Generally, all of that is consistent with national policy and reasonable.

809. However, the support for proposals that restore designated assets should instead relate to schemes that conserve them. The two are not necessarily the same things, and it is the latter which the NPPF seeks to achieve. It is also necessary for effectiveness to alter the requirement that all feasible solutions to avoid and mitigate harm have been implemented. Implementation could involve actually undertaking the development, such that it is not possible to implement the solution before permission is granted. Consequently, the policy should demand that the solutions in question are assessed. Main modification **MM193** is therefore necessary to modify this wording.
810. Policy HE3 is entitled 'local heritage'. It aims to prevent the loss of local buildings of interest unless the replacement building contributes to the local character and distinctiveness of the area. It also requires that a continuous contract for the demolition and redevelopment works has been secured, except where there are justifiable grounds for not redeveloping the site. It is intended that this requirement should relate to assets in Conservation Areas, to avoid long lasting harm to the character or appearance of the Conservation Area while works are undertaken. Although a modification is needed to clarify the latter point, the approach overall here is reasonable and, on the whole, is consistent with national policy.
811. The Council has explained that this policy relates to non-designated heritage assets. The Plan itself is less explicit. For effectiveness, a paragraph explaining this is necessary, and the policy's title should also be altered. Paragraph 135 of the NPPF sets out the national policy approach to the effect of development on the significance of non-designated heritage assets. As submitted, Policy HE3 does not reflect it. For consistency with national policy, it should.
812. The Council has put forward **MM194** and **MM195** which deal with all the aforementioned issues. The wording suggested is suitable, and changes are needed for the reasons already given.
813. Policy HE4 allows developments that affect heritage assets with archaeological interest. It sets out the requirement for a desk-based assessment or, where necessary, a field evaluation. It seeks preservation of the archaeological remains and incorporated into the layout of the development where in-situ preservation is preferable. Where the loss of the archaeological remains is justified, it requires recording, reporting, publication and archiving of the results. This is appropriate and consistent with national policy.
814. Finally, Policy HE4 says that where archaeological sites have been assessed to

meet the criteria for inclusion on adopted registers or maps of locally important heritage assets, these shall be treated the same way as archaeology areas and areas of archaeological significance. This is a reasonable approach. Indeed, it seems to me that it should also apply to any undiscovered areas of archaeology. Main modification **MM196** adds text accordingly and is necessary for effectiveness.

### **Conclusion on Issue 18**

815. Considering the above, with the main modifications put forward by the Council and as discussed above, I conclude that the policies relating to the historic environment are justified, effective, consistent with national policy and positively prepared.

### **Issue 19: Whether, in the light of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, the Plan's policies are justified and effective**

816. Numerous policies in the Plan refer to the use of land using its Use Class classification as set out in the Use Classes Order. During the examination, on 1 September 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 ('the Regulations') came into force. These Regulations made a number of changes to the Use Classes Order. In simple summary, it introduces some new Use Classes, and some uses have been moved from one Use Class to another, in some instances including to the new Use Classes.

817. The point here is that all of this, in many cases, renders the policies relying on reference to the Use Classes Order either unjustified, ineffective or both. The policies Considered by the Council to be affected are listed in its hearing statement [ED203], although I have identified a few in addition. These are all policies which, in one way or another, relate to employment or town centre uses.

818. To ensure consistency with the new Regulations, the Council has put forward numerous main modifications to these policies and the paragraphs supporting them. I have already discussed a number of these under other relevant sections of this report. Other main modifications proposed by the Council in this regard are **MM014/FM042, FM043, FM044, FM049, MM017/FM050, FM051, FM053, MM058/FM004, MM072/FM007, MM088/FM071, FM072, FM073, FM074, FM075, MM095/FM082, MM096/FM083, FM084, FM085, MM097/FM086, MM099/FM088, FM090, FM094, MM262/FM131, MM310/FM153, and FM186**. By and large, these changes tackle the problem by replacing references within the Plan to the previous Use Classes with either the revised Use Classes or with words describing the uses being referred to. To ensure that the policies concerned are justified and effective, I agree that these changes are both necessary and justified.

### **Conclusion on Issue 19**

819. Considering the above in the light of the Regulations, with the main modifications put forward by the Council and as discussed above, I conclude that the Plan's policies are justified and effective.

## Other matters

820. As submitted, the Plan refers throughout to the 'proposals map' and the map accompanying the Plan is titled as such. But there is no provision in the Act or Regulations for a 'proposals map' – it is a 'policies map' that the Council must prepare. It is therefore necessary to replace all references to a proposals map to refer instead to the policies map. Main modification **MM002** amends the text in the Plan accordingly, and to ensure that the affected policies are effective the Council will need to alter the policies map before it is adopted.
821. The NPF says that local plans should include strategic policies, and some of its provisions rely on a distinction being made between strategic and non-strategic policies. Chapter four of the Plan is entitled 'Strategic Policies'. However, for the avoidance of any doubt, the Council has proposed to modify paragraph 4.7 of the Plan to explicitly state that it is the policies of that chapter that are the strategic policies in the terms of the NPPF. For effectiveness, **MM009** is therefore necessary.
822. The policies allocating the non-strategic sites are not labelled as policies. Their status as policies within the Plan is therefore not explicit. For effectiveness, all of the policies should be titled as such. Main modification **MM197** introduces this addition.

## Overall Conclusion and Recommendation

823. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
824. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that the Duty to Co-operate has been met and that with the recommended main modifications set out in the Appendix the North Hertfordshire Local Plan 2011 – 2031 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*Simon Berkeley*

Inspector

This report is accompanied by an Appendix containing the main modifications.

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# **Report to North Hertfordshire District Council**

by Simon Berkeley BA MA MRTPI

an Inspector appointed by the Secretary of State

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## **Report on the examination of the North Hertfordshire Local Plan 2011 – 2031**

### **Appendix**

## Appendix – Main Modifications

Text which must be added to the plan as a consequence of main modifications is shown in **bold**. Text which must be removed from the plan as a consequence of these main modifications is shown ~~struck through~~. Directions for main modifications that must be made are shown in ***bold italics***.

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Ref.	Page (LP1)	Policy / Paragraph	Modification
		<b>CHAPTER 1</b>	<b>INTRODUCTION</b>
MM 002			<i>Replace all references in the Plan to the 'Proposals Map' with 'Policies Map'.</i>
FM 028	16	2.39	The HMA geography <del>has</del> informed the preparation of Strategic Housing Market Assessments (SHMA) which <del>have been</del> <b>were</b> completed on a 'best fit' basis by groups of local authorities. The Council <del>has</del> prepared a joint SHMA <sup>26</sup> with Stevenage which identifies , <b>at the time of the plan's submission, identified</b> an objectively assessed need (OAN) for 13,800 homes in North Hertfordshire and 7,600 homes within Stevenage over the period 2011-2031. <b>Further Government household projections were released during the examination and a revised assessment for North Hertfordshire identified an OAN of 11,500 homes<sup>x</sup>.</b> The plans of both authorities show that their individual housing needs can be accommodated in full within their administrative areas. <b><i>x Review of the Official Projections for North Hertfordshire (ORS, 2020)</i></b>
FM 034	20	2.56	The County Council is also the Highway Authority with responsibility for transport matters. This Plan supports key priorities and proposals from the Hertfordshire Local Transport Plan ( <del>LTP3</del> ) <b>(LTP4)</b> adopted in <del>2011-2018</del> . <del>LTP3</del> <b>LTP4</b> sets out the transport strategy for Hertfordshire (over the period from <del>2011</del> <b>2018</b> to 2031), the goals and challenges to be met, and outlines a programme of transport schemes and initiatives to be delivered subject to available funding. The LTP covers all modes of transport - including walking, cycling, public transport, car based travel and freight - and takes account of the effect of transport on wider aspects including the economy, environment, climate change and social inclusion.
		<b>SECTION TWO</b>	<b>SPATIAL STRATEGY AND STRATEGIC POLICIES</b>
		<b>CHAPTER 3</b>	<b>SPATIAL STRATEGY AND SPATIAL VISION</b>
MM 007	30	After Ch.3	<i>Add key diagram as shown at Annex 1 of this schedule</i>
		<b>CHAPTER 4</b>	<b>STRATEGIC POLICIES</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 009	32	Para 4.7	In setting a framework for growth, this Plan also recognises the value of local knowledge and the importance of local choice. A number of parishes within the District are already designated Neighbourhood Planning areas and our Local Plan is structured flexibly in response. This chapter contains the <b>strategic</b> policies and aspirations with which any neighbourhood plans, or other local planning initiatives, must be in general conformity.
MM 010 / FM 039	32	Policy SP2	<p><b>Policy SP2: Settlement Hierarchy and Spatial Distribution<sup>x</sup></b></p> <p><b>Between 2011 and 2031, the plan makes provision for at least 13,000 new homes.</b></p> <p><b>Approximately 80% The majority of the District's housing development and the substantial majority of new employment, retail and other development will be located within the adjusted settlement boundaries of or adjoining the following towns:</b></p> <ul style="list-style-type: none"> <li>• Baldock (2,198 homes)</li> <li>• Hitchin (1,842)</li> <li>• Letchworth Garden City (1,928)</li> <li>• Royston (1,899)</li> <li>• Stevenage (including Great Ashby)<sup>32</sup> (1,705); and</li> <li>• Luton<sup>32</sup> (1,485)</li> </ul> <p><b>Approximately 13% of housing, along with supporting infrastructure and facilities will be delivered within the adjusted settlement boundaries of the following five villages for the levels of development indicated:</b></p> <ul style="list-style-type: none"> <li>• Barkway (208)</li> <li>• Codicote (363)</li> <li>• Ickleford (235)</li> <li>• Knebworth (731)</li> <li>• Little Wymondley (312)</li> </ul> <p><b>The remaining development will be dispersed across the District as set out below.</b></p> <p><b>In Category A villages, Ggeneral development will also be allowed within the defined settlement boundaries of the Category A villages of:</b></p> <ul style="list-style-type: none"> <li>• Ashwell;</li> <li>• Hexton;</li> <li>• Pirton;</li> <li>• Barkway;</li> <li>• Ickleford;</li> <li>• Preston;</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>• Barley;</li> <li>• Breachwood Green;</li> <li>• Cockernhoe &amp; <b>Mangrove Green</b>;</li> <li>• <del>Codicote</del>;</li> <li>• Graveley;</li> <li>• Kimpton;</li> <li>• <del>Knebworth</del>;</li> <li>• <del>Little Wymondley</del>;</li> <li>• Lower Stondon<sup>32</sup>;</li> <li>• Oaklands<sup>32</sup>;</li> <li>• Offley;</li> <li>• Reed;</li> <li>• Sandon;</li> <li>• St Ippolyts &amp; <b>Gosmore</b>;</li> <li>• Therfield</li> <li>• Weston; and</li> <li>• Whitwell</li> </ul> <p>Infilling development which does not extend the built core of the village will be allowed in the Category B villages of:</p> <ul style="list-style-type: none"> <li>• Blackmore End;</li> <li>• Great Wymondley;</li> <li>• Hinxworth</li> <li>• Holwell</li> <li>• Kelshall;</li> <li>• Lilley;</li> <li>• Newnham;</li> <li>• Old Knebworth;</li> <li>• Rushden;</li> <li>• Wallington; and</li> <li>• Willian</li> </ul> <p><del>Only</del> Limited affordable housing and facilities for local community needs <b>meeting the requirements of Policy CGB2</b> will be allowed in the Category C settlements of:</p> <ul style="list-style-type: none"> <li>• Bygrave;</li> <li>• Caldecote;</li> <li>• Clothall</li> <li>• Langley;</li> <li>• Nuthampstead;</li> <li>• Peters Green; and</li> <li>• Radwell</li> </ul> <p><b>Development outside of these locations or general parameters will be permitted where this is supported by an adopted Neighbourhood Plan. Under the provisions of national policy at the time of this Plan’s examination, Neighbourhood Plans cannot allocate sites in the Green Belt or amend Green Belt boundaries</b></p> <p><i>Footnote [x]</i> The figures shown in this policy for individual settlements are the total of planned, permitted and completed development for the period 2011-2031. These figures are <u>not</u> a target and do not necessarily represent the maximum number of new homes that will be built.</p>
MM 011 / FM 040	33	After paragraph 4.11 (new paragraphs)	<p><b>Based on the policies and allocations of this plan, it is anticipated that approximately four in every five new homes delivered over the plan period will be built within the adjusted settlement boundaries of the towns. These will remain the primary focus for employment, retail and other development. The balance of new development will be distributed across North Hertfordshire’s villages and the remainder of the District.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			Much of this growth will be delivered on sites allocated for development by this Plan. This will be supplemented by (often smaller) 'windfall' sites which come forward within the settlement boundaries and parameters identified in Policy SP2 as well as any further sites subsequently identified through Neighbourhood Plans. These schemes may include opportunities for self-build development.
MM 012 / FM 041	33	After paragraph 4.12 (new paragraph)	<p>Five villages have been identified that will support higher levels of new housing allocations than the Category A villages:</p> <ul style="list-style-type: none"> <li>• Knebworth and Codicote are the two largest villages within North Hertfordshire and support a range of services, including a station at Knebworth;</li> <li>• Ickleford and Little Wymondley provide opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections; and</li> <li>• Barkway as a focus for development in the rural east of the District.</li> </ul>
MM 014 / FM 042	35	SP3	<p><b>Policy SP3: Employment</b></p> <p>The Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer. We will:</p> <ol style="list-style-type: none"> <li>a. <b>Allocate</b> <del>Bring forward</del> an adequate supply and range of employment land in Hitchin, Letchworth Garden City, Baldock and Royston to meet the <b>needs of the Functional Economic Market Area</b> requirements of the local economy over the plan period to 2031. <b>The allocations as shown on the Policies Map are :</b> <ol style="list-style-type: none"> <li>i. <b>east of Baldock BA10 (19.6ha); and</b></li> <li>ii. <b>west of Royston RY9 (10.9ha);</b></li> </ol> </li> <li>b. <del>Designate existing</del> <b>Safeguard</b> Employment Areas within the District's main settlements, <b>as shown on the Policies Map</b>, to enhance and <b>protect their safeguard</b> employment potential <b>for office, research and development, industrial or storage and distribution uses;</b></li> <li>c. <del>Support additional employment provision through the new designations</del> <del>allocations shown on the on the Policies Map designations at :</del> <ol style="list-style-type: none"> <li>i. <del>the former Power Station, Letchworth Garden City (1.5ha);</del></li> <li>ii. <del>east of Baldock (19.6ha); and</del></li> <li>iii. <del>west of Royston RY9 (10.9ha);</del></li> </ol> </li> <li>d. Work with landowners, developers and, for sites on the edge of the District, adjoining authorities to identify an appropriate amount of employment land to be included through the masterplanning process in <b>strategic housing sites</b> <del>major new developments;</del></li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>e. Permit an appropriate range of <b>offices, research and development, light industrial or B class</b> employment uses within these areas;</p> <p>f. Promote and support the expansion of the knowledge based economy in the District. Proposals for the redevelopment of existing employment sites and the development of new <del>allocated</del> employment sites which increase the level of knowledge-intensive employment will be supported in principle.</p> <p>g. Support <b>offices, research and development, light industrial and B-class</b> uses in appropriate locations outside of designated employment areas, including offices in main town centres and concentrations of <del>B-class</del> <b>these employment</b> uses in certain <del>Category A</del> villages; and</p> <p>h. Ensure relevant policies of this Plan recognise the contribution of <b>sectors other than B Class uses and offices, research and development and light industrial uses, including tourism, to the provision of jobs.</b> <del>non-B class sectors, including tourism, to the provision of jobs in the District.</del></p>
FM 043	35	4.19 (delete paragraph)	<p><del>In planning, employment land usually refers to 'B-class' uses<sup>35</sup> and includes:</del></p> <ul style="list-style-type: none"> <li><del>• B1(a) – offices</del></li> <li><del>• B1(b) – research and development</del></li> <li><del>• B1(c) – light industry</del></li> <li><del>• B2 – general industry; and</del></li> <li><del>• B8 – storage and distribution</del></li> </ul> <p><del>[Footnote]<sup>35</sup> As defined in the Town and Country Planning (Use Classes) Order (1987) (as amended)</del></p>
FM 044	36	4.26	Trend-based forecasts reflect these patterns and anticipate continued increases in out-commuting from North Hertfordshire over the plan period <sup>38</sup> . Unchecked, this would lead to increased pressure on transport infrastructure that is already under strain at peak periods. This Plan therefore makes employment provision for <b>offices, research and development, light industrial, general industry and storage and distribution</b> at above modelled levels.
MM 015 / FM 045	37	4.28	A significant <del>new</del> employment <b>allocation for certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses</b> site will be developed <b>out</b> at the east of Baldock, supporting the proposed increase in residential development in the town (see Policy SP8). The allocation benefits from proximity to existing employment uses as well as existing and planned residential development. It has access to the strategic road network via the A505 Baldock Bypass.
MM 016	37	4.30	Within Hitchin and Letchworth Garden City, employment area designations from the previous local plan will be broadly retained, with some modest releases of sustainable, brownfield sites for residential development. Within

Ref.	Page (LP1)	Policy / Paragraph	Modification
			Letchworth, the former power station site at Works Road has been brought back into use for employment purposes. <del>and is reflected in a new planning designation.</del>
FM 046	37	4.33	Within these designated areas, an appropriate range of <b>offices, research and development, light industrial, general industry and storage and distribution B-class</b> uses will be permitted in line with the detailed policies of this Plan.
FM 047	37	4.34	<del>B-class uses will not be solely confined to designated employment areas.</del> A number of employment premises are located outside of defined areas and these will continue to be supported where they are compatible with other surrounding uses. In particular, office uses will continue to be supported in the main town centres (see Policy SP4), in line with national planning policy.
FM 048	37	4.35	Beyond our main towns, there is a steady demand for rural employment land and premises. Owing to the size and extensive spread of rural settlements these types of development are best dealt with on a case-by-case basis rather than through allocations, although our general approach will be to direct concentrations of rural business to <del>the Category A</del> larger villages. There are quite sizeable employment sites in villages such as Ashwell, Codicote, Kimpton, Little Wymondley and Weston which provide rural jobs and should be retained.
FM 049	38	4.36	Approximately 45% of all jobs fall <b>within the office, research and development, light industrial sectors</b> or into the B uses classes. The rest of the jobs in the local economy consist of services such as retail, health, education and leisure, or 'footloose' careers in sectors such as construction and the trades. The role of these <del>non-B-class</del> sectors in the overall employment balance of the District is recognised and will continue to be supported <b>where appropriate.</b>
MM 017 / FM 050	38	Policy SP4	<p><b>Policy SP4: Town Centres, and Local Centres and Community Shops</b></p> <p>The Council will make provision for an appropriate range of retail <b>and service</b> facilities across the District and are committed to protecting the vitality and viability of all centres. We will:</p> <ol style="list-style-type: none"> <li>a. Promote, protect and enhance the <b>provision of shops, financial and professional services, café or restaurants, pubs or drinking establishments or takeaways in retail and service functions</b> of the following centres in our retail hierarchy: <ol style="list-style-type: none"> <li>i. The town centres of Hitchin, Letchworth Garden City, Baldock and Royston;</li> <li>ii. 13 existing local centres consisting of:</li> </ol> </li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification																																			
			<ul style="list-style-type: none"> <li>• village centres at Ashwell, Codicote and Knebworth;</li> <li>• seven centres in Hitchin</li> <li>• two centres in Letchworth Garden City; and</li> <li>• the centre at Great Ashby; and</li> </ul> <p>iii. 2 new local centres north of Baldock and East of Luton within the strategic housing sites identified in this Plan;</p> <p>b. Support proposals for main town centre uses in these locations where they are appropriate to the size, scale, function, catchment area, historic and architectural character of the centre;</p> <p>c. Identify Primary Shopping Frontages within town centres where <del>A1 retail uses</del> <b>shops<sup>x</sup></b> will be expected to concentrate</p> <p>d. <b>To ensure the District's towns maintain their role and market share, Mmake provision for up to 38,100m<sup>2</sup> gross sq.m of additional A-class floorspace over the plan period comprising shops, café or restaurants, pubs or drinking establishments or takeaways, including the re-occupation of vacant floorspace, consisting of:</b></p> <ul style="list-style-type: none"> <li>i. 22,500m<sup>2</sup> <b>gross sq.m</b> comparison goods (e.g. clothes, shoes, furniture, carpets);</li> <li>ii. <del>8,500m<sup>2</sup></del> <b>8,600 gross sq.m</b> convenience (e.g. food, drink, toiletries); and</li> <li>iii. 7,000m<sup>2</sup> <b>gross sq.m food and beverage outlets (e.g. restaurants, takeaways and bars).</b></li> </ul> <p><b>38,100 gross sq.m is a district wide retail capacity but it is principally derived from the retail capacity projections for the four town centres, as indicated below:</b></p> <table border="1"> <thead> <tr> <th>Years</th> <th>2016-2021</th> <th>2021-2026</th> <th>2026-2031</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>Baldock</td> <td>300</td> <td>1,600</td> <td>1,400</td> <td>3,300</td> </tr> <tr> <td>Hitchin</td> <td>3,800</td> <td>3,600</td> <td>3,700</td> <td>11,100</td> </tr> <tr> <td>Letchworth</td> <td>2,400</td> <td>3,300</td> <td>3,500</td> <td>9,200</td> </tr> <tr> <td>Royston</td> <td>3,200</td> <td>2,000</td> <td>1,900</td> <td>7,100</td> </tr> <tr> <td>Strategic Housing Sites</td> <td>1,500</td> <td>2,700</td> <td>2,600</td> <td>6,800</td> </tr> <tr> <td>Other</td> <td>200</td> <td>200</td> <td>200</td> <td>600</td> </tr> </tbody> </table>	Years	2016-2021	2021-2026	2026-2031	Totals	Baldock	300	1,600	1,400	3,300	Hitchin	3,800	3,600	3,700	11,100	Letchworth	2,400	3,300	3,500	9,200	Royston	3,200	2,000	1,900	7,100	Strategic Housing Sites	1,500	2,700	2,600	6,800	Other	200	200	200	600
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			<table border="1"> <tr> <td><b>Total</b></td> <td><b>11,400</b></td> <td><b>13,400</b></td> <td><b>13,300</b></td> <td><b>38,100</b></td> </tr> </table> <p>The three town centres of Baldock, Hitchin and Letchworth Garden City have significant overlapping markets, with spend leakage from Letchworth Garden City to Hitchin and a lack of physical space at Baldock to accommodate its projected retail capacity. To address the leakage and physical capacity across these three centres the indicative distribution and phasing of provision is as follows:</p> <table border="1"> <thead> <tr> <th>Years</th> <th>2016-2021*</th> <th>2021-2026</th> <th>2026-2031</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>Baldock</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Hitchin</td> <td>0</td> <td>3,700</td> <td>3,300</td> <td>7,000</td> </tr> <tr> <td>Letchworth</td> <td>5,350</td> <td>5,500</td> <td>5,000</td> <td>15,850</td> </tr> <tr> <td>Royston</td> <td>4,350</td> <td>2,200</td> <td>1,800</td> <td>8,350</td> </tr> <tr> <td>Strategic Housing Sites</td> <td>0</td> <td>3,400</td> <td>2,900</td> <td>6,300</td> </tr> <tr> <td>Other</td> <td>0</td> <td>300</td> <td>300</td> <td>600</td> </tr> <tr> <td><b>Total</b></td> <td><b>9,700</b></td> <td><b>15,100</b></td> <td><b>13,300</b></td> <td><b>38,100</b></td> </tr> </tbody> </table> <p>*2016 to 2021 projections includes take-up of vacant units and the implementation of commitments.</p> <p>e. <b>Prepare and maintain</b> up-to-date town centre strategies to support this approach and / or adapt to change. <b>These will be used to inform the approach to retail at the time of the early review;</b> and</p> <p>f. Support the retention and provision of shops outside of identified centres where they serve a local <b>day-to-day</b> need.</p> <p><i>Footnote [x] Please refer to the Glossary for a definition of comparison and convenience goods</i></p>	<b>Total</b>	<b>11,400</b>	<b>13,400</b>	<b>13,300</b>	<b>38,100</b>	Years	2016-2021*	2021-2026	2026-2031	Totals	Baldock	0	0	0	0	Hitchin	0	3,700	3,300	7,000	Letchworth	5,350	5,500	5,000	15,850	Royston	4,350	2,200	1,800	8,350	Strategic Housing Sites	0	3,400	2,900	6,300	Other	0	300	300	600	<b>Total</b>	<b>9,700</b>	<b>15,100</b>	<b>13,300</b>	<b>38,100</b>
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FM 051	38	After SP4 (new paragraph)	<b>In relation to policy SP4, retail and service facilities refers to shops, cafés and restaurants (E-class use) along with pubs and drinking establishments and takeaways (sui generis). These were previously Class A uses.</b>																																													
MM 018	39	After paragraph 4.39 (New paragraphs)	<p><b>4.xx The Local Plan strategy for town centre uses is to maintain the District’s market share. This means that across the district, the retail capacity will be met principally in the four town centres. This is to maintain the current retail hierarchy within the District and the wider catchment areas.</b></p> <p><b>4.xx However given that Baldock, Letchworth Garden City and Hitchin are in close proximity, leakage of the projected retail expenditure for each town is likely to occur. The most significant is leakage from</b></p>																																													

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<b>Letchworth Garden City to Hitchin.</b> <b>4.xx In addition there is less physical capacity in Baldock and Hitchin to accommodate their projected retail capacities. The retail strategy for the District is therefore to direct the capacity to Letchworth Garden City over the plan period, which has greater potential for physical space and to recapture its leakage.</b>
MM 019 / FM 052	39	Paragraph 4.40	We are committed to promoting the well-being of the town centres in the District. Town centre strategies have been produced for the main centres of Hitchin, Baldock, Letchworth Garden City, and Royston. These promote the vitality and viability of the centres and cover all those aspects of policy guidance with a spatial dimension relevant to town centres, including economic, environmental and social well-being and matters such as community safety, community facilities, traffic management, marketing and delivery. The strategies provide a method of keeping town centre development up-to-date and flexible to take account of ongoing changes in the retail environment, <b>and will inform whether it is necessary to review the retail strategy set out in this Plan. Work on these town centre strategies will commence within 12 months of the adoption of this Plan. They will be monitored and reviewed during the life of this Plan.</b>
FM 053	39	Paragraph 4.41	Our detailed policies set out our approach to development applications, including for changes of use. In general terms, <del>A1 retail uses</del> <b>shops</b> will be expected to concentrate within the defined primary frontages with <del>a wider variety of A class-related retail and service uses, that are pubs or drinking establishments</del> permissible in secondary frontage areas.
MM 020 / FM 054	39	Paragraph 4.44	The growth of the District will require additional centres to be provided to serve the <del>largest new developments</del> <b>strategic housing sites. The centres for the two largest sites at Baldock and on the edge of Luton are expected to contain a wider range of retail facilities.</b> Once built, these will become local centres in our retail hierarchy and future proposals within them will be assessed appropriately.
MM 021 / FM 055	39-40	Paragraph 4.46	Our evidence shows there will be a steady growth in retail demand over the plan period, <b>although projected growth post-2026 carries a degree of uncertainty due to changing shopping and retail patterns and the effects of Covid-19. Projected growth is</b> <del>driven</del> in part by planned population growth but also by underlying changes in the way people shop and how much money they have available to spend. It is anticipated that on-line shopping will continue to grow whilst a certain amount of future demand can be accommodated through the re-occupation of existing, vacant shop units. However, it is also necessary to identify new sites for retail <sup>41</sup> . <b>Projected retail needs, and particularly those in the post-2026 period, will be kept under review via the monitoring framework and updated retail studies.</b>
MM 022	40	Paragraph 4.48 (delete paragraph)	<del>Further allocations and broad locations are identified within our main towns to accommodate the remainder.</del>
MM 023	41	Policy SP5	<b>Policy SP5: Countryside and Green Belt</b> We support the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>and Rural Areas Beyond the Green Belt are shown on the <del>Proposals</del> <b>Policies</b> Map. We:</p> <ol style="list-style-type: none"> <li>a. Have conducted a comprehensive review of the Green Belt. Land has been removed from the Green Belt to: <ol style="list-style-type: none"> <li>i. enable strategic development at the locations referred to in Policies SP8 and SP3;</li> <li>ii. enable local development around a number of the District's towns and villages; and</li> <li>iii. define boundaries for villages referred to in Policy SP2 which fall within the Green Belt but were previously 'washed over' by this designation;</li> </ol> </li> <li>b. Have provided new Green Belt to cover, in general terms, the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north;</li> <li>c. Will only permit development proposals in the Green Belt where they would not result in inappropriate development <b>or where very special circumstances have been demonstrated</b>; and</li> <li>d. Will operate a general policy of restraint in Rural Areas beyond the Green Belt <b>through the application of our detailed policies</b>.</li> </ol>
MM 025	42	Paragraph 4.56	Proposals for development within the Green Belt will be considered against national <del>guidance</del> <b>policy</b> . Where the proposed use can be considered acceptable in principle, we will use the detailed policies of this Plan to determine whether permission should be granted.
MM 027	42	Paragraph 4.59	In terms of intrinsic character and beauty, <del>this area</del> <b>the Rural Area beyond the Green Belt</b> contains some of the highest quality countryside in the District. However, the settlements are generally more dispersed meaning a Green Belt designation cannot be justified. This sparser pattern of development additionally means that, outside of the defined settlements, many sites are not well located in relation to key services. On these grounds it remains appropriate to <b>restrain the types of development allowed in the Rural Area beyond the Green Belt</b> <del>have a policy of restraint</del> . Our detailed <b>Development Management</b> policies set out the approach that will apply in this area.
MM 028	43	Policy SP6	<p><b>Policy SP6: Sustainable transport</b></p> <p>We will deliver accessibility improvements and promote the use of sustainable transport modes insofar as reasonable and practicable. We will:</p> <ol style="list-style-type: none"> <li>a. Comply with the <b>NHDC Transport Strategy and the</b> provisions of the Local Transport Plan and other supporting documents as <b>relevant</b> <del>considered necessary</del>;</li> <li>b. Encourage development in locations which enable sustainable journeys to be made to key services and facilities;</li> <li>c. Work with Hertfordshire County Council, <b>neighbouring authorities</b>, Highways England and service providers to ensure that a range of sustainable transport options are available to all potential occupants or users. This may involve new or</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>improved pedestrian, cycle and passenger transport (including rail and/or bus links and routes;</p> <p>d. Seek the <b>earliest reasonable opportunity to implement</b> early implementation of sustainable travel infrastructure on Strategic Housing Sites <b>and other development sites</b> in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage;</p> <p>e. Assess development proposals against the parking standards set out in this Plan and <b>having regard to</b> relevant supplementary advice;</p> <p>f. Require applicants to provide assessments, plans and supporting documents to demonstrate the safety and sustainability of their proposals; and</p> <p>g. Protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, require replacement routes to the satisfaction of the Council.</p>
MM 029 / FM 056	43	Paragraph 4.66	<p>The overarching transport policy document for the area is the Hertfordshire Local Transport Plan (<del>LTP3</del>) (<b>LTP4</b>) which provides the framework for achieving better transport systems in Hertfordshire for the plan period <del>2011</del> <b>2018-2031</b>. The LTP4 is in progress which will cover the Hertfordshire 2020 Transport vision and will be consulted on in late 2016. <b>LTP4 was adopted in 2018</b>. The Local Transport Plan covers all modes of transport including walking, cycling, public transport, car based travel, reducing road freight movements and making provision for those with mobility impairments.</p>
MM 030	44	Paragraph 4.67 and associated footnote	<p>Although the <del>LTP3</del><b>Local Transport Plan</b> identifies some specific schemes, the majority of transport schemes are identified at settlement level. From time to time the County Council, <b>North Hertfordshire District Council, and neighbouring authorities</b> publishes other documents and strategies<sup>[x]</sup> which will also need to be taken into account <b>when considering development proposals. This includes the NHDC Transport Strategy and also relevant strategies prepared by neighbouring authorities, such as the Stevenage Mobility Strategy, for sites that are functionally attached to, or in close proximity to North Hertfordshire.</b></p> <p><i>[Footnote] [x] These could include the forthcoming HCC Growth Transport Plans, the NHDC Transport Strategy prepared as part of the evidence base as well as other local strategies, for example cycling.</i></p>
MM 031	44	After Paragraph 4.68 (new paragraph)	<p><b>Many of the developments in the smaller settlements may not be enough on their own to have a major transport impact within an area. However, cumulatively a number of developments can create additional demands and burdens on existing infrastructure (such as increased use of less appropriate roads, higher volumes of traffic through constrained village centres) which may require suitable mitigation to be implemented. Such mitigation can also include better, walking and cycling improvements and public transport services which will</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>reduce the need to travel by car. The Council will consider these overall cumulative impacts as far as they are able as part of Policy SP7 and may require appropriate contributions from all such development sites.</p>
MM 032	44	Policy SP7	<p><b>Policy SP7: Infrastructure requirements and developer contributions</b></p> <p>The Council will require development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development. We will:</p> <ol style="list-style-type: none"> <li>a. Require developers to provide, finance and / or contribute towards provision which is fairly and reasonably related in scale and kind to the development, including:             <ol style="list-style-type: none"> <li>i. on-site and/or off-site improvements and infrastructure necessary as a result of the development in order to:                 <ul style="list-style-type: none"> <li>• ensure appropriate provision of facilities and infrastructure for new residents;</li> <li>• <b>contribute toward</b> <del>help-addressing</del> cumulative impacts that might arise across multiple developments;</li> <li>• avoid placing unreasonable additional burdens on the existing community or existing infrastructure;</li> <li>• mitigate <del>any</del> adverse impacts <b>where possible</b>; and/or</li> <li>• enhance critical assets or make good their loss or damage; and</li> </ul> </li> <li>ii. maintenance and/or operating costs of any such new provision;</li> </ol> </li> <li>b. Ensure <b>essential</b> new infrastructure to support new development <del>is</del> <b>will be</b> operational no later than the completion of development or <b>during the</b> phase in which it is needed, <b>whichever is earliest</b> <del>unless otherwise agreed with relevant providers</del>;</li> <li>c. Refuse planning permission where appropriate agreements or processes ensuring criteria (a) and (b) can be met are not in place;</li> <li>d. Have regard to <del>any</del> <b>relevant national</b> guidance or requirements in relation to planning obligations and any Community Infrastructure Levy <b>or successor funding tariff</b> which may be introduced <b>by the Council</b>;</li> <li>e. Work with landowners, developers and other agencies in facilitating the delivery of sites identified in the Local Plan <b>and associated infrastructure</b> and seek to overcome known obstacles; and</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			f. <del>Take a stringent approach</del> <b>Need robust evidence to be provided</b> where developers consider that viability issues impact <b>upon</b> the delivery of key infrastructure and/or mitigation measures. <b>This evidence will be used to determine whether an appropriate and acceptable level of contribution and / or mitigation can be secured.</b>
MM 033	45	Paragraph 4.75	On the largest development sites, it will be necessary to directly provide facilities alongside the primary use – schools within residential areas, bus stops within business parks, cycling routes and new footways etc. In other areas, much of the growth arises from a number of smaller developments. A small development on its own may not be enough in itself to have a major impact within an area. However, cumulatively a number of developments <b>(including both the larger and smaller sites)</b> can create additional demands and burdens on existing infrastructure which may require suitable mitigation to be implemented. <b>Transport infrastructure including highways improvements and sustainable transport measures such as walking, cycling, improved public transport and behaviour change - projects are needed to address cumulative impacts - the latter seek to reduce vehicle travel to improve capacity and enable more sustainable travel. The NHDC Transport Strategy sets out the measures required, and all developments will be expected to contribute to these measures.</b>
MM 034	46	Paragraph 4.83	In cases where viability is an issue, developers will <del>be expected</del> <b>need to provide pay for an independent assessment and analysis of their viability evidence in order to verify it. This must be completed by a suitably qualified individual or company and to scrutinise the assumptions that have been made and the conclusions that have been reached and whether they are justified.</b> The methodology and scope of any such assessment should be agreed in advance between the applicant and the Council. If, following this assessment, it is accepted <b>by the Council</b> that the viability of a scheme would be critically undermined by application of the Council's usual standards and expectations, we will exceptionally: <ul style="list-style-type: none"> <li>• consider which requirements are most critical to securing development and meeting the overall vision and objectives of this Plan;</li> <li>• assess the extent to which these might be met in a way which makes any scheme viable; and</li> <li>• determine whether this would result in an appropriate and acceptable level of contribution and / or mitigation.</li> </ul>
MM 035 / FM 057	47-48	Policy SP8	<b>Policy SP8: Housing</b> Over the period 2011-2031, housing growth will be supported across the District. We will: <ul style="list-style-type: none"> <li>a. Release sufficient land to deliver at least <del>14,000</del> <b>11,600 net</b> new homes for North Hertfordshire's own needs. Of these: <ul style="list-style-type: none"> <li>i. around <del>13,800</del> <b>11,500 net new homes</b> will be provided within that part of the District falling within the Stevenage Housing Market Area (HMA); while</li> </ul> </li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>ii. around <del>200</del> <b>100 net new homes</b> will be provided within that part of the District falling within the Luton HMA;</p> <p>b. Provide additional land within the Luton HMA for a further 1,950 <b>net new</b> homes as a contribution towards the unmet needs for housing arising from Luton <b>with approximately 1,400 of these being delivered over the Plan period to 2031;</b></p> <p>c. Deliver these homes through the sites and allowances identified in this Plan that will support approximately<sup>48</sup>:</p> <p>i. <del>4,340</del> <b>5,100</b> homes from completions and permissions achieved since 2011 and other allowances;</p> <p>ii. 7,700 homes from six Strategic Housing Sites <b>delivering approximately 5,560 of these by 2031:</b></p> <ul style="list-style-type: none"> <li>• BA1 - North of Baldock for 2,800 homes (<del>2,500</del> <b>approximately 1,400</b> to be delivered by 2031);</li> <li>• LG1 - North of Letchworth for 900 homes (<b>approximately 600 by 2031</b>);</li> <li>• NS1 - North of Stevenage in Graveley parish for 900 homes (<b>approximately 775 by 2031</b>);</li> <li>• HT1 - East of Hitchin for 700 homes;</li> <li>• GA2 - North-east of Great Ashby in Weston parish for 600 homes; and</li> <li>• EL1 / EL2 / EL3 - East of Luton for 2,100 homes (<b>approximately 1,500 by 2031</b>);</li> </ul> <p>iii. <del>4,860</del> <b>4,000</b> homes through local housing allocations that will provide homes on:</p> <ul style="list-style-type: none"> <li>• <del>newly identified sites and land within pre-existing settlement limits;</del></li> <li>• <del>sites released from the Green Belt as part of a comprehensive, District-wide review; and</del></li> <li>• <del>land identified following a review of other relevant boundaries or designations.</del></li> <li>• <b>Further sites within the adjusted settlement boundaries of the towns;</b></li> <li>• <b>Land within the adjusted settlement boundaries of five villages where more than 200 homes are expected to be built over the Plan period; and</b></li> <li>• <b>Sites identified within the defined settlement boundaries of the Category A villages.</b></li> </ul> <p><b>This includes the use of land within pre-existing settlement limits, non-strategic sites released from the Green Belt and other land identified following a review</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>of other relevant boundaries or designations.</b></p> <ul style="list-style-type: none"> <li>iv. <del>7-4</del> new, permanent Gypsy and Traveller pitches</li> <li>d. Maintain a five-year housing land supply and target the completion of 20% of new homes over the plan period on previously developed land;</li> <li>e. Seek to provide long-term certainty by <ul style="list-style-type: none"> <li><b>x. identifying Strategic Housing Sites that will continue delivery beyond the end of the Plan period in 2031;</b></li> <li>i. working with the Government and other relevant agencies to identify new settlement options within North Hertfordshire that can provide additional housing supply in the period after 2026; <del>and</del></li> <li>ii. safeguarding land to the west of the A1(M) at Stevenage, as shown on the <del>Proposals Policies Map, for up to 3,100 dwellings to meet longer-</del> <b>term development needs</b> in the period beyond 2026 subject to a future review of this Plan; <b>and</b></li> <li><b>x. undertaking a review of this Plan by the end of 2023.</b></li> </ul> </li> <li>f. Support a range of housing tenures, types and sizes measured against targets to provide: <ul style="list-style-type: none"> <li>i. 33% of all homes over the plan period as Affordable Housing for local needs with targets to deliver up to 40% Affordable Housing where viable;</li> <li>ii. A broadly even split between smaller (1- and 2-bed) and larger (3+ bed) properties <b>subject to up-to-date-assessments of housing needs;</b> and</li> <li>iii. <del>100-56</del> <b>plots on specified Strategic Housing Sites to help pro-actively address demand</b> for self-build development over the plan period; and</li> </ul> </li> <li>g. Provide <del>up to</del> <b>at least</b> 350 bed spaces in suitable, supported accommodation to meet the needs of those who cannot live in their own home.</li> </ul>
MM 036	47	Footnote 48	These requirements include a small buffer of approximately <b>13% 7%</b> -over and above the <del>targets for North Hertfordshire's housing needs identified in criterion (a)</del> <b>total housing requirement set through criteria (a) and (b) of this Policy</b> to ensure sufficient flexibility. See Monitoring and Delivery chapter for further information. <b>All figures are net.</b>
FM 058	48	Paragraph 4.86	Our evidence identifies a requirement for <del>13,800</del> <b>11,500</b> homes to be built between 2011 and 2031 to meet the needs of North Hertfordshire <sup>49</sup> . A modest uplift has been added. This predominantly reflects the fact that, as people live for longer and live in their own homes for longer, it may be more appropriate to assume that more of their needs will be met in the normal housing stock <sup>50</sup> .  <sup>49</sup> <b>Updating the Overall Housing Need (ORS, 2016) Review of the Official Projections for North Hertfordshire (ORS,</b>

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			<b>2020)</b> <sup>50</sup> Housing requirements are normally calculated on the basis that the proportion of older persons needing specialised accommodation will not change over time.
MM 037 / FM 059	48	Paragraph 4.89	<del>More than 4,300</del> <b>Approximately 5,100</b> of the required homes are accounted for by completions since 2011, sites which have already obtained planning permission <b>and commenced development</b> and other allowances. <b>This includes two large developments on the edge of Royston with permission for almost 600 homes.</b> <del>These allowances</del> <b>The majority of these homes will be on previously developed land and also</b> include: <ul style="list-style-type: none"> <li>• windfalls (those sites which will continue to come forward for development outside of the local plan process) <del>as well as;</del> <b>and</b></li> <li>• <b>Letchworth Town Centre as a broad location.</b> <del>locations. These are areas</del> <b>This is an area</b> where it is reasonable to assume development might occur in the latter years of the plan, but where we cannot currently identify the exact location. <b>The boundary of the broad location is the same as the Town Centre boundary for Letchworth shown on the policies map.</b> <del>The majority of these 4,300 homes will be on previously developed land.</del></li> </ul>
MM 038 / FM 060	49	Paragraph 4.95	The remainder of new homes will be delivered through a range of local housing allocations set out in the detailed policies of this Plan: <ul style="list-style-type: none"> <li>• <del>More than 850 further homes are identified within pre-existing settlement boundaries and have influenced our target to build 20% of new homes on previously developed land;</del></li> <li>• <del>As part of our comprehensive review of the Green Belt, a number of additional villages have been 'inset' with boundaries drawn to release additional land for development. These locations will contribute around 2,600 homes to our target whilst also ensuring the long term sustainability of these settlements.</del></li> <li>• <del>A series of developments around the edge of Royston will contribute almost 1,000 further homes; while</del></li> <li>• <b>Sites for over 2,200 homes, in addition to the strategic sites, are identified within the adjusted settlement boundaries of the towns;</b></li> <li>• <b>Sites for nearly 1,600 homes are identified at five village locations identified by Policy SP2; while</b></li> <li>• <del>A review of the settlement boundaries in the Rural Areas Beyond the Green Belt of Category A villages allows for approximately 400</del> <b>180</b> homes.</li> </ul>
MM 039 / FM 061	49	Paragraph 4.96	This Plan also makes provision to meet the future needs of the Gypsy and Traveller community. <del>Existing arrangements at the Pulmer Water site near Codicote will be formalised</del> <b>A new site is allocated at Woodside Place, Danesbury Park Road at the southern edge of the District</b> allowing requirements over the period to 2031 to be met.
FM 063	49	After Paragraph 4.98 (new	<b>The spatial strategy proposed by this Plan requires the simultaneous delivery of a number of strategic sites around the main towns. There will be challenges in this approach. These include the capacity of the development industry</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification
		paragraph)	<b>to deliver and the ability of the market to absorb these new homes. We will support higher delivery rates where possible. This might include using innovative approaches to construction. We will develop a greater understanding of the rates of housing delivery that can be achieved as schemes are progressed and reflect these in the review of the plan as set out in Policy IMR2.</b>
MM 040 / FM 064	50	Paragraph 4.99	A stepped approach is considered most appropriate <b>to deal with these issues. An average of 313 homes per year were built over the first nine years of the plan period between 2011 and 2020. Moving forward, housing supply will be measured against targets to deliver an average of 500 homes per year over the first ten years of the plan period (2011–2021) period to 31 March 2024. For the period beyond 2021, From 1 April 2024 a target of 1,100 1,120 homes per year will apply. Our approach to five-year land supply is set out in Policy IMR1 in Chapter 14.</b>
MM 041	50	Paragraph 4.101	The Council is committed to fully exploring new settlement options in the District <b>and initial work has been undertaken<sup>53</sup>. However, Our evidence shows that we cannot expect rely upon a future new settlement to make a substantial contribution contribute to housing requirements in this current Plan period to 2031<sup>53</sup>. We will work with relevant partners on an on-going basis to build the evidence base that is required to support any new settlement(s) and deliver on our aspirations.</b> <sup>53</sup> North Hertfordshire New Settlement Study (ATLAS, 2016)
MM 042	50	Paragraph 4.104	Land to the west of the A1(M) at Stevenage within North Hertfordshire has long been identified as a sustainable location for a substantial urban extension to the town. Given the history of this site, it is considered there is sufficient justification to remove this site from the Green Belt now and safeguard it for future use. <b>This land is not allocated for development at the present time.</b> No development will be permitted until a plan review determines that the site is required to meet long-term needs and remains (part of) the most appropriate solution.
MM 043 / FM 065	50	Paragraph 4.105	In taking this approach, it is recognised that <del>a review of this Local Plan will need to conclude before the end of the plan period in 2031</del> <b>we are required to undertake a review of the Plan every five years to see if it needs to be updated. This Plan commits to undertaking a full review by the end of 2023, well within the five-year period.</b> <del>It is reasonable to assume that some development will be realised from whichever sites are identified through this process in the period after 2026. An allowance of 500 homes has been included in our housing figures.</del>
FM 066	50	Paragraph 4.106	<b>Policy IMR2 in the Monitoring and Delivery</b> Chapter 14 of this Plan sets out in greater detail how we expect the local plan review process to occur.
MM 044	51	Paragraph 4.109	Self-build provides another route to home ownership. <b>Small developments, often delivered by local builders and companies, have historically made a valuable contribution to housing land supply in North Hertfordshire. These include schemes designed by individuals for their own use. We will continue to support small windfall schemes where they are compatible with the policy framework of this plan. Government guidance also encourages us to facilitate further opportunities for people to self-build through Local Plan policies and other measures. On five of our strategic sites, 1% of plots will be reserved and marketed for those people with a local connection who wish to</b>

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			build their own home <b>reflecting demand recorded on the Council's Self-Build Register</b> . No specific self-build targets have been set on Local Housing Allocation sites and local demand will be considered on a site-by-site basis having regards to the Council's self-build register. Self build may additionally be an issue that local communities wish to explore through Neighbourhood Plans.
MM 045 / FM 001	52	Policy SP9	<p><b>Policy SP9: Design and sustainability</b></p> <p>The Council considers good design to be a key aspect of sustainable development. We will</p> <ul style="list-style-type: none"> <li>a. Support new development where it is well designed and located and responds positively to its local context;</li> <li><b>x. Require Strategic Masterplans to be produced for Strategic Housing Sites and other significant development.</b>  <b>Significant development generally comprises residential developments of 100 dwellings or more. Exceptionally, developments under 100 dwellings will be considered significant if there are site specific complexities and sensitivities that require a masterplan-led approach. In some circumstances a Strategic Masterplan may also be required to consider the cumulative impact of more than one site to support a co-ordinated and integrated approach to place-making and design.</b></li> <li>b. Require <b>Strategic Masterplans and planning applications for Strategic Housing Sites and significant developments to (as applicable):</b> <ul style="list-style-type: none"> <li>i. <b>Create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character;</b></li> <li>ii. <b>Create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas;</b></li> <li>iii. <b>Provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycle ways integrated with the wider built and natural environment and communities;</b></li> <li>iv. <b>Plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities;</b></li> <li>v. <b>Positively integrate with adjacent rural and urban communities and positively contribute to their character and the way the area functions, including addressing cumulative, cross boundary planning and infrastructure matters;</b></li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>vi. Provide a diverse and distinctive range of flexible and adaptable house types, tenures and building forms to meet the differing needs of the population;</li> <li>vii. Create an accessible multi-functional green infrastructure network that provides:               <ul style="list-style-type: none"> <li>▪ a key structuring and functional placemaking feature supporting healthy lifestyles, sport, play and recreation, linking into the wider Green Infrastructure Network; and</li> <li>▪ a high quality, integrated network to support ecological connectivity, biodiversity net gain, climate adaptation and mitigation linking into the wider Ecological Network;</li> </ul> </li> <li>viii. Ensure the effective use of sustainable urban drainage and sustainable water management;</li> <li>ix. Ensure a hierarchy of linked, high quality and attractive public spaces and public realm that is safe, attractive and supports social interaction for all age groups; and</li> <li>x. Design to last with a clear stewardship, management and maintenance strategy;</li> <li>x. Ensure Strategic Masterplans are informed by a technical and design evidence base and include the following for Strategic Housing Sites and where applicable for other significant development:               <ul style="list-style-type: none"> <li>i. Site specific vision and placemaking principles</li> <li>ii. Masterplan setting out the quantum, scale, type, mix and distribution of land uses, housing and community facilities</li> <li>iii. Green Infrastructure Framework identifying the scale, distribution, type and design of green spaces, biodiversity net gain, strategic drainage, on and off-site linkages</li> <li>iv. Movement Framework setting out the key access points, strategic highways, street hierarchy and footways and cycleways (on and off site)</li> <li>v. Urban Design Framework and design principles identifying how the site responds to local character and context and key structuring elements and layout principles (including heights and densities)</li> </ul> </li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>vi. Sustainability &amp; Energy Framework identifying site wide and building scale opportunities for low and zero carbon</li> <li>vii. Illustrative Masterplan Layout</li> <li>viii. Infrastructure Delivery, Phasing &amp; Management Strategy</li> <li>x. Encourage the submission of Strategic Masterplans for the Council’s consideration and agreement before the submission of a planning application. We will also confirm the scope and contents of individual Strategic Masterplans with applicants in pre-application discussions. Planning applications must be accompanied by a Strategic Masterplan. Where applications have already been submitted to the Council a Strategic Masterplan should be agreed with the Council prior to or as part of the grant of planning permission. Adherence to the Strategic Masterplan will be secured through planning conditions and/or legal agreement.</li> <li>c. Assess proposals against detailed policy requirements set out in this Plan and <b>have regard to</b> the Design SPD; and</li> <li>d. Adopt the Government’s <b>additional optional</b> technical standards for the size of new homes, water efficiency and, in specified circumstances, accessibility.</li> </ul>
FM 002	52	Paragraph 4.116 (and new paragraphs thereafter)	<p>The largest sites will be masterplanned in accordance with any requirements set out in Policies SP14-SP19 and the Communities section of this Plan to maximise their benefits. <b>Policy SP9 sets out the strategic design and masterplanning expectations of the Council for the Strategic Housing Sites and other significant development. The policy has to apply to a wide range of developments in terms of quantum, scale and complexity. The policy should be applied in its entirety to Strategic Housing Sites but for other significant development a tailored and case-by-case approach will be required to identify a proportionate level of masterplan and design detail to secure design quality dependent on site specific issues and the level of detail submitted with any planning application.</b></p> <p><b>4.xxx Strategic Masterplans are an effective tool in securing comprehensive and timely delivery and securing design quality and positive place outcomes. Masterplans support comprehensive, integrated, well- planned and sustainable places in terms of the natural, built and historic environment. An effective masterplanning process helps to support a multi-disciplinary, integrated, inclusive and collaborative approach to securing quality design and delivery. It also assists with resolving and co-ordinating planning issues at an early stage in the process speeding up decision-making and driving forward delivery through a shared vision. This both de-risks and provides certainty.</b></p>

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			<p><b>4.xxx We encourage the production of Strategic Masterplans on a staged basis, initially evaluating and agreeing baseline technical, character and design analysis and assessments, then agreeing a shared vision and set of place-making objectives, exploring and testing a series of options with stakeholder input and then the agreement of a preferred option and masterplan.</b></p> <p><b>4.xxx For large sites that are developed over a long time period, strategic masterplans may require review and be flexible to adapt to changing circumstances. A Strategic Masterplan is not a blueprint, it is a framework within which further planning and design instruction can emerge over time.</b></p>
MM 046	52	Paragraph 4.117	The detailed policies of this Plan and supplementary guidance set out standards that will apply to new development in the District. Government reforms and technical standards have streamlined the type and amount of additional requirements that we can ask of new development. Having regard to relevant evidence, we consider it appropriate to introduce these <del>standardised</del> <b>additional optional</b> requirements in North Hertfordshire.
FM 067	53	Policy SP10(e) [remainder of policy unchanged]	<p>e. Work with Hertfordshire County Council and education providers to ensure the planning system contributes to the provision of sufficient school places and facilitates the provision of new or expanded schools in appropriate and accessible locations. <b>This will include monitoring of projected future demand to inform the review of this plan in relation to secondary education provision for the Stevenage area;</b></p>
FM 068	54	After Paragraph 4.127 (new paragraph)	<b>Forecasting education demand that will arise from new developments over the long-term is challenging. It is difficult to predict with certainty how and when school places will be needed until developments are built and new families move in. This is a particularly complex issue in the Stevenage area where housing developments have been proposed by three local authorities (North Hertfordshire, East Hertfordshire and Stevenage) across a wide number and variety of sites contained in separate local plans. These plans set out allocations and requirements for secondary education that could meet demand well into the 2030s. However, this issue needs to be kept under review particularly as alternative sites and opportunities which supplement those identified in current Plans and / or better address the County Council's operational preferences may arise over this period. We will monitor long-term forecasts of demand with the County Council to inform the early review set out in Policy IMR2.</b>
MM 047	55	Policy SP11	<p><b>Policy SP11: Natural resources and sustainability</b></p> <p>This Plan seeks to meet the challenges of climate change and flooding. We will:</p> <ol style="list-style-type: none"> <li>Support proposals for renewable and low carbon energy development in appropriate locations;</li> <li>Take a risk based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF and ensuring the provision of Sustainable Drainage Systems (SuDS) and other</li> </ol>

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			<p>appropriate measures;</p> <p>c. Support the principles of the <del>Water Framework Directive</del> <b>Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</b> and seek to protect, enhance and manage the water environment; and</p> <p>d. Give consideration to the potential or actual impact of land contamination and support proposals that involve the remediation of contaminated land; and</p> <p>e. <b>Work with utilities providers, East Hertfordshire District Council and relevant agencies to ensure additional wastewater treatment capacity is delivered without harm to protected European sites.</b></p>
MM 048	55	Paragraph 4.136	<p>This Plan also seeks to have regard to the wider water environment. The <del>Water Framework Directive (WFD)</del> <b>Water Environment (Water Framework Directive) Regulations 2017</b><sup>[59]</sup> is a piece of <b>transpose</b> European legislation that requires member states to make plans to protect and improve the water environment. It seeks to improve the condition of all qualifying water bodies to a “good” status and prevent deterioration in the water environment.</p> <p>Footnote:  <sup>[59]</sup>For information on the <b>Water Environment (Water Framework Directive) Regulations 2017</b>, see: <a href="http://www.environment-agency.gov.uk/research/planning/33362.aspx">http://www.environment-agency.gov.uk/research/planning/33362.aspx</a> <a href="http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx">http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx</a> and <a href="https://www.legislation.gov.uk/uksi/2017/407/contents/made">https://www.legislation.gov.uk/uksi/2017/407/contents/made</a></p>
MM 049	56	After paragraph 4.138 (new paragraph)	<p><b>Wastewater from some parts of North Hertfordshire is treated at Rye Meads on the Hertfordshire / Essex border. This site lies within a protected site of European importance and currently has capacity to serve additional development until 2026. We will work with the relevant bodies to ensure long-term wastewater treatment solutions are available which will not have an adverse impact upon the Lee Valley Special Protection Area.</b></p>
MM 050 / FM 069	56	Policy SP12	<p><b>Policy SP12: Green infrastructure, landscape and biodiversity and landscape</b></p> <p>We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will:</p> <p>a. <del>Protect, enhance and manage the green infrastructure network and seek opportunities to create new green infrastructure;</del> <b>Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure;</b></p> <p>x. <b>Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;</b></p> <p>x. <b>Protect, enhance and manage sites in accordance with the following hierarchy</b></p>

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			<p>of designations and features:</p> <ul style="list-style-type: none"> <li>• Internationally designated sites</li> <li>• Nationally designated sites</li> <li>• Locally designated sites;</li> <li>• Non-designated sites that include important habitats and species</li> </ul> <p>b. Protect, enhance and manage biodiversity networks including <b>wildlife corridors, ancient woodlands and hedgerows</b>, wetland and riverine habitats, Local Geological Sites, <b>protected species, priority species and habitats, and non-designated sites of ecological value</b> and <del>seek opportunities for</del> <b>ensure measureable</b> net gains for biodiversity; and</p> <p>c. <del>Consider and respect landscape character and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty</del> <b>Protect other open spaces and support provision of new and improved open space.</b></p>
MM 051	56	Paragraph 4.145	<b>This Plan sets out a clear strategic approach for the protection, enhancement, creation and management of networks of green infrastructure.</b> Green infrastructure refers to all assets within and between towns and villages, both urban and rural. It is a network of multi-functional open spaces, including urban parks, gardens, woodlands, hedgerows, watercourses and associated buffer zones, and green corridors in addition to protected sites, nature reserves and open countryside.
MM 052	57	Paragraph 4.147	Our detailed policies set out our approach to green infrastructure <del>provision in new developments.</del>
MM 053	57	After paragraph 4.147 (new paragraphs)	<p><b>Much of North Hertfordshire is largely unspoilt, with very attractive landscape encompassing a range of natural, man-made and urban and rural spaces. The natural landscape to the west of Hitchin towards Hexton and Lilley follows the escarpment of the Chiltern Hills and part of the District here falls within the Chilterns Area of Outstanding Natural Beauty (AONB). There are also locally important landscapes which contribute to a feeling of remoteness in other parts of the District, for example Lilley Bottom and the East Anglian Heights.</b></p> <p><b>Whilst there are no biodiversity sites designated at the European level in the District, for example Ramsar sites, Special Areas of Conservation or Special Protection Areas, there are a number of nationally designated sites. Strict protection and control will be applied to all national designations in accordance with the conservation of Species and Habitats Regulations (2010). These designations include six Sites of Special Scientific Interest (SSSIs) as shown on the Policies Map and eight designated Local Nature Reserves (LNRs).</b></p> <p><b>Ancient woodland is a nationally agreed designation for land that has been woodland since at least 1600 AD. The District's woodlands will be managed over the plan period to provide recreation and amenity for local residents,</b></p>

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			<p>and also to ensure their survival to benefit biodiversity. Ancient hedgerows are protected by the Hedgerow Regulations 1997 and will be protected and enhanced where possible to ensure their contribution to biodiversity and ecological networks.</p> <p>Species or Habitats of Principal Importance as identified in S41 of the Natural Environment and Rural Communities Act 2006 are defined at the national level and the Hertfordshire Biodiversity Action Plan<sup>x</sup> sets out an approach to biodiversity at the county level. In addition to this, the Hertfordshire Local Nature Partnership (LNP) Guiding Principles have informed the policies in this Plan.</p> <p>The District has over 300 designated Wildlife Sites<sup>y</sup>. The Hertfordshire Environmental Records Centre updates the list of designated Wildlife Sites on a regular basis. Sites identified or designated as Wildlife Sites are afforded protection as sites of substantive nature conservation value.</p> <p>Local Geological Sites are given the same level of protection as Wildlife Sites and are considered important for their educational or historical value. There are currently 11 Local Geological Sites in North Hertfordshire.</p> <p>[Footnote] [x] Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p> <p>[Footnote] [y] Please refer to the list held by the Hertfordshire Environmental Records Centre for the current list of designated Wildlife Sites</p>
MM 054		Paragraph 4.148	<p>There are a wide range of important habitats within North Hertfordshire, including hedgerows, wildflower meadows, orchards, ponds, lakes, reed bed and fen, ancient woodlands in the south, chalk grasslands and chalk streams in the east, and wet woodlands along the River Hiz and its tributaries, <b>and a wildlife corridor which runs in a south-west to north-east direction passing through the northern part of the district which is an important asset of food and habitat for flora and fauna, particularly birds.</b> Many of these habitats are subject to specific designations, reflecting their value in terms of wildlife interest, for instance national sites such as Sites of Special Scientific Interest and Local Nature Reserves, and local sites such as local wildlife sites. <b>The Biodiversity Action Plan for Hertfordshire and the Green Infrastructure Plan for North Hertfordshire identify the importance of such habitats.</b></p>
MM 055		Paragraph 4.150	<p>Much of North Hertfordshire is largely unspoilt, very attractive landscape encompassing a range of natural, man-made and urban and rural spaces. The natural landscape to the west of Hitchin towards Hexton and Lilley follows the escarpment of the Chiltern Hills and part of the District here falls within the Chilterns Area of Outstanding Natural Beauty (AONB).</p> <p>There are also locally important landscapes which contribute to a feeling of remoteness in other parts of the District, for example Lilley Bottom and the East Anglian Heights. Our detailed policies set out how we expect landscape issues to be taken into account.</p>

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MM 056 / FM 070	57	Policy SP13	<p><b>Policy SP13: Historic environment</b></p> <p>The Council will balance the need for growth with the proper protection and enhancement of the historic environment. <b>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting.</b> We will pursue a positive strategy for the conservation and enjoyment of the historic environment through:</p> <ol style="list-style-type: none"> <li>Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting <b>according to their significance;</b></li> <li>Identifying sites on the national register of Heritage at Risk or <b>on the Council's 'At Risk' local-risk-register;</b></li> <li>Periodic reviews of Conservation Areas and other locally designated assets; and</li> <li>Publication of detailed guidance.</li> </ol>
MM 057 / FM 003	60	After Paragraph 4.174 (new paragraph)	<p><b>All strategic sites will be informed by a Strategic Masterplan. We encourage their production to be undertaken pro-actively and collaboratively with the Council and key stakeholders in accordance with Policy SP9 Design and Sustainability and the individual site policy requirements. Planning applications must be accompanied by a Strategic Masterplan, and adherence to it and any further masterplanning and design requirements will be secured through conditions and/or legal agreements.</b></p>
MM 058 / FM 004	61	Policy SP14	<p><b>Policy SP14: Site BA1 – North of Baldock</b></p> <p>Land to the north of Baldock, as shown on the <del>Proposals-Policies</del> Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,800 homes.</p> <p><del>Planning permission for residential-led development will be granted where the following site-specific requirements are met:</del></p> <ol style="list-style-type: none"> <li><del>A site masterplan to be approved prior to the submission of any detailed matters;</del></li> </ol> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.</b></p> <p><b>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</b></p> <p><b>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Development proposals should provide the following planning and master planning requirements:</b></p> <ul style="list-style-type: none"> <li>b. A new <b>mixed use</b> local centre/s to provide for a range of day to day local needs including along with additional neighbourhood-level provision providing of around 500 m<sup>2</sup> (net) class A1 convenience retail provision and 1,400 m<sup>2</sup> (net) of other A-class <b>comparison retail and food and beverage</b> floorspace</li> <li>c. Structural planting to create a sense of place, integration into surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the north and east;</li> <li>d. A new link road connecting the A507 <del>London</del> <b>North</b> Road to the A505 Baldock bypass including a new bridge across the railway;</li> <li>e. Sustainable transport measures to include: <ul style="list-style-type: none"> <li>i. A secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way;</li> <li>ii. Safe access routes to / from, and upgrades to, Baldock station;</li> <li>iii. Sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development; and</li> <li>iv. The use of Bygrave Road / Ashwell Road from the south-western edge of the allocated site to the link road as a sustainable transport corridor; <b>and</b></li> <li>v. <b>comprehensive integration into the existing pedestrian and cycle, public transport and road networks;</b></li> </ul> </li> <li>f. At least 28 serviced plots for self-build development;</li> <li>x. <b>Provision of an appropriate site for a care home for older people in Use Class C2 in accordance with the locational criteria in Policy HS4;</b></li> <li>g. A community hall and GP surgery;</li> <li>h. Up to 6 forms of entry (FE) of additional primary-age and secondary-age education provision;</li> <li>x. <b>Up to 8 forms of entry (FE) of additional secondary-age education provision. A secondary school larger than 6FE will be supported where:</b> <ul style="list-style-type: none"> <li>i. <b>It is located at the south of the allocation site; and</b></li> <li>ii. <b>Safe, sustainable and direct routes to school are provided from Clothall Common;</b></li> </ul> </li> <li>i. Address existing surface water flood risk issues, particularly to the south of Ashwell Road, through SUDs or other appropriate solution;</li> <li>j. Appropriate mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including: <ul style="list-style-type: none"> <li>i. Ivel Springs Local Nature Reserve;</li> </ul> </li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>ii. Bygrave Road local wildlife site; and</li> <li>iii. Identified protected species and priority habitats;</li> <li>k. Built development contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road; and</li> <li>l. Sensitive treatment of heritage assets and their settings including: <ul style="list-style-type: none"> <li>i. An access solution from the A507 <del>London</del> North Road which satisfactorily addresses potential impacts;</li> <li>ii. Retaining framed views of St Mary's Church from within and beyond the site;</li> <li>iii. Using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy; and</li> <li>iv. Ivel Springs Scheduled Ancient Monument</li> </ul> </li> </ul>
MM 059	62	After Paragraph 4.179 new paragraph	<b>At minimum, the site will contain a 6FE secondary school to ensure the demands arising from within the development can be met. A larger school of 8FE would additionally serve existing residents of Clothall Common and adjoining new development. Appropriate measures to ensure pupils can safely and conveniently walk or cycle to school from the south of the railway line will be required to support this scale of provision.</b>
MM 060	62	After Paragraph 4.180 New paragraph	<b>National policy encourages the creation of inclusive and mixed communities meeting the needs of all age groups. A small proportion of plots will be reserved for those wishing to build their own home. Land will also be reserved for a home for older people who need greater levels of care. A minimum of 50-60 bed spaces are likely to be required in order to support the provision of communal facilities and on-site staff. The care home site should be sustainably located close to key facilities in line with the requirements of Policy HS4.</b>
MM 061 / FM 005	63	Policy SP15	<p><b>Policy SP15: Site LG1 – North of Letchworth Garden City</b></p> <p>Land to the north of Letchworth Garden City, as shown on the <del>Proposals</del> <b>Policies</b> map, is allocated as a strategic housing site for a <b>new neighbourhood</b> of approximately 900 homes. Planning permission for residential development will be granted where the following site-specific requirements are met:</p> <ul style="list-style-type: none"> <li>a. A site masterplan to be approved prior to the submission of any detailed matters which also sets out: <ul style="list-style-type: none"> <li>i. How the site will follow and implement Garden City principles</li> </ul> </li> </ul> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. This should follow and implement Garden City principles.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</b></p> <p><b>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</b></p> <p><b>Development proposals should provide the following planning and master planning requirements</b></p> <ul style="list-style-type: none"> <li>ii. The most appropriate points of vehicular access considering landscape and traffic impacts;</li> <li><b>x. How comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured;</b></li> <li>iii. An appropriate education solution <del>with a presumption in favour of on-site provision of</del> <b>which delivers a new 2FE primary school on-site; and</b></li> <li>iv. Any measures required to address nearby heritage assets including the Scheduled Ancient Monument at Radwell Lodge and the Croft Lane and Norton Conservation Areas;</li> <li><b>v. The approach to existing trees and hedgerows around and within the site, with the presumption that trees will be retained and any hedgerow losses kept to a minimum;</b></li> <li>b. Neighbourhood level retail and community facilities <del>providing</del> <b>including</b> around 900 m<sup>2</sup> (net) <del>of A-class floorspace</del> <b>retail and food and beverage floorspace and a GP surgery;</b></li> <li>c. At least 9 serviced plots for self-build development;</li> <li><b>x. Provision of an appropriate site for a care home for older people in Use Class C2 in accordance with the locational criteria in Policy HS4 subject to up-to-date assessment of likely future needs and existing supply</b></li> <li>d. Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>e. Structural planting to create a sense of place, integration into the surrounding landscape and a long-term, defensible Green Belt boundary, particularly to the north-west and east;</li> <li>f. Diversion and / or re-provision of the Letchworth Greenway to provide a revised</li> </ul>

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			<p>route around the new urban edge.</p> <p><b>g. Undertake a detailed odour assessment to demonstrate no adverse impact on future residents and occupants of non residential buildings.</b></p>
MM 063	63	Paragraph 4.189	<p>Sites at this scale generate enough demand to support the provision of new primary schools on-site. <del>The presumption is that</del> site LG1 will follow this principle. However, the irregular shape of the site and the location of surrounding schools <del>and an existing reserve school site in the area</del> mean that this requires further consideration <b>to ensure existing school intake and travel patterns are not unduly affected.</b></p>
MM 064	64	Paragraph 4.190	<p>Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable. <b>Our evidence also identifies a requirement for a new GP surgery in Letchworth to serve new development<sup>[x]</sup>.</b></p> <p><b>[Footnote] [x] Infrastructure Delivery Plan Update (RS Regeneration, 2018)</b></p>
MM 065	64	After Paragraph 4.190 (new paragraph)	<p><b>A small proportion of plots will be reserved for those wishing to build their own home. To ensure sufficient provision of homes for older people, any application should be supported by up-to-date evidence of housing need. This will determine whether it is necessary to make provision for a care home. These normally require a minimum of 50-60 bed spaces in order to support the provision of communal facilities and on-site staff so an accurate picture of existing supply across Letchworth and the wider district will be essential. Any care home site should be sustainably located close to key facilities in line with the requirements of Policy HS4.</b></p>
MM 066	64	Paragraph 4.193	<p>Although parts of the north-eastern boundary are quite clearly defined, there are currently limited features demarcating the north-west and eastern edges of the site. These should be addressed in a comprehensive strategy which limits any harm to <b>existing green infrastructure</b> and the wider landscape, <del>and</del> preserves the setting of nearby heritage assets <del>whilst creating</del> <b>and creates</b> new defensible limits to the town.</p>
MM 067	64	Insert after paragraph 4.194	<p><b>An odour assessment will need to demonstrate that a suitable distance is provided between Letchworth Garden City Water Recycling Centre and sensitive development (defined as buildings which are regularly occupied) as part of the detailed masterplanning of the site.</b></p>
MM 068 / FM 006	65	Policy SP16	<p><b>Policy SP16: Site NS1 – North of Stevenage</b></p> <p>Land to the north of Stevenage within Graveley parish, as shown on the <del>Proposals</del> <b>Policies</b> map, is allocated as a Strategic Housing Site for a <b>new neighbourhood</b> of approximately 900 homes. Planning permission for residential development will be granted where the following site-specific requirements are met:</p> <p>a. A site masterplan to be approved prior to the submission of any detailed matters</p> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>prepared and agreed between the landowner/developer and the Council.</p> <p>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements:</p> <ul style="list-style-type: none"> <li>b. Integration with adjoining development in Stevenage Borough including site-wide solutions for access, <b>sustainable travel</b>, education, retail, and other necessary <b>medical and social infrastructure to include:</b> <ul style="list-style-type: none"> <li>i. <b>2FE of primary-age education provision either wholly within the site or in conjunction with the adjoining land allocated for development in Stevenage Borough ensuring adequate primary school capacity across both sites over the lifetime of the developments;</b></li> <li>ii. <b>Travel provision designed having regard to the Stevenage Mobility Strategy and including:</b> <ul style="list-style-type: none"> <li>• <b>Effective links into the existing pedestrian and cycle, public transport and road networks; and</b></li> <li>• <b>an upgraded junction at the intersection of Graveley Road / North Road; and</b></li> </ul> </li> <li>iii. <b>Neighbourhood-level retail facilities subject to an up-to-date assessment of local demand and supply</b></li> </ul> </li> <li>c. A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>d. At least 9 serviced plots for self-build development;</li> <li>e. Structural planting to create a sense of place, integration into surrounding landscape and a long-term, defensible Green Belt boundary to the north as <del>informed by detailed assessments;</del></li> <li>f. Integration of existing public rights of way to provide routes through the site to the wider countryside including</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>i. Footpath Graveley 006 and Bridleway Gravelly 008 along the perimeter of the site; and</li> <li>ii. Footpath Graveley 007 as a south-east to north-west route through the site and link path from the urban area to the Stevenage Outer Orbital Path; and</li> <li>g. Sensitive consideration of existing settlements, landscape features and heritage assets including: <ul style="list-style-type: none"> <li>i. Graveley village and Conservation Area;</li> <li>ii. The St Nicholas &amp; Rectory Lane Conservation Area <b>including the Grade I listed St Nicholas Church and Rook's Nest</b>; and</li> <li>iii. Chesfield Park.</li> <li>iv. Church of St Etheldreda</li> <li>v. Manor Farm; and</li> </ul> </li> <li><b>h. Detailed design and layout of the site to be informed by site-specific assessments to mitigate any landscape, heritage and Green Belt impacts to the fullest reasonable extent.</b></li> </ul>
MM 069	65	Paragraph 4.196	It is envisaged that principal access to the site will be in the form of a looped estate road, one end of which will be in Stevenage Borough. The northern end of this road will emerge at, or close to, the existing junction of the B197 at Graveley Road / North Road. A new arrangement, possibly a roundabout, will need to be provided. <b>Any transport proposals should consider the effects on adjacent networks and communities such as Graveley, and propose suitable mitigation; the analysis should also consider cumulative impacts.</b>
MM 070	66	After paragraph 4.196 (new paragraphs)	<p><b>The site will need to integrate provision for walkers, cyclists and public transport in line with the aims of the Stevenage Mobility Strategy. This will include connections to the wider sustainable travel network. These measures, along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.</b></p> <p>Development at this scale would normally generate a requirement for the on-site provision of a 2FE primary school. The relationship with the adjoining land in Stevenage means that, in this instance, it may be possible to co-locate education provision for the two schemes to ensure the most effective outcome.</p> <p>Our evidence suggests that the three housing allocations to the north of Stevenage within the District will generate a requirement for two additional GPs<sup>x</sup>. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>patterns of provision within Stevenage.</p> <p>The retail forecasts supporting the plan suggest that approximately 1,300m<sup>2</sup> of retail and food and beverage floorspace could be accommodated within this site to meet the needs arising from the new housing<sup>y</sup>. Equally it is recognised that Site NS1 is located in close proximity to existing and proposed convenience supermarkets and proposed local facilities within Stevenage. Any application should be supported by an up-to-date assessment of local retail requirements to ensure provision within this site is appropriately scaled to meet the needs generated by the development.</p> <p>[x] North Hertfordshire Infrastructure Delivery Plan September 2016 (Updated January 2018)  [y] North Hertfordshire Retail Study Update (Nathaniel Lichfield &amp; Partners, 2016)</p>
MM 071	66	Paragraph 4.200	<p>The site is in close proximity to a number of heritage assets. Sensitive design and layout will be required to ensure that any harm to their settings is minimised. Assessment of any impact upon the historic environment must be comprehensive and should not stop at the administrative boundary. To the south-east of the site, the adjoining land within Stevenage Borough is known colloquially as 'Forster Country' in recognition of author EM Forster. His childhood home of Rook's Nest is Grade I listed with a large part of its historic landscape setting protected by a the St Nicholas' and Rectory Lane Conservation Area. This conservation area also contains and provides the setting for a Grade I listed, twelfth century church.</p>
MM 072 / FM 007	67	Policy SP17	<p><b>Policy SP17: Site HT1 – Highover Farm, Hitchin</b></p> <p>Land to the east of Hitchin, as shown on the <del>Proposals</del> Policies map, is allocated as a strategic housing site for a new neighbourhood of approximately 700 homes. <del>Planning permission for residential development will be granted where the following site-specific requirements are met:</del></p> <p>a. A site masterplan to be approved prior to the submission of any detailed matters</p> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be approved prepared and agreed between the landowner/developer and the Council.</b></p> <p><b>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</b></p> <p><b>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Development proposals should provide the following planning and master planning requirements</b></p> <ul style="list-style-type: none"> <li>b. Neighbourhood-level retail facilities providing approximately 500m<sup>2</sup> (net) of <b>A-class retail and food and beverage</b> floorspace;</li> <li>c. Principal access from Stotfold Road with <del>appropriate integration to the local highway network</del> <b>provision for sustainable modes of transport and comprehensive integration into the existing pedestrian and cycle, public transport and road networks;</b></li> <li>d. At least 7 serviced plots for self-build development;</li> <li>e. <del>On-site</del> <b>Approximately two hectares of land reserved for</b> provision of a new primary school;</li> <li>f. Appropriate separation distances from the adjoining railway embankment to safeguard residential amenity; <del>and</del></li> <li>g. Lower density development and / or green infrastructure provision as informed by detailed landscape assessments at the north of the site to: <ul style="list-style-type: none"> <li>i. Maintain appropriate visual and physical separation between Hitchin and Letchworth Garden City;</li> <li>ii. Address surface water flood risk; and</li> <li>iii. Respect the setting of the scheduled burrows to the north-east.</li> </ul> </li> <li>h. <b>Sensitive consideration of other designated and non-designated heritage assets at Highover Farm including the Grade II listed Threshing Barn;</b></li> <li>i. <b>Undertake Contaminated Land Preliminary Risk Assessment, particularly relating to current and historic agricultural use; and</b></li> <li>j. <b>Undertake ecological appraisal in relation to Stotfold Road Verges and Hitchin Railway Banks Wildlife Sites.</b></li> </ul>
MM 074	68	After paragraph 4.208 (new paragraph)	<b>The Highover Farm complex, at the south-west of the allocation site, is an important and long-evolved complex of agricultural buildings recognised on the Council's register of locally important heritage assets. In 2018, the Threshing Barn, which lies within this complex, was Grade II listed.</b>
MM 075 / FM 008	69	Policy SP18	<p><b>Policy SP18: Site GA2 – Land off Mendip Way, Great Ashby</b></p> <p>Land to the north-east of Great Ashby within Weston parish, as shown on the <del>Proposals</del> <b>Policies</b> map is allocated as a strategic housing site for <b>a new neighbourhood</b> of approximately 600 homes. <del>Planning permission for residential development will be granted where the following site specific requirements are met:</del></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><del>a. A site masterplan to be approved prior to the submission of any detailed matters</del></p> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer, and the Council.</b></p> <p><b>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</b></p> <p><b>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</b></p> <p><b>Development proposals should provide the following planning and master planning requirements</b></p> <ul style="list-style-type: none"> <li>b. Neighbourhood-level facilities providing approximately 500 m<sup>2</sup> (net) of <b>A1-class retail and food and beverage</b> floorspace <b>and other necessary medical and social infrastructure</b>;</li> <li>c. <del>Up to</del> <b>Four hectares of land at the north of the allocation site, broadly bounded by Footpaths Weston 044 and Weston 027 and Dell Spring reserved for education purposes-use to accommodate</b> subject to up-to-date assessments of need including, at minimum, <b>2FE</b> of primary-age provision <b>and 4FE of secondary age provision</b>;</li> <li>d. Principal access from Mendip Way <b>with:</b> <ul style="list-style-type: none"> <li>i. <b>provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy; and</b></li> <li>ii. <b>comprehensive integration into the existing pedestrian and cycle, public transport and road networks;</b></li> </ul> </li> <li>x. <b>Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;</b></li> <li>e. A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>f. At least 6 serviced plots for self-build development;</li> <li>g. Structural planting along the alignment of footpath <del>Weston 044</del> <b>site boundaries</b> as informed by detailed landscape assessments to reinforce the revised Green Belt boundary and mitigate landscape impacts;</li> <li>h. Address existing surface water flood risk issues, particularly running south- east from Dell Spring to Newberry Grove, through SUDs or other appropriate solution;</li> <li>i. Appropriate mitigation, compensation and / or enhancement of key features of biodiversity including:</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>i. Local wildlife sites at Tilekiln Wood, Parsonsgreen Wood, New Spring Wood, Brooches Wood and Claypithills Spring Wood; and</li> <li>ii. Identified protected species and priority habitats; and</li> <li>iii. <b>Retention of green infrastructure connectivity and corridors to the wider countryside;</b></li> <li>j. Integration of existing public rights of way within and adjoining the site to provide routes to the wider countryside including <ul style="list-style-type: none"> <li>i. Footpaths Weston 027 and Weston 044 and Bridleway Weston 033 as features which help define the perimeters of the site; and</li> <li>ii. Footpath Weston 029 as a potential green corridor through the site;</li> </ul> </li> <li>k. Provision of a green infrastructure corridor beneath the current alignment of the pylon lines to <b>respect statutory safety clearance requirements for residential development;</b> and</li> <li>l. Lower intensity development and / or green infrastructure provision to the north of the site to minimise harm to the setting of listed buildings.</li> </ul>
MM 076	69	Paragraph 4.211	Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable. <b>Our evidence identifies that the three housing allocations to the north of Stevenage within the District will generate a requirement for two additional GPs. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed patterns of provision within Stevenage.</b>
MM 077	70	Paragraph 4.213	Development of this site provides the opportunity to address these issues. <b>Reserving sufficient land within this site to deliver 2FE of primary-age and 4FE of secondary-age</b> provision will <del>exceed</del> meet the requirements arising from the site itself and <b>also</b> help alleviate pressures arising from existing and planned development in Great Ashby. <b>Together these will help to create a more sustainable residential neighbourhood at the north-east of Stevenage enabling more short-distance journeys to school.</b>
MM 078	70	Paragraph 4.214	<del>We will continue to work with the landowner and County Council to explore options for secondary school provision in this area. A modest level of secondary age provision, potentially in the form of an all-through school, could provide a local solution for Great Ashby and create a more sustainable residential neighbourhood at the north-east of Stevenage. It is currently anticipated that the secondary element of a new school will not be required before the late 2020s at the earliest. To ensure an appropriately sized site, additional school playing fields would be required on land beyond the allocation boundary to the south-west of Footpath Weston 027 and Warrengreen Wood towards Warrens Green Lane. This land is retained within the Green Belt to ensure appropriate control over any built structures.</del>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 079	70	After Paragraph 4.214 (new paragraphs)	<p><b>The Stevenage Mobility Strategy aims to significantly increase the proportion of journeys undertaken on foot, by bike and by public transport over the plan period. Sites on the edge of Stevenage will need to make appropriate provision for sustainable modes of transport, and appropriate contributions to relevant sustainable travel schemes across the town, to ensure that they meet these aims.</b></p> <p><b>There are local concerns that Back Lane, a narrow minor road which leads to Church Lane in Graveley, could be used by increased numbers of vehicles leaving the site, and that junctions in Graveley itself will suffer from congestion as a result of increased flows. This issue should be specifically addressed in the Transport Assessment for the site as part of the consideration of likely development impacts upon the wider highway network. These measures, along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.</b></p>
MM 081	70	Paragraph 4.216	<p>Distinct areas of woodland lie between the site and the existing development at Great Ashby. These should be sensitively incorporated into the development having regard to their status as local wildlife sites. These woods, <b>and the connections from them to the wider countryside</b>, will be integral to the green infrastructure of the site, <del>which</del> This will also include incorporation of key rights of way.</p>
MM 082	70	Paragraph 4.217	<p>A green infrastructure corridor currently runs through Great Ashby following the alignment of the overhead power lines. This should additionally be carried through the new development to provide a continuous link through the neighbourhood to the wider countryside. <b>The width of the corridor will be informed by the health and safety clearance requirements imposed by National Grid (or any other relevant body).</b></p>
MM 083 / FM 009	71	Policy SP19	<p><b>Policy SP19: Sites EL1, EL2 &amp; EL3 – East of Luton</b></p> <p>Land to the east of Luton, as shown on the <del>Proposals</del> <b>Policies</b> map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,100 homes. Planning permission for residential led development will be granted where the following site-specific requirements are met:</p> <ul style="list-style-type: none"> <li>a. A site masterplan to be approved prior to the submission of any detailed matters</li> </ul> <p><b>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.</b></p> <p><b>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</b></p> <p><b>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Development proposals should provide the following planning and master planning requirements</b></p> <ul style="list-style-type: none"> <li>b. A new <b>mixed use</b> local centre/s to provide for a range of day to day local needs including with additional neighbourhood-level provision providing of around 250 m<sup>2</sup> (net) class A1 convenience retail provision and 850 m<sup>2</sup> of other A class of comparison retail and food and beverage floorspace and other necessary social infrastructure;</li> <li>c. Structural planting to create a sense of place, integration into the surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the east and mitigate landscape impacts;</li> <li>d. Principal access to be taken from Luton Road and integrated into Luton's existing highway network via Crawley Green Road with: <ul style="list-style-type: none"> <li>i. <b>Provision for sustainable modes of transport;</b></li> <li>ii. <b>Comprehensive integration into the existing pedestrian and cycle, public transport and road networks; and</b></li> <li>iii. <b>Appropriate transport mitigation measures secured to address impacts upon Luton</b></li> </ul> </li> <li>e. <del>Up to 4FE</del> of primary-age and <b>4FE</b> of secondary-age education provision to ensure the needs arising from this allocation can be met within the site with any secondary education solution designed so as not to preclude the potential for future expansion;</li> <li>f. <del>At least 21 serviced plots for self build development;</del> <b>Appropriate mechanism(s) to ensure that all the affordable housing derived from the 1,950 homes for Luton's unmet needs address affordable housing needs from Luton Borough;</b></li> <li>g. Built development contained within the Breachwood Ridge and avoiding adverse impacts on the wider landscape of the Lilley Valley or the Chilterns AONB as informed by detailed landscape assessments;</li> <li>h. Integration of existing public rights of way within and adjoining the site to provide routes to the wider countryside including: <ul style="list-style-type: none"> <li>i. Footpath Offley 001 as a route from south-east Luton to the rural area; and</li> <li>ii. Footpaths Offley 039, Offley 002 and Offley 003 as potential north-west to south-east green corridors through the site;</li> </ul> </li> <li>i. Address existing surface water flood risk issues, particularly along the south- western perimeter of the site, through SUDs or other appropriate solution;</li> <li>j. Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces;</li> <li>k. <b>Appropriate</b> <del>M</del>mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including: <ul style="list-style-type: none"> <li>i. The <b>adjoining</b> local wildlife sites at Stubbocks Wood; and</li> </ul> </li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>ii. Priority deciduous woodland habitat at Brickkiln Wood; and</li> <li>l. Sensitive integration of existing settlements and heritage assets, including               <ul style="list-style-type: none"> <li>i. Minimising the visual impacts of development upon the historic parts of Cockernhoe, including relevant listed buildings;</li> <li>ii. Using the location of the Mangrove Green and Cockernhoe areas of archaeological significance to inform a site-wide green infrastructure strategy; and</li> <li>iii. Retaining an appropriate setting to the adjoining Putteridge Bury;</li> </ul> </li> <li><b>m. Undertake Contaminated Land Preliminary Risk Assessment, particularly relating to historic landfill; and</b></li> <li><b>n. Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</b></li> </ul>
MM 084	72	Paragraph 4.219	Three adjoining sites are identified to the East of Luton totalling 2,100 dwellings. Around 150 homes will meet requirements arising from within North Hertfordshire, with the remaining 1,950 homes addressing needs that cannot be physically accommodated within Luton. <b>The contribution towards unmet needs from Luton will include the provision of both market and affordable homes. The District Council will work with Luton Borough Council to secure appropriate mechanisms for nomination rights in any legal agreement(s) relating to the site(s).</b>
MM 085	72	Paragraph 4.222	Our assessments show that this level of development can be accommodated without a significant adverse impact on the wider highway networks of Luton and Hertfordshire <sup>70</sup> . This will be achieved, in part, by ensuring that education needs arising from the allocation will be met within the site itself. <b>In the period beyond 2028, it may prove necessary to expand secondary provision to ensure wider education needs across the rural west of the District can be met. This matter will be kept under review and subject to further investigation and / or planning application(s) at the appropriate time.</b> <sup>[70]</sup> East of Luton Urban Extension Stage 2 – Traffic Modelling Results (AECOM, 2016); Preferred Local Plan Model Testing (AECOM, 2016)
MM 086	72	After paragraph 4.222 New paragraph	<b>The sites will need to integrate provision for walkers, cyclists and public transport in line with the aims of the NHDC Transport Strategy and the sustainable travel strategy set out in the Luton Local Plan. This will include connections to the wider sustainable travel network.</b>
MM 087	72	After paragraph 4.225 New paragraph	<b>East of Luton lies within the Thames Water area with wastewater draining to their facility at East Hyde south east of Luton. Previous work identifies that this treatment works should have sufficient capacity to accommodate this planned development, it is recognised that upgrades to the existing infrastructure network may be required.</b> <b>Scheme promoters should work with Thames Water, and together, to identify the likely nature of infrastructure required to ensure this can be programmed appropriately.</b>
		<b>SECTION 3</b>	<b>DEVELOPMENT MANAGEMENT POLICIES</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification
		<b>CHAPTER 5</b>	<b>ECONOMY AND TOWN CENTRES</b>
MM 088 / FM 071	75	ETC1	<p><b>Policy ETC1: Appropriate uses in Employment Areas</b></p> <p>Within the <del>safeguarded</del> allocated Employment Areas, <del>and the Employment Allocations (BA10 and RY9)</del>, as shown on the <del>Policies Proposals</del> Map, planning permission will be granted <del>where</del> <b>for office, research and development, industrial processes, industrial and storage and distribution uses provided:</b></p> <ol style="list-style-type: none"> <li><del>Within those parts of the Employment Areas designated for business use only, development is for Use Class B1;</del></li> <li><del>Elsewhere within Employment Areas, development is for Use Classes B1, B2 or B8;</del></li> <li><b>For allocated sites</b> any relevant site-specific criteria are met; and</li> <li>Any Use Class B8 development is easily accessible from the primary road network.</li> </ol> <p>Planning permission for other uses will be granted as an exception to the above criteria <del>where</del> <b>provided</b> they are:</p> <ol style="list-style-type: none"> <li>Ancillary to the above uses;</li> <li>Essential to the continued operation of an established premises;</li> <li>Would bring comparable benefits to <b>office, research and development, industrial processes, industrial and storage and distribution</b> <del>a B-class</del> uses in the same location; or</li> <li>Would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time.</li> </ol> <p><b>Conditions and legal agreements will be used to limit uses to ensure that development meets, and will continue to meet, identified employment needs</b></p>
FM 072	75	5.1	<p>Within the four main towns there are a number of established Employment Areas, where the majority of employment premises are located. They include <del>B1 business, B2 general industrial and B8 storage and distribution uses</del> <b>certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses.</b> They are well-established areas and are a valuable resource to the District</p>
MM 089	75	5.4	<p><del>Within the employment areas, certain areas will be reserved for B1 uses such as offices, research and development and light industry only. Due to the constrained nature of the District's Town Centres, and the competition from other land uses, much of the new office development anticipated over the plan period is likely to be within Employment Areas.</del></p>
FM 073	76	5.5	<p>However, the Council recognises that Employment Areas are often sought-after locations for a number of other uses. It is recognised that there is a need for some flexibility to meet the needs of uses, <b>including sui generis uses such as motor trade uses and taxi vehicle depots</b> such as: tyre and exhaust centres, trade wholesalers, vehicle hire, plant hire, <del>motor trade uses and taxi vehicle depots.</del> These are often partial B uses, combining a retail element with a</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>predominantly business, industrial or storage use, or are sui generis<sup>71</sup>. These uses tend to cause conflict in other parts of the towns, such as town centres or residential areas as a result of impacts on residential amenity and living condition.</p> <p><sup>71</sup> 'Sui generis' is a term used to mean any use which does not fall within the use classes defined in the Use Classes Order.</p>
FM 074	76	5.6	<p>Motor vehicle premises, in particular, usually include a mixture of sales and repairs. The sale of motor vehicles tends to provide lower density of employment than normally expected in an employment area. The amount of the retail sales element on larger developments will be restricted in order to protect the availability of, and maximise the use of, employment land. In addition, in order to prevent the change of use of buildings to Class A1 (shops) a condition will be imposed on any relevant grant of permission removing permitted development rights. These considerations apply to the sale of all types of vehicles.</p>
FM 075	76	5.7	<p>Development proposals for uses in employment areas <b>that are not for office, research and development, industrial processes, industrial and storage and distribution uses</b> which seek to make use of the exception criteria of this policy will be considered on their merits. When assessing such proposals, the Council will have regard to (as applicable in each instance):</p> <ul style="list-style-type: none"> <li>• employment generation on site;</li> <li>• impact on relevant town centres, <b>including details of any sequential and / or impact testing;</b></li> <li>• where appropriate, the level and type of retail involved on the site;</li> <li>• any potential benefits to the community or surrounding businesses from the proposed use;</li> <li>• the proportion of the site to be used for sales and display as opposed to repairs and servicing, in the case of motor trade uses;</li> <li>• accessibility by non-car modes of transport; <b>and</b></li> <li>• any evidence clearly demonstrating that: <ul style="list-style-type: none"> <li>• the land or premises is no longer required to meet future employment needs of the District;</li> <li>• the land or premises is inappropriate or unfeasible for employment use, based on market conditions or amenity / living condition problems; and</li> <li>• no other suitable sites outside designated employment areas are viable and available. ; <b>and</b></li> </ul> </li> <li>• <b>details of any sequential and / or impact testing.</b></li> </ul>
FM 076	76	After 5.8 (New paragraph)	<p><b>The Council is required to make provision for sufficient employment land over the plan period. To ensure that development meets identified employment needs, both now and in the future, conditions and legal agreements will be used.</b></p>
MM	77	ETC2	<p><b>Policy ETC2: Employment development outside Employment Areas and Employment Allocations</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
090			<p><b>BA10 and RY9</b></p> <p>Planning permission for employment uses outside of allocated Employment Areas <b>and Employment Allocations BA10 and RY9</b> will be granted <del>where</del> <b>provided that:</b></p> <ol style="list-style-type: none"> <li>a. <del>they are located consistently with the principles of sustainable development;</del> <b>the proposal is:</b> <ol style="list-style-type: none"> <li>i. <b>within a defined settlement boundary or the built core of a Category B village; or</b></li> <li>ii. <b>for small scale offices or other small employment development; and or</b></li> <li>iii. <b>is appropriate to the location in terms of size, scale, function, catchment area and / or historic and architectural character; and</b></li> </ol> </li> <li>b. <del>The proposal is appropriate to the area in terms of size, scale, function, catchment area and / or historic and architectural character;</del></li> <li>c. <del>there would be no significant adverse impacts on living conditions.</del></li> <li>d. <del>if major in scale, evidence is provided that there are no more suitable sites within the existing Employment Areas.</del></li> </ol> <p>The Council will only permit the loss of existing employment uses on unallocated sites, where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>i. the land or premises is no longer required to meet future employment needs of either the local community or the District, <b>demonstrated through evidence of at least twelve months of active marketing;</b></li> <li>ii. the existing use has a significant adverse impact on the amenities of surrounding land uses; or</li> <li>iii. the existing use is detrimental to highway safety.</li> </ol>
MM 091 / FM 077	77	5.9	<p>There are a number of employment sites across North Hertfordshire that are outside the designated Employment Areas <b>and Employment Allocations</b> but which provide sources of local employment and services. These are in other parts of the main towns including town centres, in <del>category A larger</del> villages, and sometimes within category B and C villages or in the countryside following the re-use or redevelopment of agricultural buildings. Some have been there for a long time and may not be in the most appropriate location while others exist perfectly well adjacent to other uses such as residential and / or in their wider setting. <b>Planning Applications seeking non-employment uses on such sites will need to be supported with evidence that at least twelve months of active marketing has been undertaken. This will include an assessment of market signals, including that the marketing has been conducted appropriately given the terms, rental values and / or sales values of the site and similar properties, the benefits of the proposed uses and the impact on the community of such a loss of employment land.</b></p>
MM 092 /	77	ETC3	<p><b>Policy ETC3: New retail, leisure and other main town centre development</b></p> <p>Planning permission for new retail, leisure and other main town centre <del>uses</del> <b>development</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
FM 078			<p>will be granted <b>provided that</b> where:</p> <ol style="list-style-type: none"> <li>The sequential test is passed;</li> <li><b>Where the town centre development is outside of the town centre, an impact assessments is</b> are provided based on locally set <b>the following minimum floorspace</b> thresholds demonstrating there is no unacceptable harm to the vitality or viability of a designated town centre: <ul style="list-style-type: none"> <li><b>Hitchin: 2,500 gross sq.m and above;</b></li> <li><b>Letchworth Garden City: 1,000 gross sq.m gross and above;</b></li> <li><b>Baldock, Royston and elsewhere: 500 gross sq.m and above;</b></li> </ul> </li> <li>Within retail allocation sites, as shown on the <del>Proposals</del> <b>Policies</b> Map, any relevant site-specific criteria are met;</li> <li>The proposal is appropriate to the area in terms of use, size, scale, function, catchment area, historic and architectural character; and</li> <li>There would be no significant adverse impact upon living conditions.</li> </ol> <p><b>The Council will use planning conditions or legal agreements to limit uses to ensure that the identified retail needs are met, and will continue to be met, through the allocated sites.</b></p> <p>[Footnote] * <b>Main town centre uses are defined in the Local Plan Glossary</b></p>
FM 079	78	5.13	<p>In assessing proposals for main town centre uses, we will adopt the 'sequential approach' as set out in Government guidance<sup>74</sup>. Therefore, retail uses will be considered in the following order of preference:</p> <ol style="list-style-type: none"> <li>within the primary or secondary shopping frontages of town centres, on allocated sites within town centres, or in local centres;</li> <li><del>other parts of the town centres;</del></li> <li><del>2.</del> the edge of centres; and</li> <li><del>3.</del> out of centre, only where there are no available, suitable and viable sites which are sequentially preferable.</li> </ol>
MM 093 / FM 080	78	5.16	<p>Nevertheless, the first preference for the location of leisure facilities <b>is within the defined town centre boundaries.</b> encompasses a wider area than retail as leisure uses should not be re-directed from the wider town centre areas to the primary shopping area. Therefore, the first preference for leisure facilities includes both the primary shopping area and wider town centre area.</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 407	78	5.17 (delete)	<del>For other town centre uses the test will start at number two in the list above.</del>
MM 094	78	5.19	<p>This Plan identifies thresholds for the application of the impact test in North Hertfordshire's towns in line with our evidence<sup>76</sup>. Applications for main town centre uses on sites outside the town centres, not otherwise in accordance with the development plan and exceeding the thresholds in <b>Policy ETC3 below</b> must also be assessed against the impact considerations set out in Government guidance before planning permission will be granted.:</p> <ul style="list-style-type: none"> <li>• Hitchin: 2,500m<sup>2</sup> and above</li> <li>• Letchworth Garden City: 1,000m<sup>2</sup> and above</li> <li>• Baldock, Royston and elsewhere: 500m<sup>2</sup> and above</li> </ul> <p>[Footnote] <sup>76</sup>North Hertfordshire Town Centre and Retail Study Update (NLP, 2016)</p>
FM 081	78	After 5.19 (New Paragraph)	<b>The Council is required to make provision for sufficient retail land over the plan period. To ensure that development meets identified retail needs, both now and in the future, conditions and legal agreements will be used.</b>
MM 095 / FM 082	79	ETC4	<p><b>Policy ETC4: Primary Shopping Frontages</b></p> <p>Town Centre boundaries for Hitchin, Letchworth Garden City and Royston are shown on the <del>Proposals</del> <b>Policies</b> Map. Within the designated Primary Shopping Frontages, planning permission will be granted at ground-floor level:</p> <ol style="list-style-type: none"> <li>For <del>shops retail A1 uses</del>; or</li> <li>Exceptionally <del>For an A3 or similar</del> <b>other main town centre uses<sup>x</sup> if they do it does not, individually or cumulatively, undermine the retail function of the centre and where the proposal will attract people to the centre, enhancing in the daytime or detract from the centre's vitality and viability.</b></li> </ol> <p>[Footnote] <sup>x</sup> <b>Main town centre uses are defined in the Local Plan Glossary</b></p>
MM 096 / FM 083	79	ETC5	<p><b>Policy ETC5: Secondary Shopping Frontages</b></p> <p>In the Secondary Shopping Frontages of Hitchin, Letchworth Garden City, Baldock and Royston, as shown on the <del>Proposals</del> <b>Policies</b> Map, planning permission will be granted at ground-floor level:</p> <ol style="list-style-type: none"> <li>For <del>retail, professional services and restaurants (A1, A2, or A3)</del> <b>shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways</b>; or</li> <li>Exceptionally <del>For other main town centre uses<sup>x</sup> if they do, it does not</del> <b>individually or cumulatively, undermine the retail function of the centre and where the-</b></li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>proposal will attract people to the centre, enhancing or detract from the centre's vitality and viability.</p> <p>[Footnote] * <b>Main town centre uses are defined in the Local Plan Glossary</b></p>
FM 084	79	5.21	Too many non-retail A1 uses can create 'dead frontages' (units not normally open during normal shopping hours or which attract relatively few customers), reduce the interest and attraction of the primary shopping area, and harm the retail function. This is particularly a problem where there are a number of units in a row which are not shops. This is something the Council is keen to prevent.
FM 085	80	5.23	Within Primary Frontages we will retain the attractiveness of the essential and continuous shopping cores of our town centres; only <b>shops retail (A1)</b> will generally be permitted here.
MM 097 / FM 086	80	5.24	For Secondary Frontages, the policy is more flexible, allowing <b>shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways,</b> retail, office and restaurant (A1, A2, and A3) uses based on their contribution to vitality and viability and their ability to attract people to the centre. <del>Other uses such as pubs (A4) and hot food takeaways (A5) can add to an areas attractiveness and vitality, however, control is needed to ensure that these uses do not detract from the centre and affect the shopping pattern.</del>
MM 098 / FM 087	80	5.25	Evidence in the form of predicted footfall, opening times and linked trips will be required for any application seeking to meet <b>part b of policies ETC4 and ETC5 to assess the impact upon daytime retail function, vitality and viability</b> the exception criteria. Where a shop unit has been vacant for an extended period of time (normally at least <del>six months</del> <b>one year</b> ), documentary evidence should demonstrate that all reasonable attempts to sell or let the premises for the preferred use(s) <b>as set out in part a. of Policies ETC4 and ETC5</b> have failed.
MM 099 / FM 088	80	ETC6	<p><b>Policy ETC6: Local Centres</b></p> <p>Within Local Centres, as shown on the <b>Policies Proposals</b> Map or identified in approved masterplans <b>for the strategic site allocations</b>, planning permission will be granted where:</p> <ol style="list-style-type: none"> <li>It is for a <b>shop, financial and professional services, café or restaurant, pub or drinking establishment, takeaway or use classes F1 or F2</b> use class A1, A2, A3, A4, A5, D1 or D2 at ground floor level; and</li> <li>The centre would continue to provide a range of uses, <del>with the majority of units being retained in A1 use</del> <b>including shops to meet day-to-day needs and the vitality and viability of the centre would be maintained;</b> and</li> <li>Any change of use from class A1 would: <ol style="list-style-type: none"> <li>maintain the general vitality and viability of the centre; and</li> <li>not seriously diminish the provision of local shopping facilities.</li> </ol> </li> </ol> <p>Proposals for over 500 sq.m m<sup>2</sup> gross will not generally be suitable in local centres.</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
FM 089	80	5.29	The Council considers that it is important that the neighbourhood centres continue to provide a mix of shopping, services and community facilities, and in particular retail units. A predominance of shops is considered to be necessary to secure <b>the</b> future viability of these centres. However, some non-retail uses may be appropriate in the centres where <b>local community retail needs are already met</b> <del>this does not harm the mainly retail function.</del>
FM 090	81	5.31	Where a vacant shop premises is subject to a proposed change of use <b>where planning permission is required</b> , then documentary evidence will be necessary to show that all reasonable attempts to sell or let it for use as a shop for a year or more have failed. If there are other vacant units in the centre this will also be taken into account.
MM 100 / FM 092	100	Policy ETC7	<p><b>Policy ETC7: Scattered Local community shops and services in towns and villages</b></p> <p>Planning permission for small-scale proposals providing new shops and services <del>will be granted within existing settlements to serve the day-to-day needs of the local community as an exception to the sequential approach set out in Policy ETC3(a)</del> <b>will be granted where:</b></p> <ul style="list-style-type: none"> <li>• <b>The site is within a defined settlement boundary;</b></li> <li>• <b>In the case of Category B villages, the site is within the built core; or</b></li> <li>• <b>In the case of Category C settlements, the proposed development meets the criteria of Policy CGB2b.</b></li> </ul> <p><b>280 sqm will generally be used as a guide to determine small scale. This reflects the Use Classes Order 2020 and recognises that some such facilities will fall within Class E or other use classes.</b></p> <p>Planning permission for the loss or change of use of any shops, services or facilities outside the defined retail hierarchy will be granted where:</p> <ol style="list-style-type: none"> <li>a. there is another shop, service or facility of a similar use available for customers within an <b>800m convenient</b> walking distance; and</li> <li>b. the proposed replacement use would complement the function and character of the area.</li> </ol> <p>An exception to criterion (a) above will only be permitted if it can be demonstrated that the unit is <b>no longer required to meet the needs of the local community, including through evidence of at least twelve months active marketing.</b> <del>has remained vacant for a year or more, and documentary and viability evidence has been provided that all reasonable</del></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			attempts to sell or let the premises for similar uses in that period have failed.
MM 101	81	5.34	New facilities of an appropriate scale and location within <del>Category A and Category B</del> <b>villages, towns, villages and smaller settlements</b> will generally be supported <b>subject to meeting the criteria of Policy CGB2b where applicable without the need for sequential testing of alternate locations.</b>
MM 408	81	Paragraph 5.36	These facilities should be protected wherever possible and the policy seeks to prevent their loss. However, where it can be shown such facilities are no longer needed and not viable, then permission may be granted for a change of use. <b>Planning Applications seeking a change of use that is not for shops, services or similar facilities will need to be supported with evidence that at least twelve months of active marketing has been undertaken. This will include an assessment of market signals, including that the marketing has been conducted appropriately given the terms, rental values and / or sales values of the site and similar properties, the benefits of the proposed use(s) and the impact on the community of such a loss of shops, services or similar facilities.</b>
MM 102	82	ETC8	<p><b>Policy ETC8: Tourism</b></p> <p>Planning permission for tourism-related development will be granted as an exception, <b>subject</b> to the sequential approach set out in Policy ETC3(a) where it:</p> <ol style="list-style-type: none"> <li>increases the attractiveness of the District as a tourist destination;</li> <li>improves visitor accommodation; or</li> <li>delivers sustainable tourist and visitor attractions in appropriate locations.</li> </ol> <p><del>In the rural area outside settlement boundaries proposals will need to evidence why they can not be accommodated within existing settlements and how they will support the rural economy.</del></p>
MM 103	82	5.41	<del>Although</del> <b>The district of North Hertfordshire is itself not a major tourist destination, the inclusion of a tourism policy reflects this sector's growing significance as a form of economic development and its potential to diversify both urban and rural economies. However,</b> there are a wide range of attractions in the District, particularly those based on heritage and the countryside. Some, such as Letchworth, the world's first Garden City, Royston Cave and the British Schools <b>and Museum</b> in Hitchin are unique. Knebworth House and <b>its grounds are</b> a major day visitor destination <b>in the region and unique nationally in their capacity for large music. The inclusion of a tourism policy reflects this sector's growing significance as a form of economic development, and its potential to diversify both urban and rural economies.</b>
		<b>CHAPTER 6</b>	<b>COUNTRYSIDE AND GREEN BELT</b>
MM 104	84	Policy CGB1	<p><b>Policy CGB1: Rural Areas beyond the Green Belt.</b></p> <p>In the Rural Areas beyond the Green Belt, as shown on the <del>Proposals</del> <b>Policies Map,</b> planning permission will be granted <del>where</del> <b>provided that</b> the development:</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>a. Is <b>infilling development which does not extend within</b> the built core of a Category B village;</li> <li>b. Meets a proven local need for community facilities, <del>and services or rural</del> <b>affordable housing in an appropriate location;</b></li> <li>c. Is strictly necessary for the needs of agriculture or forestry;</li> <li>d. Relates to an existing rural building;</li> <li>e. Is a modest proposal for rural economic development or diversification; or</li> <li>f. Would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area.</li> </ul>
MM 105	84	Paragraph 6.1	<p>The Rural Area beyond the Green Belt covers the countryside to the east <b>and north</b> of the District that lies outside of the towns and <del>Category A</del> <b>larger</b> villages identified in Policy SP2. These areas do not meet the necessary criteria to be designated as Green Belt, but it is still necessary to impose restraints on development to prevent inappropriate schemes<sup>x</sup>.</p> <p><b>[new footnote] <sup>x</sup> The Council’s definition of “Rural Areas beyond the Green Belt” is not intended to replicate the NPPF definition of “rural areas” which also includes development within villages, as covered by other policies of this Plan.</b></p>
MM 106	84	Paragraph 6.2	<p><b>Policy CGB1 sets out the broad typologies of development considered acceptable within the Rural Area Beyond the Green Belt.</b> Where schemes <b>fall within</b> meet one or more of the <del>criteria</del> <b>categories</b> above, they will be judged against other relevant policies of the Plan.</p>
MM 107	84	Policy CGB2	<p><b>Policy CGB2: Exception sites in rural areas</b></p> <p>Planning permission for community facilities and services or affordable housing</p> <ul style="list-style-type: none"> <li>• <del>Adjoining Category A villages;</del></li> <li>• <del>Beyond the built core of Category B villages; or</del></li> <li>• <del>Within Category C settlements will be granted where:</del> <ul style="list-style-type: none"> <li>a. <del>It meets a proven local need as identified through a parish survey or other relevant study;</del></li> <li>b. <del>There are no reasonable alternate, suitable and available sites within the defined settlement boundaries of relevant towns or Category A villages or the built core of relevant Category B villages;</del></li> <li>c. <del>he proposal would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;</del></li> <li>d. <del>The proposed development would not have a substantial adverse impact on the openness or general policy aims of the Green Belt or Rural Area beyond the Green Belt; and</del></li> <li>e. <del>The public benefit of the proposal outweighs any harm that might arise against these aims.</del></li> </ul> </li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><del>f. The provision of limited market housing to cross-subsidise schemes under this policy will be granted planning permission in exceptional circumstances where it can be demonstrated that the level of market housing proposed is strictly necessary to make the required development deliverable and would accord with criteria (d) and (e) of this policy.</del></p>
MM 108	84	Policy CGB2 – New policies	<p><b>Policy CGB2a: Exception sites for affordable housing in the Green Belt</b></p> <p>Planning permission for limited affordable housing in the Green Belt</p> <ul style="list-style-type: none"> <li>• Adjoining Category A villages; or</li> <li>• Beyond the built core of Category B villages;</li> </ul> <p>will be granted provided that the land is identified for such development in a Neighbourhood Plan or:</p> <ol style="list-style-type: none"> <li>a. It meets a proven local need as identified through a parish survey or other relevant study;</li> <li>b. There are no reasonable alternate, suitable and available sites:               <ol style="list-style-type: none"> <li>i. within the defined boundaries of the relevant Category A settlement or the built core of the relevant Category B village; or</li> <li>ii. otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified;</li> </ol> </li> <li>c. The proposal would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;</li> <li>d. The proposed development would not have a substantial adverse impact on the openness or general policy aims of the Green Belt; and</li> <li>e. The public benefit of the proposal outweighs any harm that might arise against these aims.</li> </ol> <p>Development permitted in Category C settlements within the Green Belt under Policy SP2 will also need to meet criteria (a) to (e) above.</p> <p><b>Policy CGB2b: Community facilities, services and affordable housing in the Rural Area Beyond the Green Belt</b></p> <p>Planning permission for community facilities, services or affordable housing in the Rural Area Beyond the Green Belt</p> <ul style="list-style-type: none"> <li>• Adjoining Category A villages; or</li> <li>• Beyond the built core of Category B villages</li> </ul> <p>will be granted provided that the land identified for such development in a Neighbourhood Plan or:</p> <ol style="list-style-type: none"> <li>a. it meets a proven local need as identified through a parish survey or other relevant study;</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>b. there are no reasonable alternate, suitable and available sites:</p> <ol style="list-style-type: none"> <li>i. within the defined boundaries of the relevant Category A settlement or the built core of the relevant Category B village; or</li> <li>ii. otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified;</li> </ol> <p>c. any affordable housing would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;</p> <p>d. the proposed development would not have a substantial adverse impact on the openness or general policy aims of the Rural Area beyond the Green Belt; and</p> <p>e. the public benefit of the proposal outweighs any harm that might arise against these aims.</p> <p>Development permitted in Category C settlements in the Rural Area Beyond the Green Belt under Policy SP2 will also need to meet criteria (a) to (e) above</p> <p>The provision of limited market housing to cross-subsidise schemes under this policy will be granted planning permission in exceptional circumstances where it can be demonstrated that the level of market housing proposed is strictly necessary to make the required development deliverable and would accord with criteria (d) and (e) of this policy.</p>
MM 109	85	Paragraph 6.5	This Plan proactively identifies a range of development allocations across the District. These will all be expected to contribute towards affordable housing provision <b>and, where justified, new infrastructure</b> resulting in a significant boost in new homes <b>and facilities</b> for local needs.
MM 110 / FM 093	85	6.6	However, on occasion a small-scale need may still be identified for affordable housing or other types of community facilities to meet rural needs which cannot be met within the <b>adjusted settlement boundaries of the</b> main towns and villages. This policy continues North Hertfordshire's historic approach of allowing specified development on exception sites.
MM 111	85	Paragraph 6.9	A number of the settlements identified in Policy SP2 are located relatively closely to one another and it may be possible to meet any such needs more sustainably in nearby settlements. In justifying the exception site, applicants should have regard to actual and potential sites <b>both within the parish where development is proposed and in other, nearby locations. In assessing compliance with criterion b of the policies, the Council will have regard to potential alternate sites within both a 15 minute drive time and a 30 minute journey time using passenger transport where the locations are connected by a route providing at least five services per weekday.:</b> <ul style="list-style-type: none"> <li>• <del>Within the parish where the development is proposed</del></li> <li>• <del>In immediately adjoining parishes and towns; and</del></li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified</li> </ul>
MM 112	86	Policy CGB3	<p><b>Policy CGB3: Rural workers' dwellings</b></p> <p>Planning permission for <b>isolated</b> new homes <b>in the countryside</b> to support existing agricultural, forestry and other rural businesses will be granted <del>where</del> <b>provided that</b>:</p> <ol style="list-style-type: none"> <li>there is a clearly established existing functional need;</li> <li>the unit and the rural business concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and should remain so;</li> <li>the functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and</li> <li>the proposal responds appropriately to the site's local context <b>and the needs of the business</b> in terms of design, scale and function.</li> </ol> <p><b>Where accommodation is proposed in association with a new business, applicants will need to demonstrate the business is viable with secure future prospects as an exception to criterion (b).</b></p> <p><b>If a new home is deemed essential to support a rural business, it should first be permitted through a time-limited permission, or temporary accommodation such as a caravan. Permission for permanent dwellings will normally only follow in the event of a persistent need.</b></p> <p><b>Any temporary or permanent home will be restricted to the occupancy of a worker associated with the business.</b> Planning permission for the removal of agricultural occupancy conditions will only be granted where:</p> <ol style="list-style-type: none"> <li>the circumstances which led to the imposition of the relevant condition(s) have significantly changed;</li> <li>the building is demonstrably not required or suitable for an agricultural or rural business use; and</li> <li>it is clearly evidenced that there is no further need in the locality for an agricultural worker's dwelling.</li> </ol> <p><b>Where proposals are for development that would be inappropriate in the Green Belt, this policy will be used to help consider and assess any case of very special circumstances.</b></p>
MM 113	86	Paragraph 6.17 (delete)	<p><del>If a new home is deemed essential to support a rural business, it should first be permitted through a time-limited permission, or temporary accommodation such as a caravan.</del></p> <p><del>Permission for permanent dwellings will normally only follow in the event of a persistent need. Any temporary or</del></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			permanent home will be restricted to the occupancy of a worker associated with the business.
MM 114	87	Policy CGB4	<p><b>Policy CGB4: Existing rural buildings in the Rural Area Beyond the Green Belt</b></p> <p>Planning permission for the re-use, replacement or extension of buildings in the <del>Green Belt or Rural Area</del> beyond the Green Belt will be granted <del>where</del> <b>provided that</b>:</p> <ol style="list-style-type: none"> <li>any existing building to be converted <b>for re-use</b> does not require major extension or reconstruction;</li> <li>the resultant building(s) do not have a materially greater impact on the openess, purposes or general policy aims of the <del>Green Belt or Rural Area</del> beyond the Green Belt than the original building(s); and</li> <li>any outbuilding(s) are sited as close as possible to the main building(s) and visually subordinate to them.</li> </ol>
MM 115	87	After paragraph 6.21 (new paragraph)	<b>National policy provides clear guidance on proposals for the re-use, replacement or extension of buildings in the Green Belt which will be used, alongside the detailed design policies of this plan for relevant applications.</b>
MM 116	87	Paragraph 6.22	<b>We consider that a broadly consistent approach is also justified in the Rural Area Beyond the Green Belt to <del>in</del> these cases, we will ensure that similar proposals do not cause harm to the rural area.</b> Such harm may come from a variety of sources. The extension, alteration or replacement of buildings can change their character negatively, for example where a modest cottage, over time, becomes a mansion.
MM 117	88	Policy CGB5	<p><b>Policy CGB5: Urban Open Land</b></p> <p>In areas of Urban Open Land, as shown on the <del>Proposals</del> <b>Policies</b> Map, planning permission will be granted <del>where</del> <b>provided that</b> the development:</p> <ol style="list-style-type: none"> <li>Would provide land or limited ancillary built facilities for: <ul style="list-style-type: none"> <li>outdoor sport, outdoor recreation or cemeteries;</li> <li>rural land uses or buildings appropriate in an urban fringe location; or</li> <li>landscaping, <b>essential transport infrastructure</b> or other earthworks associated with the development of adjoining allocated sites;</li> </ul> </li> <li>Is low intensity in nature; and</li> <li>Would maintain openess and respect the transition from the urban area to the rural area beyond.</li> </ol>
MM 118	88	Paragraph 6.28	However it is also recognised that, in appropriate circumstances, this land could provide opportunities for the location of <b>access roads or other transport infrastructure</b> , general landscaping, school playing fields, sports pitches or other low-intensity uses associated with nearby development and / or the adjoining settlements. Where such uses are sought within Urban Open Land, all reasonable attempts should be made to maintain openess and

Ref.	Page (LP1)	Policy / Paragraph	Modification																		
			careful consideration should be given to the scale of any ancillary <b>buildings</b> and treatments such as boundary fencing or bunding.																		
		<b>CHAPTER 7</b>	<b>TRANSPORT</b>																		
MM 119	89	Policy T1	<p><b>Policy T1: Assessment of transport matters</b></p> <p>Planning permission will be granted <b>provided that where:</b></p> <ul style="list-style-type: none"> <li>a. Development would not <del>adversely</del> <b>lead to highway safety problems or cause unacceptable</b> impacts upon <b>the highway network and safety;</b></li> <li>b. Mechanisms to secure any necessary sustainable transport measures and / or improvements to the existing highway network are secured in accordance with Policy SP7;</li> <li>c. Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required; and</li> <li>d. For major developments, applicants demonstrate (as far as is practicable) how: <ul style="list-style-type: none"> <li>i. the proposed scheme would be served by public transport; <del>and</del></li> <li>ii. safe, direct and convenient routes for pedestrians and cyclists will be provided; <b>and</b></li> <li>iii. <b>comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured.</b></li> </ul> </li> </ul>																		
FM 094	91	After 7.4 (Table 1)	<table border="1"> <thead> <tr> <th></th> <th>Transport Statement</th> <th>Transport Assessment</th> </tr> </thead> <tbody> <tr> <td>Residential (<del>C3</del>)</td> <td>&gt;50 homes</td> <td>&gt;80 homes</td> </tr> <tr> <td>Business (<del>Use Class B1</del>)</td> <td>&gt;1,500m2 Gross Floor Area (GFA)</td> <td>&gt;2,500m2 GFA</td> </tr> <tr> <td>Industrial (<del>B2</del>)</td> <td>&gt;2,500m2 GFA</td> <td>&gt;4,000m2 GFA</td> </tr> <tr> <td>Warehousing (<del>B8</del>)</td> <td>&gt;3,000m2 GFA</td> <td>&gt;5,000m2 GFA</td> </tr> <tr> <td>Non-food retail</td> <td>&gt;800m2 GFA</td> <td>&gt;1,500m2 GFA</td> </tr> </tbody> </table>		Transport Statement	Transport Assessment	Residential ( <del>C3</del> )	>50 homes	>80 homes	Business ( <del>Use Class B1</del> )	>1,500m2 Gross Floor Area (GFA)	>2,500m2 GFA	Industrial ( <del>B2</del> )	>2,500m2 GFA	>4,000m2 GFA	Warehousing ( <del>B8</del> )	>3,000m2 GFA	>5,000m2 GFA	Non-food retail	>800m2 GFA	>1,500m2 GFA
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MM 120	90	Policy T2	<p><b>Policy T2: Parking</b></p> <p>Planning permission will be granted <b>provided that where:</b></p> <ul style="list-style-type: none"> <li>a. Parking <b>for residential development</b> is provided in accordance with the minimum standards set out in <b>Appendix 4</b> of this Plan;</li> <li>x. <b>Parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document;</b></li> <li>b. Proposals have regard to relevant Supplementary Planning Documents, strategies or advice and;</li> <li>c. Applicants clearly identify how they provide for all likely types of parking demand <b>and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.</b></li> </ul> <p><b>Variations from these standards will only be considered where applicants can demonstrate that the</b></p>																		

Ref.	Page (LP1)	Policy / Paragraph	Modification								
			accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.								
MM 122	91	After paragraph 7.16 (new paragraph)	The policy also introduces some flexibility in the application of the standards. Where development proposals seek to reduce the standard, applicants will be required to demonstrate justification for such variation based on the principles of the NPPF (paragraph 39) and taking into consideration impact on on-street conditions such as highway safety, available on-street capacity as well as likely pedestrian and environmental impacts.								
		<b>CHAPTER 8</b>	<b>HOUSING STRATEGY</b>								
MM 125	92	Policy HS2	<p><b>Policy HS2: Affordable housing</b></p> <p>Planning permission for new homes will be granted where provided that:</p> <p>a. Affordable housing provision is</p> <ol style="list-style-type: none"> <li>i. maximised having regard to provided in accordance with the following targets <b>subject to viability</b> set in this policy:</li> </ol> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th><i>Size of site (gross dwellings)</i></th> <th><i>Target percentage of dwellings to be affordable</i></th> </tr> </thead> <tbody> <tr> <td><b>11 – 14 dwellings</b></td> <td><b>25%</b></td> </tr> <tr> <td><b>15 – 24 dwellings</b></td> <td><b>35%</b></td> </tr> <tr> <td><b>25 or more dwellings</b></td> <td><b>40%</b></td> </tr> </tbody> </table> <ol style="list-style-type: none"> <li>ii. made delivered on-site unless robustly justified; and</li> <li>iii. genuinely affordable to local people where rents or prices are linked to open-market values</li> </ol> <p>b. The size, type and tenure of any affordable housing meets has regard to:</p> <ol style="list-style-type: none"> <li>i. the Council's <b>expectation</b> starting point for negotiation that 65% of the <b>affordable housing required by criterion (a)(i)</b> homes will be rented and 35% other forms of affordable housing;</li> <li>ii. the housing needs of the area <b>including needs identified by relevant local authority housing register data, Neighbourhood Plans and any settlement- or parish-level surveys or assessments; and</b></li> <li>iii. the likely affordability of any affordable housing provision in real terms;</li> <li>iv. relevant local authority housing register data; and</li> <li>v. the requirements of Policy HS3 and <b>will contribute to an appropriate the proposed</b> mix of housing across the site as a whole;</li> </ol> <p>c. The affordable housing is secured for first and subsequent occupiers through an appropriate condition or legal agreement providing for</p>	<i>Size of site (gross dwellings)</i>	<i>Target percentage of dwellings to be affordable</i>	<b>11 – 14 dwellings</b>	<b>25%</b>	<b>15 – 24 dwellings</b>	<b>35%</b>	<b>25 or more dwellings</b>	<b>40%</b>
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Ref.	Page (LP1)	Policy / Paragraph	Modification								
			<p>i. the retention of dwellings through the Council, a registered provider or similar body agreed with the Council; and</p> <p>ii. where appropriate, review mechanisms</p> <p>d. Relevant Supplementary Planning Documents, strategies or advice have been taken into account.</p> <p>Where development of a site is phased or divided into separate parts, or could reasonably be considered part of a larger development which would exceed the thresholds, it will be considered as a whole for the purposes of affordable housing provision.</p> <table border="1"> <thead> <tr> <th><i>Size of site (gross dwellings)</i></th> <th><i>Target percentage of dwellings to be affordable</i></th> </tr> </thead> <tbody> <tr> <td>11—14 dwellings</td> <td>25%</td> </tr> <tr> <td>15—24 dwellings</td> <td>35%</td> </tr> <tr> <td>25 or more dwellings</td> <td>40%</td> </tr> </tbody> </table>	<i>Size of site (gross dwellings)</i>	<i>Target percentage of dwellings to be affordable</i>	11—14 dwellings	25%	15—24 dwellings	35%	25 or more dwellings	40%
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MM 126	93	Paragraph 8.8	Affordable housing is provided for those who cannot access open market housing. It includes social rented and affordable rented housing and intermediate housing, such as shared ownership schemes <b>or other models where they meet the definition of Affordable Housing set in national policy. Affordable Housing is normally delivered in partnership with Registered Providers who assume long-term responsibility for the homes and can include schemes built through Community Land Trusts or other forms of co-operative provision.</b> It is secured with planning conditions and legal agreements to make sure that the benefit of the housing continues in the long term.								
MM 127	94	Paragraph 8.11	Our general expectation is that any affordable housing provision required and secured under this policy will be made on site. Although sites of between 10 and 14 units will deliver relatively low numbers of affordable homes, Registered Providers operating in the District are normally willing to take on these small groups of new homes. The onus will be firmly upon the applicant to <del>demonstrate that any exceptional circumstances exist to</del> <b>robustly</b> justify off-site provision <b>or</b> contributions in lieu. <del>or, on</del> <b>On Strategic Housing Sites, or other large schemes, a phased approach to affordable housing delivery will normally only be agreed where this is critical to ensuring viability and / or the provision of supporting infrastructure. The justification for any of these approaches will need to demonstrate how the scheme would contribute to the objective of delivering mixed and balanced communities.</b>								
MM 128	94	Paragraph 8.12	Our normal approach will be to request 65% rented tenures and 35% other tenures for affordable housing to meet the needs of local people <b>and ensure viability.</b> <del>This will be used as a starting point for negotiation, but this-</del> <b>This</b> may change as the plan period progresses <b>in response to new evidence</b> or to reflect site-specific circumstances.								
MM 129	94	Paragraph 8.13	The strength of local house prices means that affordable housing products which are linked to open-market sales or rental values will remain out of reach for many households and this issue will need to be taken into consideration.								

Ref.	Page (LP1)	Policy / Paragraph	Modification
			Affordable rent for larger (3+ bed) properties will normally be capped at below 80% of the local market rent. For shared ownership products, the most appropriate initial purchase percentages will be assessed on a case-by-case basis based upon local sales values. The Council will also consider the likely impacts of any proposed service (or other) charges in determining affordability.
MM 130	94	After paragraph 8.15 (new paragraph)	All affordable housing will be secured through legal agreements. Where appropriate, these agreements will include mechanisms to ensure that those with local connections are given appropriate priority in the allocation of homes. This is particularly relevant for schemes outside of the main towns where occupants of affordable housing on both allocated and exception sites may need to demonstrate a connection either to the parish in which the housing is to be provided, or to another nearby parish where a specific need for affordable housing has been identified. A local connection to the District is normally required to be eligible for inclusion on the housing waiting list.
MM 131	95	Policy HS3	<p><b>Policy HS3: Housing mix</b></p> <p>Planning permission for new homes will be granted <del>where provided that:</del></p> <p>a. An appropriate range of house types and sizes are provided taking into account:</p> <ul style="list-style-type: none"> <li>x. <b>the overall targets of this plan;</b></li> <li>i. the findings of the most up-to-date <b>evidence including the most recent Strategic Housing Market Assessment, the Council's Self-Build Register and other relevant evidence of housing need;</b></li> <li>ii. the location and accessibility of the site; and</li> <li>iii. recent completions, existing permissions and sites in the five year supply; and</li> </ul> <p>b. The scheme would provide a density, scale and character of development appropriate to its location and surroundings.</p>
MM 132	95	Paragraph 8.18	National policy requires local plans to provide for a mix of housing that meets the requirements of different groups within the community <sup>[92]</sup> . <del>Having regards to our evidence, we will seek</del> <b>Current evidence suggests it is most appropriate to deliver target</b> a broad balance between smaller (defined as 2-bed or less) and larger (3-bed or more) homes over the plan period.  <sup>[92]</sup> Paragraph 50 of the NPPF
MM 133	95	Paragraph 8.20	On most suburban and edge-of-settlement sites, applicants should therefore make an initial assumption of 60% larger (3+ bed) and 40% smaller (1 or 2 bed) homes to ensure an overall mix is achieved. The most appropriate solution will be considered on a site-by-site basis having regard to this, <b>up-to-date evidence of housing need</b> , the criteria set out above and the outcomes from applying Policy HS2.

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 134	96	Policy HS4	<p><b>Policy HS4: Supported, sheltered and older persons housing</b></p> <p>Planning permission for sheltered and supported housing in uses classes C2 and C3 will be granted <del>where</del> <b>provided that</b>:</p> <ol style="list-style-type: none"> <li>There is good access to local services and facilities;</li> <li>The site is well served by public transport;</li> <li>Appropriate levels of on-site landscaping, amenity space and car parking (for residents, visitors and staff) are provided; and</li> <li>It would accord with Policy HS3(b).</li> </ol> <p>Planning permission for residential developments of 100 units or more will be granted where <b>provided that an element of accommodation within Use Class C3 for older persons housing is included under the requirements of Policy HS3(a) where this would be consistent with criteria (a) to (d) above.</b>; and</p> <ol style="list-style-type: none"> <li><del>An element of accommodation within Use Class C3 for older persons housing is included under the requirements of Policy HS3(a) where this would be consistent with criteria (a) to (d) above;</del> and</li> <li><del>On Strategic Housing Sites, provision is made for some accommodation in Use Class C2.</del></li> </ol>
MM 135	96-97	Paragraph 8.29	<p>On the <del>largest</del> <b>larger</b> housing sites we will <del>additionally expect a modest proportion of sheltered and / or supported housing to be provided</del> <b>new homes</b> to contribute towards the modelled demand for older persons housing<sup>95</sup>. This should include affordable housing provision where appropriate. <b>The most appropriate form(s) of provision will be assessed on a case-by-case basis. On some sites, the provision of a modest number of bungalows or smaller housing units that meet Accessible and Adaptable standards (see Policy HS5) may be the most appropriate approach. On larger sites we may seek a wider range of provision including sheltered and / or supported housing across both the market and affordable elements of provision.</b></p>
MM 136	97	Paragraph 8.30	<p>All of our Strategic Housing Sites will be large enough to support the provision of local facilities such as shops and bus routes. It should be possible for each of the sites identified in Policy SP14 to SP19 to accommodate the requirements of this policy. <b>Any additional requirements for these sites in relation to C2 provision are set out in the site-specific policies.</b></p>
MM 138	98	Policy HS6	<p><b>Policy HS6: Relatives' and dependents' accommodation</b></p> <p>Planning permission for relatives' and dependents' accommodation formed by the adaptation or extension of the main dwelling will be permitted <del>where</del> <b>provided that</b>:</p> <ol style="list-style-type: none"> <li>A genuine need for the accommodation is demonstrated;</li> <li>The annex is subordinate to the main dwelling and designed in such a way that it can be easily (re-</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>)incorporated into the main house if use as an annex ceases;</p> <p>c. Any development would not exceed the size of extensions that would otherwise normally be acceptable; and</p> <p>d. The occupation of the accommodation is restricted by condition.</p> <p>Free standing annexes will <del>exceptionally</del> be allowed where the above criteria are met and it can be demonstrated that adaptation or extension of the main house is not possible.</p>
MM 139 / FM 095	98-99	Policy HS7	<p><b>Policy HS7: Gypsies, Travellers and Travelling Showpeople</b></p> <p><del>Land at Pulmore Water, as shown on the Proposals Map, is allocated for the provision of 7 permanent Gypsy and Traveller pitches to meet the District's needs up to 2031.</del></p> <p><b>The Council will protect existing and allocated lawful pitches for Gypsies and Travellers. The following site, as shown inset into the Green Belt on the Policies Map, is allocated for the provision of permanent Gypsy and Traveller pitches to meet the District's needs up to 2031:</b></p> <ul style="list-style-type: none"> <li>• <b>Policy CD6 - Land at Woodside Place, Danesbury Park Road is allocated for the provision of 4 permanent Gypsy and Traveller pitches.</b></li> </ul> <p><b>This site is allocated solely for the accommodation of Gypsy and Travellers that meet the planning definition. Planning Permission will only be granted for development and occupation that meets the planning definition of Gypsy and Travellers. Other uses will not be permitted.</b></p> <p><b>There is no identified need to allocate any transit or travelling showpeoples' sites.</b></p> <p>Planning permission for accommodation for Gypsies and Travellers or Travelling Showpeople will be granted where:</p> <ol style="list-style-type: none"> <li>It satisfies a demonstrated local need for accommodation;</li> <li>The intended occupants meet the <b>planning</b> definition of Gypsies and Travellers, or Travelling Showpeople, as set out in government guidance or case law;</li> <li>Residents of the proposed site can access local services such as shops, schools, public transport and medical facilities within a reasonable distance from the site and where those facilities have capacity to meet the needs of the site's residents;</li> <li>The proposed site:</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>i. does not conflict with any other development plan policy or national policy including flood risk, agricultural land classification, contamination and hazardous development, and has no significant adverse impact on the character and appearance of the countryside, or on features of significant biodiversity or heritage importance;</li> <li>ii. has no significant adverse impact on the amenity of nearby residents or adjoining land users and can be successfully screened and contained within a specified boundary;</li> <li>iii. has adequate and safe access from a suitable road, and adequate parking, storage, turning and servicing on site;</li> <li>iv. is capable of being serviced with water, electricity, sewerage and rubbish disposal; and</li> <li>v. will provide a safe, inclusive and secure environment for the residents in an appropriate location to meet their needs.</li> </ul> <p>Where all the above criteria are met, proposals for sites for Gypsies, Travellers and Travelling Showpeople may be appropriate in the countryside as rural exception sites (in line with Policy CGB2b) but Green Belt policies would still apply.</p>
MM 140 / FM 096	99	Paragraph 8.41	<p>The Local Plan should make appropriate provision to meet the needs of Gypsies, Travellers and Travelling Showpeople in North Hertfordshire. <del>There is recognition that the three groups are different and have very different needs, but for the purposes of this policy the key considerations are very similar.</del> <b>The Council's evidence<sup>x</sup> shows that there is no identified need for transit or travelling show people sites but a need to provide four additional pitches for Gypsies at Danesbury Park Road.</b></p> <p>[Footnote] <sup>x</sup> <b>Gypsy &amp; Traveller Accommodation Assessment Study (2018); NHDC Note on Gypsy and Traveller provision (2020)</b></p>
MM 141 / FM 097	99	Paragraph 8.42	<p>There is currently one private Traveller site at <del>Pulmore</del> <b>Pulmer Water</b> in the parish of Codicote. This consists of twelve permanent and <del>six temporary</del> pitches. <b>There is a further site at Danesbury Park Road which currently benefits from a temporary planning permission and is allocated in this Local Plan to meet the identified need.</b> - <del>There is no public site in the District.</del> Historically, the District has not been an area where significant numbers of Gypsies, Travellers or Travelling Showpeople have resided in or resorted to, which is supported by figures for unauthorised encampments and developments.</p>
MM 142 /	99	Paragraph 8.44 (delete)	<p><del>Our evidence identifies a requirement for 7 additional pitches over the period to 2031<sup>400</sup>. The area covered by the temporary planning permission on the Pulmore Water site meets requirement though the existing permission-</del></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
FM 098			<p>expires in 2017.</p> <p>[Footnote] <sup>400</sup>-Gypsy and Traveller Accommodation Study, ORS 2014</p>
MM 143 / FM 099	100	Paragraph 8.45	<p>This area is therefore allocated for permanent provision and to provide certainty going forward. Based on current evidence, it should prevent the need for future 'single issue' reviews of this policy and the long-term needs of these communities will be considered as part of the next general review of the plan alongside the needs of the settled community. <b>The site at Pulmer Water has a complex planning history and consists of Gypsy and Traveller provision adjoining a caravan park with permission for residential use. A robust and up-to-date assessment of current occupation and the future needs arising from this site, alongside any needs from elsewhere in the District, will be required to inform the proposed early review of the Plan (see Policy IMR2 in the Delivery Chapter).</b></p>
		<b>CHAPTER 9</b>	<b>DESIGN</b>
MM 144	101	Policy D1	<p><b>Policy D1: Sustainable design</b></p> <p>Planning permission will be granted <b>provided that</b> where development proposals:</p> <ol style="list-style-type: none"> <li>a. Respond positively to the site's local context;</li> <li>b. Take all reasonable opportunities, consistent with the nature and scale of the scheme, to: <ol style="list-style-type: none"> <li>i. create or enhance public realm;</li> <li>ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);</li> <li>iii. reduce energy consumption and waste;</li> <li>iv. retain existing vegetation and propose appropriate new planting;</li> <li>v. maximise accessibility, legibility and <b>physical and social</b> connectivity <b>both internally and with neighbouring areas;</b></li> <li>vi. future proof for changes in technology and lifestyle;</li> <li>vii. design-out opportunities for crime and anti-social behaviour; and</li> <li>viii. minimise the visual impact of street furniture and parking provision;</li> </ol> </li> <li>c. Have regard to the Design SPD, and any other relevant guidance; <del>and</del></li> <li><b>x. Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and</b></li> <li>d. For residential schemes, meet or exceed the nationally described space <b>standards</b> and <b>the additional optional</b> water efficiency standards.</li> </ol>
MM 145	102	Paragraph 9.6	<p>Using innovative design to reduce energy consumption and waste from the construction and use of buildings can optimise the potential of the site and have a positive influence on the environment. Development should <del>meet the requirements of the most up-to-date standards on</del> <b>seek to minimise</b> carbon emissions and <del>embedded</del> <b>maximise</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<b>opportunities for the generation of energy from renewable sources, so far as is practicable given other policies in this plan and viability considerations.</b> The reduction of carbon emissions should be achieved by both making new development as energy efficient as possible and through increasing the amount of energy gained from renewable sources. The efficient use of new materials from local or sustainable sources, together with the reuse and recycling of materials will help to reduce the energy used and the waste created in the development. It will also help the development to achieve local character and distinctiveness. The policy encourages sustainable design, and the use of materials and technologies that will ensure that the energy used in the construction and throughout the life of the development will be minimised.
MM 146	102	Paragraph 9.12	Development proposals should be in line with current regulations and guidelines and any future changes in Legislation or to the Building Regulations that will affect the sustainability of a building. <b>North Hertfordshire lies in an area of serious water stress. Both the Environment Agency and Anglian Water support the introduction of the optional water efficiency standard within the district therefore, the lower figure of 110 litres per person per day for water consumption is sought. The introduction of the lower standard will have a marginal impact on scheme viability in the area.</b>
MM 147	103	Paragraph 9.16	For development proposals in Letchworth Garden City reference should be made to the <b>Letchworth Garden City Design Principles set out in Appendix 5 of this Plan.</b> available on the Heritage Foundation's website.
MM 148	104	Policy D2	<p><b>Policy D2: House extensions, replacement dwellings and outbuildings</b></p> <p>Planning permission for house extensions will be granted where:</p> <ol style="list-style-type: none"> <li>a. The extension is sympathetic to the existing house in height, form, proportions, <b>roof type</b>, window details, and materials <b>and the orientation of the main dwelling; and</b></li> <li>b. Pitched roofs are used where appropriate, particularly if the extension is more than the height of a single storey;</li> <li>c. <del>Rear</del> <b>The extensions does not dominate adjoining properties and: are well related to the levels of adjoining properties, the direction the house faces and the distance between the extension and the windows in the next door properties; and</b> <ol style="list-style-type: none"> <li>i. <b>It is well related to the floor levels of adjoining properties,</b></li> <li>ii. <b>there is an appropriate distance between the proposed extension and the windows of the adjoining properties; and</b></li> <li>iii. <b>Spacing between buildings ensures there is no harm to the character and appearance of the streetscene.</b></li> </ol> </li> <li>d. Side extensions, at first floor level or above, adjoining a residential plot to the side are at least 1 metre from the boundary to ensure there is no adverse impact on the character of the streetscene.</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>Planning permission for replacement dwellings and outbuildings will be granted where:</p> <ul style="list-style-type: none"> <li>e. The proposal <del>enhances</del> <b>does not harm</b> the character and <b>appearance</b> setting of the site; and</li> <li>f. The location of the proposal does not have an adverse impact on the character <b>and appearance</b> of the streetscene or area.</li> </ul>
MM 149	104	After paragraph 9.23 (new paragraph)	<b>London Luton Airport immediately adjoins the District to the west. Development potentially affected by noise from the airport will need to ensure that appropriate mitigation measures are incorporated. Site-specific criteria for relevant allocated sites are set out in the Communities section of this plan.</b>
MM 150	105	Policy D4	<p><b>Policy D4: Air quality</b></p> <p>Planning permission will be granted <b>provided that</b> where development proposals:</p> <ul style="list-style-type: none"> <li>a. Give consideration to the potential or actual impact on local air quality, both during the demolition/ construction phase and as a result of its final occupation and use;</li> <li>b. Propose appropriate levels of mitigation to minimise emissions to the atmosphere and their potential effects upon health and the local environment; and</li> <li>c. Carry out air pollution impact assessments, where required, to determine the impact on local air quality of the development, <del>otherwise the development may be refused.</del></li> </ul> <p><b>Where an air quality impact assessment demonstrates that a development is unacceptable from a local air quality perspective the development will be refused.</b></p> <p>Where air pollution impact assessments are not required there will still be a requirement on developers to provide appropriate levels of mitigation to address emissions of pollutants to the atmosphere.</p>
MM 153	106	Paragraph 9.30 1 <sup>st</sup> sentence	The following are types of developments for which the Council would expect <del>consideration to be given to the</del> submission of an air quality impact assessment: .....
MM 154	106	Paragraph 9.31	For other types of developments an air quality impact assessment will not be required but there will be <del>an expectation</del> <b>a requirement</b> for the developer to negotiate and agree air quality mitigation measures that are proportionate to the scale of the proposed development. <b>This requirement is in place to provide an opportunity to address the cumulative impacts of smaller, or less sensitively located, developments that nonetheless will be making a contribution to the emission of air pollutants.</b>
		<b>CHAPTER 10</b>	<b>HEALTHY COMMUNITIES</b>
MM 155	108	Policy HC1	<p><b>Policy HC1: Community facilities</b></p> <p>Planning permission for new community facilities will be granted <b>provided that</b> where they are:</p> <ul style="list-style-type: none"> <li>a. Appropriate in scale having regard to their local context;</li> <li>b. Accessible by a range of transport modes; and</li> <li>c. Would meet an identified need in the local community.</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Proposals for the redevelopment of sporting facilities will be supported where the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss of the existing facilities.</b></p> <p>The loss of community facilities will only be permitted where this is justified by:</p> <ul style="list-style-type: none"> <li>i. The provision of replacement facilities, either on site as part of the development proposal or in an alternative appropriate location;</li> <li>ii. Showing that there is no local need for the facility or service and that any appropriate, alternative community use of the existing premises to meet local needs is not required; or</li> <li>iii. Demonstrating that the facility, or any reasonable replacement, is not, and will not be viable on that site.</li> </ul>
MM 156	108	Paragraph 10.5	<p>It is important that these facilities are situated within local communities so that they are accessible; help to reduce the need to travel and provide opportunities for people to participate in activities within their own community. <b>One way that this can be achieved is through the shared use of facilities such as the dual use of school facilities for sport and other community uses in appropriate locations.</b></p>
		<b>CHAPTER 11</b>	<b>NATURAL ENVIRONMENT</b>
MM 157	110	Before Policy NE1 (New Policy NEx and supporting text )	<p><b>Policy NEx: Strategic green infrastructure</b></p> <p><b>Planning permission will be granted provided that development:</b></p> <ul style="list-style-type: none"> <li>a. Protects, conserves and where possible enhances the strategic green infrastructure network;</li> <li>b. Avoids the loss, fragmentation, severance or negative impact on the function of the strategic green infrastructure network;</li> <li>c. Creates new strategic green infrastructure where appropriate and is accompanied by a plan for its long term maintenance and management; and</li> <li>d. Has suitable mitigation measures or appropriate replacement to satisfactorily address adverse impacts on the strategic green infrastructure network.</li> </ul> <p>11.x Protection of those sites which contribute to the diversity of strategic green infrastructure throughout the District from inappropriate development is important. However, in some cases it needs to be acknowledged that appropriate mitigation measures would enable development to take place.</p> <p>11.x This policy will also ensure that when new strategic green infrastructure is created appropriate management and maintenance regimes are in place to provide the framework for its long-term use.</p> <p>11.x North Hertfordshire has significant strategic green infrastructure assets. These are identified in the North Hertfordshire District Green Infrastructure Plan<sup>x</sup> and include:</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>• ancient woodlands (e.g. at Newton Wood),</li> <li>• biodiversity rich landscapes (e.g. Therfield Heath),</li> <li>• other valued landscapes and the Chilterns AONB (see also policies NE2 and NE3)</li> <li>• chalk streams, rivers, and valleys (e.g. Lilley Bottom and the Mimram valley).</li> <li>• the historic designed landscapes of Letchworth Garden City and the literary associations of Forster Country, north of Stevenage, and</li> <li>• the rights of way networks, and long distance walking and cycling connections, e.g. the Chiltern Way, Hertfordshire way, National Cycle Route No.12.</li> </ul> <p>11.x The plan also identifies areas of strategic green infrastructure deficiency as well as opportunities to create new strategic green infrastructure not yet identified. New development should be connected to strategic green infrastructure networks which provide high quality, direct linkages across the development where possible. Developers should use the guiding principles set out in the Green Infrastructure Plan to influence all development proposals from an early stage in the design process.</p>
MM 158	110	Policy NE1	<p><b>Policy NE1: Landscape</b></p> <p>Planning permission will be granted for development proposals that:</p> <ol style="list-style-type: none"> <li>Respect the sensitivities of the relevant landscape character area and <del>accord with</del> <b>have regard to</b> the guidelines identified for built development and landscape management;</li> <li>Do not have a detrimental impact on <del>cause unacceptable harm to the character and appearance of their immediate surroundings and the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this unless suitable mitigation measures can satisfactorily address the adverse impact;</del> <b>cause unacceptable harm to the character and appearance of their immediate surroundings and the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this</b> unless suitable mitigation measures can satisfactorily address the adverse impact;</li> <li>Are designed and located to ensure the health and future retention of important landscape features; and</li> <li>Have considered the long term management and maintenance of any existing and proposed landscaping.</li> </ol>
MM 159	110	Paragraph 11.3	<p>The <b>guidelines referred to at criterion ‘a.’ of the policy originate from the North Herts Landscape Study<sup>107</sup> is which provides</b> an assessment of the character of the landscape within the District. There are 37 separate landscape character areas covering the District, some lie totally within the District while some extend into adjoining districts. The study provides a description of the distinctive characteristics of each landscape character area based on</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			factors such as the geology, landform, soil types and historical activities for each area.
MM 160	110	Paragraph 11.4	The North Herts Landscape Study also identifies the inherent sensitivities of each character area in landscape and visual terms together with its capacity to accommodate a range of different types of development. Development should respect the sensitivities of each landscape character area and accord with the guidelines for managing change identified for each landscape character area in relation to built development and landscape management, <b>whilst recognising that some impacts on landscape are inevitable if future development needs are to be met.</b>
MM 161	110	Policy NE3	<b>Delete Policy NE2 in its entirety.</b>
MM 162	111	Paragraphs 11.5 to 11.7	<b>Delete Paragraphs 11.5 to 11.7 and the associated footnote in their entirety.</b>
MM 163	111	Policy NE3	<p><b>Policy NE3: The Chilterns Area of Outstanding Natural Beauty (AONB)</b></p> <p>Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted <del>when</del> <b>provided that it:</b></p> <ol style="list-style-type: none"> <li>Is appropriate in scale having regard to national planning policy;</li> <li>Conserves and <b>where possible</b> enhances the Chilterns AONB's special qualities, distinctive character <b>and</b> biodiversity, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation;</li> <li>Is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;</li> <li><del>Meets the aims of</del> <b>Has regard to</b> the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;</li> <li><del>Complies with</del> <b>Has regard to</b> the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and</li> <li>Avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</li> </ol>
MM 164	112	Paragraph 11.12	The AONB is a nationally designated landscape and as such permission for major developments <b>within its boundaries</b> will be refused unless exceptional circumstances prevail as defined by national planning policy. <sup>112</sup> National guidance explains that whether a proposal constitutes major development is a matter for the relevant decision taker, taking into account the proposal in question and the local context. <sup>113</sup>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 166 / FM 100	113	After paragraph 11.14 (New Policy NEx and supporting text)	<p><b>Policy NEx: Biodiversity and geological sites</b></p> <p>Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in policy SP12. All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.</p> <p>Applicants should, having regard to the status of any affected site(s) or feature(s):</p> <ol style="list-style-type: none"> <li>a. Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;</li> <li>b. Demonstrate that adverse effects can be avoided and / or satisfactorily minimised having regard to the hierarchy of protection below: <ol style="list-style-type: none"> <li>i. locating on an alternative site with a less harmful impact;</li> <li>ii. providing adequate mitigation measures; or</li> <li>iii. as a last resort compensated for.</li> </ol> </li> </ol> <p>The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.</p> <ol style="list-style-type: none"> <li>c. Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;</li> <li>d. Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows<sup>v</sup>. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees; and</li> <li>e. Provide a long-term management and monitoring plan including mitigation measures as necessary.</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>Local Geological Sites are ratified by the Herts &amp; Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.</p> <p>11.xx Sites allocated in this Plan that have the potential to impact on designated biodiversity sites are required to provide an ecological survey and provide mitigation and/or off-setting measures as necessary. Where appropriate the Strategic Policies and Communities sections of this Plan provide site-specific policies relating to the impact on designated sites, for instance on Therfield Heath SSSI or Wain Woods SSSI.</p> <p>11.xx Sites can contain important habitats or species even where they are not formally designated. These may be identified by the Hertfordshire Environmental Records Centre, other relevant sources (such as the Government's 'MAGIC' mapping tool) or through the survey process as being of ecological interest and should be afforded an appropriate level of protection.</p> <p>11.xx Ecological surveys will be expected to involve an objective assessment of ecological value and identify any priority habitat, protected or priority species on site with survey data and site assessment to establish the potential impact. Surveys should be consistent with BS42020 Biodiversity- Code of Practice for Planning and Development, or as superseded, and use the DEFRA Biodiversity Metric<sup>w</sup>, or as superseded, or any statutorily prescribed alternative to assess ecological value and deliver measurable net gain.</p> <p>11.xx Development proposals will be expected to maximise opportunities for net gains, or contribute to improvements in biodiversity. This methodology will ensure that appropriate mitigation or compensation is provided to meet the aims of national policy and is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site.</p> <p>11.xx Where off-site compensation is delivered as a last resort, the ecological networks mapping system developed by the Herts and Middlesex Wildlife Trust and Local Nature Partnership should be used. This provides the basis of targeted habitat creation to maximise the benefits to biodiversity of any required ecological measures.</p> <p>11.xx Certain habitats (such as chalk grassland) are priority habitats for the District. Restoration, mitigation and any compensation measures should focus on these priority habitats as described in the Hertfordshire Biodiversity Action Plan.<sup>x</sup></p> <p>11.xx Developments are required to demonstrate how existing wildlife habitats such as trees, hedgerows, woodlands and rivers (and any connective features between them) will be retained, safeguarded and managed during and after development, including the provision of buffers where required.</p> <p>11.xx Where necessary, a management plan outlining mitigation and monitoring measures may be required to sensitively manage any issues arising as a result of the development on biodiversity or geodiversity assets and will be secured through planning conditions or obligations.</p> <p>11.xx Net gains can be delivered through the provision of soft landscaping, including trees, shrubs and other</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>vegetation to support wildlife habitats as identified by the Hertfordshire Biodiversity Action Plan<sup>2</sup>. Similarly, the provision of permanent integrated features for wildlife can contribute to net gains, for instance the provision of bat and swift boxes, particularly where development borders open space.</p> <p><u>Footnotes:</u></p> <p><sup>w</sup> The DEFRA Biodiversity Metric is a tool used to quantify the value of biodiversity at any site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of required offsite compensation. The current Biodiversity Metric is available at : <a href="http://publications.naturalengland.org.uk/publication/5850908674228224">http://publications.naturalengland.org.uk/publication/5850908674228224</a></p> <p><sup>x</sup>Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p> <p><sup>y</sup> North Hertfordshire District Green Infrastructure Plan (2009)</p> <p><sup>z</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p>
MM 167	113	Policy NE4	<p><b>Policy NE4: Protecting publically accessible open space</b></p> <p>Planning permission will <b>only</b> be granted for any proposed loss of open space <del>only where</del> <b>provided that:</b></p> <ol style="list-style-type: none"> <li>a. It can be demonstrated that the open space is surplus to requirements, <del>or otherwise</del> <b>and</b> justified on the basis of: <ol style="list-style-type: none"> <li>i. the quality and accessibility of the open space;</li> <li>ii. the extent to which the open space is serving its purpose;</li> <li>iii. the quality and accessibility of alternative public open space; and</li> </ol> </li> <li>b. It is mitigated against by: <ol style="list-style-type: none"> <li>i. re-provision of an appropriate open space taking into account quality and accessibility; and/ or</li> <li>ii. financial contributions towards new or existing open space where: <ul style="list-style-type: none"> <li>• the required provision cannot reasonably be delivered on-site; or</li> <li>• the required provision cannot be provided on site in full; and</li> <li>• the proposal has over-riding planning benefits.</li> </ul> </li> </ol> </li> </ol>
MM 168	113	Before Paragraph 11.15 insert (New Policy NEx)	<p><b>Policy NEx: New and improved open space</b></p> <p><b>Planning permission will be granted for development proposals that make provision for new and/or improved open space which:</b></p> <ol style="list-style-type: none"> <li>a. meets the needs arising from the development having regard to the Council's open space standards</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>and other relevant guidance;</p> <p>b. contributes towards improving the provision, quality and accessibility of open space; and</p> <p>c. incorporate any necessary open space buffer(s) for landscape, visual, ecological or air quality reasons.</p> <p>Any on-site provision must include a long term maintenance and management plan, and where required phasing plans, to demonstrate delivery.</p> <p>Any built facilities within new or existing open space must be ancillary to the primary use and of an appropriate scale and design. Measures should be taken to integrate such facilities into the landscape.</p> <p>Proposals for new open spaces which meet identified needs will be encouraged in suitable locations, served by a choice of sustainable travel options.</p> <p>Financial contributions towards the provision of open space will be considered only where it can be demonstrated that the requirements of policy NE5 part (b)(ii) are met.</p> <p>Where a development is phased, or a site is either divided into separate parts or otherwise regarded as part of a larger development, it will be considered as a whole for the purposes of open space provision.</p>
MM 169	114	Paragraph 11.15 delete	<p><del>Over the plan period it is anticipated that some open spaces could come under pressure for development. It is therefore vital that any proposed loss of open space is carefully considered to ensure that the both the existing and future population of North Hertfordshire has sufficient access to open space.</del></p>
MM 170	114	Paragraph 11.18	<p>The Open Space Review <b>defines the types of open space</b>, sets out the current provision of open space, identifying deficits, surpluses as well as priorities for improvement <b>and suggested standards for open space provision associated with new development</b>. The review analyses open space provision in the four main towns of Hitchin, Letchworth Garden City, Baldock and Royston, as well as in rural areas. <b>The Council also currently has a number of Action Plans<sup>x</sup> that set out open space priorities, which along with other relevant guidelines<sup>y</sup> can be used when determining the type of open space required.</b></p> <p><b>Footnotes:</b></p> <p><sup>x</sup> The Council's Action Plans include: Cemeteries and Closed Churchyards Action Plan; Outdoor Play Provision Action Plan; Outdoor Sports Facilities Action Plan; and the Allotments Action Plan.</p> <p><sup>y</sup> Fields in Trust Guidelines (October 2015) or as superseded, Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard, <a href="http://www.fieldsintrust.org/guidance">http://www.fieldsintrust.org/guidance</a></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 171	114	After paragraph 11.18 insert (New paragraphs)	<p><b>11.xx</b> Over the plan period it is anticipated that some open spaces could come under pressure for development. It is therefore vital that any proposed loss of open space is carefully considered to ensure that both the existing and future population of North Hertfordshire has sufficient access to open space. In parts of the District where there are identified deficiencies in open space, any proposed loss would be subject to increased scrutiny.</p> <p><b>11.xx</b> As well as guarding against losses we also need to ensure provision of open space on new development and securing improvement to existing spaces.</p> <p><b>11.xx</b> It is vital to ensure that any on-site open space in new development is high quality, complements the landscape setting and is fully publically accessible to support sustainable and inclusive communities. Open space should be well integrated into the design of a scheme and located to achieve good access for all residents by suitable and sustainable modes of travel. Further to this, the provision of new open spaces across the District will be valuable in alleviating visitor and recreational pressure on designated biodiversity sites.</p> <p><b>11.xx</b> The Open Space Review outlines locations where there is currently under- provision of certain types of open space and should be used in determining the most appropriate type of open space required.</p> <p><b>11.xx</b> Designing new open spaces to meet community needs and enable community access can be extremely valuable in maximising access to open space. For example, enabling open spaces associated with schools to be used by the community can be helpful in meeting the demands for specific types of open space, such as playing fields.</p> <p><b>11.xx</b> In some developments, there may be a requirement for open space buffers to protect against sources of pollution, such as roads or railway lines, or for landscape, visual or ecological purposes, for instance connective features such as hedgerows and watercourses. In these cases it will be expected that the open space standards will be delivered alongside any buffer areas which are necessary.</p> <p><b>11.xx</b> The Council will support proposals for facilities within new and existing open spaces, for instance changing rooms or a kiosk, where the proposed facility is ancillary to the primary use and is of a scale and design that is commensurate with the primary use. The Council will consider larger facilities where they are appropriate to the use of the open space in accordance with national policy and guidance.</p> <p><b>11.xx</b> Long-term management and maintenance plans will be required to ensure that open spaces can continue to be enjoyed by the community in years to come.</p> <p><b>11.xx</b> It is acknowledged that some types of open space can only realistically be delivered on a larger scale due to the amount of space that would be required and management arrangements. In these circumstances it may be acceptable for financial contributions to be provided towards the provision of open space.</p> <p><b>11.xx</b> Where it can be demonstrated that open space cannot be provided on site a financial contribution</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>towards the provision of new or enhancement of existing open space will be sought subject to the criteria set out in the policy. In such instances, the Council will direct such contributions towards areas with an identified open space deficiency or towards projects for new or improved open spaces. This is to ensure that the additional demand created by the proposed development is met.</p> <p><b>11.xx This Plan does not designate Local Green Space. However, the Council will support the designation and enhancement of Local Green Space as proposed by local communities, for instance in Neighbourhood Plans, where appropriate.</b></p>
MM 172	114	Paragraphs 11.19 and 11.20 delete	<p>The Open Space Review and any other relevant Council reports should be used when interpreting the above policy. In parts of the District where there are identified deficiencies in open space, any proposed loss would be subject to increased scrutiny.</p> <p>Financial contributions may be appropriate subject to the criteria set out in the policy. In such instances, the Council will direct such contributions towards areas with an identified open space deficiency or towards projects for new or improved open spaces.</p>
MM 173	114	Policy NE5 (delete)	<p><b>Policy NE5: New and improved public open space and biodiversity</b></p> <p>Planning permission will be granted for relevant development proposals that:</p> <ul style="list-style-type: none"> <li>a. provide high quality, on-site, fully publically accessible open space having regard to the Council's open space standards;</li> <li>b. incorporate an open space buffer(s) where necessary for landscape, visual, ecological or air quality reasons;</li> <li>c. contribute to net gains for biodiversity, ecological networks and the water environment and/or restores degraded or isolated habitats; and</li> <li>d. submit a long term maintenance and management plan, and where required phasing plans, to demonstrate delivery.</li> </ul> <p>Any proposed facilities within open space must be small scale and ancillary to the primary use.</p> <p>Financial contributions towards the provision of open space as an exception to criterion (a) will be considered only in exceptional circumstances and where it can be demonstrated that the requirements of policy NE4 part (b)(ii) are met.</p> <p>Where a development is phased, or a site is either divided into separate parts or otherwise regarded as part of a larger development, it will be considered as a whole</p>
MM	115	Paragraphs 11.21 to	<p><del>11.21 To support growth over the plan period, relevant development proposals will be expected to contribute</del></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
174	to 117	11.40 delete	<p>towards open space provision in the District. Relevant development proposals are:</p> <ul style="list-style-type: none"> <li>• over 200 residential units; or</li> <li>• over 10,000 sqm gross external floorspace; or</li> <li>• where a specific need has been identified by the Council.</li> </ul> <p>11.22 It is vital to ensure that any on-site open space is high quality, complements the landscape setting and is fully publically accessible to support sustainable and inclusive communities. Further to this, the provision of new open spaces across the District will be valuable in alleviating visitor and recreational pressure on designated biodiversity sites.</p> <p>11.23 The Open Spaces Review undertaken in 2016 sets out open space standards that should be taken into account when determining the quantity of open space provision required. These standards will also be used at masterplanning stage for the strategic sites outlined in the Plan.</p> <p>11.24 Where large-scale developments are intended to be phased over a number of years, forward projections of the population and / or households may be considered.</p> <p>11.25 Whilst in most cases open space provision on-site will be required as the development exceeds the thresholds set out above, there may be instances where there is a specific need for open space. For example, in an area with an open space deficiency, or where an open space improvement project has been identified.</p> <p>11.26 The Open Spaces Review also outlines locations where there is currently under-provision of certain types of open space. This Review, or as superseded, should be used in determining the most appropriate type of open space to provide or contribute towards.</p> <p>11.27 In addition, the Council has a number of other relevant documents which can be used when determining the type of open space required. The Green Space Management Strategy and accompanying Action Plan sets out priorities for open space for across the District between 2014 and 2019. The priority actions are disaggregated by the type of open space, timescales and cost within a clear framework for delivery.</p> <p>11.28 The Council also currently has a number of Action Plans that that set out open space priorities comprising:</p> <ul style="list-style-type: none"> <li>• Cemeteries and Closed Churchyards Action Plan</li> <li>• Outdoor Play Provision Action Plan</li> <li>• Outdoor Sports Facilities Action Plan</li> <li>• Allotments Action Plan</li> </ul> <p>11.29 Play and recreational space has an important role in the function of many of the District's open spaces. Play space provision should be made in accordance with the relevant guidelines.<sup>116</sup> A balance must be achieved between a level of supervision for child safety and crime prevention, and the potential for noise</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>amenity impacts.</p> <p>11.30 No additional allotment sites are designated in this Plan. However, the Council will require appropriate contributions towards allotment provision given the demand for allotment space.</p> <p>11.31 This Plan does not designate Local Green Space. However, the Council will support the designation and enhancement of Local Green Space as proposed by local communities, for instance in Neighbourhood Plans, where appropriate.</p> <p>11.32 Designing new open spaces to meet community needs and enable community access can be extremely valuable in maximising access to open space. For example, enabling open spaces associated with schools to be used by the community can be helpful in meeting the demands for specific types of open space, such as playing fields.</p> <p>11.33 It is acknowledged that some types of open space can only realistically be delivered on a larger scale due to the amount of space that would be required and management arrangements. As such, in exceptional circumstances it may be acceptable for financial contributions to be provided towards the provision of open space.</p> <p>11.34 Where a financial contribution is accepted instead, or in addition to, on-site open space provision, the contribution will be allocated to new open space provision elsewhere, or improvements towards existing open spaces. This is to ensure that the additional demand created by the proposed development is met.</p> <p>11.35 The Council will support proposals for facilities within open spaces, for instance changing rooms or a kiosk, where the proposed facility is small scale and ancillary to the primary use. The Council will take a flexible approach to the format and scale of the floorspace in accordance with national policy and guidance.</p> <p>11.36 The provision of open space can also serve a dual purpose of flood risk management, and the Council will encourage proposals that provide multiple benefits.</p> <p>11.37 In some developments, there may be a requirement for open space buffers to protect against sources of pollution, such as roads or railway lines, or for landscape, visual or ecological purposes, for instance connective features such as hedgerows and watercourses. In these cases it will be expected that the open space standards will be delivered alongside any buffer areas which are necessary.</p> <p>11.38 Development proposals will be expected to maximise opportunities for net gains, or contribute to improvements in biodiversity, which can be demonstrated by using the Biodiversity Impact Calculator<sup>117</sup>.</p> <p>11.39 Net gains can be delivered through the provision of soft landscaping, including trees, shrubs and other vegetation to support wildlife habitats as identified by the Hertfordshire Biodiversity Action Plan<sup>118</sup>. Similarly, the provision of permanent integrated features for wildlife can contribute to net gains, for instance the provision of bat and swift boxes, particularly where development borders open space.</p> <p>11.40 Long term management and maintenance plans will be required to ensure that open spaces can continue</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>to be enjoyed by the community in years to come, and to provide necessary protection to biodiversity assets.</p> <p>Footnotes:  <sup>116</sup> Fields in Trust Guidelines (October 2015) or as superseded, Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard, <a href="http://www.fieldsintrust.org/guidance">http://www.fieldsintrust.org/guidance</a>  <sup>117</sup> The Biodiversity Impact Calculator is a tool used to quantify the value of biodiversity at a ny site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of require offsite compensation. The current Biodiversity Impact Calculator is available on the Environment Bank website at : <a href="http://www.environmentbank.com/impact-calculator.php">http://www.environmentbank.com/impact-calculator.php</a>  <sup>118</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p>
MM 175	117	Policy NE6 (delete)	<p><b>Policy NE6: Designated biodiversity and geological sites</b></p> <p>Planning permission will only be granted for development proposals affecting designated sites that:</p> <ul style="list-style-type: none"> <li>a. Protect, enhance and manage designated sites in accordance with the following hierarchy of designations; <ul style="list-style-type: none"> <li>• Internationally designated sites</li> <li>• Nationally designated sites</li> <li>• National Planning Policy Framework sites</li> <li>• Locally designated sites</li> </ul> </li> <li>b. Submit an ecological survey and demonstrate that adverse effects can be satisfactorily minimised by following the hierarchy below: <ul style="list-style-type: none"> <li>i. locating on an alternative site with a less harmful impact; ii. providing adequate mitigation measures; or</li> <li>iii. as a last resort compensated for.</li> </ul> </li> <li>c. Manage construction impacts by: <ul style="list-style-type: none"> <li>i. demonstrating how existing wildlife habitats will be retained, safeguarded and managed during construction; and</li> <li>ii. providing a buffer of complimentary habitat for all connective features for wildlife habitats, or priority habitats; and</li> </ul> </li> <li>d. Provide a long term management plan including mitigation measures as necessary.</li> </ul> <p>Development proposals on non-designated sites that include important habitats and species will be expected to meet parts (b) to (d) of this policy.</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Wildlife Sites.
MM 176	117 to 119	Paragraphs 11.41 to 11.52 delete	<p>11.41— Whilst there are no biodiversity sites designated at the European level in the District, for example Ramsar sites, Special Areas of Conservation or Special Protection Areas, there are a number of nationally designated sites. This includes six Sites of Special Scientific Interest (SSSIs) as shown on the Proposals Map and eight designated Local Nature Reserves (LNRs).</p> <p>11.42— There are also a number of National Planning Policy Framework sites comprising ancient woodland, and aged or veteran trees. Ancient woodland is a nationally agreed designation for land that has been woodland since at least 1600 AD. The District's woodlands will be managed over the plan period to provide recreation and amenity for local residents, and also to ensure their survival to benefit biodiversity.</p> <p>11.43— Species or Habitats of Principal Importance as identified in S41 of the Natural Environment and Rural Communities Act 2006 are defined at the national level and the Hertfordshire Biodiversity Action Plan<sup>119</sup> sets out an approach to biodiversity at the county level. In addition to this, the Hertfordshire Local Nature Partnership (LNP) Guiding Principles have informed the policies in this Plan.</p> <p>11.44— The District has over 300 designated Wildlife Sites.<sup>120</sup> The Hertfordshire Environmental Records Centre updates the list of designated Wildlife Sites on a regular basis. Sites identified or designated as Wildlife Sites are afforded protection as sites of substantive nature conservation value.</p> <p>11.45— Local Geological Sites are given the same level of protection as Wildlife Sites and are considered important for their educational or historical value. There are currently 11 Local Geological Sites in North Hertfordshire.</p> <p>11.46— Sites allocated in this Plan that have the potential to impact on designated biodiversity sites are required to provide an ecological survey and provide mitigation and/or off-setting measures as necessary. Where appropriate the Strategic Policies and Communities sections of this Plan provide site specific policies relating to the impact on designated sites, for instance on Therfield Heath SSSI or Wain Woods SSSI.</p> <p>11.47— Sites can contain important habitats or species even where they are not formally designated. These sites are identified by the Hertfordshire Environmental Records Centre as being of ecological interest and should be afforded protection.</p> <p>11.48— Ecological surveys will be expected to involve an objective assessment of ecological value. Surveys should be consistent with BS42020 Biodiversity Code of Practice for Planning and Development, or as superseded, and use the Biodiversity Impact Calculator<sup>121</sup> or as superseded, to assess ecological value. This methodology will ensure that appropriate mitigation or compensation is provided to meet the aims of national policy.</p> <p>11.49— Where off-site compensation is delivered as a last resort, the ecological networks mapping system developed by the Herts and Middlesex Wildlife Trust and Local Nature Partnership should be used. This</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>provides the basis of targeted habitat creation to maximise the benefits to biodiversity of any required ecological measures.</p> <p>11.50 Certain habitats (such as chalk grassland) are priority habitats for the District. Restoration, mitigation and any compensation measures should focus on these priority habitats as described in the Hertfordshire Biodiversity Action Plan.<sup>122</sup></p> <p>11.51 Developments are required to demonstrate how existing wildlife habitats such as trees, hedgerows, woodlands and rivers will be retained, safeguarded and managed during and after development, including the provision of buffers where required. Where buffers are provided, these should be a minimum of 10 metres of complimentary habitat for all connective features for wildlife habitats or priority habitats.</p> <p>11.52 Where necessary, a management plan outlining mitigation measures may be required to sensitively manage any issues arising as a result of the development on biodiversity or geodiversity assets.</p> <p><u>Footnotes:</u></p> <p><sup>119</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p> <p><sup>120</sup> Please refer to the list held by the Hertfordshire Environmental Records Centre for the current list of designated Wildlife Sites.</p> <p><sup>121</sup> The Biodiversity Impact Calculator is a tool used to quantify the value of biodiversity at any site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of require offsite compensation. The current Biodiversity Impact Calculator is available on the Environment Bank website at : <a href="http://www.environmentbank.com/impact-calculator.php">http://www.environmentbank.com/impact-calculator.php</a></p> <p><sup>122</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, <a href="http://www.hef.org.uk/nature/biodiversity_vision/index.htm">http://www.hef.org.uk/nature/biodiversity_vision/index.htm</a></p>
MM 177	119	Policy NE7	<p><b>Policy NE7: Reducing flood risk</b></p> <p>Planning permission for development proposals will be granted <b>provided that</b> where (as applicable):</p> <ul style="list-style-type: none"> <li>x. <b>Development is located outside of medium and high risk flood areas (flood zone 2 and 3) and other areas affected by other sources of flooding where possible;</b></li> <li>a. <b>Where (x.) is not possible, application of the sequential and exception tests is demonstrated where development is proposed in areas of flood risk as set out in the NPPF have been applied using the Strategic Flood Risk Assessment (SFRA) and Environment Agency flood maps;</b></li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>b. A FRA has been prepared in accordance with national guidance <b>that considers the lifetime of the development, climate change impacts and safe access and egress;</b></li> <li><del>c. A reduction in flood risk will be managed through flood resistant, resilient design and construction;</del></li> <li>d. It will be located, designed and laid out to ensure the risk of flooding is <b>reduced</b> <del>minimised</del> whilst not increasing flood risk elsewhere;</li> <li><b>x. The impact of any residual flood risk will be minimised through flood resistant, resilient design and construction;</b></li> <li>e. <b>Any</b> flood protection and mitigation measures <del>which may be necessary</del> <b>will do not have an unacceptable impact on cause harm to</b> nature conservation, heritage assets, <b>and / or</b> landscape and recreation <b>and, where possible, will have a positive impact in these respects ;</b> and</li> <li>f. Overland flow routes and <b>functional floodplain</b> <del> flood storage</del> areas are protected from all development other than that which is “water compatible” and this must be designed and constructed to remain operational and safe for users during flood events, resulting in no net loss of flood plain storage and not impeding water flows or increasing flood risk elsewhere.</li> </ul>
MM 178	120	Paragraph 11.55	Where development is proposed in an area at risk from flooding, the applicant will be required to demonstrate that the site passes the flood risk Sequential Test before providing a Flood Risk Assessment (FRA) as part of the planning application submission. The flood risk Exception Test may also need to be demonstrated at this stage. An FRA is applicable to development over 1 hectare in flood zone 1 and all types of development in flood zones 2 and 3. Flood risk impacts should be taken into account for the lifetime of the development, and consideration given to the mitigation that needs to be provided for the increased future flood risk with predicted climatic changes. <b>This should include appropriate consideration of downstream flood risks and, where necessary, on site attenuation to address this.</b>
MM 179	120	Policy NE8	<p><b>Policy NE8: Sustainable drainage systems</b></p> <p>Planning permission for development will <del>only</del> be granted <b>provided that where:</b></p> <ul style="list-style-type: none"> <li>a. The most <b>appropriate</b> sustainable drainage solution is used <b>taking into account technical, viability and design issues</b> to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;</li> <li>b. It aims to mimic the natural drainage patterns and processes as far as possible; <b>and</b></li> <li>c. Drainage solutions follow the SuDS hierarchy; <del>and</del></li> <li><del>d. Developers have consulted with the Lead Local Flood Authority at the earliest possible opportunity, to ensure SuDS are incorporated at the design stage.</del></li> </ul>
MM	120	Paragraph 11.58	The Council will consult and work with the Lead Local Flood Authority <sup>123</sup> (LLFA), <del>and</del> the Environment Agency <b>and</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification
180			<b>Internal Drainage Boards</b> as required on development proposals that are at risk from flooding or may contribute to additional surface run off. At risk areas are identified in the SFRA and mitigation measures need to be considered when designing development in order to reduce the risk of flooding from surface water. <b>When selecting appropriate drainage techniques, it is important to try and maximise the number of benefits, and to prioritise the most sustainable approaches taking into consideration appropriate design and financial viability issues. These techniques can be set out in the form of a hierarchy.</b> Evidence will need to be provided that development has followed the surface water management hierarchy as detailed below.
MM 181	121	Paragraph 11.59	For major development the LLFA is a statutory consultee in relation to the management of surface water drainage. Whilst SuDS is only a requirement for major development, it is recommended for all development to ensure surface water is appropriately managed. <b>Developers should consult with the Lead Local Flood Authority and / or the Internal Drainage Board at the earliest possible opportunity, to ensure SuDS are incorporated at the design stage.</b>
MM 182	122	Policy NE9	<p><b>Policy NE9: Water quality and environment</b></p> <p>Planning permission for development proposals will be granted <b>provided that</b> where they make appropriate space for water, including (as applicable):</p> <ol style="list-style-type: none"> <li>Maintaining a minimum <del>9-8</del> 8 metre<sup>124</sup> wide undeveloped buffer zone from all designated main rivers;</li> <li>Maintaining a minimum 5m wide undeveloped buffer zone for ordinary watercourses; and</li> <li>River restoration and resilience improvements where proposals are situated close to a river or considered to affect nearby watercourses.</li> </ol>
MM 184	122	After paragraph 11.63 (new paragraph)	<b>Main rivers are watercourses shown to be designated as main on the Environment Agency's statutory flood map<sup>[x]</sup>. These are usually a larger stream or river with a significant effect on the overall drainage of a catchment area, however smaller watercourses can also be designated as main rivers. The Environment Agency has authority, powers, rights and responsibilities for regulating main rivers. Ordinary watercourses are any other river, stream, ditch or culvert (other than a public sewer) that is not a designated Main River. The responsibility for maintenance of these lies with anyone who owns the adjacent land or property. Where these fall in Internal Drainage Board (IDB) land they are regulated by the IDB, outside of this North Hertfordshire District Council will be the regulator.</b> <b>Footnote:</b> <sup>[x]</sup> Flood Map for Planning - <a href="https://flood-map-for-planning.service.gov.uk/">https://flood-map-for-planning.service.gov.uk/</a>
MM 185	123	Policy NE10	<p><b>Policy NE10 : Water conservation Framework Directive and wastewater infrastructure</b></p> <p>Planning permission for new development will be granted <b>provided that</b> where;</p> <ol style="list-style-type: none"> <li>It does not result in the deterioration of any watercourse in accordance with the <b>Water Environment</b></li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>(Water Framework Directive) <b>(England and Wales) Regulations 2017</b> (WFD);</p> <ul style="list-style-type: none"> <li>b. It helps contribute towards WFD actions and objectives.</li> <li>c. It helps achieve the objectives <b>set out in</b> <del>of flood management goals from the</del> Anglian and Thames River Basin Management Plans; <del>and</del></li> <li>d. Mechanisms for delivering any necessary new or improved water <b>and/ or wastewater</b> infrastructure are secured under the requirements of Policy SP7; <b>and</b></li> <li>e. <b>adequate foul water treatment and disposal already exists or can be provided in time to serve the development.</b></li> </ul> <p>New development around Stevenage within the Rye Meads Sewage Treatment Works Catchment will need to demonstrate that additional potable water supply and <b>consequential</b> wastewater treatment capacity can be achieved and implemented ahead of development without significant environmental impact, including adverse effects on designated sites.</p>
MM 186	123	Paragraph 11.66	<p>As a result there is little environmental capacity that can be taken up without causing a breach of statutory environmental targets including the <b>Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</b> (WFD).<sup>126</sup> Additionally water supply also has implications under the WFD, not just water quality. The Great Ouse and Thames catchments are both highly water stressed. Any proposed increase in groundwater abstraction from these catchments is also likely to have implications on compliance with WFD regulations <del>also</del>.</p> <p><sup>126</sup> For information on the Water Framework Directive, see: <a href="http://www.environment-agency.gov.uk/research/planning/33362.aspx">http://www.environment-agency.gov.uk/research/planning/33362.aspx</a> <a href="http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx">http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx</a></p>
MM 187	123	After paragraph 11.67 (new paragraph)	<p><b>At present only the River Ivel is at a “good” status while the rest of the water bodies in North Hertfordshire are failing. Further information in relation to the water bodies in North Hertfordshire is available on the Environment Agency’s Catchment Data Explorer<sup>[x]</sup> including measures that will help achieve their objectives. Developers will be expected to contribute towards measures and objectives through their development proposals.</b></p> <p><b>Footnote:</b>  <b>[x] <a href="http://environment.data.gov.uk/catchment-planning/">http://environment.data.gov.uk/catchment-planning/</a></b></p>
MM 188	124	Policy NE11	<p><b>Policy NE11: Contaminated land</b></p> <p>Planning permission for development affecting <b>or affected by</b> contaminated land will be granted <b>provided that</b> where:</p> <ul style="list-style-type: none"> <li>a. A contaminated land study / contaminated land risk assessment is submitted as part of the application</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>b. Appropriate mechanisms are in place to investigate, <b>characterise the risks</b> and <del>where necessary</del> remediate the <b>contamination to remove the risks, or reduce the risk to an acceptable level</b>; and</p> <p>c. The site is suitable for <del>the new</del> use taking account of ground conditions, <b>groundwater vulnerability</b> and pollution arising from previous <b>land</b> use and <b>land remediation in reference to relevant guidance (and any subsequent updates)<sup>x</sup></b>.</p> <p><b>Footnote:</b>  [x] Groundwater Protection: Principles and practice (GP3), <a href="https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3">https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3</a>; Model Procedures for the Management of Land Contamination, <a href="https://www.gov.uk/guidance/land-contamination-risk-management">https://www.gov.uk/guidance/land-contamination-risk-management</a></p>
MM 189	124	Paragraphs 11.72 and 11.73 (Delete and insert new paragraphs)	<p><del>11.72</del> There are numerous sites in the District which are potentially affected by contamination as a consequence of their historical land uses.</p> <p><del>11.73</del> The policy addresses the protection of the health of end users of proposed developments, as well as the protection of the historic, built and natural environment, including groundwater. The latter is of particular relevance in North Hertfordshire because much of the District's water supply comes from an unconfined aquifer.</p> <p><b>11.xx</b> Decisions should ensure that the site is suitable for its new use taking account of ground conditions, pollution arising from previous uses and any proposals for land remediation.</p> <p><b>11.xx</b> Much of the area covered by this plan overlies Secondary and Principal Aquifers. Abstractions are located throughout the plan area, with WFD aquifers and rivers present. Source Protection Zones (1 to 3) and landfills are present within the plan area, and mostly in the areas around Hitchin, Letchworth, Baldock, Royston, Ashwell and Stevenage. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The use of groundwater for local drinking water supplies in the area makes it particularly vulnerable to pollution.</p> <p><b>11.xx</b> Certain new activities need to be deterred in sensitive areas based on their intrinsic hazard to sensitive receptors (e.g. groundwater, Principal Aquifers, Source Protection Zones). Close to sensitive receptors a precautionary approach is likely to be taken even where the risk of failure is low as the consequences may be serious or irreversible.</p> <p><b>11.xx</b> Where risks from landfill gas are likely to arise, where land contamination may be reasonably suspected, or particularly environmentally sensitive developments (e.g. petrol filling stations) are proposed for</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			sensitive sites, developers are encouraged to hold pre-application discussions. A Preliminary Risk Assessment (PRA) should be undertaken as the first stage in assessing these risks and is a requirement for validating relevant planning applications.
MM 190	125	Policy NE12	<p><b>Policy NE12 : Renewable and low carbon energy development</b></p> <p><b>Proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy.</b> Proposals for <b>other</b> renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon:</p> <ol style="list-style-type: none"> <li>i. Landscape quality, landscape character and visual amenity, including consideration of cumulative impacts of development;</li> <li>ii. Environmental assets;</li> <li>iii. The historic environment, including the impact on the setting of historic assets ;</li> <li>iv. The transport network;</li> <li>v. Air quality;</li> <li>vi. Aviation interests; and</li> <li>vii. The amenity of residents.</li> </ol> <p>In assessing renewable and low carbon energy proposals against the above criteria the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes where this is relevant. Proposals for decentralised energy schemes associated with development of the strategic sites allocated in the Plan will be encouraged subject to an assessment of the impacts.</p> <p>In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure must be removed and the site restored to its former state or a condition agreed with the Council.</p>
MM 191	126	Paragraph 11.77	<p>The Hertfordshire Renewable and Low Carbon Energy Technical Study identifies energy opportunity areas in the District. This may assist developers to choose the appropriate renewable technology, depending on the location of the development. The Study also identified that there may be areas of opportunity to investigate decentralised energy schemes, this could be particularly relevant in those areas where larger scale development may take place. Broadly, decentralised energy schemes refer to energy that is generated off the main grid and can include micro-renewables, heating and cooling. Schemes can serve a single building or a whole community. Although development proposals for renewable and low carbon energy will be supported in appropriate locations, it is also important that development proposals incorporate energy efficient measures to help reduce the demand for energy in the first place. <b>The Council is mindful that an appropriate balance must be maintained between the benefits of renewable energy and other constraints and considerations in accordance with national Planning</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<b>Practice Guidance (PPG).</b>
		<b>CHAPTER 12</b>	<b>HISTORIC ENVIRONMENT</b>
MM 192	127	Policy HE1	<p><b>Policy HE1: Designated heritage assets.</b></p> <p>Planning applications relating to Designated heritage Assets <b>or their setting</b> shall be accompanied by a Heritage Assessment/Justification Statement that:</p> <ol style="list-style-type: none"> <li>Assesses the significance of heritage assets, including their setting, <del>impacted by the proposal</del>;</li> <li><del>Justify</del> <b>Justifies</b> and details the impacts of any proposal upon the significance of the designated <b>heritage</b> asset(s); and</li> <li>Informs any necessary <del>mitigation</del> measures to minimise or mitigate against any identified harms;</li> </ol> <p>Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):</p> <ol style="list-style-type: none"> <li>Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;</li> <li>Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; <b>and</b></li> <li><b>Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.</b></li> </ol> <p><b>Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.</b></p>
MM 193	128	Policy HE2	<p><b>Policy HE2: Heritage at risk</b></p> <p>Planning permission will be granted for proposals that seek to <del>restore</del> <b>conserve</b> or provide new uses for designated heritage assets identified on the national register, or the <b>Council's 'At Risk'</b> <del>local-risk</del> register maintained by the Council, that are justified and appropriate to the significance of the asset to return a heritage asset to beneficial use.</p> <p>Proposals that harm the significance of heritage assets included on national and local registers will be resisted unless the need for, and the benefits of, the development in that location clearly outweigh that harm, taking account of the asset's significance and importance, and all feasible solutions to avoid and mitigate that harm have been fully <del>implemented</del> <b>assessed</b>.</p>
MM 194	128	Policy HE3	<p><b>Policy HE3: <del>Local heritage</del> Non-designated heritage assets</b></p> <p>Permission for the loss of a building of local interest will only be granted where</p> <p><b>Permission for a proposal that would result in harm to, or the loss of, a non- designated heritage asset will</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>only be granted provided that a balanced judgement has been made that assesses the scale of harm to, or loss of significance of the non- designated asset and, where the proposal results in the loss of a non-designated heritage asset:</p> <ol style="list-style-type: none"> <li>The replacement building contributes to preserving the local character and distinctiveness of the area; and</li> <li>Where the asset is located in a conservation area a continuous contract for the demolition and redevelopment of the site has been secured, unless there are justifiable grounds for not developing the site.</li> </ol>
MM 195	128	After paragraph 12.7 (new paragraph)	<p><b>Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. This policy is concerned with those non-designated heritage assets that are locally listed, such as Buildings of local interest.</b></p>
MM 196	129	Policy HE4	<p><b>Policy HE4: Archaeology</b></p> <p>Permission for development proposals affecting heritage assets with archaeological interest will be granted provided that: where:</p> <ol style="list-style-type: none"> <li>developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation.</li> <li>It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and</li> <li>where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.</li> </ol> <p>Where archaeological sites have been assessed to meet the criteria for inclusion on adopted registers or maps of locally important heritage assets these shall be treated in the same way as archaeology areas and areas of archaeological significance.</p> <p><b>Areas of as yet, unknown archaeology may be identified during research, or through the planning or plan making process. These sites or areas should be treated in the same way as archaeology areas and areas of archaeological significance.</b></p>
		<b>CHAPTER 13</b>	<b>COMMUNITIES</b>
MM 197		All tables	<i>All site references to be prefaced with "Policy" e.g. Site-Policy AS1</i>

Ref.	Page (LP1)	Policy / Paragraph	Modification				
		<b>ASHWELL</b>					
MM 202 / FM 102	135	Policy AS1	<table border="1"> <tr> <td>Land west of Claybush Road</td> <td>33 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Provision of pedestrian access into the village;</li> <li>Sensitive design and layout required in terms of ridge line and setting within landscape, additional planting on the east and west boundaries to improve views from Arbury Banks and screen properties on Claybush Road;</li> <li>Heritage Impact Assessment required informing design and layout at southern extent of site to respect setting of Arbury Banks Scheduled Ancient Monument and the views of St Marys Church; and</li> <li>Provide archaeological survey prior to development.</li> </ul> </td> </tr> </table>	Land west of Claybush Road	33 homes	<ul style="list-style-type: none"> <li>Provision of pedestrian access into the village;</li> <li>Sensitive design and layout required in terms of ridge line and setting within landscape, additional planting on the east and west boundaries to improve views from Arbury Banks and screen properties on Claybush Road;</li> <li>Heritage Impact Assessment required informing design and layout at southern extent of site to respect setting of Arbury Banks Scheduled Ancient Monument and the views of St Marys Church; and</li> <li>Provide archaeological survey prior to development.</li> </ul>	
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FM 104	136	Paragraphs 13.9 to 13.12 (delete)	<p><b>Infrastructure &amp; mitigation</b></p> <p><del>13.9 The impact of the proposed site on heritage assets and the landscape is a key consideration. Our overall evidence base concludes that, in order to meet our housing requirements over the plan period, it will be necessary to allocate some sites which may impact upon heritage assets and landscape. Our aim will be to ensure that the overall integrity of relevant heritage assets are protected and that the development is designed to minimise impact on the landscape.</del></p> <p><del>13.10 Currently there is no pedestrian access along Claybush Road, therefore the development should deliver a pedestrian access route into the village to enable access to services and facilities.</del></p> <p><del>13.11 The footpath network in Ashwell currently extends to the junction of Bear Lane and Ashwell Street and there may be opportunities to connect from here from the north of the allocated site.</del></p> <p><del>13.12 Additional education provision will be needed in Ashwell during the Plan period, funding will therefore be sought to ensure the local education infrastructure can accommodate the additional demand arising from the site.</del></p>				
		<b>BALDOCK</b>					
MM 206	138	Policy BA2	<table border="1"> <tr> <td>Land <b>south</b>-west of Clothall Road (Clothall parish)</td> <td>200 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Creation of appropriate, defensible Green Belt boundary along <b>the south-eastern</b> south-western perimeter of <b>the</b> site;</li> <li>Appropriate mitigation measures for noise associated with the A505 to potentially include insulation and orientation of living spaces;</li> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Consider and mitigate against potential adverse impacts upon Weston Hills Local Wildlife Site;</li> <li>Heritage impact assessment (including assessment of significance) and sensitive design to ensure</li> </ul> </td> </tr> </table>	Land <b>south</b> -west of Clothall Road (Clothall parish)	200 homes	<ul style="list-style-type: none"> <li>Creation of appropriate, defensible Green Belt boundary along <b>the south-eastern</b> south-western perimeter of <b>the</b> site;</li> <li>Appropriate mitigation measures for noise associated with the A505 to potentially include insulation and orientation of living spaces;</li> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Consider and mitigate against potential adverse impacts upon Weston Hills Local Wildlife Site;</li> <li>Heritage impact assessment (including assessment of significance) and sensitive design to ensure</li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification				
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MM 207 / FM 106	138	Policy BA3	<table border="1"> <tr> <td>Land south of Clothall Common (Clothall parish)</td> <td>200 245 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Deliver, in combination with Site BA4, a southern link road connecting Wallington Road to the B656 Royston Road to Wallington Road or the A507 Clothall Road within the southern bypass;</li> <li>Provision of suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA4;</li> <li>Consideration of the most appropriate routes and movements for all modes between the allocation site, the existing Clothall Common estate and the wider transport network</li> <li>Site layout to take account of existing wastewater infrastructure;</li> <li>Appropriate solution for short- and long-term education requirements having regard to up-to-date assessments of need;</li> <li>Appropriate mitigation measures for noise associated with the A505 to potentially include appropriate insulation and orientation of living spaces;</li> <li>Maintaining or limited re-profiling of the existing bunding towards the east of the site with no housing permitted on or beyond its (revised) alignment;</li> <li>Incorporate alignment of former Wallington Road and Bridleway Clothall 027 as green corridor along northern perimeter of through the site;</li> <li>Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>Archaeological survey to be completed prior to development.</li> </ul> </td> </tr> </table>	Land south of Clothall Common (Clothall parish)	200 245 homes	<ul style="list-style-type: none"> <li>Deliver, in combination with Site BA4, a southern link road connecting Wallington Road to the B656 Royston Road to Wallington Road or the A507 Clothall Road within the southern bypass;</li> <li>Provision of suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA4;</li> <li>Consideration of the most appropriate routes and movements for all modes between the allocation site, the existing Clothall Common estate and the wider transport network</li> <li>Site layout to take account of existing wastewater infrastructure;</li> <li>Appropriate solution for short- and long-term education requirements having regard to up-to-date assessments of need;</li> <li>Appropriate mitigation measures for noise associated with the A505 to potentially include appropriate insulation and orientation of living spaces;</li> <li>Maintaining or limited re-profiling of the existing bunding towards the east of the site with no housing permitted on or beyond its (revised) alignment;</li> <li>Incorporate alignment of former Wallington Road and Bridleway Clothall 027 as green corridor along northern perimeter of through the site;</li> <li>Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>Archaeological survey to be completed prior to development.</li> </ul>	
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MM 209	139	Policy BA5	<table border="1"> <tr> <td>Land off Yeomanry Drive</td> <td>25 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Site layout to take account of existing wastewater infrastructure;</li> <li>• Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• Appropriate treatment of <del>south-eastern and south-western site</del> boundaries to maintain access to, and integrity of, Footpath Baldock 036 <b>and east-west green corridor;</b></li> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	Land off Yeomanry Drive	25 homes
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MM 211	141	Policy BA10	<table border="1"> <tr> <td>Royston Road</td> <td>19.6</td> </tr> </table> <ul style="list-style-type: none"> <li>• <b>A masterplan to be secured prior to the approval of any detailed matters;</b></li> <li>• Ensure access arrangements control HGV movements to direct vehicles towards the A505 rather than through Baldock;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• <b>Landscaping to enhance the ecological value of the railway corridor and reinforce a defensible Green Belt boundary to the east;</b></li> <li>• <b>Undertake Contaminated Land Preliminary Risk Assessment, particularly in relation to current and historic agricultural use;</b></li> <li>• Provide adequate mitigation measures for noise associated with the railway line and for any potential employment activity in relation to Clothall Common;</li> </ul>	Royston Road	19.6
Royston Road	19.6				

Ref.	Page (LP1)	Policy / Paragraph	Modification												
			<ul style="list-style-type: none"> <li>Retaining framed views of St Mary's Church from within and beyond the site;</li> <li>Archaeological survey to be completed prior to development; and</li> <li>Use of green roofs on buildings in order to create a less harsh urban-rural transition to the Green Belt on the eastern side of this allocation.</li> </ul> <p><i>Designated employment areas</i></p> <table border="1"> <tr> <td>BE1</td> <td>Bondor Business Centre</td> <td>2.5</td> </tr> <tr> <td>BE2</td> <td>Royston Road</td> <td>3.3</td> </tr> <tr> <td colspan="3">Parts of employment areas designated for business use only</td> </tr> <tr> <td>BB1</td> <td>Bondor Business Centre East</td> <td>1.0</td> </tr> </table>	BE1	Bondor Business Centre	2.5	BE2	Royston Road	3.3	Parts of employment areas designated for business use only			BB1	Bondor Business Centre East	1.0
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MM 409	142	Paragraph 13.30	Additionally a southern link road is also proposed to enable the development of site BA3 and BA4 but also improving. <b>This will improve</b> connectivity to the south of the town providing the ability to bypass this junction. <b>The detailed alignment of the link road will be determined through the Development Management process. This may require the existing bunding at the eastern end of the proposed link road to be re-profiled. The agreed route of the southern link road through the bunded area will mark the outer limits of built development in this part of the site.</b>												
MM 212	142	After 13.30 (new paragraph)	<b>Baldock has historically experienced air quality issues associated with traffic in the town. However, these measures should help to ensure that relevant Air Quality Objectives are not exceeded as a consequence of growth. Detailed assessments will be required in line with Policy D4 when larger sites (including BA1 to BA4) are brought forward for development.</b>												
		<b>BARKWAY</b>													
FM 110	144	Policy BK1 (delete)	<table border="1"> <tr> <td>Land off Cambridge Road</td> <td>13 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Site layout designed to integrate with any future use of adjoining reserve school site;</li> <li>Appropriate treatment of northern boundary to maintain integrity of Bridleway Barkway 017;</li> <li>Sensitive design to respect setting of Barkway Conservation Area and Cokenach Registered Park and Garden to include: <ul style="list-style-type: none"> <li>Reinforcing hedgerows and landscaping along southern boundary of site; and</li> <li>Access arrangements designed to minimise harm to heritage assets</li> </ul> </li> </ul>	Land off Cambridge Road	13 homes										
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MM 215 / FM 111	144	Policy BK2	<table border="1"> <tr> <td>Land off Windmill Close</td> <td>20 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Part of the site to be retained as open space; and</li> <li><b>Contribution towards travel by sustainable modes of transport between Barley and Barkway schools</b></li> </ul>	Land off Windmill Close	20 homes										
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Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>Archaeological survey to be completed prior to development</li> </ul>
MM 216 / FM 112	144	Policy BK3	<p>Land between Cambridge Road &amp; Royston Road 140 homes</p> <ul style="list-style-type: none"> <li>Development should be set back from the road;</li> <li>Lower density housing would be appropriate on the eastern part of the site;</li> <li>Incorporation of footpath <b>Bridleway</b> Barkway 017 as a north-south green corridor through the site;</li> <li>Appropriate treatment of northern boundary to maintain alignment and integrity of Bridleway Barkway 018</li> <li>Explore opportunities for connecting road from Royston Road to Cambridge Road having regard to heritage considerations (below);</li> <li>Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for pedestrian and cycle access;</li> <li><b>Contribution towards travel by sustainable modes of transport between Barley and Barkway schools</b></li> <li>Provision of local convenience shop;</li> <li><b>Approximately 1.5 hectares of land secured as a reserve site for primary education;</b></li> <li>Site layout designed to integrate with any future use of <b>land identified for adjoining reserve</b> school site;</li> <li>Development should include extensive tree planting, maintenance of the existing boundaries and hedgerows.</li> <li><b>Development should include measures to minimise impact on Newsells Park Stud, in terms of proximity of built development, noise and increased activity;</b></li> <li>Sensitive design to respect setting of Cokenach Registered Park and Garden and listed buildings within Newsells estate to include: <ul style="list-style-type: none"> <li>Reinforcing of hedgerows and landscaping along site boundaries; and</li> <li>Access arrangements designed to minimise harm to heritage assets</li> </ul> </li> </ul>
MM 219 / FM 114	144	Paragraph 13.39	<p>The existing first school site in Barkway is <b>federated with the first school in neighbouring Barley with different year groups taught in each village. Current estimates suggest that the additional pupils likely to arise from the sites in Barkway can be accommodated in the existing schools. Contributions to support sustainable travel between the two sites should be secured from new developments. Both school sites are constrained and is are considered difficult to expand. Hertfordshire County Council hold a reserve school site in the village, lying between sites BK1 and within site BK3. This A reserve site will be retained providing the opportunity to respond to the any further increase in the number of dwellings for the pupils from the two villages.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification				
FM 115	145	Paragraph 13.40	We will work with the County Council and Diocese (who operate the schools in Barkway and Barley) to explore the most appropriate long-term education solutions.				
MM 220	145	After paragraph 13.41 (new paragraph)	<b>Newsells Park Stud is an established rural business which lies directly to the north of site BK3. The stud is a specialist business which relies on the adjoining pasture land to create the best conditions for rearing foals. Development on site BK3 will need to take into account any potential impact from noise, increased activity and other forms of disturbance both during construction and throughout the occupancy of the scheme.</b>				
MM 224 / FM 120	152	Policy CD1 (3 <sup>rd</sup> and 4 <sup>th</sup> bullets)	<table border="1"> <tr> <td>Land south of Cowards Lane</td> <td>73 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li><b>Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</b></li> <li><b>Contribution towards expansion of Codicote Primary School;</b></li> <li><b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> <li>Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street;</li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Consider and mitigate against potential adverse impacts upon <del>Hollands</del> <b>Hollards</b> Farm Meadow Local Wildlife Site and adjoining priority woodland habitat.</li> </ul> </td> </tr> </table>	Land south of Cowards Lane	73 homes	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li><b>Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</b></li> <li><b>Contribution towards expansion of Codicote Primary School;</b></li> <li><b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> <li>Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street;</li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Consider and mitigate against potential adverse impacts upon <del>Hollands</del> <b>Hollards</b> Farm Meadow Local Wildlife Site and adjoining priority woodland habitat.</li> </ul>	
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MM 225 / FM 121	153	Policy CD2 (2 <sup>nd</sup> and 3 <sup>rd</sup> bullets)	<table border="1"> <tr> <td>Codicote Garden Centre, High Street</td> <td>54 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li><b>Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</b></li> <li><b>Contribution towards expansion of Codicote Primary School;</b></li> <li><b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> </ul> </td> </tr> </table>	Codicote Garden Centre, High Street	54 homes	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li><b>Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</b></li> <li><b>Contribution towards expansion of Codicote Primary School;</b></li> <li><b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> </ul>	
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			<ul style="list-style-type: none"> <li>• <b>Access through site to adjoining sports field and community centre;</b></li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat;</li> <li>• Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles;</li> <li>• <b>Retain and strengthen existing boundary hedgerows.</b></li> </ul>		
MM 226 / FM 122	153	Policy CD3 (1 <sup>st</sup> and 2 <sup>nd</sup> bullets)	<table border="1"> <tr> <td>Land north of The Close</td> <td>48 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• <b>Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</b></li> <li>• <b>Contribution towards expansion of Codicote Primary School;</b></li> <li>• <b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• Sensitive incorporation of Footpaths Codicote 007 and 008 as <del>perimeter</del> features <del>around</del> <b>within</b> the site and <b>providing</b> a connection from the High Street to the wider countryside;</li> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate approach to nearby Grade II* listed The Bury.</li> </ul>	Land north of The Close	48 homes
Land north of The Close	48 homes				
MM 227 / FM 123	153	Policy CD5 (1 <sup>st</sup> and 2 <sup>nd</sup> bullets)	<table border="1"> <tr> <td>Land south of Heath Lane</td> <td>140 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Land <del>broadly</del> to the east of the current alignment of footpath Codicote 014 to be reserved <b>and secured for education use to enable for</b> expansion of the existing school <b>to accommodate additional pupils arising from the allocated sites;</b></li> <li>• <b>Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</b></li> <li>• Detailed drainage strategy identifying water infrastructure required and</li> </ul>	Land south of Heath Lane	140 homes
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Ref.	Page (LP1)	Policy / Paragraph	Modification						
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MM 229 / FM 125	154	Paragraph 13.78	A site adjoining the existing Gypsy and Traveller site at <b>Danesbury Park Road Pulmore Water</b> has been identified for <b>four</b> <del>six</del> additional <b>Gypsy and Traveller</b> pitches to meet identified needs.						
MM 230 / FM 126	154	Policy CD4 (delete)	<table border="1"> <thead> <tr> <th>Ref</th> <th>Site</th> <th>Pitch estimate</th> </tr> </thead> <tbody> <tr> <td>CD4</td> <td>Land at Pulmore Water, St Albans Road</td> <td>6</td> </tr> </tbody> </table>	Ref	Site	Pitch estimate	CD4	Land at Pulmore Water, St Albans Road	6
Ref	Site	Pitch estimate							
CD4	Land at Pulmore Water, St Albans Road	6							
MM231	154	Policy CD6 (add)	<table border="1"> <tbody> <tr> <td>CD6</td> <td>Land at Woodside Place, Danesbury Park Road</td> <td>4</td> </tr> </tbody> </table>	CD6	Land at Woodside Place, Danesbury Park Road	4			
CD6	Land at Woodside Place, Danesbury Park Road	4							
MM 232	154	Paragraph 13.80	The existing 1 FE Codicote school regularly fills most of its available places from the local area. Its current site is physically constrained. Expansion of the existing primary school is required to accommodate demand from the additional residential development <b>within sites CD1, CD2, CD3 and CD5 as well as other dwellings that may come forward that is planned</b> in Codicote. <b>Expansion of the existing primary school will require site CD5 to come forward first to provide the land with the other three sites coming forward shortly after to ensure the necessary</b>						

Ref.	Page (LP1)	Policy / Paragraph	Modification				
			contributions for the expansion are available at the right time.				
MM 233	154	After paragraph 13.81 (new paragraph)	Some minor roads leading to/from Codicote may require mitigation. This includes Bury Lane/Park Lane to Old Knebworth, and St. Albans Road. The effects of increased traffic through the village centre could also be off-set by environmental improvements.				
		<b>GREAT ASHBY AND NORTH-EAST STEVENAGE</b>					
MM 237	156	Policy GA1	<table border="1"> <tr> <td>Land at Roundwood (Graveley parish)</td> <td>330 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>Sensitive integration into existing settlement in terms of development layout and building orientation;</li> <li>Principal vehicular access taken from existing residential streets within Great Ashby</li> <li><b>Provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy;</b></li> <li><b>Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;</b></li> <li><b>Contribution towards appropriate GP provision across the north of Stevenage sites;</b></li> <li>Maintain general integrity of Weston Road, including as a through route for pedestrians and cyclists</li> <li>Retention and sensitive treatment of priority woodland habitats surrounding site to north and west;</li> <li>Consider and mitigate against any adverse impacts upon adjacent local wildlife site at Parsonsgreen Wood;</li> <li>Integration of Footpath Graveley 010 as a perimeter feature around the north of the site;</li> <li>Sensitive design and landscaping around northern and western peripheries to minimise impacts upon wider landscape and heritage assets, including the setting of the Scheduled Ancient Monument at Chesfield Church.</li> </ul> </td> </tr> </table>	Land at Roundwood (Graveley parish)	330 homes	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>Sensitive integration into existing settlement in terms of development layout and building orientation;</li> <li>Principal vehicular access taken from existing residential streets within Great Ashby</li> <li><b>Provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy;</b></li> <li><b>Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;</b></li> <li><b>Contribution towards appropriate GP provision across the north of Stevenage sites;</b></li> <li>Maintain general integrity of Weston Road, including as a through route for pedestrians and cyclists</li> <li>Retention and sensitive treatment of priority woodland habitats surrounding site to north and west;</li> <li>Consider and mitigate against any adverse impacts upon adjacent local wildlife site at Parsonsgreen Wood;</li> <li>Integration of Footpath Graveley 010 as a perimeter feature around the north of the site;</li> <li>Sensitive design and landscaping around northern and western peripheries to minimise impacts upon wider landscape and heritage assets, including the setting of the Scheduled Ancient Monument at Chesfield Church.</li> </ul>	
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MM 238	157	Paragraph 13.99	Our proposals for site GA2 also require consideration of education provision, including a <del>minimum requirement</del> <b>reserving land</b> to provide a new 2FE primary / <b>4FE secondary 'all through'</b> school. <del>Between them, t</del> These measures <del>should</del> <b>will</b> ensure sufficient provision to serve Great Ashby as a whole.				
MM 239	157	After paragraph 13.99 (New paragraph)	<b>The Stevenage Mobility Strategy aims to significantly increase the proportion of journeys undertaking on foot, by bike and by public transport over the plan period. Sites on the edge of Stevenage will need to make appropriate provision for sustainable modes of transport, and appropriate contributions to relevant sustainable travel schemes across the town, to ensure that they meet these aims.</b>				
MM 240	157	Paragraph 13.100	Our transport modelling does not identify any specific mitigation scheme requirements for Great Ashby. <b>There are however local concerns that Back Lane, a narrow minor road which leads to Church Lane in Graveley, could be used by increased numbers of vehicles leaving the new development sites, and that junctions in Graveley itself</b>				

Ref.	Page (LP1)	Policy / Paragraph	Modification				
			<p>will suffer from congestion as a result of increased flows . These issues are also part of wider network issues concerning junction 8 of the A1(M) and alternative routeings to this, which are being reviewed by the Council and HCC, and which will propose mitigation measures in the area. These will be reflected in future iterations of the Infrastructure Delivery Plan. Any transport proposals should consider the effects on adjacent networks and communities such as Graveley , and propose suitable mitigation; the analysis should also consider cumulative impacts. However, it is also recognised that there are localised highway issues in the area, particularly relating to on-street car parking<sup>141</sup>. These <b>parking issues</b> have arisen, in part, as a result of national planning policies in place at the time Great Ashby was developed which restricted the amount of off-street car parking the District Council could require. <b>These measures, along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.</b></p> <p>[Footnote] <sup>141</sup> This also explains why high-level traffic modelling, which will not contain this level of intelligence, considers there to be sufficient capacity.</p>				
MM 241	157	Paragraph 13.101	<b>Some elements of potential solutions to these issues</b> highway management measures, such as the use of Traffic Regulation Orders (TROs) <b>to deal with parking issues</b> , lie outside the direct control of the planning system and it is therefore not for this Local Plan to dictate the most appropriate solution(s).				
MM 244	158	After Paragraph 13.103 (new paragraph)	<b>Our evidence identifies that the three housing allocations proposed to the north of Stevenage within the District will generate a requirement for two additional GPs. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed patterns of provision within Stevenage.</b>				
		<b>HITCHIN</b>					
MM 249	162	Policy HT2	<table border="1"> <tr> <td>Land north of Pound Farm (St Ippolyts parish)</td> <td>84 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• <b>No residential development within Flood Zone 2;</b></li> <li>• Maintain appropriate buffer zone from Ippolitts Brook at south-east of site;</li> <li>• Consider and mitigate against any adverse impacts upon adjoining priority habitat (deciduous woodland) and key features of interest of adjacent local wildlife site (Folly Alder Swamp);</li> <li>• <b>Retain and reinforce planting along southern and eastern boundaries to ensure integrity of revised Green Belt boundary;</b></li> <li>• Sensitive design towards south-west of site and in areas viewed from Mill Lane to minimise harm to heritage assets.</li> </ul> </td> </tr> </table>	Land north of Pound Farm (St Ippolyts parish)	84 homes	<ul style="list-style-type: none"> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• <b>No residential development within Flood Zone 2;</b></li> <li>• Maintain appropriate buffer zone from Ippolitts Brook at south-east of site;</li> <li>• Consider and mitigate against any adverse impacts upon adjoining priority habitat (deciduous woodland) and key features of interest of adjacent local wildlife site (Folly Alder Swamp);</li> <li>• <b>Retain and reinforce planting along southern and eastern boundaries to ensure integrity of revised Green Belt boundary;</b></li> <li>• Sensitive design towards south-west of site and in areas viewed from Mill Lane to minimise harm to heritage assets.</li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification		
250			<ul style="list-style-type: none"> <li>Access from Westbury <del>Close Way or Long Innings</del> whilst maintaining the general integrity and character of Oughtonhead Lane (Restricted Byway Hitchin 003);</li> <li>Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI;</li> <li><b>Retain and reinforce planting along western and southern boundaries to ensure integrity of revised Green Belt boundary;</b></li> <li>Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.</li> </ul>		
MM 251	HT5	Policy HT5	<table border="1"> <tr> <td>Land at junction of Grays Lane &amp; Lucas Lane</td> <td>16 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Improvements to Grays Lane to provide access to sites HT5 and HT6 whilst maintaining appropriate access to, <b>and general integrity and character of,</b> Bridleway Hitchin 004 and Byway Open to All Traffic Hitchin 007;</li> <li><b>Retain and reinforce planting along western boundaries to protect openness of Green Belt beyond the allocation;</b></li> <li>Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI;</li> <li>Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.</li> </ul>	Land at junction of Grays Lane & Lucas Lane	16 homes
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MM 252	HT6	Policy HT6	<table border="1"> <tr> <td>Land at junction of Grays Lane &amp; Crow Furlong</td> <td>53 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Improvements to Grays Lane to provide access to sites HT5 and HT6 whilst maintaining appropriate access to, <b>and integrity and character of,</b> Bridleway Hitchin 004 and Byway Open to All Traffic Hitchin 007;</li> <li>Consider and mitigate against any adverse impacts upon adjoining priority habitat (deciduous woodland);</li> <li>Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI;</li> <li><b>Retain and reinforce planting along western and southern boundaries to ensure integrity of revised Green Belt boundary;</b></li> <li>Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB;</li> <li>Archaeological survey to take place prior to development.</li> </ul>	Land at junction of Grays Lane & Crow Furlong	53 homes
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Ref.	Page (LP1)	Policy / Paragraph	Modification																														
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MM 398	164	Table after Paragraph 13.128	<table border="1"> <thead> <tr> <th>Ref</th> <th>Employment allocations and site-specific criteria <i>Designated employment areas</i></th> <th>Hectares</th> </tr> </thead> <tbody> <tr> <td>HE1</td> <td>Wilbury Way</td> <td>38.9</td> </tr> <tr> <td>HE2</td> <td>Burymead Road</td> <td>7.1</td> </tr> <tr> <td>HE3</td> <td>Station approach</td> <td>1.4</td> </tr> <tr> <td>HE4</td> <td>Land adjacent to Priory Park</td> <td>0.9</td> </tr> <tr> <td colspan="3"><i>Parts of employment areas designated for business use only</i></td> </tr> <tr> <td>HB1</td> <td>Wilbury Way</td> <td>3.6</td> </tr> <tr> <td>HB2</td> <td>Cadwell Lane</td> <td>0.8</td> </tr> <tr> <td>HB3</td> <td>Burymead Road</td> <td>7.1</td> </tr> <tr> <td>HB4</td> <td>Land adjacent to Priory Park</td> <td>0.9</td> </tr> </tbody> </table>	Ref	Employment allocations and site-specific criteria <i>Designated employment areas</i>	Hectares	HE1	Wilbury Way	38.9	HE2	Burymead Road	7.1	HE3	Station approach	1.4	HE4	Land adjacent to Priory Park	0.9	<i>Parts of employment areas designated for business use only</i>			HB1	Wilbury Way	3.6	HB2	Cadwell Lane	0.8	HB3	Burymead Road	7.1	HB4	Land adjacent to Priory Park	0.9
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MM 255	164	Paragraph 13.132	<p>A need for additional retail floorspace has been recognised <b>by the Council</b> and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. <b>The retail capacity projections<sup>[x]</sup> are district wide and can be met within the district. They are based on the projected additional spend on retail from an increased population and retaining market shares from competing centres. The capacity projections for Hitchin indicate the potential for growth of 11,100 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance advises that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail. Our evidence sees the Churchgate Centre and the surrounding area as a location where up to 4,000m<sup>2</sup> of additional retail floorspace could be provided as part of a comprehensive mixed-use redevelopment.</b></p> <p>[Footnote] <sup>[x]</sup>North Hertfordshire Retail Study Update (NLP, 2016); Retail Background Paper (NHDC, 2016)</p>																														
MM 256	164	After paragraph 13.132 (New Paragraph)	<p><b>For allocation purposes, the capacity has been distributed between three of the four Town centres' in the District. Baldock does not have an allocation due to no sites being presented as available to the Council.</b></p>																														
MM 257	164	Paragraph 13.133	<p><b>Our evidence sees the Churchgate Centre and the surrounding area as a location where up to 4,000 gross sq.m of additional retail floorspace could be provided as part of a comprehensive mixed-use redevelopment across the</b></p>																														

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			<b>entire allocated site.</b> Redevelopment of this area at a suitable scale and reflecting the historic properties of Hitchin town centre has the potential to enhance the character, appearance and significance of this area.				
MM 258	164	After paragraph 13.133 (new paragraphs)	<p><b>Paynes Park could deliver up to 3,000 gross sq.m additional retail floorspace and overall the remaining potential retail capacity for Hitchin of 4,100 gross sq.m will need to be met on a district wide basis. The retail study briefing note<sup>[x]</sup> indicates in its summary table that by 2031 the District as a whole will have effectively met its current capacity projections.</b></p> <p><b>A concept framework / masterplan will be initiated by the District Council to address the requirements of Policies HT11 and HT12. It will consider existing and potential land uses, capacities for development and place-making. It will illustrate the disposition and connectivity of current and potential land uses including retail; employment / commercial; housing; community facilities; formal/informal public open space; the market; links to car parks, bus stops, key footpaths, cycle tracks and vehicular routes as well as guidance on how these routes will align through and around the framework / masterplan area connecting to surrounding neighbourhoods. The framework / masterplan will also consider the phasing and deliverability of any site-specific proposals.</b></p> <p>[New footnote] <sup>[x]</sup><b>Retail Study Briefing Note (Lichfields, 2017)</b></p>				
MM 259	164	Paragraph 13.134	These schemes will be <b>main town centre uses</b> retail-led. Consequently, no specific housing allocation or requirement is identified, and any residential units here will contribute towards the windfall other allowances identified in Policy SP8(c) of this Plan.				
MM 260	164	After paragraph 13.135 (new paragraphs)	<p><b>Any major planning application within the allocation area on the Policies Map, should have regard to the concept framework / masterplan. Any major planning application which comes ahead of the concept framework / masterplan will be considered in accordance with the criterion in Policy HT11.</b></p> <p><b>The Hitchin Town Centre Strategy review will commence in advance of the second period of the Local Plan; being informed by the preceding Concept Framework.</b></p>				
MM 262 / FM 131	165	Policy HT11	<table border="1"> <thead> <tr> <th>Churchgate and its surrounding area</th> <th>Mixed-use</th> </tr> </thead> <tbody> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Redevelopment to provide approximately 4,000 m<sup>2</sup> of gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. <ul style="list-style-type: none"> <li>Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design,</li> </ul> </li> </ul> </td> </tr> </tbody> </table>	Churchgate and its surrounding area	Mixed-use	<ul style="list-style-type: none"> <li>Redevelopment to provide approximately 4,000 m<sup>2</sup> of gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. <ul style="list-style-type: none"> <li>Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design,</li> </ul> </li> </ul>	
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			<p><b>layout and transport terms.</b></p> <ul style="list-style-type: none"> <li>• Provision of residential accommodation on upper floors;</li> <li>• <b>Preparation of a concept framework / masterplan to enable:</b> <ul style="list-style-type: none"> <li>○ Identification of suitable, long-term location(s) for Hitchin Market;</li> <li>○ <del>Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</del></li> <li>○ Provision of high quality public realm including strengthened pedestrian links between Market Place, Queen Street, Portmill Lane, Bancroft and along the River Hiz;</li> <li>○ Preservation and enhancement of heritage assets including Hitchin Conservation Area and listed buildings, including:           <ul style="list-style-type: none"> <li>▪ Protection of key views of Grade I listed St Mary’s Church, including from Hollow Lane;</li> <li>▪ Consideration and sensitive treatment of key listed buildings and their settings including the Sun Hotel, the Biggin and various buildings in Market Place;</li> <li>▪ Retention and enhancement of terracing to River Hiz <b>having regard to identified Flood Zone;</b></li> <li>▪ Any replacement buildings required to:               <ul style="list-style-type: none"> <li>• respect existing building frontage lines on Sun Street and Market Place; and</li> <li>• provide architectural variation to reflect rhythm of historic building plots.</li> </ul> </li> </ul> </li> </ul> </li> <li>• Archaeological survey to be completed prior to development; <b>and</b></li> <li>• <b>Ensure an appropriate level of car parking is retained and / or provided across the town as a whole.</b></li> </ul>				
MM 263 / FM 132	165	Policy HT12	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td data-bbox="672 1182 1395 1230"><b>Paynes Park</b></td> <td data-bbox="1395 1182 2074 1230" style="text-align: right;">Mixed-use</td> </tr> <tr> <td colspan="2" data-bbox="672 1230 2074 1447"> <ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 4,000m<sup>2</sup> of <b>3,000 gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway</b> town centre uses floorspace <b>at ground floor level, subject to an up-to date assessment of retail capacity and supply.</b> <ul style="list-style-type: none"> <li>○ <b>Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</b></li> </ul> </li> </ul> </td> </tr> </table>	<b>Paynes Park</b>	Mixed-use	<ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 4,000m<sup>2</sup> of <b>3,000 gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway</b> town centre uses floorspace <b>at ground floor level, subject to an up-to date assessment of retail capacity and supply.</b> <ul style="list-style-type: none"> <li>○ <b>Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</b></li> </ul> </li> </ul>	
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MM 264	166	Paragraph 13.145	All schemes in Hitchin will be required to make reasonable contributions towards the funding of these works, <b>and to walking and cycling schemes in Hitchin which aim to influence mode share and free up capacity for new development.</b> However, appropriate funding arrangements will need to be made. These need to reflect the fact that background traffic growth triggers the requirement for the schemes with new development than utilising some of the additional capacity that would be provided. <b>In some cases, existing traffic or background growth may result in junction capacity issues, and new development will further increase these problems. However any additional capacity developed to resolve existing or background growth issues will also be taken up by new development, and appropriate contributions are therefore likely to be required.</b>				
<b>ICKLEFORD</b>							
MM 268	169	Policy IC1	<table border="1"> <tr> <td>Land at Duncots Close</td> <td>9 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>● Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>● No built development in north-east corner of site to protect views from Grade I listed church;</li> <li>● <b>Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts</b></li> <li>● Archaeological survey to be completed prior to development.</li> <li>● <b>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</b></li> </ul> </td> </tr> </table>	Land at Duncots Close	9 homes	<ul style="list-style-type: none"> <li>● Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>● No built development in north-east corner of site to protect views from Grade I listed church;</li> <li>● <b>Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts</b></li> <li>● Archaeological survey to be completed prior to development.</li> <li>● <b>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</b></li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification		
269			<ul style="list-style-type: none"> <li>• Provision of a pedestrian crossing point over the A600 to connect to the existing footpath network and ensure safe access;</li> <li>• Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures;</li> <li>• Consider and mitigate against any adverse impacts upon key features of interest of adjoining local wildlife site (Westmill Lane)</li> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Retention of planting at south and west of the site to ensure integrity of revised Green Belt boundary;</li> <li>• Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism.</li> </ul>		
MM 270	170	Policy IC3	<table border="1"> <tr> <td>Land at Bedford Road</td> <td>150 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures;</li> <li>• Approximately two hectares of land secured as a <del>appropriate solution for</del> reserve site for a primary school education requirements having regard to up-to-date assessments of need;</li> <li>• Appropriate junction access arrangements to Bedford Road;</li> <li>• Sensitive incorporation of Footpaths Ickleford 013 &amp; 014 as green routes around the edge of the site including appropriate measures to reinforce the new Green Belt boundary along their alignment;</li> <li>• Integration of Bridleway Ickleford 015 as a green corridor through the site;</li> <li>• Sensitive treatment of priority deciduous woodland habitat or, where this cannot be (fully) retained, compensatory provision elsewhere within or adjoining the site;</li> <li>• Development proposals to be informed by site-specific landscape assessment;</li> <li>• Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li>• Archaeological survey to be completed prior to development;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	Land at Bedford Road	150 homes
Land at Bedford Road	150 homes				

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism.</li> <li>Consider and mitigate against potential adverse impacts of sites on Oughtonhead Lane SSSI.</li> </ul>
MM272	170	Paragraph 13.158	Our transport modelling work does not identify any specific mitigation works that are required on the Ickleford road network. Development here will, however, contribute toward traffic generation within Hitchin and appropriate contributions will be sought towards identified schemes in the town. <b>Any transport assessments for sites in Ickleford should also consider the junction of the A600 and Turnpike Lane, where improved facilities for pedestrians and cyclists may mitigate higher traffic volumes.</b>
MM 273	170	Paragraph 13.160	Ickleford Primary is a 1FE school and regularly fills most of its available places from the local area. However, it is located on a constrained site. The school premises lie partially within the Conservation Area and the original school building is listed. There is no capacity to expand within the current site <b>but the advantages of keeping the school at the historic centre of the village are recognised in both functional and heritage terms.</b>
MM 274	170	After Paragraph 13.160 (new paragraph)	<b>As well as serving Ickleford, the school also admits pupils from northern Hitchin as well as outlying rural areas and settlements. The amount of development proposed for Ickleford may result in a need for additional primary school provision. However, it is not possible to say at this point exactly how or when this provision might be needed. The additional demand created by new development in Ickleford may be offset, either in whole or in part, by changes to school admission patterns outside of the village.</b>
MM 275	170	Paragraph 13.161	<del>The estimated number of homes on site Site IC3</del> <b>reserves sufficient land to provide</b> <del>makes allowance for the provision of a new primary school of up to 2FE on this site</del> <b>should this prove necessary.</b> This would allow for the relocation of the existing school and / or additional provision to meet requirements arising from new development if this is determined to be the most appropriate solution. <b>The Council will work with the school, Hertfordshire County Council and other stakeholders as required to monitor the demand for school places. All options for the retention of the existing school in its current form, its expansion within or adjoining its existing site or splitting provision across the two sites will be fully explored before any decision is taken to relocate Ickleford Primary to the reserve site within IC3.</b>
MM 276	171	Paragraph 13.163	Anglian Water consider there is capacity in the relevant treatment works to support the level of growth proposed. <b>There have been local incidents of sewer flooding and all sites will be required to robustly assess wastewater drainage requirements.</b>
MM 277	171	After paragraph 13.163 (new paragraph)	<del>Hertfordshire County Council, as minerals planning authority, has identified a potential resource block (and associated buffer) to the north of Hitchin. Sites IC2 and IC3 lie within these areas. These sites will be subject to consultation with the mineral planning authority to determine whether prior extraction (or any other relevant measure) is necessary to avoid sterilisation of any minerals resource.</del>
		<b>KIMPTON</b>	

Ref.	Page (LP1)	Policy / Paragraph	Modification				
MM 280	173	Policy KM3	<table border="1"> <tr> <td>Land north of High Street</td> <td>13 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Address existing surface water <b>and groundwater</b> flood risk issues through SUDs or other appropriate solution;</li> <li>Sensitive design to minimise impacts upon adjoining Conservation Area.</li> </ul> </td> </tr> </table>	Land north of High Street	13 homes	<ul style="list-style-type: none"> <li>Address existing surface water <b>and groundwater</b> flood risk issues through SUDs or other appropriate solution;</li> <li>Sensitive design to minimise impacts upon adjoining Conservation Area.</li> </ul>	
Land north of High Street	13 homes						
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MM 281	173	After paragraph 13.174 (new paragraph)	<p><b><i>Infrastructure and mitigation</i></b>  <b>There are known flooding issues in Kimpton, from both surface water and groundwater, particularly along Claggy Road which acts as a flood route into the High Street. Development in Kimpton will be required to achieve the equivalent of greenfield run off rates to ensure existing issues are not exacerbated.</b></p>				
<b>KING'S WALDEN</b>							
MM 282	174	Policy KW1	<table border="1"> <tr> <td>Land west of The Heath, Breachwood Green</td> <td>16 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Appropriate noise monitoring and mitigation measures, to potentially include insulation and appropriate orientation of living spaces, demonstrating WHO and BS8223 standards will be met;</li> <li>Reprovision of existing allotments subject to up-to-date assessments of need;</li> <li>Sensitive treatment on site frontage to minimise impacts upon setting of nearby Listed buildings on The Heath;</li> <li>Reinforce western site boundary to screen views, enhance Green Belt boundary and maintain rural setting of Listed buildings on Brownings Lane;</li> <li><del>Incorporation</del> <b>Provision of Footpath Kings Walden 008 as green corridor through the site linking Footpath Kings Walden 008 with Footpath Kings Walden 014.</b></li> </ul> </td> </tr> </table>	Land west of The Heath, Breachwood Green	16 homes	<ul style="list-style-type: none"> <li>Appropriate noise monitoring and mitigation measures, to potentially include insulation and appropriate orientation of living spaces, demonstrating WHO and BS8223 standards will be met;</li> <li>Reprovision of existing allotments subject to up-to-date assessments of need;</li> <li>Sensitive treatment on site frontage to minimise impacts upon setting of nearby Listed buildings on The Heath;</li> <li>Reinforce western site boundary to screen views, enhance Green Belt boundary and maintain rural setting of Listed buildings on Brownings Lane;</li> <li><del>Incorporation</del> <b>Provision of Footpath Kings Walden 008 as green corridor through the site linking Footpath Kings Walden 008 with Footpath Kings Walden 014.</b></li> </ul>	
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<b>KNEBWORTH</b>							
MM 285	177	Policy KB1	<table border="1"> <tr> <td>Land at Deards End</td> <td>200 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li><b>Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</b></li> <li>Sensitive design and / or lower density housing at east of site to respect setting of Deards End Lane Conservation Area and listed buildings;</li> <li>Creation of appropriate, defensible Green Belt boundary along north-western perimeter of site;</li> <li><b>Detailed scheme layout to be informed by site-specific visual impact assessment to mitigate Green Belt impacts to the fullest reasonable extent;</b></li> <li>Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient</li> </ul> </td> </tr> </table>	Land at Deards End	200 homes	<ul style="list-style-type: none"> <li><b>Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</b></li> <li>Sensitive design and / or lower density housing at east of site to respect setting of Deards End Lane Conservation Area and listed buildings;</li> <li>Creation of appropriate, defensible Green Belt boundary along north-western perimeter of site;</li> <li><b>Detailed scheme layout to be informed by site-specific visual impact assessment to mitigate Green Belt impacts to the fullest reasonable extent;</b></li> <li>Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient</li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification		
			<ul style="list-style-type: none"> <li>Monument);</li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces;</li> <li>Consider and mitigate against potential adverse impacts upon Knebworth Woods SSSI and priority habitat (deciduous woodland) adjoining site; and</li> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>		
MM 286 / FM 145	177	Policy KB2 (4 <sup>th</sup> bullet)	<table border="1"> <tr> <td>Land off <del>Gypsy</del> <b>Gypsy Lane</b></td> <td>184 homes</td> </tr> </table> <ul style="list-style-type: none"> <li><b>Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</b></li> <li>Sensitive design and / or lower density housing where site affects setting of Stockens Green Conservation Area;</li> <li>Creation of appropriate, defensible Green Belt boundary along southern perimeter of site;</li> <li><b>Approximately two hectares of land to the south of Gypsy Lane and adjoining the existing settlement reserved as an appropriate site for provision of <del>1FE</del> a new Primary School</b></li> <li>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>Address existing surface water flood risk issues, including any run-off from A1(M), through SUDs or other appropriate solution;</li> <li>Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient Monument);</li> <li>Appropriate noise mitigation measures, to potentially include buffer strip, insulation and appropriate orientation of living spaces; and</li> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	Land off <del>Gypsy</del> <b>Gypsy Lane</b>	184 homes
Land off <del>Gypsy</del> <b>Gypsy Lane</b>	184 homes				
FM 146	177	Policy KB3 (delete)	<table border="1"> <tr> <td><del>Chas Lowe site, London Road</del></td> <td><del>14 homes</del></td> </tr> </table>	<del>Chas Lowe site, London Road</del>	<del>14 homes</del>
<del>Chas Lowe site, London Road</del>	<del>14 homes</del>				

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>Address existing surface water flood risk issues through removal of hardstanding, SUDs or other appropriate solution.</li> </ul>
MM 288	178	Policy KB4	<p>Land east of Knebworth 200 homes</p> <ul style="list-style-type: none"> <li><b>Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</b></li> <li>Structural landscaping and planting to provide and / or reinforce Green Belt boundary to east;</li> <li><b>Up to 4ha of land north of Watton Road reserved for long-term secondary education purposes subject to up-to-date assessments of needs;</b></li> <li>Integrate Bridleway Knebworth 001 as part of green infrastructure strategy;</li> <li>Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>Preserve longer-views from Knebworth to wider countryside along dry valley to south of Watton Road; and</li> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>
MM 291	178	Paragraph 13.191	<p><b>Land will be reserved within Site KB2 will to provide an additional primary school that will meet the needs arising from new development at the west of Knebworth and provide capacity to serve some existing residential areas. Land at the south-east of the KB2 allocation is most suited for this provision which should additionally seek to maximise the distance of the school from the A1(M).</b></p>
MM 293 / FM 147	178	Paragraph 13.193	<p><del>New development, particularly on site KB4 to the east of Knebworth, provides the opportunity to look at alternate approaches. Making smaller-scale secondary provision, possibly as an 'all-through school'<sup>144</sup> may be an appropriate solution which meets future needs, benefits existing residents and provides a more sustainable approach.</del>  <sup>144</sup>All-through schools make provision for all children from age 4 to 18. See Policy SP10.</p>
MM 294	179	Paragraph 13.194	<p><b>It is currently anticipated that any secondary school provision in Knebworth will not be required until the late 2020s at the very earliest. To ensure an appropriately sized site can be made available, land to the north of Watton Lane at the east of the village is reserved for this purpose. We will continue to work with Hertfordshire County Council, the Parish Council, the landowner and Knebworth Primary School to monitor long-term education needs across the Stevenage School Place Planning Area and explore the most appropriate education solution for this site.</b></p>
MM 295	179	Paragraph 13.195	<p>Our transport modelling does not identify any specific mitigation scheme requirements for Knebworth. However, the high street, <b>including the junction of Stevenage Road/London Road/Watton Road and Station Road</b>, is a</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification				
			known pinch point, particularly when delays or incidents on the A1(M) result in the B197 being used as an alternate route between Welwyn Garden City and Stevenage. <b>There are also issues of poor pedestrian/cycle access along Station Road under the railway line, and similar issues at Gun Lane and new development will be expected to consider improvements to walking/cycling conditions in these locations and make reasonable contributions to secure their delivery.</b>				
		<b>LETCWORTH GARDEN CITY</b>					
MM 298	182	Paragraph 13.214	New development within Letchworth Garden City will need to demonstrate how it accords with <b>the Letchworth Garden City Design principles as set out in Appendix 5.</b>				
MM 300	182	Policy LG4	<table border="1"> <tr> <td>Land north of former Norton School, Norton Road</td> <td>45 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• Appropriate access arrangements to minimise impact upon Croft Lane Conservation Area;</li> <li>• <del>Justification for any loss of open space. Re-provision or contributions towards improvements to existing provision where appropriate;</del></li> <li>• Address existing surface water flood risk through SUDs or other appropriate solution, particularly on the western boundary of the site;</li> <li>• Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area, the setting of the Croft Lane Conservation Area and setting of the Grade II Listed Croft Corner and Grade II Listed Treetops;</li> <li>• Archaeological survey to be completed prior to development.</li> </ul> </td> </tr> </table>	Land north of former Norton School, Norton Road	45 homes	<ul style="list-style-type: none"> <li>• Appropriate access arrangements to minimise impact upon Croft Lane Conservation Area;</li> <li>• <del>Justification for any loss of open space. Re-provision or contributions towards improvements to existing provision where appropriate;</del></li> <li>• Address existing surface water flood risk through SUDs or other appropriate solution, particularly on the western boundary of the site;</li> <li>• Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area, the setting of the Croft Lane Conservation Area and setting of the Grade II Listed Croft Corner and Grade II Listed Treetops;</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	
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MM 301	183	Policy LG5	<table border="1"> <tr> <td>Land at Birds Hill</td> <td>86 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• Higher density/flatted development may be achieved given surrounding built form, subject to heritage considerations;</li> <li>• Appropriate mitigation measures for noise associated with railway and / or adjoining employment are to potentially include insulation and orientation of living spaces;</li> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses</li> <li>• Sensitive design where site affects setting of the Letchworth Conservation Area and Grade II Listed buildings on Birds Hill;</li> <li>• Retention of <del>any buildings of historic and/or architectural interest</del> <b>the following non-designated heritage assets<sup>[x]</sup> or, where this cannot be achieved, justification for their loss:</b> <ul style="list-style-type: none"> <li>• <b>Gunmetal &amp; Bronze, Letchworth Casting Co. Ltd, Casting House</b></li> <li>• <b>Ogle</b></li> </ul> </li> </ul> </td> </tr> </table>	Land at Birds Hill	86 homes	<ul style="list-style-type: none"> <li>• Higher density/flatted development may be achieved given surrounding built form, subject to heritage considerations;</li> <li>• Appropriate mitigation measures for noise associated with railway and / or adjoining employment are to potentially include insulation and orientation of living spaces;</li> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses</li> <li>• Sensitive design where site affects setting of the Letchworth Conservation Area and Grade II Listed buildings on Birds Hill;</li> <li>• Retention of <del>any buildings of historic and/or architectural interest</del> <b>the following non-designated heritage assets<sup>[x]</sup> or, where this cannot be achieved, justification for their loss:</b> <ul style="list-style-type: none"> <li>• <b>Gunmetal &amp; Bronze, Letchworth Casting Co. Ltd, Casting House</b></li> <li>• <b>Ogle</b></li> </ul> </li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification				
			<ul style="list-style-type: none"> <li>Vantage Point, Tenement Factory</li> </ul> <p>[Footnote] <sup>[x]</sup> As identified in <i>Design Principles for Industrial Premises in Letchworth Garden City</i>, Letchworth Garden City Heritage Foundation, 2015</p>				
MM 302	183	Policy LG6	<table border="1"> <tr> <td>Land off Radburn Way</td> <td>35 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Re-provision or relocation of any garages lost as a result of development subject to up-to-date evidence of occupation and demand;</li> <li>Retention of an area of priority orchard habitat within any scheme with appropriate Off-site compensatory re-provision for any of former priority orchard habitat lost as a result of development.</li> </ul> </td> </tr> </table>	Land off Radburn Way	35 homes	<ul style="list-style-type: none"> <li>Re-provision or relocation of any garages lost as a result of development subject to up-to-date evidence of occupation and demand;</li> <li>Retention of an area of priority orchard habitat within any scheme with appropriate Off-site compensatory re-provision for any of former priority orchard habitat lost as a result of development.</li> </ul>	
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MM 303	183	Policy LG9	<table border="1"> <tr> <td>Former Lannock School</td> <td>45 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Justification for any loss of open space. Re-provision or contributions towards improvements to existing provision where appropriate;</li> <li>Lower density development with retention of some existing trees and green space to retain sense of openness and accord with Garden City principles;</li> <li>Site layout designed to take account of existing wastewater infrastructure;</li> <li>Address existing surface water flood risk issues through SUDs or other appropriate solution.</li> </ul> </td> </tr> </table>	Former Lannock School	45 homes	<ul style="list-style-type: none"> <li>Justification for any loss of open space. Re-provision or contributions towards improvements to existing provision where appropriate;</li> <li>Lower density development with retention of some existing trees and green space to retain sense of openness and accord with Garden City principles;</li> <li>Site layout designed to take account of existing wastewater infrastructure;</li> <li>Address existing surface water flood risk issues through SUDs or other appropriate solution.</li> </ul>	
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MM 304	184	Policy LG10	<table border="1"> <tr> <td>Former playing field, Croft Lane</td> <td>37 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Justification for the loss of outdoor sports facilities. Re-provision or contributions towards improvements to existing provision where appropriate;</li> <li>Sensitive design and lower density development to minimise harm to the Croft Lane Conservation Area and setting of the Grade II Listed Buildings along Cashio Lane, Croft Lane and Norton Road;</li> <li>Access arrangements to minimise impact upon heritage assets;</li> <li>Provide archaeological survey prior to development.</li> </ul> </td> </tr> </table>	Former playing field, Croft Lane	37 homes	<ul style="list-style-type: none"> <li>Justification for the loss of outdoor sports facilities. Re-provision or contributions towards improvements to existing provision where appropriate;</li> <li>Sensitive design and lower density development to minimise harm to the Croft Lane Conservation Area and setting of the Grade II Listed Buildings along Cashio Lane, Croft Lane and Norton Road;</li> <li>Access arrangements to minimise impact upon heritage assets;</li> <li>Provide archaeological survey prior to development.</li> </ul>	
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FM 150	185	Policy LG14 (delete)	<table border="1"> <tr> <td>Site at Icknield Way</td> <td>8 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area;</li> </ul> </td> </tr> </table>	Site at Icknield Way	8 homes	<ul style="list-style-type: none"> <li>Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area;</li> </ul>	
Site at Icknield Way	8 homes						
<ul style="list-style-type: none"> <li>Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area;</li> </ul>							
FM 151	185	Policy LG17 (delete)	<table border="1"> <tr> <td>Hamonte</td> <td>30 homes</td> </tr> <tr> <td colspan="2">No site-specific requirements identified.</td> </tr> </table>	Hamonte	30 homes	No site-specific requirements identified.	
Hamonte	30 homes						
No site-specific requirements identified.							
MM 399	185	Paragraph 13.217 (delete)	In order to help deliver the additional local jobs estimated to be needed in the District over the plan period, policy SP3 identifies that 1.5 hectares of employment land should be allocated at the former Power Station on Works Road, partly to compensate the loss of employment sites on the western fringes of the main employment area, but also to provide new employment space for business growth.				

Ref.	Page (LP1)	Policy / Paragraph	Modification																																							
MM 400	185- 186	Table after Paragraph 13.217	<table border="1"> <thead> <tr> <th>Ref</th> <th>Employment allocations and site-specific criteria <i>Designated employment areas</i></th> <th>Hectares</th> </tr> </thead> <tbody> <tr> <td>LG12</td> <td>Former power station, Works Road</td> <td>1.5</td> </tr> <tr> <td colspan="3"><i>Designated employment areas</i></td> </tr> <tr> <td>LE1</td> <td>Works Road</td> <td>70.9</td> </tr> <tr> <td>LE2</td> <td>Blackhorse Road</td> <td>11.8</td> </tr> <tr> <td>LE3</td> <td>Icknield Way</td> <td>11.4</td> </tr> <tr> <td>LE4</td> <td>Spirella</td> <td>2.8</td> </tr> <tr> <td colspan="3"><i>Parts of employment areas designated for business use only</i></td> </tr> <tr> <td>LB1</td> <td>Amor Way</td> <td>0.2</td> </tr> <tr> <td>LB2</td> <td>Blackhorse Road North</td> <td>4.8</td> </tr> <tr> <td>LB3</td> <td>Icknield Way North</td> <td>3.7</td> </tr> <tr> <td>LB4</td> <td>Icknield Way South</td> <td>3.0</td> </tr> <tr> <td>LB5</td> <td>Spirella</td> <td>2.8</td> </tr> </tbody> </table>	Ref	Employment allocations and site-specific criteria <i>Designated employment areas</i>	Hectares	LG12	Former power station, Works Road	1.5	<i>Designated employment areas</i>			LE1	Works Road	70.9	LE2	Blackhorse Road	11.8	LE3	Icknield Way	11.4	LE4	Spirella	2.8	<i>Parts of employment areas designated for business use only</i>			LB1	Amor Way	0.2	LB2	Blackhorse Road North	4.8	LB3	Icknield Way North	3.7	LB4	Icknield Way South	3.0	LB5	Spirella	2.8
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MM 306	186	Paragraph 13.219	<p>There is no immediate identified need (up to 2021) for additional retail floorspace in Letchworth as existing permissions and filling vacant units help meet the town's short-term requirement. However, beyond 2021 there is a need to identify sites to accommodate additional floorspace. This will be in the form of mixed-use allocations. <b>A need for additional retail floorspace has been recognised by the Council and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. The retail capacity projections<sup>[x]</sup> are district wide and can be met within the District. They are based on the projected additional spend on retail from an increased population and retaining market shares from competing centres. The capacity projections for Letchworth indicate the potential for growth of 9,200 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance advises that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail. For allocation purposes, the capacity has been distributed between three of the four town centres' in the District. Baldock does not have an allocation due to no sites being presented as available to the Council.</b></p> <p>[Footnote] <sup>[x]</sup> North Hertfordshire Retail Study Update (NLP, 2016); Retail Background Paper (NHDC, 2016)</p>																																							
MM 310 / FM 153	186	Policy LG19	<table border="1"> <tr> <td>The Wynd, Openshaw Way</td> <td>Mixed-use</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Redevelopment to provide approximately 4,500m<sup>2</sup> of gross sq.m of additional main-shop, café or restaurant, pub or drinking establishment or takeaway town centre</li> </ul> </td> </tr> </table>	The Wynd, Openshaw Way	Mixed-use	<ul style="list-style-type: none"> <li>Redevelopment to provide approximately 4,500m<sup>2</sup> of gross sq.m of additional main-shop, café or restaurant, pub or drinking establishment or takeaway town centre</li> </ul>																																				
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			<p>uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply.</p> <ul style="list-style-type: none"> <li>○ <b>Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout, flood risk and transport terms.</b></li> <li>○ <b>Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout, flood risk and transport terms.</b></li> </ul> <ul style="list-style-type: none"> <li>● No net loss of residential accommodation;</li> <li>● Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</li> <li>● A public pedestrian link should be provided through the site from Norton Way South and Howard Gardens;</li> <li>● Sensitive design to respect Letchworth Conservation Area and the listed building at 52-58 Leys Avenue;</li> <li>● Address existing surface-water flood risk issues, including any run-off, through <b>preparation of a site-specific flood risk assessment and the provision of SUDs</b> or other appropriate solution.</li> </ul>		
MM 311 / FM 154	186	Policy LG20	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Gernon Road</td> <td style="width: 50%;">Mixed-use</td> </tr> </table>	Gernon Road	Mixed-use
Gernon Road	Mixed-use				

Ref.	Page (LP1)	Policy / Paragraph	Modification		
			<ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 1,000m<sup>2</sup> of gross sq.m of additional main shop, café or restaurant, pub or drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply.               <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> <li>• Development should seek to retain parts of the library that make a positive contribution to the appearance and street-scene;</li> <li>• Development should enhance the setting of Broadway Gardens;</li> <li>• Preservation or enhancement of the setting of the listed museum;</li> <li>• Sensitive design to respect Letchworth Conservation Area and Letchworth Museum, Vasant Hall and Town Hall listed buildings;</li> <li>• Address existing surface water flood risk issues, including any run-off, through SUDs or other appropriate solution.</li> </ul>		
MM 312 / FM 155	187	Policy LG21	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td data-bbox="672 866 1377 911">Arena Parade</td> <td data-bbox="1377 866 2076 911">Mixed-use</td> </tr> </table> <ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 5,000m<sup>2</sup> of gross sq.m of additional main shop, café or restaurant, pub or drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply.               <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> <li>• No net loss of residential accommodation;</li> <li>• Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</li> <li>• Maintenance of building lines along Broadway and Eastcheap;</li> <li>• Improve east to west pedestrian links;</li> </ul>	Arena Parade	Mixed-use
Arena Parade	Mixed-use				

Ref.	Page (LP1)	Policy / Paragraph	Modification				
			<ul style="list-style-type: none"> <li>• Vehicle access/egress and servicing should be from Broadway;</li> <li>• Sensitive design to respect Letchworth Conservation Area and the Town Hall and Broadway Chambers listed buildings;</li> <li>• Address existing surface water flood risk issues, including any run-off, through SUDs or other appropriate solution.</li> </ul>				
MM 313	187	After Policy LG21 (New paragraphs)	<b>The allocation of sites LG19, LG20 and LG21 will not prejudice other re-development proposals, which would be of benefit to the vibrancy and vitality of the town centre; taking into consideration of the Local plan as a whole. The Letchworth Garden City Town Centre Strategy review will commence within twelve months of the adoption of this plan, which working with landowners, the local community, the Business Improvement District and other key stakeholders will consider up-to-date retail projections and if growth is still required, how to accommodate that growth.</b>				
MM 314	187	Before paragraph 13.221 and after new paragraphs at MM313 (New paragraphs)	<b>The schemes will be main town centre uses led. Consequently, no specific housing allocation is identified and any residential units here will contribute towards the windfall and other allowances identified in Policy SP8, c of this Plan. The projected additional 50 homes in the housing trajectory for Letchworth Garden City are expected to be completed within the broad location defined as the Town Centre Boundary on the Policies Map.</b>				
MM 315	187	Paragraph 13.225	<del>Further schools provision will be needed. Any further primary school places that are required in addition to the proposed new school north of Letchworth will be met through expansions. However, Hertfordshire County Council have confirmed that the expansion of Fearnhill School can meet demand for additional secondary school places beyond 2028. need to undertake further work to determine which schools have capacity to expand on their existing sites and how this relates to the proposed pattern of development across the town. This applies to both primary and secondary level education.</del>				
MM 316	188	Paragraph 13.228	Schemes in Letchworth will be required to make reasonable contributions towards these schemes and / or other schemes in nearby locations (see Baldock and Hitchin sections of this chapter in particular) where traffic generation arising from new development will have an impact. <b>In addition schemes will be required to make contributions to walking and cycling schemes in Letchworth which aim to influence mode share and free up capacity for new development.</b>				
		<b>LOWER STONDON</b>					
FM 158	190	Policy LS1 (delete)	<table border="1"> <tr> <td>Land at Bedford Road</td> <td>120 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• <del>Appropriate junction access arrangements to Bedford Road;</del></li> <li>• <del>Sensitive integration into existing settlement, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</del></li> </ul> </td> </tr> </table>	Land at Bedford Road	120 homes	<ul style="list-style-type: none"> <li>• <del>Appropriate junction access arrangements to Bedford Road;</del></li> <li>• <del>Sensitive integration into existing settlement, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</del></li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification						
			<ul style="list-style-type: none"> <li>• Sensitive incorporation of Footpaths Ickleford 001 &amp; 002 as green routes through and around the edge of the site;</li> <li>• No residential development within Flood Zones 2 or 3;</li> <li>• Incorporate ordinary watercourses (and any appropriate measures) and address existing surface water flood risk issues within comprehensive green infrastructure and / or SUDs approach;</li> <li>• Development proposals to be informed by site-specific landscape and heritage assessment;</li> </ul> <table border="1"> <tr> <td>Total allocated sites</td> <td>120 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>4 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>124 homes</td> </tr> </table>	Total allocated sites	120 homes	Completions and permissions	4 homes	Total allocated, completed and permitted	124 homes
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FM 159	191	Paragraphs 13.243 to 13.246 (delete)	<p><del>Infrastructure and mitigation</del></p> <p><del>13.243 Our transport modelling work does not identify any specific mitigation works that are required in this area. Development here will, however, contribute toward traffic generation within Hitchin and appropriate contributions will be sought towards schemes in the town.</del></p> <p><del>13.244 Site LS1 will require the creation of a new access onto the A600 Bedford Road. The most appropriate solution, along with any consequential works – such as changes to speed limits entering / exiting the village from / to the north – will be explored through transport assessments.</del></p> <p><del>13.245 The nearest school within Hertfordshire is Ickleford Primary. Our approach to education here is set out in the Ickleford section of this chapter. However, development of this site will tie in to the urban area of Lower Stondon and parents may express a preference for their children to go to school within the village.</del></p> <p><del>13.246 On this and all other relevant matters it will be necessary to consider how the proposed development interacts with land and facilities in the administrative area of Central Bedfordshire Council.</del></p>						
		<b>PRESTON</b>							
MM 327	196	Policy PR1	<table border="1"> <tr> <td>Land off Templars Lane</td> <td>21 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Consider and mitigate against potential adverse impacts upon nearby Wain Wood SSSI;</li> <li>• Sensitive design that considers any impacts upon the setting of Preston Conservation Area and adjacent listed buildings;</li> <li>• <b>Retention of hedgerow boundary with Butchers Lane;</b></li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	Land off Templars Lane	21 homes				
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MM 328	196	After table	<b>Infrastructure and mitigation</b>						

Ref.	Page (LP1)	Policy / Paragraph	Modification				
		(new paragraph)	<b>Wain Woods SSSI (Site of Special Scientific Interest) lies approximately 200m to the north of Preston and is accessed by the Public Rights of Way network. Any potential impacts that could be associated with an increase in visitor numbers to the SSSI, such as trampling of vegetation or dog fouling should be addressed through mitigation measures such as interpretation leaflets</b>				
		<b>ROYSTON</b>					
FM 168	200	Policy RY1 (delete)	<table border="1"> <tr> <td>Land west of Ivy Farm, Baldock Road</td> <td>279 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• <del>Appropriate solution for primary education requirements having regard to up-to-date assessments of need and geographical distribution of existing provision;</del></li> <li>• <del>Retention of Public Right of Way Royston 017 as a green corridor through the site;</del></li> <li>• <del>Appropriate mitigation measures for noise associated with the adjoining railway to potentially include insulation and appropriate orientation of living spaces;</del></li> <li>• <del>Design to minimise visual impact of the development from Therfield Heath;</del></li> <li>• <del>Proposals to be informed by a site-specific landscape assessment and to retain trees as a buffer to the railway line;</del></li> <li>• <del>Consider and mitigate against potential adverse impacts upon Therfield Heath SSSI including provision of green infrastructure within the development to reduce recreational pressure;</del></li> <li>• <del>Address potential surface water flood risk through SUDs or other appropriate solution;</del></li> <li>• <del>Archaeological survey to be completed prior to development.</del></li> <li>• <del>Sensitive design and mitigation measures to address any impact on the setting of the Scheduled Ancient Monuments (pre-historic barrows).</del></li> </ul> </td> </tr> </table>	Land west of Ivy Farm, Baldock Road	279 homes	<ul style="list-style-type: none"> <li>• <del>Appropriate solution for primary education requirements having regard to up-to-date assessments of need and geographical distribution of existing provision;</del></li> <li>• <del>Retention of Public Right of Way Royston 017 as a green corridor through the site;</del></li> <li>• <del>Appropriate mitigation measures for noise associated with the adjoining railway to potentially include insulation and appropriate orientation of living spaces;</del></li> <li>• <del>Design to minimise visual impact of the development from Therfield Heath;</del></li> <li>• <del>Proposals to be informed by a site-specific landscape assessment and to retain trees as a buffer to the railway line;</del></li> <li>• <del>Consider and mitigate against potential adverse impacts upon Therfield Heath SSSI including provision of green infrastructure within the development to reduce recreational pressure;</del></li> <li>• <del>Address potential surface water flood risk through SUDs or other appropriate solution;</del></li> <li>• <del>Archaeological survey to be completed prior to development.</del></li> <li>• <del>Sensitive design and mitigation measures to address any impact on the setting of the Scheduled Ancient Monuments (pre-historic barrows).</del></li> </ul>	
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FM 169	200	Policy RY2 (delete)	<table border="1"> <tr> <td>Land north of Newmarket Road</td> <td>330 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>• <del>New vehicular access from the A505;</del></li> <li>• <del>Appropriate solution for education requirements arising from sites RY2 and RY10 having regard to up-to-date assessments of need;</del></li> <li>• <del>Design to minimise visual and landscape impact, including development limits below the 70 metre contours;</del></li> <li>• <del>Undertake an ecological survey (including reptiles) due to adjacent habitats and provide mitigation and/or off-setting measures as necessary. Developer to ensure management of the chalk grassland;</del></li> <li>• <del>Protect and enhance hedgerows and trees where possible. Retain roadside trees and tree clump along the A505 and Newmarket Road;</del></li> </ul> </td> </tr> </table>	Land north of Newmarket Road	330 homes	<ul style="list-style-type: none"> <li>• <del>New vehicular access from the A505;</del></li> <li>• <del>Appropriate solution for education requirements arising from sites RY2 and RY10 having regard to up-to-date assessments of need;</del></li> <li>• <del>Design to minimise visual and landscape impact, including development limits below the 70 metre contours;</del></li> <li>• <del>Undertake an ecological survey (including reptiles) due to adjacent habitats and provide mitigation and/or off-setting measures as necessary. Developer to ensure management of the chalk grassland;</del></li> <li>• <del>Protect and enhance hedgerows and trees where possible. Retain roadside trees and tree clump along the A505 and Newmarket Road;</del></li> </ul>	
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Ref.	Page (LP1)	Policy / Paragraph	Modification		
			<ul style="list-style-type: none"> <li>Address potential surface water flood risk through SUDs or other appropriate solution;</li> <li>Additional wastewater treatment capacity to be provided prior to commencement of development;</li> <li>Archaeological survey to be completed prior to development.</li> </ul>		
MM307	221	Policy RY4	<table border="1"> <tr> <td>Land north of Lindsay Close</td> <td>40-100 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Access connecting from Old North Road in the west to Burns Road at the east;</li> <li>Appropriate mitigation measures for noise associated with the A505 Royston Bypass to potentially include insulation and appropriate orientation of living spaces;</li> <li>Site design and landscaping to mitigate landscape impacts;</li> <li>Protect and enhance tree belts where possible;</li> <li>Address existing surface water flood risk through SUDs or other appropriate solution, particularly to the east of the site;</li> <li>Site layout design to take account of existing wastewater infrastructure;</li> <li>Undertake a detailed assessment of the impact of the Royston Water Recycling Centre in relation to odours, lighting, noise and traffic impacts <b>to demonstrate no adverse impact on future residents. To provide evidence to demonstrate that a suitable distance is provided from Royston City Water Recycling Centre and sensitive development (buildings that are regularly occupied) as part of the detailed planning of the site and provide mitigation measures where necessary.</b></li> </ul>	Land north of Lindsay Close	40-100 homes
Land north of Lindsay Close	40-100 homes				
MM 338	201	Policy RY5 (delete)	<table border="1"> <tr> <td>Agricultural supplier, Garden Walk</td> <td>20 homes</td> </tr> </table> <ul style="list-style-type: none"> <li><del>Retain tree belts where possible;</del></li> <li><del>Address surface water flood risk through SUDs or other appropriate solution, particularly along Garden Walk;</del></li> <li><del>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation.</del></li> </ul>	Agricultural supplier, Garden Walk	20 homes
Agricultural supplier, Garden Walk	20 homes				
MM 339	201	Policy RY7	<table border="1"> <tr> <td>Anglian Business Park, Orchard Road</td> <td>48-60 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Higher density/flatted development may be achieved given surrounding built form;</li> <li>Appropriate mitigation measures for noise associated with the railway to potentially include insulation and orientation of living spaces;</li> <li>Ensure appropriate residential amenity for any properties adjoining employment area or likely to be affected by existing, permitted operations;</li> </ul>	Anglian Business Park, Orchard Road	48-60 homes
Anglian Business Park, Orchard Road	48-60 homes				

Ref.	Page (LP1)	Policy / Paragraph	Modification		
			<ul style="list-style-type: none"> <li>Address potential surface water flood risk through SUDs or other appropriate solution;</li> <li>Site layout designed to take account of existing wastewater infrastructure.</li> </ul>		
FM 170	202	Policy RY8 (delete)	<table border="1"> <tr> <td>Land at Lumen Road</td> <td>14 homes</td> </tr> </table> <ul style="list-style-type: none"> <li><del>Ensure appropriate residential amenity having regard to adjoining employment uses</del></li> <li><del>Design and layout to take account of foul pumping station within proximity to the site ensuring a buffer of 15m from the boundary of proposed occupied buildings;</del></li> <li><del>Address potential surface water flood risk through SUDs or other appropriate solution;</del></li> <li><del>Site layout designed to take account of existing wastewater infrastructure;</del></li> <li><del>Phasing of development to link with Sewage Treatment Works improvements;</del></li> <li><del>Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</del></li> <li><del>Sensitive design and / or lower density housing where the site affects the setting of the Grade II Listed 21 Mill Road.</del></li> </ul>	Land at Lumen Road	14 homes
Land at Lumen Road	14 homes				
MM341	203	Policy RY10	<table border="1"> <tr> <td>Land south of Newmarket Road</td> <td>300 homes</td> </tr> </table> <ul style="list-style-type: none"> <li><del>Appropriate solution for education requirements arising from sites RY2 and RY10 having regard to up to date assessments of need;</del></li> <li>Provide a site-specific landscape assessment and tree survey. Retention of trees and hedgerows where possible;</li> <li>Design and layout to respond to topography;</li> <li>Address potential surface water flood risk through SUDs or other appropriate solution;</li> <li>Archaeological survey to be completed prior to development;</li> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	Land south of Newmarket Road	300 homes
Land south of Newmarket Road	300 homes				
MM 403	203	After Paragraph 13.293 (new paragraphs)	<p><b>A need for additional retail floorspace has been recognised by the Council and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. The retail capacity projections<sup>[x]</sup> are district wide and can be met within the District. They are based on the projected additional spend on retail from an increased population and retaining market shares from completing centres. The capacity projections for Royston indicate the potential for growth of 7,100 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance warns that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail.</b></p>		

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MM 404	203	Paragraph 13.295	This scheme will be <del>main town centre uses</del> retail-led. Consequently, no specific housing allocation or requirement is identified, and any residential units here will contribute towards the <del>windfall</del> other allowances identified in Policy SP8(c) of this Plan.						
FM 172	204	Paragraph 13.297 (delete)	<del>The potential impacts of site RY1 on the SSSI and heritage assets and Therfield Heath is one of the key-consideration. Our overall evidence base concludes that, in order to meet our housing requirements over the plan-period, it will be necessary to allocate some sites which may impact upon heritage assets and landscape . Our aim will be to ensure that the overall integrity of relevant heritage assets are protected and that the development is designed to minimise impact on the landscape.</del>						
MM 345	204	Paragraph 13.301	<p>In its role as Highway Authority, Hertfordshire County Council has recently developed a new county-wide transport model, 'COMET'. This will be used to identify transport mitigation schemes in the Royston Area. <b>This has identified that a number of improvement schemes will be required in Royston by 2031. Particular congestion points identified included:</b></p> <ul style="list-style-type: none"> <li>• <b>A505/ A10 Roundabout;</b></li> <li>• <b>A505/ A1198 Roundabout; and</b></li> <li>• <b>A10/ Newmarket Road/ Melbourn Street Roundabout</b></li> </ul> <p><b>In line with the Transport Strategy, development in Royston will be required to consider the implications of their schemes on these locations and make reasonable contributions towards improvements and / or other schemes improving walking and cycling in Royston which aim to influence mode share.</b> These will be reflected in future iterations of the Infrastructure Development Plan.</p>						
MM 346	204	After paragraph 13.302 (New paragraph)	<b>For site RY4, an odour assessment will need to demonstrate that a suitable distance is provided between the Water Recycling Centre and sensitive development (defined as buildings which are regularly occupied) as part of the detailed planning of the site.</b>						
		<b>ST IPPOLYTS</b>							
MM 350	207	Paragraph 13.316	The northern part of the parish forms part of the town of Hitchin. St Ippolyts & Gosmore is classed as a Category A village, with the boundary drawn so as to include <b>the main built area of both settlements Gosmore</b> . The settlement boundary is shown on the <del>Proposals</del> Policies Map within which development will be allowed.						
MM 352	207	Policy SI1	<table border="1"> <tr> <td>Land south of Waterdell Lane</td> <td>40 homes</td> <td></td> </tr> <tr> <td colspan="3"> <ul style="list-style-type: none"> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> </ul> </td> </tr> </table>	Land south of Waterdell Lane	40 homes		<ul style="list-style-type: none"> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> </ul>		
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Ref.	Page (LP1)	Policy / Paragraph	Modification								
			<ul style="list-style-type: none"> <li>Additional planting to provide a continuous hedgerow boundary around the south-west of the site</li> <li>Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces</li> </ul>								
MM 353	208	Policy SI2, after 3 <sup>rd</sup> bullet (new criterion)	<table border="1"> <tr> <td>Land south of Stevenage Road</td> <td>12 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Archaeological survey to be completed prior to development.</li> <li>Trees should be incorporated into the design of the development;</li> <li>Maintain the existing right of way through the site</li> <li>Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces</li> </ul>	Land south of Stevenage Road	12 homes						
Land south of Stevenage Road	12 homes										
<b>ST PAULS WALDEN</b>											
MM 356 / FM 179	209	Policy SP2 (delete)	<table border="1"> <tr> <td>Land between Horn Hill and Bendish Lane, Whitwell</td> <td>41 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>Integration of Byway Open to All Traffic St Paul's Walden 036 as a green corridor through the site and boundary feature;</li> <li>Sensitive design approach, particularly towards north-east of site to minimise impacts on adjoining Conservation Area.</li> </ul> <table border="1"> <tr> <td>Total allocated sites</td> <td>41 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>9 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>50 homes</td> </tr> </table>	Land between Horn Hill and Bendish Lane, Whitwell	41 homes	Total allocated sites	41 homes	Completions and permissions	9 homes	Total allocated, completed and permitted	50 homes
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<b>THERFIELD</b>											
MM 359	210	Policy TH1	<table border="1"> <tr> <td>Land at Police Row</td> <td>12 homes</td> </tr> </table>	Land at Police Row	12 homes						
Land at Police Row	12 homes										

Ref.	Page (LP1)	Policy / Paragraph	Modification		
			<ul style="list-style-type: none"> <li>• Frontage development facing Police Row only;</li> <li>• Sensitive treatment of western boundary to maintain integrity of Footpath Therfield 022;</li> <li>• <del>No infiltration drainage SUDs (or other) features without prior consent of Environment Agency;</del> <b>Any infiltration drainage SuDS (or other features) must have regard to Environment Agency groundwater bore holes;</b></li> <li>• <b>Design with sensitivity to the nearby listed buildings and their setting;</b></li> <li>• <b>Retain open space to the southeast corner of the allocation from the edge of the hedgerow of the western boundary and directly eastwards to Police Row, to prevent coalescence between Therfield and Hay Green;</b></li> <li>• An assessment of the impact of development on the Therfield Conservation Area <del>must should</del> be undertaken <b>to address the opportunity to make a sensitive entrance to the Conservation Area;</b></li> <li>• Archaeological survey to be completed prior to development.</li> </ul>		
<b>WESTON</b>					
MM 363	212	Policy WE1	<table border="1"> <tr> <td>Land off Hitchin Road</td> <td>40 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Site layout to take account of existing wastewater infrastructure;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• <b>Western hedgerow to maintained and strengthened to form a robust boundary;</b></li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	Land off Hitchin Road	40 homes
Land off Hitchin Road	40 homes				
<b>WYMONDLEY</b>					
MM 367	213	Policy WY1	<table border="1"> <tr> <td>Land south of Little Wymondley</td> <td>300 homes</td> </tr> </table> <ul style="list-style-type: none"> <li>• Appropriate solution for primary education requirements having regard to up-to-date assessments of need;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> <li>• <b>Undertake site specific Flood Risk Assessment to address existing surface water and river-fluvial flood risk issues, particularly along Stevenage Road, including the site's access, through and help inform SuDS SUDs or other appropriate solution to ensure that pre-existing flooding issues along Stevenage Road are not exacerbated. Hertfordshire County Council, as Lead Local</b></li> </ul>	Land south of Little Wymondley	300 homes
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Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p><b>Flood Authority (LLFA) should be consulted.</b></p> <ul style="list-style-type: none"> <li>• Sensitive integration into the existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li>• <b>Transport Assessment to identify and secure a package of improvements to Stevenage Road through Little Wymondley which mitigate the severance impact of the road between the north and south of the village and improves accessibility for non-motorised highway users.</b></li> <li>• Proposals to be informed by a site-specific landscape assessment;</li> <li>• Appropriate mitigation measures for noise associated with A602 Wymondley Bypass to potentially include landscaping and / or insulation and appropriate orientation of living spaces;</li> <li>• Access to the site to take into account the impact on heritage assets and surface water flooding;</li> <li>• Minimise impact upon the heritage assets and their settings near the site, to include; <ul style="list-style-type: none"> <li>○ Any access from Stevenage Road to consider impact upon setting of Listed Buildings;</li> <li>○ Consideration of key views from Wymondley Bury and St Mary's Church;</li> <li>○ Reinforcing existing boundary planting;</li> <li>○ Retention of significant groups of trees within the site;</li> </ul> </li> <li>• Archaeological survey to be completed prior to development</li> <li>• <b>Undertake Contaminated Land Preliminary Risk Assessment, particularly in relation to historic landfill.</b></li> </ul>
MM 369	214	Paragraph 13.355	Our transport modelling identifies the junction between Hitchin Road and Arch Road in Great Wymondley as a location where a mitigation scheme will be required to support new development. <b>Some minor roads leading to and from the villages within Wymondley parish may require other traffic management measures which will also need to be investigated and will be reflected in future iterations of the Infrastructure Development Plan. Mitigation could include environmental improvements to the village centre. The mitigation of these issues will be part of the wider package of measures identified through the wider consideration of network issues concerning A1(M) J8 and alternate routings to this.</b>
MM 370	215	Paragraph 13.358	There are known flooding issues in Wymondley from both surface and <del>river</del> -fluvial flooding. The key flood route broadly follows the alignment of Stevenage Road with an additional surface water flood route along Priory Lane. <b>Hertfordshire County Council Wymondley Flood Investigation Report, November 2014, makes recommendations to reduce the risk of flooding along Stevenage Road. These recommendations relate to measures upstream and outside of the site. However, implementation of an appropriate flood attenuation scheme on the site may support these measures and benefit the village by reducing the overall flooding risk.</b>
		<b>SECTION 5</b>	<b>IMPLEMENTATION, MONITORING AND REVIEW</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification
		<b>CHAPTER 14</b>	<b>DELIVERY</b>
FM 186	221	After 14.29 (Table 2)	<p>SP4</p> <p>% of primary frontages in A1-retail use</p> <p>For at least 66% of units and floorspace within the primary frontage to remain in A1-retail use</p>
MM 372 / FM 187	222	After Table 2: New Policy IMR1	<p><b>Policy IMR1 Five Year Housing Land Supply</b></p> <p><b>In order to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, we will:</b></p> <p>a. Deliver the total housing requirement of 13,000 net dwellings over the plan period on a stepped basis. The Council's five year housing land supply will be measured against housing requirement targets of:</p> <ul style="list-style-type: none"> <li>• 350 dwellings per annum for the plan period from 2011 to 31 March 2020;</li> <li>• 500 dwellings per annum for the plan period from 1 April 2020 to 31 March 2024; and</li> <li>• 1,120 dwellings per annum for the remainder of the plan period from 1 April 2024 to 2031;</li> </ul> <p>b. Add any shortfall in housing delivery since the plan's start date, spread evenly over the remaining plan period, to the calculation of the requirement;</p> <p>c. Ensure that the supply of specific, deliverable sites includes a buffer (moved forward from later in the plan period) in line with national planning policy; and</p> <p>d. Monitor housing completions and permissions on an ongoing basis to ensure the housing trajectory is based upon robust and up-to-date information and assumptions.</p>
MM 373 / FM 188	222	After proposed new Policy IMR1 (new paragraphs)	<p><b>Figure 6 over-page shows the anticipated housing trajectory. This will be kept up-to-date in future monitoring reports. This programme of delivery will allow the plan to demonstrate a five-year land supply at the point of adoption and, subsequently, on an on-going basis.</b></p> <p><b>In order to achieve this, the plan uses a stepped approach to the housing requirement. For the period to 1 April 2020, a housing requirement of 350 dwellings per annum is applied recognising that the quantum of development delivered from the start of the plan period in 2011 to this date is fixed. This increases to 500 dwellings per year between 2020 and 2024 before rising to a requirement for 1,120 dwellings per annum over the remaining years of the plan period.</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>This approach is linked to development strategy set out in this plan. A significant proportion of future new homes will be delivered upon new strategic sites. Delivery of these sites requires their release from the Green Belt which is achieved through this plan. However, this means that in the first half of the plan period from 2011 to 2021, reliance has been placed upon sites permitted under the previous policy regime and extant planning permissions.</p> <p>In the second half of the plan period from 2021, the Local Housing Allocations released from the Green Belt will be critical to maintaining the delivery profile and a rolling five-year land supply. It is anticipated that the Strategic Housing Sites will become the main component of new housing supply in the latter years of the plan. The stepped approach to housing delivery over the plan period allows a better match with actual and anticipated delivery.</p> <p>The same circumstances support a measured approach to meeting the shortfalls in housing delivery that have occurred since 2011. To this end the plan does not seek to meet the full extent of any backlog of delivery within the first five years (known as the <i>Sedgefield</i> approach) but rather seeks to meet this backlog over the remainder of the plan period (the <i>Liverpool</i> approach).</p> <p>In addition to the measures above, national policy requires a buffer, moved forward from later in the plan period, to be applied to the calculation of the five year supply<sup>x</sup>. This buffer should be a minimum of 5% but, where there has been a record of persistent under delivery of housing, this should be increased to 20%.</p> <p>In the period from the start of the plan period on 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2020 the delivery of housing completions in the District were well below the 650 dwellings per annum that would be necessary if the requirement were to be met evenly over the whole plan period, averaging 313 dwellings per annum. This necessitates the application of a 20% buffer at the point of the plan's adoption.</p> <p>The buffer requirement will be added to both the housing requirement and any backlog in delivery to be met over the five year period under assessment.</p> <p>These approaches are set out in Policy IMR1 and will be the basis of the housing land supply calculations that are produced for monitoring purposes over the plan period. The delivery of sites will be monitored and will inform the plan review set out in Policy IMR2.</p> <p><sup>x</sup> Paragraph 47 of the NPPF</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
MM 374 / FM 189	223	Figure 6 (replace with housing trajectory as shown in ED191B)	
FM 190	222	Before Paragraph 14.30	<p><b>Policy IMR2: Local plan early review</b></p> <p><b>The Council will undertake a whole plan review of the Local Plan 2011-2031 by the end of 2023 at the latest. This will determine whether this Plan needs to be updated either in whole or in part. All policies will be reviewed but with particular regard paid to the following matters that were specifically identified during the preparation and examination of this plan:</b></p> <ul style="list-style-type: none"> <li>• Housing requirements for the District and wider housing market areas;</li> <li>• Housing delivery having regard to the progress and implementation of the Strategic Housing Sites and Local Housing Allocations identified in this plan and the rates of development being achieved measured against the stepped approach and housing trajectory set out in this plan;</li> <li>• The safeguarded land to the West of Stevenage;</li> </ul>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<ul style="list-style-type: none"> <li>• The outcomes of the process(es) to comprehensively explore new settlement options in the District;</li> <li>• Gypsy and Traveller provision</li> <li>• The identification of needs for retail, leisure, office and other main town centre uses;</li> <li>• Options for long-term secondary education provision in the Stevenage area; and</li> <li>• Broad alignment with the statutory five-year time limit for reviews of the East Hertfordshire and Stevenage local plans (required by November 2023 and May 2024 respectively) to allow co-ordinated consideration of the above matters.</li> </ul> <p>The review will have regard to up-to-date information and be conducted in line with Government policy and statutory requirements. Subject to the outcomes of that review, a new plan or policies will be prepared to a new time horizon of at least 2041.</p> <p>The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint plan or policies based upon wider functional geographies.</p>
FM 191	222	Paragraph 14.30	<p>The Government expects plans to be regularly reviewed, preferably every five years<sup>155</sup> and we will need to update our Local Plan more regularly than has happened in the past. National guidance recognises that plans can be reviewed in whole or in part to respond flexibly to changing circumstances<sup>156</sup>. We will use the monitoring framework, set out above, to keep the effects of this Plan under review.</p> <p>Footnote  <sup>155</sup> As set out in the Government's Technical consultation on implementation of planning changes (DCLG, 2016)  <b>Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</b></p>
FM 192	224	Paragraph 14.32	<p>In addition to our monitoring, we recognise that <del>other events may trigger a future review of the Plan.</del> local plans should normally set out where development will occur over a 15-year period from the point of adoption<sup>157</sup>. This Plan shows how we will meet our needs over the period to 2031, <del>13</del> <b>10</b> years from the anticipated date of adoption.</p>
FM 193	224	Paragraph 14.33	<p><del>We already recognise that further work is required to ensure we meet our needs in full in the period beyond 2026. However, we believe that, due to the progress already made on these issues, the approach set out in this Plan is the most appropriate one for North Hertfordshire.</del> <b>Policy IMR2 therefore commits to an early, whole plan review to</b></p>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<b>commence by the end of 2023 that will allow the Council to consider longer-term requirements, including in relation to a number of specific issues identified through the production of this plan.</b>
FM 194	224	Paragraph 14.36	At the same time, future decisions by other bodies may significantly influence future options for growth in North Hertfordshire. We will continue to work with central government, <b>the Hertfordshire Growth Board</b> and other relevant agencies to better understand the likely nature of <b>these potential projects</b> <sup>158</sup> .
FM 195	224	Paragraph 14.37	<del>We currently consider it most likely that</del> The outcomes of these deliberations and the new settlement process will be reflected in a full <del>the review of the Plan</del> <b>process outlined in Policy IMR2. We currently consider it most likely that this review will result in a need to comprehensively update the local plan, recognising that this cannot be prejudged at this time.</b> Our present intention is that <del>the next full</del> <b>any comprehensive</b> review of this Plan will be completed by the mid-2020s at the latest. It will roll the Plan forward to a new time horizon of at least 2041 and deliver <b>any</b> specific additional <del>land</del> <b>or updated policies</b> and sites <del>that we already recognise will be</del> <b>that are identified as being needed.</b>
MM 410	224	Paragraph 14.39	We actively worked with the other authorities in the HMA – Luton, Central Bedfordshire and Aylesbury Vale – to understand the extent to which the market area as a whole could accommodate development needs <sup>159</sup> . <b>The authorities in the Luton HMA jointly commissioned and subsequently agreed a Growth Options Study<sup>159</sup>. This demonstrates sufficient potential capacity within the Luton HMA to accommodate Luton’s unmet housing needs. The outcomes of this study have been tested through the individual examinations of the partner authorities’ plans.</b>  <sup>159</sup> Luton Housing Market Area Growth Study (Land Use Consultants, forthcoming-2017)
MM 375	224	After paragraph 14.39 (new paragraphs)	<b>We will also work with these and other relevant authorities to understand, and holistically plan for, any long-term strategic infrastructure requirements arising from future growth. This will include consideration of any infrastructure that may be required within North Hertfordshire to facilitate the delivery of growth proposed in other authorities’ plans or other long-term aspirations that may come to fruition over the plan period. Any proposals to expand London Luton Airport beyond the limits of its current planning permission would fall within the scope of this commitment.</b> <b>NHDC will be a co-commissioning authority for the A505 Corridor Study along with Luton Borough Council, Central Bedfordshire Council, Hertfordshire County Council and other neighbouring authorities as appropriate. The outcomes of this Study will determine the likely long-term cumulative traffic impacts of growth in the wider area on both Luton and North Hertfordshire and potential measures to mitigate these.</b>
MM 376	224	Paragraph 14.40	We will continue to engage constructively in <del>this process</del> <b>these processes</b> and, if necessary, consider how best to reflect the outcomes. Dependant on the nature of any issues raised, it may be possible to deal with this through partial or focused reviews of any relevant policy/ies.

Ref.	Page (LP1)	Policy / Paragraph	Modification
FM 196	224	Paragraph 14.41	Beyond these defined events, there may be changes in circumstances that we cannot currently foresee, <b>or are yet to understand the full implications of</b> , but which have a substantial impact upon the District. This might be a major change to the way in which the planning system operates, <b>as suggested in the Government's 2020 White Paper</b> , or <del>the cancellation of a key project required to support growth</del> <b>structural changes to the population or the way we live, work or spend our leisure time in response to Brexit, Covid-19, climate change or any other future event.</b> <del>We will determine the most appropriate response as and when any such circumstances arrive.</del> <b>It is anticipated that the review process outlined in IMR2 will be the most appropriate means of considering these matters but the Council may also consider focussed reviews of individual or small groups of policies prior to this where necessary.</b>
<b>APPENDICES</b>			
MM 377	229-230	Appendix 2	<p>The Local Plan <del>Proposals</del> <b>Policies</b> Map includes the following designations, which are set by, and specifically relate to, policies in the Plan:</p> <ul style="list-style-type: none"> <li>• Green Belt</li> <li>• Rural Area Beyond the Green Belt</li> <li>• Urban Open Land</li> <li>• <del>Business Areas</del></li> <li>• Employment Areas</li> <li>• Employment Sites</li> <li>• Housing Sites</li> <li>• Neighbourhood Centres</li> <li>• Settlement Boundaries</li> <li>• Town Centre Boundaries</li> <li>• Primary Shopping Frontage</li> <li>• Secondary Shopping Frontages</li> <li>• Mixed use Allocations</li> <li>• Safeguarded Land</li> <li>• Gypsy / Traveller Sites</li> </ul> <p>The <del>Proposals</del> <b>Policies</b> Map also includes the following designations, which although referred to by policies in the Plan, are not the responsibility of the Local Plan and the extents of the designations are not set by the Local Plan process...</p> <p><i>[remainder of Appendix unchanged]</i></p>
MM	243	Appendix 4	<b>Appendix 4: Car Parking Standards</b>

Ref.	Page (LP1)	Policy / Paragraph	Modification																	
378			<p><i>Residential Parking Standards</i></p> <table border="1"> <thead> <tr> <th>Class Use C3</th> <th>Car Parking Standard</th> <th>Minimum Cycle Parking Standard</th> </tr> </thead> <tbody> <tr> <td>1 bedroom</td> <td>1 space per dwelling minimum</td> <td rowspan="2">1 secure covered space per dwelling. None if garage or secure area provided within curtilage of dwelling</td> </tr> <tr> <td>2+ bedrooms</td> <td>2 spaces per dwelling minimum</td> </tr> <tr> <td>Retirement developments (e.g. warden assisted independent living accommodation)</td> <td>1 space per dwelling minimum</td> <td>1 secure and covered space for residents per 5 units.</td> </tr> </tbody> </table> <p>The above <del>standard standards</del> will also require visitor / unallocated parking as set out below to be added. Garages will be counted towards meeting the standards only if they are at least 7m x 3m measured internally. <b>Reductions from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.</b> <del>Reductions will be considered only in exceptional circumstances e.g. in town centres or other accessible locations with the availability of a range of local services and good local sustainable transport options and for e.g. small-scale conversion of buildings for a small number of residential units in defined town centres.</del></p> <p><b>Visitor/Unallocated Parking</b></p> <table border="1"> <thead> <tr> <th>Class Use C3</th> <th>Car Parking Standard</th> <th>Minimum Cycle Parking Standard</th> </tr> </thead> <tbody> <tr> <td>Retirement developments (e.g. warden assisted independent living accommodation)</td> <td>1 space per dwelling <b>minimum</b></td> <td>1 space per 8 units (visitors)</td> </tr> </tbody> </table>	Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard	1 bedroom	1 space per dwelling minimum	1 secure covered space per dwelling. None if garage or secure area provided within curtilage of dwelling	2+ bedrooms	2 spaces per dwelling minimum	Retirement developments (e.g. warden assisted independent living accommodation)	1 space per dwelling minimum	1 secure and covered space for residents per 5 units.	Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard	Retirement developments (e.g. warden assisted independent living accommodation)	1 space per dwelling <b>minimum</b>	1 space per 8 units (visitors)
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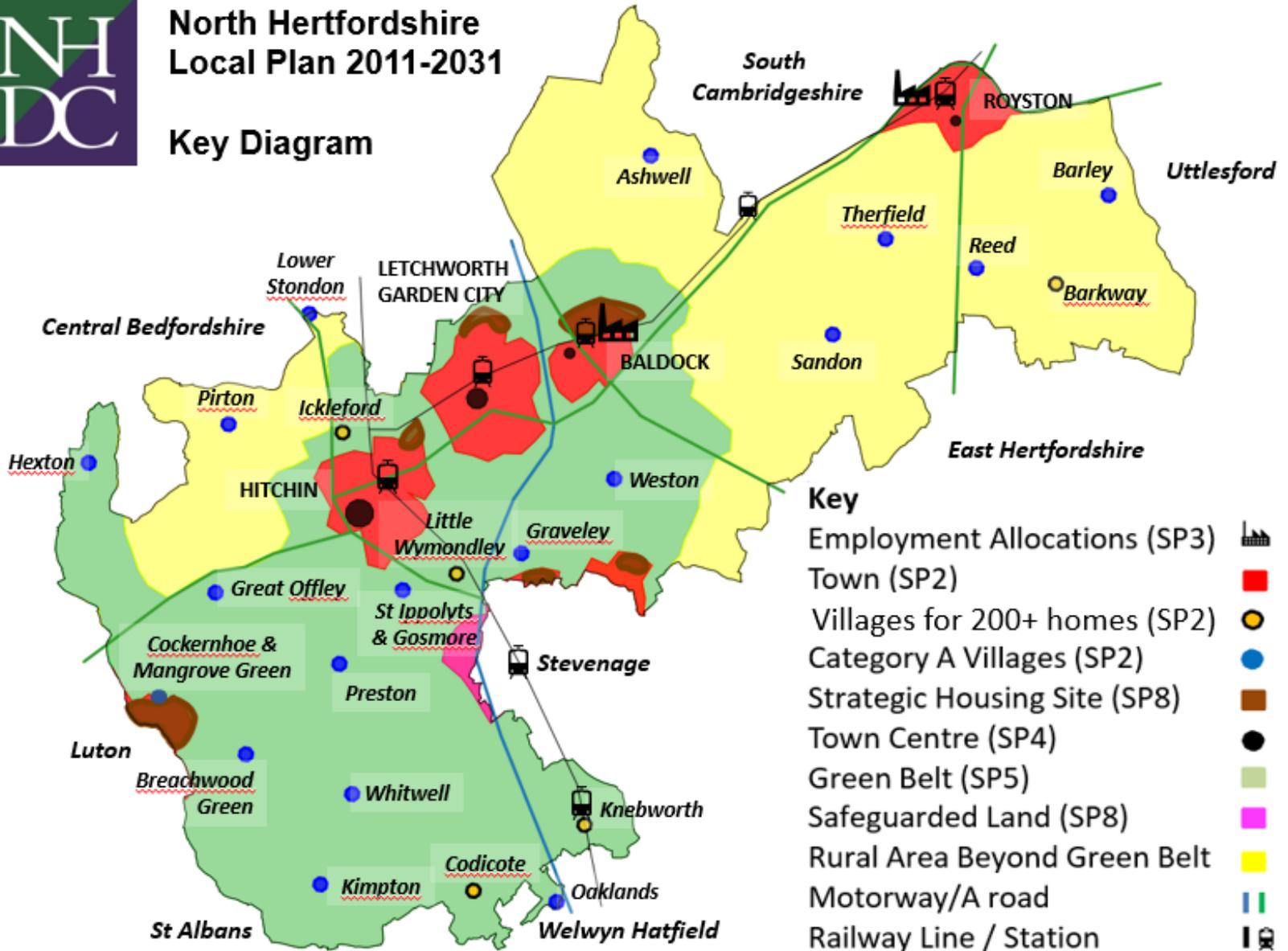
Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>Visitor / unallocated</p> <p>Between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number) with the <b>higher</b> <del>lower</del> standard being applied where there are no garages in the schemes and the <b>lower</b> <del>higher</del> standard applied where every dwelling in the scheme is to be provided with a garage</p> <p><b>For above C3 general housing</b> - if no garage or secure area is provided within curtilage of dwelling then 1 covered and secure space per dwelling in a communal area <del>for residents plus 1 space per dwelling</del> for visitors</p> <p><b>For C3 retirement developments - 1 covered and secure visitor space per 3 units</b></p> <p>For the above <del>two</del> <b>visitor and unallocated parking</b> standards, reductions in provision will be considered where:</p> <ol style="list-style-type: none"> <li>1. Alternative publicly available off-street parking is available within 2 minutes' walk of the site;</li> <li>2. Visitor parking arising from small-scale (i.e. infill) development can be accommodated on-street without compromising highway safety, the amenity of existing residents or the ability for businesses to operate; or</li> <li>3. Relevant evidence is submitted by the applicant which supports a reduction in standard and considers existing and future car ownership and likely visitor <b>demand</b>.</li> </ol>
MM 379		Appendix 5 (new)	<p><b>Appendix 5: Letchworth Garden City Design Principles</b></p> <ol style="list-style-type: none"> <li>1. For development proposals in Letchworth, their overall layout and design should, as far as practicable, reflect 'Garden City' layout and design principles. Creative reinterpretation of the principles in the light of modern requirements will be sought, and a knowledge of the quality and variety of early garden residential development in the Garden City is a pre-requisite to the success of any proposals. The following notes are intended to give a guide to examples which might be studied, with benefit.</li> <li>2. The term 'Garden City' is equated with open residential development, characteristically low density and generously landscaped with mature trees and hedges set amongst individual houses. This is only partly true. Many of the finest early Garden City layouts depended on a successful corporate design for the scheme as a whole, in addition to the individual features mentioned above. The key to success in the best of examples</li> </ol>

Ref.	Page (LP1)	Policy / Paragraph	Modification
			<p>quoted below is the appreciation of the way houses are grouped to form a sequence of outdoor spaces related to each other and to the overall setting.</p> <ol style="list-style-type: none"> <li data-bbox="689 331 2056 539">3. The broadest overall effect is that of the <u>vista</u>. This has a formal quality exemplified by the broad tree-lined swathe which projects the main axis of the town across Norton Common, and was very effectively handled in the section of Broadway between the J.F. Kennedy Gardens and the Sollershotts where a double avenue of Lime trees was planted. Other principal approach roads of the town were treated in this manner, for example Norton Way South and Pixmore Way. In the latter, the articulated building lines of the early Letchworth U.D.C. Council housing was notably successful.</li> <li data-bbox="689 563 2033 842">4. In contrast, the principle of <u>closure</u> represented the breaking down of the street picture into sequences by means of closing the view at key points, particularly at road junctions. Notable examples are the view southwards into Rushby Mead from Hillshott analysed in detail below; The Crescent between Pixmore Way and Baldock Road where a series of spaces is created along a curved road; or more formally, in Jackmans Place around the triple road junction where a focal block is set across the view line. The use of an informal design approach should not be at the expense of purposeful design of space framed by buildings, an aspect always emphasised by Barry Parker and Raymond Unwin, consultant architects for the original Letchworth Plan of 1904 and much of the subsequent detailed layout of housing.</li> <li data-bbox="689 866 2011 1002">5. Within the street picture, <u>accents</u> were often created by variations in the building line. For example, the splayed arrangement of the tree blocks of Silver Birch Cottages in Station Road added visual interest to an otherwise monotonous road. Greens were used to create a corporate sense of design, for example at Westholm, Ridge Road and in the section of Lytton Avenue between Gernon Road and Pixmore Way.</li> <li data-bbox="689 1026 2045 1297">6. Finally, <u>group design</u> was used as a means of giving identity to the various roads within the Garden City. The residential cul-de-sac, was one of the earliest instances of the use of a feature which is now common in housing layouts. Other means of grouping include the linking together of blocks at street corners, as at the junction of Ridge Avenue and Hillshott, and the use of linking walls and garages as in the groups at the junction of Lytton Avenue and South View. Occasionally, corners would be treated with blocks of striking design, for example the twin 'L' blocks which frame the north side of the junction between Sollershott East and Field Lane or the block boldly set diagonally across the acute angled junction between Sollershott East and South View.</li> </ol>



# North Hertfordshire Local Plan 2011-2031

## Key Diagram



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# North Hertfordshire Local Plan

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**North  
Herts**  
Council



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# **SECTION ONE - INTRODUCTION AND CONTEXT**



# SECTION ONE - INTRODUCTION AND CONTEXT

## 1 Introduction

- 1.1 Planning is about making important decisions affecting the environment and character of our towns, villages and countryside and ensuring that development happens in the right place at the right time. These decisions affect how we live and work and how we feel about places.
- 1.2 The processes of preparing local plans and controlling development are firmly based within a legal framework set by the Government. The legislation and national planning advice state that all local authorities should have an up-to-date local plan. The last District Local Plan was adopted in 1996. North Hertfordshire District Council's new Local Plan directs where new development will take place across the plan area, describes what changes will occur and identifies how our towns and villages will be shaped in the future.
- 1.3 This Local Plan seeks to address the key issues facing North Hertfordshire and will set a strategic vision and spatial strategy for the District over the period 2011 to 2031. The Local Plan contains five main sections, not including the appendices. A separate Local Plan Policies Map is published alongside the Local Plan to show the spatial implications of policies:
- **Section One: Introduction and Context** – This section explains the planning system and provides an overview of North Hertfordshire and the wider area. It also sets out the key challenges and issues facing the District.
  - **Section Two: Spatial Strategy and Strategic Policies** – This section sets out the spatial strategy and vision for the future of the District and links this to the strategic policies which provide the guidance on the main issues that the Plan seeks to address. It sets out our overall approach to topics such as housing, employment, Green Belt and countryside. It also contains a separate policy for each of the Strategic Housing Sites (defined as sites of 500 or more homes) which will make a substantial contribution towards housing requirements over the plan period.
  - **Section Three: Development Management Policies** – This section covers the detailed requirements that new development must meet to be granted planning permission. It includes issues such as open space, design and car parking.
  - **Section Four: Communities** – This section sets out the site allocations for each community on a parish / town basis. It identifies the detailed site-specific criteria for each local housing allocation. Retail and employment allocations are also identified.
  - **Section Five: Implementation, Monitoring and Review** – This section sets out how the proposals in the Plan will be delivered. It identifies key supporting infrastructure and the partners that will help to deliver it. It sets out a monitoring framework that will be used to ensure that our vision and

strategic policies are being met and sets out an approach to a future review of the Plan.

- 1.4 It is important to note that the policies and supporting text in this Plan are inter-related and need to be read together when considering a specific proposal or issue. This Local Plan supersedes the saved policies from the 1996 North Hertfordshire District Local Plan No 2 (with Alterations). Appendix 1 provides a list of policies that have been superseded. Appendix 2 provides a list of Local Plan designations as shown on the Policies Maps and where to view other designations which policies in the Local Plan refer.

## The Planning Framework

### National Policy and Guidance

- 1.5 The National Planning Policy Framework (NPPF)<sup>1</sup> was first published in 2012 and revised in 2018 and 2021. The NPPF sets out the Government's planning policies for England and must be taken into account along with other national planning policy in the preparation of local and neighbourhood plans and in determining planning applications. The NPPF is supplemented by detailed Planning Practice Guidance (PPG), first released in 2014, which provides additional detail on certain topics. Local plans must be consistent with national planning policy to pass examination. This Local Plan has been prepared in accordance with the 2012 version of the NPPF.
- 1.6 One of the key elements of the NPPF is the presumption in favour of sustainable development. Local plans must be based on and reflect the presumption and include clear policies setting out how the presumption should be applied locally. It also states that local plans should meet objectively assessed needs for housing, business and other requirements, with sufficient flexibility to adapt to rapid change, unless the adverse impacts of doing so would significantly outweigh the benefits or other specific policies in the NPPF indicate that development should be restricted.
- 1.7 In relation to local plans, matters covered by the NPPF include (but are not limited to) requirements to:
- Properly assess the need for new development (known as objectively assessed needs) and planning to meet these insofar as is consistent with the framework;
  - Where appropriate, carry out these assessments with regard to market areas which may cross administrative boundaries and ensuring that development needs across these wider areas are also met;
  - Protect existing Green Belt and only alter it in exceptional circumstances;
  - Identify what infrastructure will be required to support planned development;

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<sup>1</sup> National Planning Policy Framework (DCLG) March 2012 – <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- Address issues such as climate change and ensure a positive approach to the conservation and enhancement of natural and historic environments; and
- Where potential harm to relevant natural or historic assets may occur, consider this against the public benefits that may arise from any proposed development.

### Duty to co-operate

- 1.8 Another important element of the National Planning Policy Framework is the Duty to Co-operate. The 'Duty-to-Co-operate' was introduced via the 2011 Localism Act. Public bodies have a legal duty to co-operate on strategic planning issues that cross administrative boundaries, with local planning authorities working together to meet development requirements which cannot wholly be met within their own areas. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination.
- 1.9 The Council has sought to engage constructively and on an on-going basis with other neighbouring authorities and public bodies throughout the preparation of the Plan. This includes the joint commissioning and sharing of evidence base studies and the identification of infrastructure requirements. In particular, the Council has worked with Stevenage Borough Council, Luton Borough Council and Central Bedfordshire District Council in terms of addressing housing and employment requirements. The Council has also worked with Hertfordshire County Council and other national bodies in terms of transport and other infrastructure requirements.

### Relationship to Neighbourhood Plans

- 1.10 Neighbourhood plans have been introduced by the Localism Act 2011 and enable local communities to shape development in their area. These are plans produced by a parish council or a neighbourhood forum. Towns and parishes also have the option of working together to prepare a joint neighbourhood plan. If a neighbourhood plan is prepared, independently examined, is supported by the Council and receives a majority vote in a referendum it becomes part of the statutory development plan for that neighbourhood and is used when determining planning applications, alongside the Local Plan.
- 1.11 In order for a neighbourhood plan to become part of the statutory development plan for an area it must:
- have appropriate regard to national policy and guidance;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies contained in the development plan for the area; and
  - not breach and be otherwise compatible with EU obligations.

- 1.12 The first step in preparing a neighbourhood plan is to define a neighbourhood area. There are currently thirteen neighbourhood planning areas designated within the District with one further community considering preparing a neighbourhood plan. Four neighbourhood plans have been “made” and form part of the Development Plan; Pirton, Wymondley, Preston and the joint neighbourhood plan for Baldock, Bygrave & Clothall. Those plans under preparation include the parishes of Ashwell, Codicote, Barkway and Nuthampstead, Ickleford, Kimpton, Knebworth, St Ippolyts, St. Pauls Walden, and Wallington. In addition, a neighbourhood planning forum and planning area has been designated for the unparished area of Charlton.
- 1.13 National policy makes it clear that once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the relevant local plan, and has been brought into force, the policies it contains will take precedence over existing non-strategic policies in the local plan for that neighbourhood, where they are in conflict.
- 1.14 This local plan clearly distinguishes between strategic and non-strategic policies to assist in the development and interpretation of Neighbourhood Plans.
- 1.15 Local planning authorities have a general duty to support communities producing neighbourhood plans. The Council is committed to neighbourhood planning as a process and offers support and guidance to parish councils in preparation of their plans.

#### Appraisals and Assessments

- 1.16 The Local Plan must undergo a Sustainability Appraisal (SA) and a Strategic Environment Assessment (SEA) as part of its preparation. These are required under national law. SEA takes into consideration the likely impacts of the Plan on the environment. The SA appraises the likely significant environmental, social and economic effects of the proposed policies in the Plan and how these can be mitigated and controlled. These assessments are normally carried out as a single process and this approach has been taken.
- 1.17 This Plan is accompanied by a sustainability appraisal report. The findings of the assessments have fed directly into the development of the policies. For the strategic policies reference is made in the Plan to the most important findings of the report.
- 1.18 In preparing the Local Plan, we have also carried out a Habitat Regulations Screening Assessment to determine whether the Plan is likely to have any significant effects on known European wildlife habitat sites. This assessment concluded that, within the measures and safeguards included in this Plan, the

scale and type of development being proposed is unlikely to have a significant effect upon and European sites<sup>2</sup>.

### Statement of Community Involvement

1.19 The Local Plan has been prepared following consultation with the local community in accordance with the Council's Statement of Community Involvement<sup>3</sup> which sets out when the Council will consult the community in relation to the Local Plan, how the Council will engage with the community and who the Council will involve in that consultation. Consultation on the Local Plan has also been carried out in accordance with requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

### Local Development Scheme

1.20 The Local Plan has been prepared in accordance with the Council's Local Development Scheme<sup>4</sup> which shows the programme for preparing this Local Plan and the timetable for its review.

### The Local Plan Evidence Base

1.21 All local plans are required to have an evidence base to draw from during their preparation to ensure that accurate, robust and up-to-date information is available to formulate meaningful and effective policies. The Council has prepared a wide-ranging evidence base for the Local Plan. This is listed on the Council website and is updated on an ongoing basis.

### **Previous Consultation**

1.22 The policies and proposals within this Local Plan have evolved through a number of previous consultation stages.

1.23 Under new legislation in 2004 with the introduction of the Planning and Compulsory Purchase Act, the local plan process was renamed the 'Local Development Framework' (LDF). The contents of the LDF were guided by regional plans, formally known as Regional Spatial Strategies (RSS). These set out development targets and strategic policies for the local planning authorities in their area. North Hertfordshire was located within the East of England region and an RSS for this area was adopted in 2008.

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<sup>2</sup> NHDC Habitats Regulations Assessment (2018); Habitats Regulations Assessment Addendum Note (2021)

<sup>3</sup> North Hertfordshire Statement of Community Involvement updated July 2020; NHDC Habitats Regulations Assessment (2018); Habitats Regulations Assessment Addendum Note (2021)

<sup>4</sup> North Hertfordshire Local Development Scheme January 2022

- 1.24 The Council published several consultation papers as part of the LDF between 2005-2009 to conform to the emerging and adopted proposals of the RSS, including:
- Core Strategy and Development Policies Issues & Options (2005);
  - Core Strategy Preferred Options (2007);
  - Development Policies Preferred Options (2007);
  - Stevenage & North Herts Action Plan Issues and Options (2007, jointly with Stevenage Borough Council);
  - Land Allocations Issues & Options (2008); and
  - Land Allocations Additional Suggested Sites Issues & Options (2009)
- 1.25 The publication of the NPPF in March 2012, followed by the eventual revocation of the East of England Plan in January 2013 effectively ‘reset the clock’ for North Hertfordshire’s Local Plan. A decision was made to merge the work on the emerging core strategy and the land allocations into a single local plan. As a consequence of these events, the Council became responsible for determining strategic planning matters formerly set out in the RSS, such as the setting of housing targets for the area.
- 1.26 Since March 2012, the Council has carried out three public consultations on a new Local Plan for North Hertfordshire. Given the significant changes above, it is these consultations that are viewed as marking the formal preparation of this Plan. This was in response to the evidence work carried out in assessing the objectively assessed need for housing and requiring consultation on proposed housing sites. These included the:
- Housing Options Growth Levels and Locations 2011-2031 (February 2013)
  - Housing Additional Local Options (July 2013); and
  - Local Plan Preferred Options (December 2014)
- 1.27 All three of these consultations saw relatively strong responses from residents, businesses, organisations, elected representatives and other stakeholders. All representations have been assessed and summarised and have been key in shaping this document. The Statement of Consultation<sup>5</sup> sets out how the Council has taken into account the comments it has received and forms part of the Council’s evidence base.
- 1.28 Further consultation was undertaken on the Inspector’s Proposed Main Modifications in 2019 and 2021.

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<sup>5</sup> Statement of Consultation (NHDC - September 2016)

## 2 A Picture of North Hertfordshire

Figure 1: North Hertfordshire in Context:



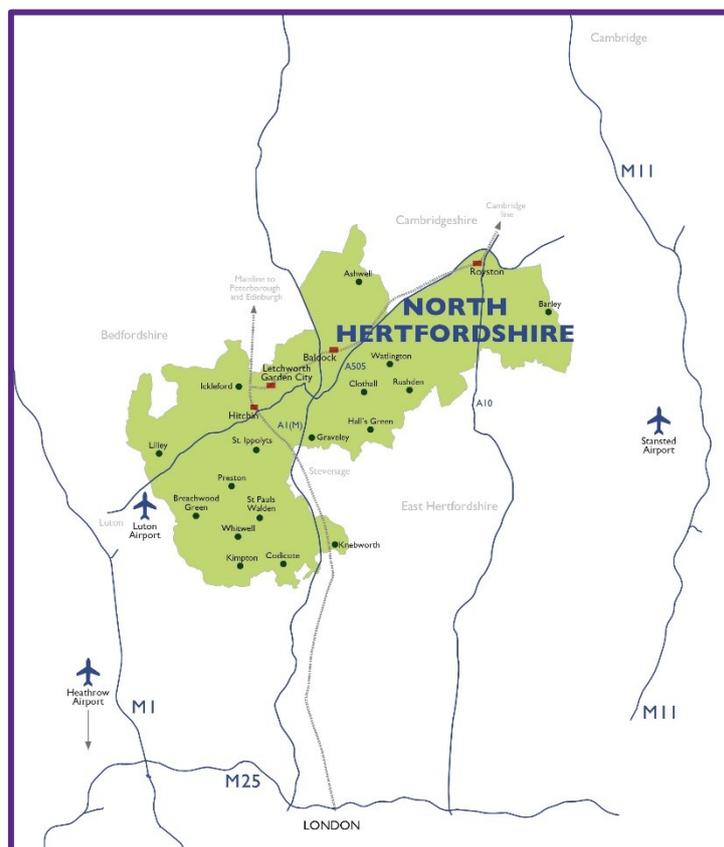
- 2.1 North Hertfordshire is a predominantly rural district covering approximately 375 square kilometres of land and is the most northern district within the County of Hertfordshire. The District is bounded by eight local authority areas – Stevenage, East Hertfordshire, St. Albans and Welwyn Hatfield within Hertfordshire, but also Luton, Central Bedfordshire, South Cambridgeshire and Uttlesford (Essex). Stevenage and Luton are relatively small in size and primarily urban by nature.
- 2.2 North Hertfordshire is characterised by a number of small to medium sized towns with a range of facilities and smaller settlements located within open countryside. The main settlements within North Hertfordshire are Hitchin, Baldock, Royston and the world’s first Garden City, Letchworth, each representing a significant focus for employment and housing. Most of the Great Ashby estate on the edge of Stevenage lies in North Hertfordshire. There are also about 40 villages and hamlets. Although there is no one dominant centre serving the District, there is a high degree of interdependency between the various towns and villages, as well as with surrounding larger towns like Stevenage, Luton, Milton Keynes, Cambridge, Welwyn Garden City and London.
- 2.3 A large proportion of the rural area of the District is covered by Green Belt, with the remainder classified as rural area beyond the Green Belt. North Hertfordshire has two areas of Green Belt, the London Metropolitan Green Belt covering Hitchin, Letchworth Garden City, Baldock, Stevenage and

nearby settlements, and the Luton Green Belt covering parts of the west of the District<sup>6</sup>.

2.4 The District is strategically positioned with good rail and road connections. It is less than 40 miles from central London. The five railway stations within North Hertfordshire provide direct services north to Peterborough, north-east to Cambridge and King's Lynn, and south to London and Hertford. There are also services to Stevenage that offers access to the North East and Scotland. However, no rail links from the District to the west exist, meaning towns like Luton and Milton Keynes are less accessible via public transport.

2.5 The A1 linking London to the North also passes through the District, as does the A505 running from east to west. Other main roads serving the local authority area include the A600, A602 and A507, while the two airports of Stansted and Luton are also situated in close proximity to the District as shown on Figure 2 below.

Figure 2: North Hertfordshire in detail



<sup>6</sup> See Green Belt Review (NHDC 2016), updated 2018

## Demographic Profile<sup>7</sup>

### Population & Distribution

- 2.6 North Hertfordshire is a diverse area. The total population figure for North Hertfordshire, from the 2019 Mid-Year Estimates, was 133,570 (males = 65,382 and females = 68,188)<sup>8</sup>. Over 70% of the population live in the four main settlements of Hitchin, Letchworth Garden City, Royston and Baldock.
- 2.7 The District age profile shows that there is a lower proportion of 15-29 year olds than in Hertfordshire (North Hertfordshire 14.9% compared to 16.6% in the county). However, the proportion of people in the District in the 30 – 54 age group mirrors the proportion in the county as a whole (North Hertfordshire 35.1% compared to 34.9% for Hertfordshire)<sup>9</sup>.
- 2.8 Official statistics indicate that the population is likely to increase over the next 10 years by nearly 9,000 residents (population estimate at 2031 – 146,500)<sup>10</sup>. This is due to a combination of factors, including people living longer, changes in social patterns, and the attractiveness of the District as a place to live. This will put considerable pressure not just on our housing numbers but on vital social support mechanisms such as schools and GP surgeries as well as our transport infrastructure.

### Ethnicity

- 2.9 The District has a diverse population, with a black and minority ethnic population comprising 10.5% of the total population, compared with 14.6% for England, and 9.2% for the East of England region.

### Economic Activity and Inactivity

- 2.10 More than 8 in 10 (87.6%) of North Hertfordshire's 16-64 year olds are economically active (in or seeking employment) compared to a national figure of 79%<sup>11</sup>. The unemployment rate in North Hertfordshire is 2.8%; this is below the East of England figure (3.6%) and below the national rate (4.2%)<sup>12</sup>. Approximately 1 in 5 (12.4%) of North Hertfordshire's 16-64 year olds are economically inactive<sup>13</sup>.

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<sup>7</sup> Summary of the demographic profile of North Hertfordshire is based on data taken from nationally recognised sources such as the Office for National Statistics, NOMIS, Sport England and Experian.

<sup>8</sup> ONS (2019) Mid 2019 Population Estimates for UK, England and Wales, Scotland and Northern Ireland

<sup>9</sup> ONS (2019) Population Estimates by single year of age

<sup>10</sup> ONS 2016

<sup>11</sup> Nomis (2020) – Official Labour Market Statistics; Employment and unemployment (Oct 2019 – Sept 2020)

<sup>12</sup> Nomis (2020) – Model based estimates of unemployment (Sept 2020)

<sup>13</sup> Nomis (2020) – Official Labour Market Statistics; Employment and unemployment (Oct 2019 – Sept 2020)

### Deprivation

2.11 According to the 2019 Index of Multiple Deprivation, North Hertfordshire is relatively affluent compared to other local authority areas. The District ranks 269<sup>th</sup> out of 317 local authority areas in England (1 being the most deprived)<sup>14</sup>. None of the District's population lives in areas within the bottom 10% of Super Output Areas (SOA) nationally, i.e. in the most deprived parts of the country. North Hertfordshire does however have five areas in the next two cohorts, i.e. those which are in the top 30% are seen as being most deprived, this includes one area in Hitchin and four in Letchworth Garden City.

### Health

2.12 On the whole the quality of life in North Hertfordshire is good. Life expectancy in North Hertfordshire is similar to the national figure; the male rate is currently 81 years compared to 79.8 years for England, and the female equivalent is 84.3 years compared to 83.7 years nationally. Life expectancy is 4.7 years lower for men in the most deprived areas of North Hertfordshire than in the least deprived areas<sup>15</sup>.

2.13 Projected population changes for North Hertfordshire to 2031 and beyond shows the impact that higher life expectancy has in regard to the age of the general population, with a higher proportion of our residents living between the 70 to 90+ age bands who will require differing degrees of support in terms of health and social care.

2.14 Adult and child obesity rates in North Hertfordshire are below the national and regional averages. Adult obesity rates in the District at 2020 were 58.2% of all adults compared with a national rate of 62.3% which still presents a key challenge for the District<sup>16</sup>.

### **Economy**

2.15 Like most areas North Hertfordshire did not escape the detrimental effects of the economic downturn in 2009 and many variables including unemployment and job growth figures suffered as result. Figures have only recently returned to pre-2008 levels and the local employment environment is improving and the figures are moving in the right direction. It is estimated that there are around 54,000 jobs<sup>17</sup> in North Hertfordshire.

2.16 There is a higher concentration of people working in the District employed in sectors such as manufacturing, construction, retail, motor trades, property, entertainment and recreation. Many higher skilled residents commute out of the District for employment. Nonetheless sectors such as finance & insurance

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<sup>14</sup> Ministry of Housing, Communities and Local Government English indices of deprivation 2019

<sup>15</sup> Public Health England (2019 - 2020) – North Hertfordshire Health Profile

<sup>16</sup> Public Health England (2019 - 2020) – Obesity Profile North Hertfordshire

<sup>17</sup> Nomis Local Authority Profile 2019

and information & communication make a substantial contribution to the District's overall economic output, although not employing a huge number of people. These represent opportunities for future expansion and development<sup>18</sup>.

- 2.17 The District hosts a number of internationally important businesses in the environmental technologies, insurance and electronics, as well as companies in pharmaceutical technologies, advanced engineering. Information technology and in the service and business support sectors.
- 2.18 The District has a working age population of 81,600 of which 76,700 are economically active. The majority of these are employees and work full-time but a small proportion of the population are self employed (10.5%).
- 2.19 In 2020, the median gross pay for full time employees was £644.10 per week which compares favourably with the national average of £586.70.
- 2.20 16.65% of the population do not have access to a car. This is much lower than the national figure (25.8%) and slightly lower than regionally (16.93%).

## Housing

- 2.21 At the start of the plan period in 2011, there were approximately 55,000 homes in North Hertfordshire. Almost one-quarter of homes in North Hertfordshire were detached houses. This proportion was slightly higher than both the Hertfordshire county and national figures. Conversely, the proportion of flats (including converted houses) was slightly lower<sup>19</sup>.
- 2.22 House prices in the District are well above the regional and national averages, although slightly below the average for Hertfordshire which is skewed significantly upwards by prices in areas such as St Albans. The average cost of a home in the District is around £355,000, meaning prices are around 44% higher than the national average<sup>20</sup>.
- 2.23 Plainly, these district-wide figures mask some fairly significant variations within and between North Hertfordshire's towns and villages.
- 2.24 In the ten-year period preceding this Plan, almost 5,500 new homes were built. The level of housing completions was highest over the period 2001-2008. On average, more than 600 homes were built each year during this period, with more than 700 new homes built in both 2001/02 and 2007/08. However, the completion of work at Great Ashby coincided with the financial 'crash' and general downturn in the property market. Since 2008, housing completion rates in the District have almost halved to around 330 new homes per year<sup>21</sup>.

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<sup>18</sup> Employment land review (Regeneris Consulting, 2013)

<sup>19</sup> 2011 Census, Table KS401EW

<sup>20</sup> ONS House Price Statistics for Small Areas 2019-2020

<sup>21</sup> NHDC monitoring data

- 2.25 There are currently more than 2,100 households on the local authority housing register awaiting assistance with their housing needs<sup>22</sup>.

## Natural and Built Environment

### Natural environment

- 2.26 The natural environment of North Hertfordshire contributes to its character and distinctiveness. North Hertfordshire has a diverse range of green infrastructure and environmental assets of local, regional and national importance. This includes Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Wildlife Sites, protected trees and woodlands, extensive areas of agricultural land, minerals reserves, rivers, floodplains, and a comprehensive network of open space.
- 2.27 North Hertfordshire comprises a broad band of attractive undulating countryside following the chalk escarpment of the Chiltern Hills. This ridge forms the watershed between the river basins of the Thames and The Wash. The highest point is Telegraph Hill at Lilley, at 184m above sea level and the lowest point of 32m above sea level is where the River Rhee leaves the District north of Ashwell. Most of the rural area is farmland, although there is some woodland, especially in the west of the District. Part of the District is within the Chilterns Area of Outstanding Natural Beauty located to the far north west, an area designated for its nationally significant landscape.
- 2.28 The District contains a variety of habitats for wildlife and plants, including areas of high biodiversity - notably the chalk grasslands and chalky boulder clay woodlands and meadows in the east of the District, the oak and hornbeam woodlands in the west and the wet meadows and fens along the River Hiz and tributaries.
- 2.29 North Hertfordshire is located at the head of both Great Ouse and Thames river catchments and as a result fluvial flooding is not a huge issue based on the size and flow of the watercourses. Of greater significance is surface and groundwater flooding associated with historic settlement pattern topography. Also of concern is the potential for pollution of watercourses linked to the lack of dilution in the river environment. Additionally, North Hertfordshire is identified as an area of water stress.
- 2.30 Minerals such as sand, gravel, crushed rock, chalk and clay are an important natural resource locally. The southern part of the District falls within a sand and gravel belt which stretches across Hertfordshire from Bishops Stortford to Hemel Hempstead. This provides the raw minerals required for constructing and maintaining roads, buildings and other infrastructure. Hertfordshire County Council is responsible for minerals planning for Hertfordshire.

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<sup>22</sup> NHDC Summary Statistics 2020

### Built Environment

- 2.31 The settlements of Hitchin, Baldock and Royston are all historic market towns each with their own distinctive character. Letchworth Garden City is based on Ebenezer Howard's original concept of a self-contained settlement combining both town and country living. Hitchin, Letchworth Garden City and Baldock lie very close to each other and have strong relationships in terms of housing markets and job movements. All four towns are service centres with a range of shops, jobs and community facilities that serve their respective rural hinterlands. The District has 35 civil parishes and three unparished areas (Baldock, Hitchin and Letchworth Garden City). The Communities Chapter provides more detail on each of the towns and rural settlements across north Hertfordshire.
- 2.32 All the towns and many of the villages have historic areas and buildings; there are 40 conservation areas and approximately 2750 listed buildings. There are also a number of registered historic parks and gardens. The District has a long history of human habitation and is crossed by the prehistoric Icknield Way. It also contains many ancient monuments, including the iron age Ravensburgh Castle at Hexton, the largest fort in south-east England.
- 2.33 It is important for the Council to review and understand changes and trends in its economy and local population and associated pressures on its environment. The Spatial Strategy and policies in this Plan make provision for guiding development, improving and providing for facilities for the future, whilst protecting and enhancing the natural and historic environment. This cannot be done in isolation without understanding cross boundaries issues and working with key agencies.

### **Relationship with Other Plans and Strategies**

- 2.34 In preparing this Local Plan for North Hertfordshire, we also need to consider how it relates to, and affects, the wider area and the plans of other local authorities and agencies, including taking into consideration our own district plans and strategies.

### Wider Area Plans and Strategies

- 2.35 The plan has been developed in consultation with nearby councils and other bodies under the duty to co-operate. National policy is clear that development should be co-ordinated across wider 'market areas' for both housing and employment. These are zones that share similar characteristics in terms of house prices, commuting patterns or the costs of business premises. They will not necessarily follow administrative boundaries and authorities should work together to try and meet development needs across these areas.<sup>23</sup>

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<sup>23</sup> Paragraphs 47, 159 and 160 of the 2012 NPPF.

- 2.36 The evidence work that supports this Local Plan has defined both the Housing Market Areas<sup>24</sup> and Functional Economic Market Area in which North Hertfordshire sits<sup>25</sup>.

*Housing Market Areas and Strategic Housing Market Assessment*

- 2.37 The District Council has worked collaboratively with six other authorities to identify *Housing Market Areas in Bedfordshire and surrounding areas*. This identifies that the substantial majority of North Hertfordshire (98.7%) lies in a housing market area stretching from Welwyn Garden City, through and across the District to the Cambridgeshire borders and into Bedfordshire. This covers all of Stevenage's administrative area, smaller parts of Welwyn Hatfield, Central Bedfordshire and East Hertfordshire and a minimal area within South Cambridgeshire. This functional HMA has a population of around 350,000 and is referred to as the Stevenage HMA. This area is shown green in figure 3 over the page.
- 2.38 The small area to the west of the District, including Hexton, Lilley and Breachwood Green, lies within a different housing market area centred on Luton. This HMA covers all of Luton's administrative area, a substantial area of Central Bedfordshire and a small area of Aylesbury Vale. This functional HMA has a population of around 323,000 and is referred to as the Luton HMA.
- 2.39 The HMA geography informed the preparation of Strategic Housing Market Assessments (SHMA) which were completed on a 'best fit' basis by groups of local authorities. The Council prepared a joint SHMA<sup>26</sup> with Stevenage which, at the time of the plan's submission, identified an objectively assessed need (OAN) for 13,800 homes in North Hertfordshire and 7,600 homes within Stevenage over the period 2011-2031. Further Government household projections were released during the examination and a revised assessment for North Hertfordshire identified an OAN of 11,500 homes<sup>27</sup>. The plans of both authorities show that their individual housing needs can be accommodated in full within their administrative areas.
- 2.40 The Council has also been involved in the SHMA prepared for Luton and Central Bedfordshire<sup>28</sup>. The identified need for housing in this area is significant.

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<sup>24</sup> Housing Market Areas in Bedford and Surrounding Areas (ORS 2015)

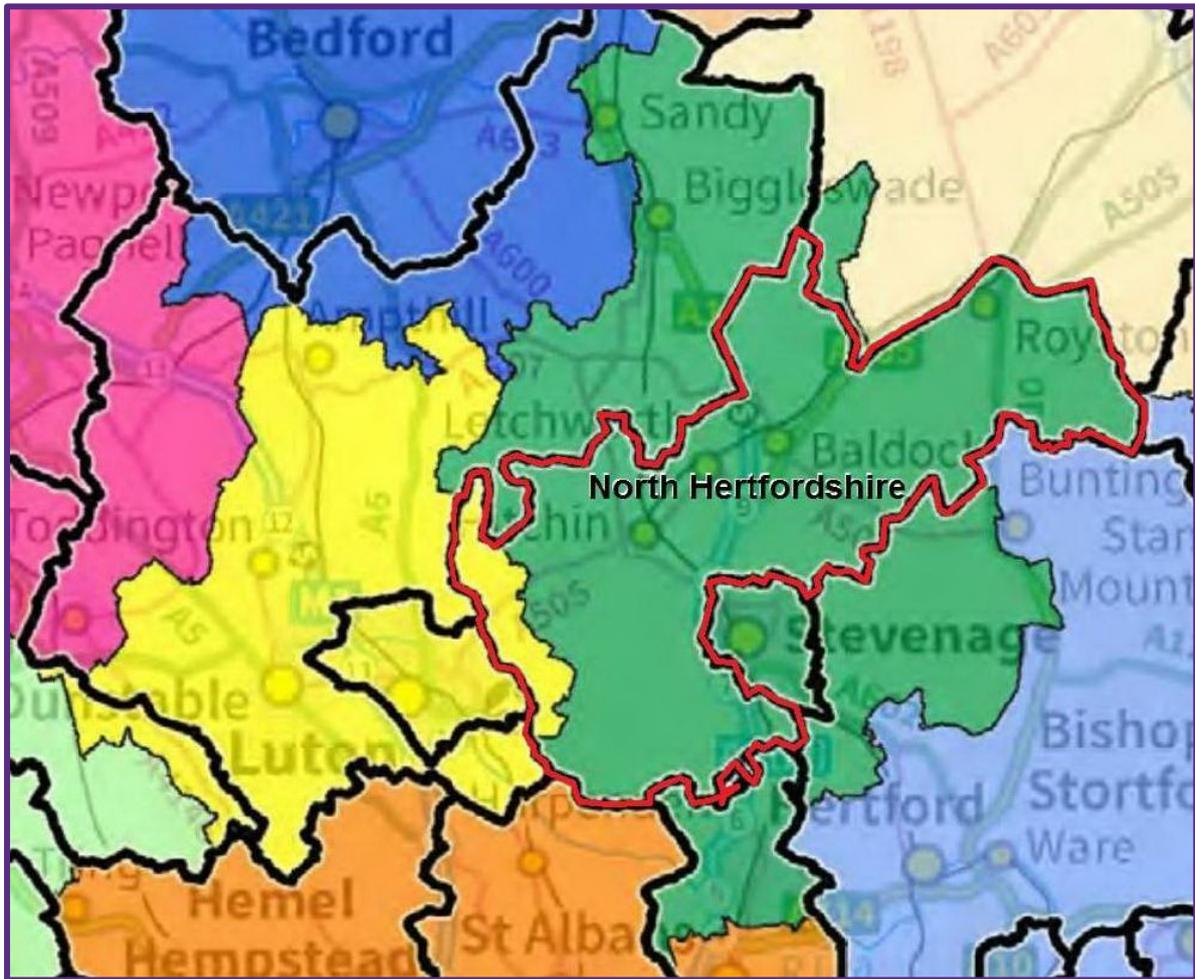
<sup>25</sup> Functional Economic Market Area Study: Stevenage, North Hertfordshire and Central Bedfordshire Councils (NLP 2015)

<sup>26</sup> Stevenage and North Hertfordshire Strategic Housing Market Assessment Update (ORS 2015) as updated / superceded by Updating the Overall Housing Need (ORS, 2016)

<sup>27</sup> Review of the Official Projections for North Hertfordshire (ORS, 2020)

<sup>28</sup> Luton and Central Bedfordshire Strategic Housing Market Assessment (ORS 2014)

Figure 3: Housing Market Areas



The majority of North Hertfordshire (outlined in red) falls within the Stevenage Housing Market Area (shown green). A small area to the west of the district falls within the Luton Housing Market Area (shown yellow)

- 2.41 Luton’s plan and associated evidence base identifies a requirement for approximately 18,000 homes in the Borough but has capacity for just 8,500. The most recent projections for Luton did not lead to a meaningful change in the housing situation presented in Luton’s adopted Plan. The issue of unmet needs from Luton is therefore a significant matter to be considered under the Duty to Co-operate.
- 2.42 The Council’s own evidence base establishes with sufficient certainty that there are sites within North Hertfordshire which could contribute towards these needs, and the approach proposed for our own Plan will maximise the amount of housing that can reasonably be accommodated within this part of the Luton HMA that falls within the District.

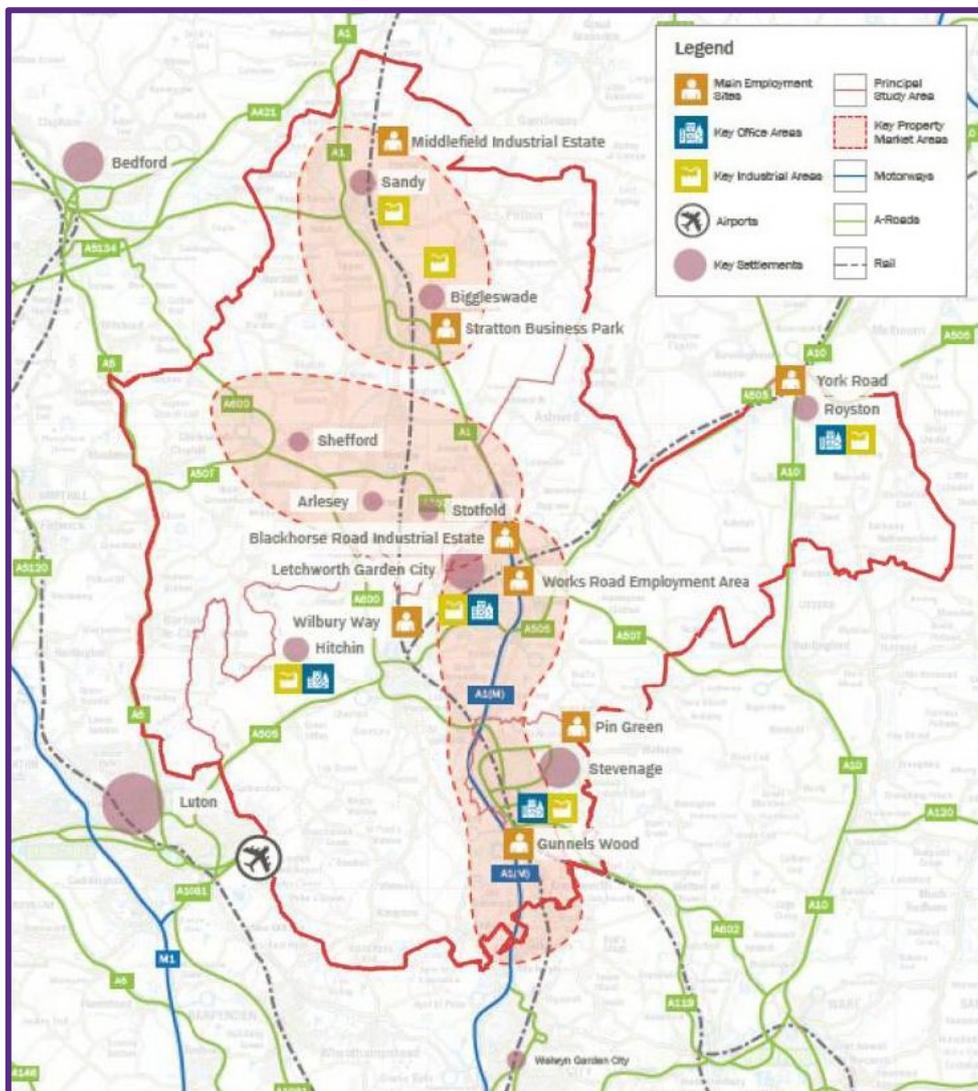
Functional Economic Market Area

- 2.43 The Functional Economic Market Area (FEMA) covers a similar area to the Stevenage HMA. Our evidence shows that Stevenage, North Hertfordshire and the eastern half of Central Bedfordshire form a clearly defined FEMA that

stretches along the A1 corridor<sup>29</sup>. 70% of people that work in this area, also live here. The economic profiles of the three areas are complementary while commercial property market data does not suggest that nearby commercial property markets, such as Luton, Bedford or Watford, extend this far). The FEMA is shown in figure 4 below.

- 2.44 The FEMA considers the employment strategies of the associated authorities and the overall supply of jobs and employment land and future employment requirements that could arise from changes to future commuting patterns. It concludes that there will be a requirement for additional employment land to be provided within the FEMA to meet Stevenage’s growth which cannot be met within their own administrative boundary.

Figure 4: Extent of FEMA



North Hertfordshire shares a Functional Economic Market Area with Stevenage and the eastern half of Central Bedfordshire

<sup>29</sup> Functional Economic Market Area Study - Nathaniel Lichfield & Partners (NLP) 2015.

## Hertfordshire Plans and Strategies

2.45 A number of key plans and strategies are produced at a county level to which the Council should have regard to in preparing the Local Plan. Key amongst these are the:

- Strategic Economic Plan, 2017 - 2030 of the Hertfordshire Local Enterprise Partnership (LEP).
- Hertfordshire Local Nature Partnership
- Hertfordshire Waste and Minerals Local Plans
- Hertfordshire Local Transport Plan

### Hertfordshire LEP

2.46 In October 2013 the Hertfordshire LEP published their Strategic Economic Plan for the county which was refreshed in July 2017. This strategy sets out the LEPs vision, that by 2030, Hertfordshire will be the leading economy at the heart of the UKs Golden Triangle, which encompasses Cambridge, Oxford and London. To deliver the vision, the LEP has identified a number of priority areas, which represent major opportunities for Hertfordshire. These include:

- Maintaining Hertfordshire's global excellence in science and technology;
- Harnessing Hertfordshire's relationship with London (and elsewhere);
- Re-invigorating Hertfordshire's places for the 21st Century; and
- Building the wider foundations for growth across both businesses and people.

2.47 The aim of the strategy is to promote growth in the county and ensure that Hertfordshire is perfectly placed for business. The plan focuses on three key growth corridors. North Hertfordshire lies within the A1 (M) corridor.

2.48 The Hertfordshire LEP is responsible for bidding and prioritising infrastructure investment within the county.

### Hertfordshire Local Nature Partnership

2.49 The purpose of the Hertfordshire LNP is to ensure the county's natural environment is fully considered and valued in local decision making and that it delivers benefits for wildlife, people, landscapes and the local economy. To this end the LNP has prepared a strategy covering the period from 2013 to 2016, which identifies the following priorities for Hertfordshire:

- Healthy and resilient ecological networks;
- Delivering health and wellbeing through the natural environment;
- Sustainable economic growth through the natural environment; and
- Water for people and wildlife.

2.50 Underpinning the strategy is the need to deliver new green infrastructure and to protect/ enhance existing green infrastructure. To support growth in

Hertfordshire local authorities will need to work together and with the LNP to achieve this.

#### Hertfordshire Waste Local Plan

- 2.51 The Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (DPD) adopted in 2012, covers the period from 2011 to 2026. These documents set out the spatial vision and strategic objectives for waste planning in Hertfordshire up to 2026 and also contain the policies needed to implement these objectives, along with detailed generic development management policies that will be used to make decisions on waste planning applications.
- 2.52 This document is supported by the Waste Site Allocations (WSA) DPD which was adopted in 2014 and identifies sites for waste management facilities across the county. In addition to the Waste Local Plan, the County Council has produced Supplementary Planning Document for Employment Land Areas of Search for new waste management facilities, reflecting that designated Employment Land Areas are often an appropriate location for waste management uses.
- 2.53 When planning for new growth in North Hertfordshire, it will be necessary to have regard to this document when considering the implications of new development on waste disposal.

#### Hertfordshire Minerals Local Plan

- 2.54 The Hertfordshire Minerals Local Plan adopted in 2007 covers the period 2002 -2016. Policy 5 of that plan sets out the approach to minerals sterilisation. These have been taken into account in the selection of sites in this Plan. The County Council has commenced a review of the Minerals Local Plan.
- 2.55 The County Council's adopted Mineral Consultation Area Supplementary Planning Document identifies areas of the district where particular care is needed to prevent the unnecessary sterilisation of sand and gravel resources.
- 2.56 In order to prevent sterilisation of mineral resources the council and developers will consider the effect of future development on mineral resources in these areas at an early stage and seek the advice of Hertfordshire County Council as the Mineral Planning Authority in accordance with the Minerals Consultation Area SPD (and any future revisions/successor).

#### Hertfordshire Local Transport Plan

- 2.57 The County Council is also the Highway Authority with responsibility for transport matters. This Plan supports key priorities and proposals from the Hertfordshire Local Transport Plan (LTP4) adopted in 2018. LTP4 sets out the transport strategy for Hertfordshire (over the period from 2018 to 2031), the goals and challenges to be met, and outlines a programme of transport

schemes and initiatives to be delivered subject to available funding. The LTP covers all modes of transport - including walking, cycling, public transport, car based travel and freight - and takes account of the effect of transport on wider aspects including the economy, environment, climate change and social inclusion.

- 2.58 It will therefore be necessary to both have regard to this strategy and work with the Highway Authority when taking forward the development sites set out in the Local Plan.

### District Plans and Strategies

- 2.59 The Local Plan is a key Council document. It is the spatial expression of the District's priorities and development needs going forward. It provides the planning framework to support the priorities identified in other Council plans and programmes including the Council Plan 2022 – 2027, and other Council strategies covering economic development, housing, leisure, climate change, environment and waste.

#### North Hertfordshire Council Plan

- 2.60 The North Hertfordshire Council Plan 2022 – 2027 sets out the Council's vision and corporate objectives for the District. The council's vision set out in the Council Plan is:

*“We put people first and deliver sustainable services, to enable a brighter future together”*

- 2.61 The Council plan sets out the priorities that the Council will address over the next five years. The plan also lays out how North Hertfordshire District Council will achieve its aims for the district.
- 2.62 The Council Plan explains the Council's co-operative values and sets out three priorities:
- **People First** People make North Herts work. We value all our residents, businesses, staff, contractors, councillors, and other partners, and place them at the heart of everything we do.
  - **Sustainability** We recognise the challenges our towns and district as a whole face and are committed to delivering services which are relevant and sustainable. In doing so we will place our environmental responsibilities, as well as sound financial planning, at the centre of our policy making.
  - **A Brighter Future Together** We are far-sighted and plan for the long term to secure the best outcomes for our people, towns and villages, and the local economy, ensuring North Herts continues to thrive.

North Hertfordshire Economic Development Strategy

2.63 'Productive North Herts' the Council's economic development strategy adopted in September 2015 covers the period 2015 to 2025. The Strategy identifies a number of priorities that will provide a more coordinated and focussed approach to the needs of the local economy, and at the same time links to the Council's corporate objective to promote sustainable growth within our District. The Strategy and its associated Action Plan seek to guide economic activities across the District whilst also providing the basis for greater connection with the business community and key stakeholders. It recognises the need to work in partnership with key stakeholders to support and grow new and existing businesses and to attract inward investment.

Other relevant plans and Strategies

2.64 The spatial implications of other plans and strategies have been taken into account in the preparation of this Local Plan. These include the investment plans of key infrastructure and utilities providers including Network Rail, Highways England and Thames Water, emerging local plans of neighbouring authorities, the public health strategy for Hertfordshire and relevant European directives and requirements that need to be incorporated. Of particular relevance to this Plan is the Water Framework Directive, which seeks to improve the quality of all water bodies as well as those directives relating the protection of key species and the environmental assessment of relevant plans and strategies.

**Key Challenges and Opportunities for North Hertfordshire**

2.65 There are a number of challenges facing North Hertfordshire over the next 15 years which the Local Plan will need to address in terms of national policy and at the District and local level. There are also a number of opportunities associated with development which the Council should seek to utilise for the benefit of the District as a whole.

2.66 The National Planning Policy Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development. It also identifies a need for the planning system to perform an economic role, a social role and an environmental role, if sustainable development is to be achieved<sup>30</sup>. These roles give rise to many issues and challenges for the District.

2.67 The key challenges are:

- Identifying and delivering the most sustainable forms and patterns of development around the District,
- Providing the right type and level of growth to meet the needs of the District and considering the strategic needs of adjoining authorities,

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<sup>30</sup> Paragraphs 6 and 7 of the 2012 NPPF

- Protecting and enhancing the environment and encouraging the prudent use of resources, and
  - Creating places where people want to live, work and spend their leisure time.
- 2.68 In addressing these key challenges the following issues will need to be taken into account.
- 2.69 Our evidence states that North Hertfordshire needs to provide a significant number of homes and jobs over the plan period. We also need to ensure that our Plan helps meet development requirements in market areas that cross our administrative boundaries. Managing the growth of the economy, housing and meeting the needs of our existing communities, against a backdrop of financial constraint, are key issues for the District.
- 2.70 Some of the sites to be developed will be substantial new communities. Each will need careful planning to ensure that the development is properly integrated into the surrounding area, has the appropriate level of facilities on site and mitigates its impact on the local area. The most appropriate way to achieve this is, is through the preparation of masterplans with relevant bodies and joint plans where sites are close to or straddle the district boundary with neighbouring authorities.
- 2.71 The population is increasing, migration levels have been high in recent years, more people are living on their own, people are living longer and household sizes are becoming smaller all of which creates a high demand for housing and places additional pressure on community facilities. In addition the market cost of housing is increasingly out of reach for many households. There is also a need for more affordable housing.
- 2.72 The District is generally prosperous with lower levels of unemployment than the national average, and some areas of North Hertfordshire are amongst the most deprived in Hertfordshire. There is a need for job growth to continue to support the local economy and meet the needs of a growing population.
- 2.73 Recent changes in planning legislation and policy mean the Council does not have the same ability to protect the supply of employment land for the future.
- 2.74 A number of our employment areas are tired and dated and are in need of investment. There are also access issues with some employment areas as well as infrastructure constraints across the District and wider area.
- 2.75 There is a need to ensure that our town centres remain vibrant in a changing and volatile retail environment. The nature of our town centres has also transformed with changing shopping patterns and practices. There is a need to be more flexible in our approach towards the changing needs of our town centres whilst ensuring that they retain their market share in supporting their local communities.

- 2.76 Transport connections from north to south are strong with the main road and rail routes radiating from London. Links from east to west are generally less well developed placing pressures on local routes and rural roads are being used as cut-throughs, particularly in the western part of the District between Stevenage, Luton and Hitchin.
- 2.77 The District has a considerable daily outflow of commuters, to highly skilled employment areas mainly in central London but also to the high tech and development industries which surround Cambridge. Working in partnership with the Local Enterprise Partnerships, the business sector, and other key stakeholders will help identify opportunities for inward investment to increase our employment base and encourage new enterprise.
- 2.78 Improving physical and mental health is a key element of quality of life. The need to plan for new development creates the opportunity to build in the infrastructure and facilities for 'healthy living' from the start as well as providing opportunities to improve existing facilities, social networks and infrastructure.
- 2.79 Infrastructure that may be needed to accommodate this growth across the District includes; schools, surgeries, community buildings and sports facilities as well as roads, energy and sewerage. This is likely to require considerable inward investment to overcome issues related to transportation, health care, education and the provision of more new homes.
- 2.80 Inward investment can be secured through the planning system but only if it does not compromise the viability of new development. The Infrastructure Delivery Plan<sup>31</sup> (IDP) prepared alongside this Plan identifies the infrastructure requirements, cost, timing, potential funding mechanisms and responsibilities for delivery.
- 2.81 The quality of the District's natural and historic environment, its open spaces and countryside are highly valued by its residents. Protecting these areas and assets for the future alongside balancing the needs for development and ensuring suitable mitigation measures are put in place to reduce their impact will need to be addressed through the policies in the Plan.
- 2.82 Housing and economic growth is likely to lead to an increase in overall greenhouse gas emissions arising from domestic, transport and industrial sectors. It is also likely to lead to an increase in overall water consumption, and the associated need to treat waste water.
- 2.83 Changes to legislation and national planning policy in 2015 and 2016 mean that the CO<sub>2</sub> and water performance of new dwellings is now governed by Building Regulations L, with changes to the Building Regulations in 2022 and 2025 expected to bring in tighter standards for CO<sub>2</sub> emissions.

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<sup>31</sup> North Hertfordshire Infrastructure Delivery Plan September 2016 (updated 2018)

- 2.84 Any new development will need to be located in places which have good access to jobs, shops, services and public transport and also provide opportunities to travel by foot or on a bike. Provision of measures for water conservation, improved biodiversity, increasing energy efficiency of new development, and renewable energy can help to ensure that development is more sustainable.



# **SECTION TWO - SPATIAL STRATEGY AND STRATEGIC POLICIES**



## SECTION TWO - SPATIAL STRATEGY AND STRATEGIC POLICIES

### 3 Spatial Strategy and Spatial Vision

- 3.1 The spatial strategy sets out our overall approach for sustainable development and growth and how this will be distributed across the District. The key components of the strategy are meeting future housing needs and supporting economic growth as well as making provision for infrastructure and services whilst protecting the natural and historic environment.
- 3.2 In preparing our spatial strategy a number of options have been considered through the SA/SEA<sup>32</sup> process, this includes identifying policy options for how the District should develop, and in particular where development should happen, and how much development there should be.
- 3.3 Our spatial strategy is one of promoting sustainable development by supporting the use of suitably located previously developed land and buildings and by focusing the majority of development on our towns (including urban extensions) in order to make maximum use of existing facilities, social networks and infrastructure, and maximise opportunities to deliver new infrastructure. It also allows for some growth of our villages in order to allow those communities to continue to thrive.
- 3.4 Our vision for the District, strategic objectives and strategic policies together with their supporting text sets out our Spatial Strategy.

#### Spatial Vision

- 3.5 Having identified the main challenges facing North Hertfordshire, this section sets out the spatial vision for North Hertfordshire. The vision is a statement of what North Hertfordshire will be like in 2031.
- 3.6 In developing the vision we have had regard to the Council's aspirations set out in its Corporate Plan, other organisations strategies and plans and to the views expressed by organisations and individuals to previous consultations on the preparation of this Plan.

#### Vision

- By 2031 North Hertfordshire will be an attractive and vibrant place where people will want to live, work and spend their leisure time.
- A mixture of quality new homes including affordable houses with a choice of tenure catering for the needs of North Hertfordshire's residents

<sup>32</sup> Sustainability Appraisal of the North Hertfordshire Local Plan (CAG, 2022)

and, where appropriate, the wider housing market, will be provided in appropriate sustainable locations.

- New development will have contributed to the creation of sustainable communities. These are safe, attractive and inclusive; well-integrated into settlements; respect local distinctiveness; raise the standards of sustainable design and architectural quality; make a positive contribution to the local area; and ensure the protection, restoration and enhancement of valuable natural and historic resources. Strategic and significant sites will have been masterplanned in accordance with the guiding principles set out within this Plan.
- New development will help to maintain and enhance the vibrancy of existing settlements, enabling the towns and villages to embrace their roles within the District's settlement hierarchy and provide an enhanced variety of new housing, employment opportunities and essential infrastructure that is of benefit to existing and future residents.
- North Hertfordshire will have a robust and prosperous economy (including sustainable tourism) with a greater mix of skilled jobs, focused in locations that best support the District's growing population. Local and smaller scale businesses will have had the opportunity to thrive and grow.
- The vitality and viability of the towns of Hitchin, Letchworth Garden City, Royston and Baldock are safeguarded in a way that takes account of their distinctive role. This will have been achieved through carefully planned development which meets the needs of these centres, retaining their market share in terms of their retail offer, whilst recognising the importance of preserving and enhancing their historic character. In local and village centres shopping facilities that meet local needs will be supported.
- The District's important natural and historic areas and buildings that help to create the distinctive identity of the District in both urban and rural areas will have been protected and enhanced where possible. The quality and attractiveness of the landscape of North Hertfordshire, which contributes to its distinctive character, will have been conserved and enhanced where possible. New green infrastructure will have enhanced the network of green corridors linking settlements to the open countryside, providing greater opportunities for healthy lifestyles.
- The rich biodiversity and geodiversity of North Hertfordshire will have been protected and enhanced where possible. Where new development could potentially have an adverse impact on biodiversity and geodiversity, measures will have been taken to ensure that the impact was either avoided or mitigated.
- North Hertfordshire will have a range of community, leisure, cultural and recreational facilities in locations that are accessible to the local population, creating cohesive communities that recognise the needs of the older population; and enhance the opportunities for children and young people.

- The District will play its part in addressing climate change by improving opportunities for travelling by public transport, walking and cycling, using natural resources more efficiently, reducing the demand for water, securing high quality sustainable design and managing the risk of flooding.
- By working in partnership with service providers, government bodies, the Local Enterprise Partnership, developers, other local authorities and other key bodies we will ensure the timely delivery of necessary supporting infrastructure.

## Strategic Objectives

3.7 The strategic objectives provide the link between our vision for the District and the strategic policies set out in the Local Plan.

### Environmental:

- ENV1** Direct development towards the most sustainable locations which seek to maintain the existing settlement pattern.
- ENV2** Protect and enhance the historic character of North Hertfordshire's towns, villages, hamlets and landscape by promoting good design that creates a distinctive sense of place.
- ENV3** Protect, maintain and enhance the District's historic and natural environment, its cultural assets and network of open spaces, urban and rural landscapes.
- ENV4** Mitigate the effects of climate change by encouraging the use of sustainable construction techniques, the appropriate use of renewable energy technologies and reducing the risk of flooding.
- ENV5** Reduce water consumption, increase biodiversity and protect and enhance the quality of existing environmental assets by enhancing new green spaces and networks of green space for both recreation and wildlife.

### Economic:

- ECON1** Support a vibrant, diverse and competitive local economy that provides a range of job opportunities enabling new and existing businesses to grow and thrive.
- ECON2** Ensure an adequate supply of employment land, office accommodation and support facilities to meet the needs of new and existing businesses within our urban and rural areas.

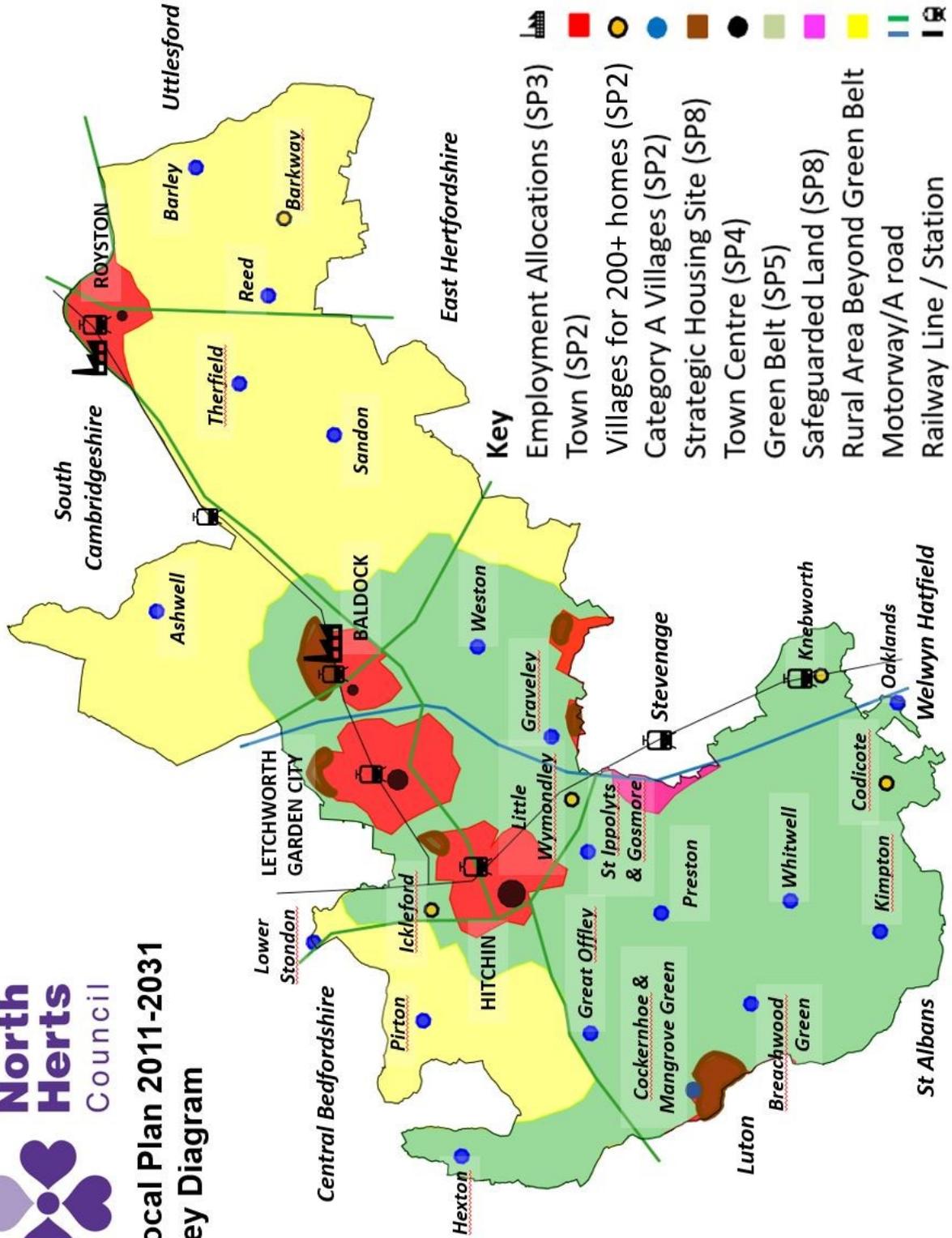
- ECON3** Provide for a greater mix of skilled jobs as well as providing opportunities for further education and skills training to promote investor confidence in locating to or remaining in the District.
- ECON4** Maintain and enhance the vitality and viability of our town, neighbourhood and village centres, as well as strengthening the retail roles of our town centres ensuring that they remain competitive and attractive for modern-day use.
- ECON5** Support and enhance local businesses, services and facilities in urban and rural areas through tourism.
- ECON6** Sustain the vitality of our villages and the rural economy in supporting rural diversification whilst ensuring development is of an appropriate scale and character.
- ECON7** Improve access opportunities, minimise the need to travel, and encourage journeys to be made by sustainable means of transport to ease congestion, reduce carbon emissions and the impacts on air quality management areas.
- ECON8** Ensure all development is supported by the necessary provision of, or improvements to infrastructure, services and facilities in an effective and timely manner to make development sustainable and minimise its effect upon existing communities

Social:

- SOC1** Identify locations for a range of types and tenures of homes, including affordable homes, to meet identified needs and provide adequate housing for an increasing and ageing population.
- SOC2** Encourage safe and vibrant mixed communities that provide for the needs of all North Hertfordshire's residents.
- SOC3** Improve access to, maintain and make provision for new facilities including community, sports, leisure, health and cultural facilities, that meet the needs of all North Hertfordshire's communities
- SOC4** Enable rural communities to plan to meet their own local needs, especially through neighbourhood planning.



**Local Plan 2011-2031  
Key Diagram**



## 4 Strategic Policies

### Sustainable Development

#### Policy SP1: Sustainable development in North Hertfordshire

This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;
- b) Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;
- c) Grant planning permission for proposals that, individually or cumulatively:
  - i. deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;
  - ii. create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;
  - iii. provide the necessary infrastructure required to support an increasing population;
  - iv. protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and
  - v. secure any necessary mitigation measures that reduce the impact of development, including on climate change; and
- d) Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan.

- 4.1 Government policy is clear that the purpose of planning is to help achieve sustainable development. This means improving our lives today while not compromising our ability to do so in the future. It means supporting growth whilst protecting key elements of the natural and historic environment.
- 4.2 In implementing this Plan, we will take a positive approach that ensures we can continue to permit the significant majority of planning applications for new development.
- 4.3 Policy SP1 sets out guiding principles for planning in the District over the period to 2031. We will seek to grant permission wherever proposals support these strategic aims and meet the requirements set out in this Plan.

- 4.4 These principles are already evident across the District. Letchworth has a global reputation as the world's first garden city. Hitchin, Baldock and Royston are established market towns built around a historic core. Our villages provide highly valued environments in which to live away from the main towns, yet also have provided opportunities for sensitive growth over time.
- 4.5 These settlements are located within a wider setting of which the District can be proud. North Hertfordshire has a rich and varied historic environment while high quality landscapes and areas of national importance surround our towns and villages. These factors help to maintain separate identities and also provide opportunities for residents to interact with the wider countryside around them.
- 4.6 This Plan accommodates necessary growth whilst maintaining these characteristics. New development will integrate with its surrounds rather than being remote. We will make use of previously developed land where possible. Key protections will be respected.
- 4.7 In setting a framework for growth, this Plan also recognises the value of local knowledge and the importance of local choice. A number of parishes within the District are already designated Neighbourhood Planning areas and our Local Plan is structured flexibly in response. This chapter contains the strategic policies and aspirations with which any neighbourhood plans, or other local planning initiatives, must be in general conformity.
- 4.8 Beyond this, there remains scope for local interpretation. Local housing allocations and, beyond the Green Belt, village boundaries are examples of issues which are open to debate and change through the Neighbourhood Planning system. Local communities will be able to supplement the policies in this Plan or identify alternate approaches whilst adhering to the key principles we have set out.
- 4.9 Our Sustainability Appraisal says that our policy provides an overarching expression of what sustainable development would look like in North Hertfordshire; it is strategic in nature and broadly covers sustainable development priorities.

#### **Policy SP2: Settlement Hierarchy and Spatial Distribution<sup>33</sup>**

Between 2011 and 2031, the plan makes provision for at least 13,000 new homes.

Approximately 80% of the District's housing development and the substantial majority of new employment, retail and other development will be located within the adjusted settlement boundaries of the following towns:

<sup>33</sup> The figures shown in this policy for individual settlements are the total of planned, permitted and completed development for the period 2011-2031. These figures are not a target and do not necessarily represent the maximum number of new homes that will be built.

- Baldock (2,198 homes);
- Hitchin (1,842);
- Letchworth Garden City (1,928);
- Royston (1,899);
- Stevenage (including Great Ashby)<sup>34</sup> (1,705); and
- Luton<sup>34</sup> (1,485)

Approximately 13% of housing, along with supporting infrastructure and facilities will be delivered within the adjusted settlement boundaries of the following five villages for the levels of development indicated:

- Barkway (208)
- Codicote (363)
- Ickleford (235)
- Knebworth (731)
- Little Wymondley (312)

The remaining development will be dispersed across the District as set out below.

In Category A villages, general development will be allowed within the defined settlement boundaries:

- Ashwell;
- Barley;
- Breachwood Green;
- Cockernhoe & Mangrove Green;
- Graveley;
- Hexton;
- Kimpton;
- Lower Stondon<sup>34</sup>;
- Oaklands<sup>34</sup>;
- Offley;
- Pirton
- Preston
- Reed;
- Sandon;
- St Ippolyts & Gosmore;
- Therfield;
- Weston; and
- Whitwell.

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

- Blackmore End;
- Great Wymondley;
- Hinxworth;
- Holwell;
- Kelshall;
- Lilley;
- Newnham;
- Old Knebworth;
- Rushden;
- Wallington; and
- Willian.

Limited affordable housing and facilities for local community needs meeting the requirements of Policy CGB2 will be allowed in the Category C settlements of:

- Bygrave;
- Caldecote;
- Clothall;
- Langley;
- Nuthampstead;
- Peters Green; and
- Radwell

<sup>34</sup> These settlements are (substantively) located outside of North Hertfordshire's administrative area, but the urban areas adjoin, or already lie partially within, the District.

Development outside of these locations or general parameters will be permitted where this is supported by an adopted Neighbourhood Plan. Under the provisions of national policy at the time of this Plan's examination, Neighbourhood Plans cannot allocate sites in the Green Belt or amend Green Belt boundaries.

- 4.10 North Hertfordshire includes a range of settlements, including isolated rural hamlets, numerous villages, the four towns of Hitchin, Letchworth Garden City, Baldock and Royston, and large parts of the Great Ashby estate on the edge of Stevenage.
- 4.11 The Council wishes to focus the majority of new development on the towns (including urban extensions to existing towns) in order to make maximum use of existing facilities, social networks and infrastructure, and maximise opportunities to deliver new infrastructure. However, it is important to allow growth of the villages in order to allow those communities to continue to function.
- 4.12 Based on the policies and allocations of this plan, it is anticipated that approximately four in every five new homes delivered over the plan period will be built within the adjusted settlement boundaries of the towns. These will remain the primary focus for employment, retail and other development. The balance of new development will be distributed across North Hertfordshire's villages and the remainder of the District.
- 4.13 Much of this growth will be delivered on sites allocated for development by this Plan. This will be supplemented by (often smaller) 'windfall' sites which come forward within the settlement boundaries and parameters identified in Policy SP2 as well as any further sites subsequently identified through Neighbourhood Plans. These schemes may include opportunities for self-build development.
- 4.14 The National Planning Policy Framework (NPPF) acknowledges sometimes development in one village may support services in other nearby villages. Although some communities may lack a full range of facilities themselves, they should not be barred from further development. In many of the District's rural areas the average number of people per household is falling. Some of the villages have seen very little growth in recent years and their populations have actually fallen. Our evidence gives further consideration to these issues and explains how the settlement hierarchy has been developed<sup>35</sup>. For those areas within the Green Belt, we have additionally considered how villages contribute to openness<sup>36</sup>.
- 4.15 Five villages have been identified that will support higher levels of new housing allocations than the Category A villages:

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<sup>35</sup> Housing and Green Belt Background Paper (NHDC, 2016)

<sup>36</sup> Green Belt Review (NHDC, 2016 & 2018). Paragraph 86 of the 2012 NPPF explains how planning authorities should consider villages within the Green Belt when setting boundaries.

- Knebworth and Codicote are the two largest villages within North Hertfordshire and support a range of services, including a station at Knebworth;
  - Ickleford and Little Wymondley provide opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections; and
  - Barkway as a focus for development in the rural east of the District.
- 4.16 The Category A villages, normally containing primary schools, also have defined boundaries within which development will be allowed and sites have been allocated to meet the District's overall housing requirement. These villages are excluded from the policy designation (either Green Belt or Rural Area Beyond the Green Belt – see Policy SP5) which affects the surrounding countryside.
- 4.17 Category B villages are those with a lower level of facilities such as village halls and public houses. Category B villages will be allowed to accommodate limited infill development that does not expand the built core of the village into the surrounding countryside.
- 4.18 Blackmore End has been excluded from the Green Belt because of its limited contribution to the openness and purposes of the Green Belt. For the remaining Category B villages, this Plan does not define a settlement boundary or the extent of the built core. The Council believes it should be possible to assess on a case-by-case basis whether a site is in the built core. However, that may be something that affected communities wish to explore through neighbourhood plans.
- 4.19 The Category C settlements are
- those which give their names to a parish that does not contain any category A or B villages; and / or
  - those with a modest level of facilities but which make an important contribution to the open character of the Green Belt.
- 4.20 Within Category C settlements, a more restrictive approach will be taken. We will support limited affordable housing and schemes for community facilities which meet proven needs from that parish in line with the detailed policies of this Plan.
- 4.21 Our Sustainability Appraisal says that our policy will have a range of positive effects in seeking to focus new development within or adjoining existing settlements. There may be some potential negative impacts in terms of interaction with exiting residential areas and environmental aspects due to development being on greenfield sites. However, these impacts can be mitigated and addressed through design and layout considerations and other policies in this Plan.

## Economy & Town Centres

### Policy SP3: Employment

The Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer. We will

- a) Allocate an adequate supply of employment land to meet the needs of the Functional Economic Market Area over the plan period to 2031. The allocations as shown on the Policies Map are:
  - i. east of Baldock BA10 (19.6ha); and
  - ii. west of Royston RY9 (10.9ha);
- b) Safeguard Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their employment potential;
- c) Work with landowners, developers and, for sites on the edge of the District, adjoining authorities to identify an appropriate amount of employment land to be included through the masterplanning process in strategic housing sites;
- d) Permit an appropriate range of offices, research and development, light industrial or B class employment uses within these areas;
- e) Promote and support the expansion of the knowledge-based economy in the District. Proposals for the redevelopment of existing employment sites and the development of new employment sites which increase the level of knowledge-intensive employment will be supported in principle.
- f) Support offices, research and development, light industrial and B-class uses in appropriate locations outside of designated employment areas, including offices in main town centres and concentrations of these employment uses in certain villages; and
- g) Ensure relevant policies of this Plan recognise the contribution of sectors other than B Class uses and offices, research and development and light industrial uses, including tourism, to the provision of jobs.

4.22 The Council wants to see sustainable economic growth within North Hertfordshire. Skills, housing and economic development should be appropriately balanced. This will be achieved, in part, by working with other partners and through delivery of the Council's own economic development plans and projects.

4.23 North Hertfordshire District Council is a member of the Hertfordshire Local Enterprise Partnership (LEP). The LEP will be an important stakeholder regarding how the North Hertfordshire economy grows and develops in the future. In particular the Hertfordshire LEP is seeking to regain the county's

competitive edge by encouraging increased employment growth and enterprise.

- 4.24 The employment strategy of this Plan is driven by three, interlinked priorities for the North Hertfordshire economy:
- Increasing representation in high skilled and high value sectors;
  - Reducing out-commuting by providing greater opportunities for people to both live and work in the District; and
  - Aligning employment development with housing growth to promote sustainable patterns of development and access by non-car modes.
- 4.25 Our evidence shows that, compared to national averages there is a higher concentration of people employed in sectors such as manufacturing, construction, retail, motor trades, property, entertainment and recreation in North Hertfordshire. Many higher skilled residents commute out of the District for employment. Nonetheless sectors such as finance & insurance and information & communication make a substantial contribution to the District's overall economic output, although not employing a huge number of people. These represent opportunities for future expansion and development<sup>37</sup>.
- 4.26 North Hertfordshire also fails to perform as well as some other Districts in Hertfordshire with regard to the knowledge economy. In partnership with key stakeholders, we will seek to increase the number of highly skilled jobs in the District. Economic growth sectors which are knowledge-intensive will be targeted. This includes research and development (R&D), life sciences, advanced manufacturing, computer-related activities, and other business activities in combination with growth of the low-carbon economy. With other stakeholders, the Council will:
- encourage business start-ups in the knowledge economy;
  - help develop existing local businesses in the knowledge economy;
  - target knowledge-based businesses into North Herts; and
  - promote the take up of any new jobs by local people by promoting specific training and targeting recruitment at local residents.
- 4.27 Due to the good levels of connectivity to other centres of employment, such as Stevenage, Welwyn Hatfield, and London it is unlikely that all the extra economically active population over the plan period will take up jobs within the District. In 2011, over a quarter of North Hertfordshire's working population were employed in these three centres, within another quarter employed elsewhere outside the District<sup>38</sup>.
- 4.28 Trend-based forecasts reflect these patterns and anticipate continued increases in out-commuting from North Hertfordshire over the plan period<sup>39</sup>. Unchecked, this would lead to increased pressure on transport infrastructure

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<sup>37</sup> Employment land review (Regeneris Consulting, 2013)

<sup>38</sup> Annual population Survey (ONS, 2010-2011)

<sup>39</sup> East of England Forecasting Model (EEFM) (Cambridgeshire Insight, 2014)

that is already under strain at peak periods. This Plan therefore makes employment provision for offices, research and development, light industrial, general industry and storage and distribution at above modelled levels.

- 4.29 The settlements of Hitchin, Letchworth Garden City and Baldock are very close together. There is a significant amount of commuting between these settlements. However, Baldock presently has a relatively low amount of employment land per person.
- 4.30 A significant employment allocation for certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses will be developed out at the east of Baldock, supporting the proposed increase in residential development in the town (see Policy SP8). The allocation benefits from proximity to existing employment uses as well as existing and planned residential development. It has access to the strategic road network via the A505 Baldock Bypass.
- 4.31 Economic activity is not contained by the District boundary and North Hertfordshire needs to be viewed within its wider Functional Economic Market Area (FEMA). Joint work has identified a FEMA along the A1 (M) corridor. This area broadly covers North Hertfordshire, Stevenage and the eastern part of Central Bedfordshire<sup>40</sup>. The allocation at Baldock also takes account of the long-term needs which will arise within the wider FEMA. Stevenage, in particular, anticipates a shortfall of employment land against modelled requirements<sup>41</sup>. These models assume continued commuting from North Hertfordshire to Stevenage, yet there is insufficient land in Stevenage to cater for the resultant growth.
- 4.32 Within Hitchin and Letchworth Garden City, employment area designations from the previous local plan will be broadly retained, with some modest releases of sustainable, brownfield sites for residential development. Within Letchworth, the former power station site at Works Road has been brought back into use for employment purposes.
- 4.33 Royston is somewhat separate from the Hitchin / Letchworth Garden City / Baldock area, in geographical terms and in employment and labour market terms. The Royston economy is influenced by both Hertfordshire and Cambridgeshire economies. Consequently, the employment area has a low vacancy rate. The allocation of further land here as a planned extension to the York Way employment area is a sustainable approach that will enable flexibility in the long term, especially in conjunction with the additional residential growth allocated to this area.
- 4.34 Over the plan period this approach will provide substantial opportunities to reduce commuting that occurs across and beyond the District, redressing the employment balance.

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<sup>40</sup> Functional Economic Market Area Study (NLP, 2015)

<sup>41</sup> Stevenage Borough Local Plan 2011-2031: Publication Draft (Stevenage Borough Council, 2016)

- 4.35 Within these designated areas, an appropriate range of offices, research and development, light industrial, general industry and storage and distribution uses will be permitted in line with the detailed policies of this Plan.
- 4.36 A number of employment premises are located outside of defined areas and these will continue to be supported where they are compatible with other surrounding uses. In particular, office uses will continue to be supported in the main town centres (see Policy SP4), in line with national planning policy.
- 4.37 Beyond our main towns, there is a steady demand for rural employment land and premises. Owing to the size and extensive spread of rural settlements these types of development are best dealt with on a case-by-case basis rather than through allocations, although our general approach will be to direct concentrations of rural business to the larger villages. There are quite sizeable employment sites in villages such as Ashwell, Codicote, Kimpton, Little Wymondley and Weston which provide rural jobs and should be retained.
- 4.38 Approximately 45% of all jobs fall within the office, research and development, light industrial sectors or into the B uses classes. The rest of the jobs in the local economy consist of services such as retail, health, education and leisure, or 'footloose' careers in sectors such as construction and the trades. The role of these sectors in the overall employment balance of the District is recognised and will continue to be supported where appropriate.
- 4.39 Our Sustainability Appraisal says our policy provides strong support for employment growth and diversification in North Hertfordshire.

#### **Policy SP4: Town Centres, Local Centres and Community Shops**

The Council will make provision for an appropriate range of retail and service facilities across the District and are committed to protecting the vitality and viability of all centres. We will:

- a) Promote, protect and enhance the provision of shops, financial and professional services, café or restaurants, pubs or drinking establishments or takeaways in the following centres in our retail hierarchy:
  - i. the town centres of Hitchin, Letchworth Garden City, Baldock and Royston;
  - ii. 13 existing local centres consisting of:
    - village centres at Ashwell, Codicote and Knebworth;
    - seven centres in Hitchin
    - two centres in Letchworth Garden City; and
    - the centre at Great Ashby; and
  - iii. 2 new local centres north of Baldock and East of Luton within the strategic housing sites identified in this Plan;

- b) Support proposals for main town centre uses in these locations where they are appropriate to the size, scale, function, catchment area, historic and architectural character of the centre;
- c) Identify Primary Shopping Frontages within town centres where shops<sup>42</sup> will be expected to concentrate;
- d) To ensure the District's towns maintain their role and market share, make provision for up to 38,100 gross sq.m of additional floorspace over the plan period, comprising shops, café or restaurants, pubs or drinking establishments or takeaways including the re-occupation of vacant floorspace, consisting of:
- i. 22,500 gross sq.m comparison goods (e.g. clothes, shoes, furniture, carpets);
  - ii. 8,600 gross sq.m convenience (e.g. food, drink, toiletries); and
  - iii. 7,000 gross sq.m food and beverage outlets (e.g. restaurants, takeaways and bars).

38,100 gross sq.m is a district wide retail capacity but it is principally derived from the retail capacity projections for the four town centres, as indicated below:

Years	2016-2021	2021-2026	2026-2031	Totals
Baldock	300	1,600	1,400	3,300
Hitchin	3,800	3,600	3,700	11,100
Letchworth	2,400	3,300	3,500	9,200
Royston	3,200	2,000	1,900	7,100
Strategic Housing Sites	1,500	2,700	2,600	6,800
Other	200	200	200	600
<b>Total</b>	<b>11,400</b>	<b>13,400</b>	<b>13,300</b>	<b>38,100</b>

The three town centres of Baldock, Hitchin and Letchworth Garden City have significant overlapping markets, with spend leakage from Letchworth Garden City to Hitchin and a lack of physical space at Baldock to accommodate its projected retail capacity. To address the leakage and physical capacity across these three centres the indicative distribution and phasing of provision is as follows:

<sup>42</sup> Please refer to the Glossary for a definition of comparison and convenience goods

Years	2016-2021*	2021-2026	2026-2031	Totals
Baldock	0	0	0	0
Hitchin	0	3,700	3,300	7,000
Letchworth	5,350	5,500	5,000	15,850
Royston	4,350	2,200	1,800	8,350
Strategic Housing Sites	0	3,400	2,900	6,300
Other	0	300	300	600
<b>Total</b>	<b>9,700</b>	<b>15,100</b>	<b>13,300</b>	<b>38,100</b>

\*2016 to 2021 projections includes take-up of vacant units and the implementation of commitments.

- e) Prepare and maintain up-to-date town centre strategies to support this approach and / or adapt to change. These will be used to inform the approach to retail at the time of the early review; and
- f) Support the retention and provision of shops outside of identified centres where they serve a local day-to-day need.

- 4.40 In relation to Policy SP4, retail and service facilities refers to shops, cafes and restaurants (E class uses) along with pubs and drinking establishments and takeaways (sui generis). These were previously Class A uses.
- 4.41 The District contains a range of retail and service centres, from medium sized towns to small village and neighbourhood centres. Each one performs a particular role to meet the needs of its catchment population and is part of a network of centres within the District. The Council is committed to protecting the vitality and viability of all centres.
- 4.42 North Hertfordshire lies within complex shopping catchment areas, which include Cambridge as a regional centre and Bedford, Luton, Stevenage and Welwyn Garden City as major town centres. The District itself has four town centres: Hitchin is the largest, followed by Letchworth Garden City and then the smaller town centres of Royston and Baldock. There are also a number of local village and neighbourhood centres.
- 4.43 The Local Plan strategy for town centre uses is to maintain the District's market share. This means that across the district, the retail capacity will be met principally in the four town centres. This is to maintain the current retail hierarchy within the District and the wider catchment areas.

- 4.44 However given that Baldock, Letchworth Garden City and Hitchin are in close proximity, leakage of the projected retail expenditure for each town is likely to occur. The most significant is leakage from Letchworth Garden City to Hitchin.
- 4.45 In addition there is less physical capacity in Baldock and Hitchin to accommodate their projected retail capacities. The retail strategy for the District is therefore to direct the capacity to Letchworth Garden City over the plan period, which has greater potential for physical space and to recapture its leakage.
- 4.46 We are committed to promoting the well-being of the town centres in the District. Town centre strategies have been produced for the main centres of Hitchin, Baldock, Letchworth Garden City, and Royston. These promote the vitality and viability of the centres and cover all those aspects of policy guidance with a spatial dimension relevant to town centres, including economic, environmental and social well-being and matters such as community safety, community facilities, traffic management, marketing and delivery. The strategies provide a method of keeping town centre development up-to-date and flexible to take account of ongoing changes in the retail environment and will inform whether it is necessary to review the retail strategy set out in this Plan. Work on these town centre strategies will commence within 12 months of the adoption of this Plan. They will be monitored and reviewed during the life of this Plan.
- 4.47 Our detailed policies set out our approach to development applications, including for changes of use. In general terms, shops will be expected to concentrate within the defined primary frontages with related retail and service uses that are pubs or drinking establishments permissible in secondary frontage areas.
- 4.48 The village centres of Codicote and Knebworth are large enough to provide a focus for the communities local to them and a range of everyday shopping facilities and services. The village centre of Ashwell contains a more limited range of shops and services and is more fragmented than Codicote and Knebworth's village centres. However, Ashwell still has enough shops, services and facilities to have a designated centre, unlike many other small settlements in the District.
- 4.49 The suburban neighbourhood centres in Hitchin, Letchworth Garden City and Great Ashby vary considerably, in terms of size, range of shops and services and catchment area. However, they are all worthy of a level of protection as they serve the day to day needs of the local community. The Council wants to improve and protect the District's centres, reduce the need for unnecessary travel to alternative facilities and ensure that the proportion of expenditure going outside the District does not increase.
- 4.50 The growth of the District will require additional centres to be provided to serve the strategic housing sites. The centres for the two largest sites at Baldock and on the edge of Luton are expected to contain a wider range of

retail facilities. Once built, these will become local centres in our retail hierarchy and future proposals within them will be assessed appropriately.

- 4.51 These will be supplemented by smaller, neighbourhood-level centres in these and other Strategic Housing Sites which will not form part of the formal retail hierarchy but will be protected by the general retail policies of this Plan.
- 4.52 Our evidence shows there will be a steady growth in retail demand over the plan period, although projected growth post-2026 carries a degree of uncertainty due to changing shopping and retail patterns and the effects of Covid-19. Projected growth is driven in part by planned population growth but also by underlying changes in the way people shop and how much money they have available to spend. It is anticipated that on-line shopping will continue to grow whilst a certain amount of future demand can be accommodated through the re-occupation of existing, vacant shop units. However, it is also necessary to identify new sites for retail<sup>43</sup>. Projected retail needs, and particularly those in the post-2026 period, will be kept under review via the monitoring framework and updated retail studies.
- 4.53 Some of this future demand will be met within the development sites identified in this Plan, ensuring that new residents have access to an appropriate range of local shops. Where planned urban extensions adjoin towns outside of the District, we will work with neighbouring authorities to identify the most appropriate types and levels of additional provision.
- 4.54 A number of shops are located outside of our retail hierarchy. This includes individual premises and small groups of shops that perform a neighbourhood function, including those in a number of rural settlements. Our detailed policies set out our approach.
- 4.55 Our Sustainability Appraisal concludes that this policy provides clear support for existing town and local centres and should have direct economic benefits and contribute to the achievement of sustainable patterns of land use.

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<sup>43</sup> North Hertfordshire Retail Study Update (Nathaniel Lichfield & Partners, 2016)

## Countryside and Green Belt

### Policy SP5: Countryside and Green Belt

We support the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt and Rural Areas Beyond the Green Belt are shown on the Policies Map. We:

- a) Have conducted a comprehensive review of the Green Belt. Land has been removed from the Green Belt to:
  - i. enable strategic development at the locations referred to in Policies SP8 and SP3;
  - ii. enable local development around a number of the District's towns and villages; and
  - iii. define boundaries for villages referred to in Policy SP2 which fall within the Green Belt but were previously 'washed over' by this designation;
- b) Have provided new Green Belt to cover, in general terms, the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north;
- c) Will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated; and
- d) Will operate a general policy of restraint in Rural Areas beyond the Green Belt through the application of our detailed policies.

- 4.56 The vast majority of land in North Hertfordshire is rural in nature. Whilst more than three-quarters of the District's homes are in the towns, the land area of these main settlements covers less than 7% of the District.
- 4.57 Restraint on unsustainable development in rural areas is a well-established policy in this area. The District has previously had two distinct areas of Green Belt. The London (Metropolitan) Green Belt covers Hitchin, Letchworth Garden City, Baldock, Stevenage and nearby areas. The Luton Green Belt covers parts of the west of the District. There are also rural areas beyond the Green Belt.
- 4.58 National policy allows for Green Belt boundaries to be altered through the preparation of local plans where 'exceptional circumstances' exist. Although there is no definition of this term within Government guidance, this matter has been considered by the courts<sup>44</sup>. Our evidence considers the approach that has been recommended<sup>45</sup>. On balance, it is considered that the relevant

<sup>44</sup> Including in *Calverton Parish Council v Nottingham City Council & Ors* [2015] EWHC 1078 (Admin) (21 April 2015)

<sup>45</sup> Green Belt Review (NHDC, 2016 & 2018), Housing and Green Belt Background Paper (NHDC, 2016)

circumstances do exist within North Hertfordshire to review boundaries and enable development to meet locally identified needs.

- 4.59 Green Belt boundaries have been reviewed around all of the main towns within and adjoining the District, with the exception of Royston which lies beyond the Green Belt. Boundaries have also been reviewed around a number of villages previously surrounded or covered ('washed over') by the Green Belt.
- 4.60 In part to offset the Green Belt releases necessary to meet housing needs, particularly in the Stevenage, Hitchin and Luton area, an additional area of Green Belt is designated around Offley and Whitwell to cover an area which was not previously Green Belt. This has the effect of linking the formerly separate Metropolitan and Luton Green Belts. This new area of Green Belt is intended to strengthen protection in the area of the District between Stevenage and Luton.
- 4.61 Proposals for development within the Green Belt will be considered against national policy. Where the proposed use can be considered acceptable in principle, we will use the detailed policies of this Plan to determine whether permission should be granted.
- 4.62 National policy generally guards against further alterations to Green Belt in the short- to medium-term following a review<sup>46</sup>. However, this requirement is not absolute. Given the potential direction of future local plan reviews, and the need to properly consider long-term solutions, it is not considered appropriate to identify significant areas of safeguarded land at this point. The exception to this is to the west of Stevenage (see Policy SP8 and Monitoring and Delivery chapter).
- 4.63 The Rural Area Beyond the Green Belt covers the majority of the east of the District including most of the land between Baldock and Royston as well as the villages and countryside to the south of Royston. It also covers the land to the north and west of Hitchin beyond the outer edge of the Green Belt.
- 4.64 In terms of intrinsic character and beauty, the Rural Area beyond the Green Belt contains some of the highest quality countryside in the District. However, the settlements are generally more dispersed meaning a Green Belt designation cannot be justified. This sparser pattern of development additionally means that, outside of the defined settlements, many sites are not well located in relation to key services. On these grounds it remains appropriate to restrain the types of development allowed in the Rural Area beyond the Green Belt. Our detailed Development Management policies set out the approach that will apply in this area.
- 4.65 Wherever possible, the inner boundaries of the Green Belt and Rural Area have been drawn around our settlements using strong features that provide clear, defensible boundaries. In certain cases this means that some land that

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<sup>46</sup> Paragraph 85 of the 2012 NPPF

we wish to remain undeveloped lie within the settlement envelopes. Urban Open Land designations are used at Baldock, Royston and Little Wymondley to ensure the affected land remains protected. Our detailed policies set out these allocations and our approach.

- 4.66 Both the Green Belt and the Rural Areas Beyond the Green Belt are policy designations designed to restrict the types and amount of new development that can occur. Our approach to the Chilterns Area of Outstanding Natural Beauty (AONB), and areas of countryside which are valuable in terms of their landscape and biodiversity is set out in Policy SP12.
- 4.67 Our Sustainability Appraisal recognises that releasing Green Belt sites for housing and economic development should help to support economic growth in the District and will play an important role in providing the necessary level of new housing, including affordable housing. However, it will also have some negative environmental effects. We will concentrate on reducing and mitigating these impacts through other policies in this Plan.

## Transport and Infrastructure

### Policy SP6: Sustainable transport

We will deliver accessibility improvements and promote the use of sustainable transport modes insofar as reasonable and practicable. We will:

- a) Comply with the NHDC Transport Strategy and the provisions of the, the Local Transport Plan and other supporting documents as relevant;
- b) Encourage development in locations which enable sustainable journeys to be made to key services and facilities;
- c) Work with Hertfordshire County Council, neighbouring authorities, Highways England and service providers to ensure that a range of sustainable transport options are available to all potential occupants or users. This may involve new or improved pedestrian, cycle and passenger transport (including rail and/or bus) links and routes;
- d) Seek the earliest reasonable opportunity to implement sustainable travel infrastructure on Strategic Housing Sites and other development sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage;
- e) Assess development proposals against the parking standards set out in this Plan and having regard to relevant supplementary advice;
- f) Require applicants to provide assessments, plans and supporting documents to demonstrate the safety and sustainability of their proposals; and
- g) Protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, require replacement routes to the satisfaction of the Council.

4.68 North Hertfordshire has a relatively good transport network, although the strategic road and rail links are generally better for north-south access than for east-west access. There is also an extensive local road network, which connect the four main towns within North Hertfordshire with its surrounding rural area.

4.69 National and local policies and guidance seek to reduce the growth of car usage and achieve greater use of more sustainable modes of transport.

4.70 The primary responsibility for delivering transport provision in North Hertfordshire rests with Hertfordshire County Council as the local highway authority. Highways England are responsible for the strategic road network which includes the A1(M) within North Hertfordshire. The involvement of

North Hertfordshire District Council relates mainly to Development Planning and the management and enforcement of parking which could have implications on the local and strategic highway network.

- 4.71 The overarching transport policy document for the area is the Hertfordshire Local Transport Plan (LTP4) which provides the framework for achieving better transport systems in Hertfordshire for the plan period 2018-2031. LTP4 was adopted in 2018. The Local Transport Plan covers all modes of transport including walking, cycling, public transport, car-based travel, reducing road freight movements and making provision for those with mobility impairments.
- 4.72 Although the Local Transport Plan identifies some specific schemes, the majority of transport schemes are identified at settlement level. From time to time the County Council, North Hertfordshire District Council, and neighbouring authorities publish other documents and strategies<sup>47</sup> which will also need to be taken into account when considering development proposals. This includes the NHDC Transport Strategy and also relevant strategies prepared by neighbouring authorities, such as the Stevenage Mobility Strategy, for sites that are functionally attached to, or in close proximity to North Hertfordshire.
- 4.73 New development can help to improve the range of transport opportunities available in the District by helping to improve existing facilities and providing new components where required.
- 4.74 Many of the developments in the smaller settlements may not be enough on their own to have a major transport impact within an area. However, cumulatively a number of developments can create additional demands and burdens on existing infrastructure (such as increased use of less appropriate roads, higher volumes of traffic through constrained village centres) which may require suitable mitigation to be implemented. Such mitigation can also include better, walking and cycling improvements and public transport services which will reduce the need to travel by car. The Council will consider these overall cumulative impacts as far as they are able as part of Policy SP7 and may require appropriate contributions from all such development sites.
- 4.75 However, national policy also recognises that the scope for passenger transport and/or other sustainable transport measures may be more limited in some locations<sup>48</sup>. Best endeavours should still be made to ensure that the best outcomes can be achieved for all new developments, regardless of their location.
- 4.76 In pursuing this approach, we need to take a pragmatic and realistic approach that recognises the role of the car in modern lifestyles. Even if sustainable alternatives are used for journeys to school or work, most households will still have access to a car for other trips.

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<sup>47</sup> These could include the forthcoming HCC Growth Transport Plans, the NHDC Transport Strategy prepared as part of the evidence base as well as other local strategies, for example cycling.

<sup>48</sup> Paragraph 29 of the 2012 NPPF

- 4.77 Parking standards will be used to assess applications for development. These take a balanced approach that reflects the levels of car ownership we expect from new development. Our detailed policies additionally set out the approach we will take to the assessment of highway proposals and provision for pedestrians and cyclists.
- 4.78 Due to the largely rural nature of much of the District, there are many public rights of way that exist across North Hertfordshire. These are protected under their own statutory regime. However, diversion applications to facilitate development are made to the District Council. A number of the sites identified in this Plan contain public rights of way. Any applications to modify or divert these routes will be considered separately to any planning application. However, our general expectation is that existing rights of way should be incorporated into the green infrastructure of development proposals. Wherever possible, existing routes and alignments should be maintained.
- 4.79 Our Sustainability Appraisal says our policy provides strong and clear support for sustainable patterns of development. The early provision of sustainable travel infrastructure as part of new developments is supported.

#### **Policy SP7: Infrastructure requirements and developer contributions**

The Council will require development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development. We will:

- a) Require developers to provide, finance and / or contribute towards provision which is fairly and reasonably related in scale and kind to the development, including:
  - i. on-site and/or off-site improvements and infrastructure necessary as a result of the development in order to:
    - ensure appropriate provision of facilities and infrastructure for new residents;
    - contribute toward addressing cumulative impacts that might arise across multiple developments;
    - avoid placing unreasonable additional burdens on the existing community or existing infrastructure;
    - mitigate adverse impacts where appropriate; and/or
    - enhance critical assets or make good their loss or damage; and
  - ii. maintenance and/or operating costs of any such new provision;
- b) Ensure essential new infrastructure to support new development is will be operational no later than the completion of development or during the phase in which it is needed, whichever is earliest;
- c) Refuse planning permission where appropriate agreements or processes ensuring criteria (a) and (b) can be met are not in place;

- d) Have regard to relevant national guidance or requirements in relation to planning obligations and any Community Infrastructure Levy or successor funding tariff which may be introduced by the Council;
- e) Work with landowners, developers and other agencies in facilitating the delivery of sites identified in the Local Plan and associated infrastructure and seek to overcome known obstacles; and
- f) Need robust evidence to be provided where developers consider that viability issues impact upon the delivery of key infrastructure and/or mitigation measures. This evidence will be used to determine whether an appropriate and acceptable level of contribution and / or mitigation can be secured.

- 4.80 The nature of planned growth in the District is such that new facilities and infrastructure will be required. Our strategic policy seeks to ensure that the necessary infrastructure and appropriate mitigation is provided.
- 4.81 On the largest development sites, it will be necessary to directly provide facilities alongside the primary use – schools within residential areas, bus stops within business parks, cycling routes and new footways etc. In other areas, much of the growth arises from a number of smaller developments. A small development on its own may not be enough in itself to have a major impact within an area. However, cumulatively a number of developments (including both the larger and smaller sites) can create additional demands and burdens on existing infrastructure which may require suitable mitigation to be implemented.
- 4.82 Transport infrastructure including highways improvements and sustainable transport measures such as walking, cycling, improved public transport and behaviour-change projects are needed to address cumulative impacts; the latter seek to reduce vehicle travel to improve capacity and enable more sustainable travel. The NHDC Transport Strategy sets out the measures required, and all developments will be expected to contribute to these measures.
- 4.83 Development can also impact upon existing built and natural assets. This could be through removing trees leading to a change in the biodiversity and landscape character of a site, to altering the setting of a listed building. One of the aims of the Local Plan is to seek to conserve and enhance such features. However, if there are reasons to allow proposals that outweigh any harmful effects, then appropriate mitigation or compensation will be required.
- 4.84 The provision of infrastructure will need to be linked directly to the phasing of development to ensure that it is delivered in line with the timing of future growth. The Council will put in place formal arrangements for ensuring key infrastructure is delivered by the relevant bodies and that all funding sources, in addition to developer contributions are explored. Initial support (pump priming) may be necessary to reflect the time lag between provision and other

funding streams. Where new facilities are provided then start-up, maintenance and operating costs will be required.

- 4.85 Our evidence base sets out in greater detail the infrastructure that we anticipate will be required<sup>49</sup>. This will be reviewed throughout the plan period to ensure that decisions on infrastructure are made in light of up-to-date information. This provides flexibility as the role and nature of infrastructure providers will change over the period to 2031.
- 4.86 At present, infrastructure contributions are normally secured through legal agreements. The Council will explore new mechanisms for contributions to new infrastructure provision.
- 4.87 Community Infrastructure Levy (CIL) is a way of collecting contributions from development through the use of standard charges. Any decision to develop a CIL for North Hertfordshire would be taken separately to the Local Plan. It would be subject to its own processes and Examination.
- 4.88 Even if a CIL were to be implemented, legal agreements would still be necessary in many cases. On the largest sites they would be used to secure the delivery of on-site improvements such as schools and off-site improvements on the local highway network. On all sites, securing affordable housing will be dealt with by means of planning obligations. It is not currently the Government's intention to provide affordable housing through the CIL.
- 4.89 Our evidence demonstrates that the requirements placed upon development by this Plan should not prove a serious risk to its implementation. It shows there is scope for many of the sites identified in this Plan to make significant contributions towards infrastructure and other policy objectives<sup>50</sup>. However, there may be individual circumstances where this is not the case. This may arise for a number of reasons. It may be as a result of (unexpected) site-specific circumstances. It may be as a result of wider factors, such as the state of the economy.
- 4.90 In cases where viability is an issue, developers will need to provide an assessment and analysis of their viability evidence in order to verify it. This must be completed by a suitably qualified individual or company and scrutinise the assumptions that have been made and the conclusions that have been reached and whether they are justified. The methodology and scope of any such assessment should be agreed in advance between the applicant and the Council. If, following this assessment, it is accepted by the Council that the viability of a scheme would be critically undermined by application of the Council's usual standards and expectations, we will exceptionally:
- consider which requirements are most critical to securing development and meeting the overall vision and objectives of this Plan;

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<sup>49</sup> Infrastructure Delivery Plan (RS Regeneration, 2016; RS Regeneration & NHDC, 2018)

<sup>50</sup> North Hertfordshire Whole Plan Viability Assessment (DSP, 2016)

- assess the extent to which these might be met in a way which makes any scheme viable; and
- determine whether this would result in an appropriate and acceptable level of contribution and / or mitigation.

4.91 Our Sustainability Appraisal says that this policy is critical in ensuring that the Plan delivers against a significant number of the sub-objectives in the sustainability appraisal framework, not only through ensuring the delivery of needed infrastructure but also through making provision for the mitigation of the adverse impacts of new development. The implementation and impacts of the policy will be carefully monitored through other policies in this Plan to ensure that it does hinder future development.

## Housing and Development

### Policy SP8: Housing

Over the period 2011-2031, housing growth will be supported across the District. We will:

- a) Release sufficient land to deliver at least 11,600 net new homes for North Hertfordshire's own needs. Of these:
  - i. around 11,500 net new homes will be provided within that part of the District falling within the Stevenage Housing Market Area (HMA); while
  - ii. around 100 net new homes will be provided within that part of the District falling within the Luton HMA;
- b) Provide additional land within the Luton HMA for a further 1,950 net new homes as a contribution towards the unmet needs for housing arising from Luton with approximately 1,400 of these being delivered over the Plan Period to 2031;
- c) Deliver these homes through the sites and allowances identified in this Plan that will support approximately<sup>51</sup>:
  - i. 5,100 homes from completions and permissions achieved since 2011 and other allowances;
  - ii. 7,700 homes from six Strategic Housing Sites delivering approximately 5,560 of these by 2031:
    - BA1 - North of Baldock for 2,800 homes (approximately 1,400 to be delivered by 2031);
    - LG1 - North of Letchworth for 900 homes (approximately 600 by 2031);
    - NS1 - North of Stevenage in Graveley parish for 900 homes (approximately 775 by 2031);
    - HT1 - East of Hitchin for 700 homes;
    - GA2 - North-east of Great Ashby in Weston parish for 600 homes; and
    - EL1 / EL2 / EL3 - East of Luton for 2,100 homes (approximately 1,500 by 2031);
  - iii. 4,000 homes through local housing allocations that will provide homes on:
    - further sites within the adjusted settlement boundaries of the towns;

<sup>51</sup> These requirements include a small buffer of approximately 13% over and above the total housing requirement set through criteria (a) and (b) of this Policy to ensure sufficient flexibility. See Monitoring and Delivery chapter for further information. All figures are net.

- land within the adjusted settlement boundaries of five villages identified for growth where more than 200 homes are expected to be built over the Plan period; and
- sites identified within the defined settlement boundaries of the Category A villages.

This includes the use of land within pre-existing settlement limits, non-strategic sites released from the Green Belt and other land identified following a review of other relevant boundaries or designations.

- iv. 4 new, permanent Gypsy and Traveller pitches
- d) Maintain a five-year housing land supply and target the completion of 20% of new homes over the plan period on previously developed land;
- e) Seek to provide long-term certainty by
  - i. identifying Strategic Housing Sites that will continue delivery beyond the end of the Plan period in 2031;
  - ii. working with the Government and other relevant agencies to identify new settlement options within North Hertfordshire that can provide additional housing supply in the period after 2026; and
  - iii. safeguarding land to the west of the A1(M) at Stevenage, as shown on the Policies Map to meet longer-term development needs in the period beyond 2026 subject to a future review of this Plan; and
  - iv. undertaking a review of this plan by the end of 2023;
- f) Support a range of housing tenures, types and sizes measured against targets to provide:
  - i. 33% of all homes over the plan period as Affordable Housing for local needs with targets to deliver up to 40% Affordable Housing where viable;
  - ii. a broadly even split between smaller (1- and 2-bed) and larger (3+ bed) properties subject to up-to-date-assessments of housing needs; and
  - iii. 56 plots on specified Strategic Housing Sites to help pro-actively address demand for self-build development over the plan period; and
- g) Provide at least 350 bed spaces in suitable, supported accommodation to meet the needs of those who cannot live in their own home.

4.92 The need for housing is one of the biggest issues for local plans to address. A balance needs to be struck between the large and pressing need for housing with the desirability of protecting the countryside. Green Belt boundaries in

North Hertfordshire were last reviewed between 1984 and 1992. At that time access to housing was comparatively much easier than it is today, especially for younger newly-forming households.

- 4.93 Our evidence identifies a requirement for 11,500 homes to be built between 2011 and 2031 to meet the needs of North Hertfordshire<sup>52</sup>. A modest uplift has been added. This predominantly reflects the fact that, as people live for longer and live in their own homes for longer, it may be more appropriate to assume that more of their needs will be met in the normal housing stock<sup>53</sup>.
- 4.94 It is also necessary to consider the wider needs of housing market areas which affect North Hertfordshire. In particular, the Luton housing market area covers parts of North Hertfordshire, and the need for development in this area is significant. A contribution towards unmet needs is made by this Plan.
- 4.95 It would only be possible to deliver a modest proportion of these housing requirements on land within the village and Green Belt boundaries established in the previous District Plan<sup>54</sup>. Having considered a wide range of evidence, this Plan concludes that sensible, planned expansion of towns and villages is the best way of delivering the growth needed whilst protecting the largely rural character of the remainder of the District.
- 4.96 Approximately 5,100 of the required homes are accounted for by completions since 2011, sites which have already obtained planning permission and commenced development and other allowances. This includes two large developments on the edge of Royston with permission for almost 600 homes. The majority of these homes will be on previously developed land and also include:
- windfalls (those sites which will continue to come forward for development outside of the local plan process) ; and
  - Letchworth Town Centre as a broad location. This is an area where it is reasonable to assume development might occur in the latter years of the plan, but where we cannot currently identify the exact location. The boundary of the broad location is the same as the Town Centre boundary for Letchworth shown on the policies map.
- 4.97 Just under half of all new homes over the plan period will be delivered on six Strategic Housing Sites removed from the Green Belt. Three of these sites adjoin some of North Hertfordshire's largest settlements – Hitchin, Letchworth Garden City and Baldock.
- 4.98 Stevenage adjoins North Hertfordshire to the south-east. The tight administrative boundaries here mean it is possible to develop two strategic

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<sup>52</sup> Review of the Official Projections for North Hertfordshire (ORS, 2020)

<sup>53</sup> Housing requirements are normally calculated on the basis that the proportion of older persons needing specialised accommodation will not change over time.

<sup>54</sup> Strategic Housing Land Availability Assessment (NHDC, 2016)

sites that are within North Hertfordshire, but will integrate with the planned urban area of Stevenage.

- 4.99 These sites will all be built wholly to meet the housing needs of North Hertfordshire.
- 4.100 Luton lies immediately to the west of the District. This strategic allocation for 2,100 homes is predominantly to meet the needs of Luton, but around 150 of the homes here will contribute to North Hertfordshire's housing needs<sup>55</sup>.
- 4.101 A strategic policy has been prepared for each site setting out the site-specific measures we will require. These are in addition to the general requirements on matters such as affordable housing and open space set out in the detailed policies of the Plan which apply in all instances.
- 4.102 The remainder of new homes will be delivered through a range of local housing allocations set out in the detailed policies of this Plan:
- Sites for over 2,200 homes, in addition to the strategic sites, are identified within the adjusted settlement boundaries of the towns.
  - Sites for nearly 1,600 homes are identified at the five village locations identified by Policy SP2; while
  - A review of settlement boundaries in the-Category A villages allows for approximately 180 homes.
- 4.103 This Plan also makes provision to meet the future needs of the Gypsy and Traveller community. A new site is allocated at Woodside Place, Danesbury Park Road at the southern edge of the District allowing requirements over the period to 2031 to be met.
- 4.104 These targets require housing completions within the District to accelerate well above those achieved historically. However, past rates have been constrained, in part, by tight village and Green Belt boundaries that have not been reviewed for well over twenty years whilst Government policy supports a 'significant boost' in the supply of housing.
- 4.105 This needs to be balanced against realistic expectations about when we can expect to see new homes being built. This is especially the case on the largest new sites which require the certainty provided by this Plan in order to proceed and can require significant up-front investment in infrastructure such as new roads. As a result, most of the planned new homes will be delivered after 2021.
- 4.106 The spatial strategy proposed by this Plan requires the simultaneous delivery of a number of strategic sites around the main towns. There will be challenges in this approach. These include the capacity of the development industry to

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<sup>55</sup> The remaining 50 homes within the Luton Housing Market Area for North Hertfordshire's needs identified in criterion (a)(ii) will be met from local housing allocations, completions, permissions and windfalls. See Housing and Green Belt Technical Paper (NHDC, 2016).

deliver and the ability of the market to absorb these new homes. We will support higher delivery rates where possible. This might include using innovative approaches to construction. We will develop a greater understanding of the rates of housing delivery that can be achieved as schemes are progressed and reflect these in the review of the plan as set out in Policy IMR2.

- 4.107 A stepped approach is considered most appropriate to deal with these issues. An average of 313 homes per year were built over the first nine years of the plan period between 2011 and 2020. Moving forward, housing supply will be measured against targets to deliver an average of 500 homes per year over the period to 31 March 2024. From April 2024 a target of 1, 120 homes per year will apply. Our approach to five-year land supply is set out in Policy IMR1 in Chapter 14.
- 4.108 As this Local Plan was developed, many residents suggested that a new settlement in North Hertfordshire would be the best way to meet future needs. We recognise many of the merits of this argument. In the longer term, continual incremental additions to existing settlements may not be the best solution.
- 4.109 The Council is committed to fully exploring new settlement options in the District and initial work has been undertaken<sup>56</sup>. However, we cannot rely upon a future new settlement to contribute to housing requirements in this current Plan. We will work with relevant partners on an on-going basis to build the evidence base that is required to support any new settlement(s) and deliver on our aspirations.
- 4.110 The outcomes of the new settlement process will be reflected in the next review of this Plan. The review will supplement rather than replace the allocations in this Plan and provide greater certainty for the period beyond this Plan.
- 4.111 If a new settlement is pursued, it would be unlikely to meet all future needs and it would probably still remain necessary to identify additional sites<sup>57</sup>. This issue is exacerbated by the constrained nature of some surrounding authorities. Stevenage Borough's current plan strategy is likely to leave only limited development opportunities within their administrative area by 2031<sup>58</sup>.
- 4.112 Land to the west of the A1(M) at Stevenage within North Hertfordshire has long been identified as a sustainable location for a substantial urban extension to the town. Given the history of this site, it is considered there is sufficient justification to remove this site from the Green Belt now and safeguard it for future use. This land is not allocated for development at the present time. No development will be permitted until a plan review determines

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<sup>56</sup> North Hertfordshire New Settlement Study (ATLAS, 2016)

<sup>57</sup> Long-term Government household and population projections, which form the starting point for consideration of local plan housing targets, continue to predict substantial growth within North Hertfordshire well beyond 2031.

<sup>58</sup> Stevenage Borough Local Plan 2011-2031: Publication draft (Stevenage Borough Council, 2016)

that the site is required to meet long-term needs and remains (part of) the most appropriate solution.

- 4.113 In taking this approach, it is recognised that we are required to undertake a review of the Plan every five years to see if it needs to be updated. This Plan commits to undertaking a full review by the end of 2023, well within the five-year period.
- 4.114 Policy IMR2 in the Monitoring and Delivery chapter of this plan sets out in greater detail how we expect the local plan review process to occur.
- 4.115 As well as setting targets for the amounts of housing, it is vital that the Local Plan sets clear expectations as to the types of homes that will be built.
- 4.116 The price of housing in North Hertfordshire is a key issue and many local residents are unable to afford housing without some form of assistance. At least one out of every three new homes built over the plan period will be Affordable Housing<sup>59</sup> to meet local needs. This will be achieved through a tiered approach requiring up to 40% provision on allocated sites, with 100% affordable schemes appropriate in some instances.
- 4.117 Self-build provides another route to home ownership. Small developments, often delivered by local builders and companies, have historically made a valuable contribution to housing land supply in North Hertfordshire. These include schemes designed by individuals for their own use. We will continue to support small windfall schemes where they are compatible with the policy framework of this plan. Government guidance also encourages us to facilitate further opportunities for people to self-build through Local Plan policies and other measures. On five of our strategic sites, 1% of plots will be reserved and marketed for those who wish to build their own home reflecting demand recorded on the Council's Self-Build Register. No specific self-build targets have been set on Local Housing Allocation sites and local demand will be considered on a site-by-site basis having regards to the Council's self-build register. Self-build may additionally be an issue that local communities wish to explore through Neighbourhood Plans.
- 4.118 Detailed policies will ensure that development sites deliver an appropriate range of property sizes. Sites in the most accessible locations will generally be expected to provide smaller units at higher densities while we will also ensure appropriate levels of provision for the family market.
- 4.119 We also need to provide the right sort of homes for older residents. Up to 650 bed spaces of specialist accommodation may be required<sup>60</sup>. However, this needs to be viewed in the context of changes in the ways in which older people might seek to live, and in which providers might seek to deliver services over the plan period. A slightly lower requirement has been set,

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<sup>59</sup> This term is defined in Annex 2 of the 2012 NPPF.

<sup>60</sup> Stevenage and North Hertfordshire Strategic Housing Market Assessment Update (ORS, 2015)

offset against the additional requirement for 'mainstream' housing identified in paragraph 4.93.

- 4.120 Our Sustainability Appraisal concludes that this policy provides clarity about the scale and location of housing which will be delivered in North Hertfordshire up to 2031. As well as securing long-term housing supply, stipulating the type and mix of housing required, the policy should help to support economic growth in the District through increasing local demand and spend and by creating jobs in construction and other development-related industry.

## Design

### Policy SP9: Design and Sustainability

The Council considers good design to be a key aspect of sustainable development. We will:

- a) Support new development where it is well designed and located and responds positively to its local context;
- b) Require Strategic Masterplans to be produced for Strategic Housing Sites and other significant development. Significant development generally comprises residential development of 100 dwellings or more. Exceptionally, developments under 100 dwellings will be considered significant if there are site specific complexities and sensitives that require a masterplan-led approach. In some circumstances a Strategic Masterplan may also be required to consider the cumulative impact of more than one site to support a co-ordinated and integrated approach to place-making and design.
- c) Require Strategic Masterplans and planning applications for Strategic Housing Sites and significant development to (as applicable):
  - i. create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character
  - ii. create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas;
  - iii. provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycleways integrate with the wider built and natural environment and communities;
  - iv. plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities;
  - v. positively integrate with adjacent rural and urban communities and positively contribute to their character and the way the area functions, including addressing cumulative, cross boundary planning and infrastructure matters;
  - vi. create and accessible multi-functional green infrastructure network that provides:
    - a key structuring and functional place-making feature supporting healthy lifestyles, sport, play and recreation linking into the wider Green Infrastructure Network;
    - and

- a high-quality integrated network to support ecological connectivity, biodiversity net gain, climate adaptation and mitigation linking into the wider Ecological Network
  - vii. ensure the effective use of sustainable urban drainage and sustainable water management;
  - viii. ensure a hierarchy of linked, high quality and attractive public spaces and public realm that is safe, attractive and supports social interaction for all age groups; and
  - ix. design to last with a clear stewardship, management and maintenance strategy
- d) Ensure Strategic Masterplans are informed by a technical and design evidence base and include the following for Strategic Housing Sites and where applicable for other significant development:
- i. site specific vision and place-making principles
  - ii. Masterplan setting out the quantum, scale, type, mix and distribution of land uses, housing and community facilities;
  - iii. Green Infrastructure Framework identifying the scale, distribution, type and design of green spaces, biodiversity net gain, strategic drainage and on and off-site linkages:
  - iv. Movement Framework setting out the key access points, strategic highways, street hierarchy and footways and cycleways (on and off site)
  - v. Urban Design Framework and design principles identifying how the site responds to local character and context and key structuring elements and layout principles (including heights and densities)
  - vi. Sustainability & Energy Framework identifying site-wide and building scale opportunities for low and zero carbon
  - vii. Illustrative Masterplan Layout
  - viii. Infrastructure Delivery, Phasing & Management Strategy
- e) Encourage the submission of Strategic Masterplans for the Council's consideration and agreement before the submission of a planning application. We will also confirm the scope and contents of individual Strategic Masterplans with applicants in pre-application discussions. Planning applications must be accompanied by a Strategic Masterplan. Where applications have already been submitted to the Council a Strategic Masterplan should be agreed with the Council prior to or as part of the grant of planning permission. Adherence to the Strategic Masterplan will be secured through planning conditions and/or legal agreement.

- f) Assess proposals against detailed policy requirements set out in this Plan and have regard to the Design SPD; and
- g) Adopt the Government's additional technical standards for the size of new homes, water efficiency and, in specified circumstances, accessibility.

- 4.121 Design is central to good planning. The achievement of high quality, sustainable design is required by Government guidance. Planning policies should promote high quality, inclusive design in layouts and buildings in terms of function and impact. Design which does not make the most of opportunities to improve the character and quality of an area should be refused.
- 4.122 North Hertfordshire has a high quality natural and built environment. Promoting sustainable growth is one of the priorities for the District. Achieving this objective depends on securing development that is of a high quality and inclusive design which reinforces local distinctiveness through fully addressing the creation of a sense of place and a safe and healthy environment.
- 4.123 North Hertfordshire is fortunate in having three historic market towns, the world's first Garden City and many villages all with unique characters set in a high-quality rural environment. As development pressures increase in the District it is important to respect, retain and where possible enhance the existing character of both the urban and rural areas to maintain the quality of the District's environment.
- 4.124 Policy SP9 sets out the strategic design and masterplanning expectations of the Council for the Strategic Housing Sites and other significant development. The policy has to apply to a wide range of developments in terms of quantum, scale and complexity. The policy should be applied in its entirety to the Strategic Housing Sites but for other significant development a tailored and case-by-case approach will be required to identify a proportionate level of masterplan and design detail to secure design quality dependant on site specific issues and the level of detail submitted with any planning application.
- 4.125 Strategic Masterplans are an effective tool in securing comprehensive and timely delivery and securing design quality and positive place outcomes. Masterplans support comprehensive, integrated, well-planned and sustainable places in terms of the natural, built and historic environment. An effective masterplanning process helps to support a multi-disciplinary, integrated, inclusive and collaborative approach to securing quality design and delivery. It also assists with resolving and co-ordinating planning issues at an early stage in the process speeding up decision-making and driving forward delivery through a shared vision. This both de-risks and provides certainty.
- 4.126 We encourage the production of Strategic Masterplans on a staged basis, initially evaluating and agreeing baseline technical, character and design analysis and assessments, then agreeing a shared vision and set of place-making objectives, exploring and testing a series of options with stakeholder input and then the agreement of a preferred option and masterplan.

- 4.127 For large sites that are developed over a long period, strategic masterplans may require review and be flexible to adapt to changing circumstances. A Strategic Masterplan is not a blueprint but a framework within which further planning and design instruction can emerge over time.
- 4.128 The detailed policies of this Plan and supplementary guidance set out standards that will apply to new development in the District. Government reforms and technical standards have streamlined the type and amount of additional requirements that we can ask of new development. Having regard to relevant evidence, we consider it appropriate to introduce these optional requirements in North Hertfordshire.
- 4.129 Our Sustainability Appraisal says that this policy with its broad strategic approach should help to ensure that the plan delivers against a number of the sustainability appraisal framework objectives and is particularly important given the scale of new development proposed by this Plan.

## Healthy Communities

### Policy SP10: Healthy Communities

We will provide and maintain healthy, inclusive communities for our residents. We will

- a) Support the retention of existing community, cultural, leisure or recreation facilities;
- b) Require appropriate levels of new community, cultural, leisure and built sport & recreation facilities to be provided in new development;
- c) Work with the NHS Trust, the Clinical Commissioning Groups and other relevant providers to ensure appropriate coverage of healthcare facilities across the District;
- d) Maintain the network of local retail centres identified in Policy SP4 and support the retention of locally-important shops;
- e) Work with Hertfordshire County Council and education providers to ensure the planning system contributes to the provision of sufficient school places and facilitates the provision of new or expanded schools in appropriate and accessible locations. This will include monitoring of projected future demand to inform the review of this plan in relation to secondary education provision for the Stevenage area; and
- f) Protect, enhance and create new physical and green infrastructure to foster healthy lifestyles.

4.130 National policy recognises that the planning system plays a role in facilitating social interaction and creating healthy, inclusive communities. Community and recreation facilities together with green spaces can play an important role in the life of local people enabling people not only to participate in physical activities but also in cultural pastimes, all of which can help to enhance physical, spiritual and mental well-being. Community, leisure, recreation and cultural facilities can include village halls, community centres, sports halls, theatres, museums, libraries, places of worship, doctors and dental surgeries and schools. Retail facilities in the towns and villages are afforded protection by Policy SP4.

4.131 Community provision requires partnership with key agencies. A number of community halls, for example, are owned and / or operated by parish councils.

4.132 Our general presumption will be that existing facilities should be retained. However, there may be exceptions to this. Where facilities are being replaced, are not in the right location to address future patterns of demand or are no longer viable in their current form some limited losses of existing premises will be permitted.

- 4.133 Our detailed policies set out our approach to considering applications, including proposals affecting Assets of Community Value.
- 4.134 The East and North Hertfordshire NHS Trust are responsible for hospital services. Health care delivered through GP surgeries and other secondary facilities is primarily managed by the East and North Hertfordshire Clinical Commissioning Group. The largest sites will be expected to make appropriate provision for new, on-site healthcare facilities.
- 4.135 Most of the District operates a two-tier education system, with children attending primary schools from ages 4-11 and secondary schools from ages 11-16 (and up to 18 where sixth-form provision is made).
- 4.136 The east of the District operates a three-tier system of lower (ages 5-9), middle (9-13) and upper (13-16/18) schools. This system is also used in neighbouring Bedfordshire. On sites close or adjacent to the County boundary, consideration will need to be given as to the most appropriate forms of provision or contribution.
- 4.137 At the same time, the Government's changes may allow for more innovative and flexible approaches to school provision in the future. Concepts such as 'all through schools' – which provide education for all ages from 4 to at least 16 – may be appropriate in certain locations, including the largest development sites. This approach might also enable more sustainable travel patterns by providing modest levels of secondary school provision in locations where children currently have to travel further afield.
- 4.138 We will work with Hertfordshire County Council, landowners, Academy Trusts and other relevant bodies to deliver appropriate solutions. Our Strategic Housing Sites will see the on-site provision of new primary and, where appropriate, secondary school facilities to serve the growing population. Some Local Housing Allocations will also result in new school places being provided, including at Ickleford, Codicote and Knebworth.
- 4.139 Forecasting education demand that will arise from new developments over the long term is challenging. It is difficult to predict with certainty how and when school places will be needed until developments are built and new families move in. This is a particularly complex issue in the Stevenage area where housing developments have been proposed by three local authorities (North Hertfordshire, East Hertfordshire and Stevenage) across a wider number of and variety of sites contained in separate local plans. These plans set out allocations and requirements for secondary education that could meet demand well into the 2030s. However, this issue needs to be kept under review particularly as alternative sites and opportunities which supplement those identified in current Plans and/ or better address the County Councils operational preferences may arise over this period. We will monitor long-term forecasts of demand with the County Council to inform the early review set out in Policy IMR2.

- 4.140 The NPPF addresses the importance that access to open space has for the health and wellbeing of a community. Physical infrastructure, for instance walking and cycling routes, can have dual benefits of improving health through exercise, whilst sustainable modes of transport also lessen the impact on the natural environment. Green infrastructure assets can also be a driver for economic growth and investment.
- 4.141 The towns and villages of North Hertfordshire are attractive places in which to live and work. The green infrastructure network forms an essential part of the quality and character of the settlements, providing accessible formal recreation opportunities, informal open space, wildlife habitats and links to the countryside. During the plan period up to 2031 the District will need to accommodate housing growth and it is important that the green infrastructure network is protected where possible, and opportunities are taken to enhance the network to ensure that the settlements remain attractive and healthy places to live.
- 4.142 In promoting the creation of healthy communities, the NPPF states that local authorities should identify specific needs, qualitative and quantitative deficits and any surpluses in open space provision, as well as any open space that is required. These requirements are set out in the detailed policies.
- 4.143 Our Sustainability Appraisal says that this policy is critical to the delivery of a number of the social and environmental sub-objectives in the sustainability appraisal framework.

## Natural and Historic Environment

### Policy SP11: Natural resources and sustainability

This Plan seeks to meet the challenges of climate change and flooding. We will:

- a) Support proposals for renewable and low carbon energy development in appropriate locations;
- b) Take a risk based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF and ensuring the provision of Sustainable Drainage Systems (SuDS) and other appropriate measures;
- c) Support the principles of the Water Environment (Water Framework Directive) Regulations 2017 and seek to protect, enhance and manage the water environment;
- d) Give consideration to the potential or actual impact of land contamination and support proposals that involve the remediation of contaminated land; and
- e) Work with utilities providers, East Hertfordshire District Council and relevant agencies to ensure additional wastewater treatment capacity is delivered without harm to protected European sites.

- 4.144 To assist in securing radical reductions in greenhouse gas emissions, the Council is required to help increase the use and supply of renewable and low carbon energy. Proposals for renewable and low carbon energy will be favourably considered subject to consideration of the impacts. A balance needs to be struck between the beneficial outcomes of renewable energy, and any adverse impacts produced by the development itself.
- 4.145 Risk of flooding can arise from a number of sources including river flooding, surface water runoff, sewer or groundwater flooding. Within North Hertfordshire there are a number of rivers and streams. Localised flooding has also occurred away from those water courses.
- 4.146 Our evidence has identified those areas of the District most at risk from flooding<sup>61</sup>. Development allocations have been identified in line with its recommendations. Where necessary, specific mitigation measures have been identified while our detailed policies set out the general requirements that will apply in all cases.
- 4.147 This includes the provision of Sustainable Urban Drainage Systems (SUDS). SUDS are an important flood risk mitigation measure to manage surface water run-off. They can take a variety of forms, including green roofs, swales,

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<sup>61</sup> Strategic Flood Risk Assessment update (North Hertfordshire District Council, 2016)

permeable pavements and retention ponds and, when well designed, integrate with wider green infrastructure provision (see Policy SP12).

- 4.148 This Plan also seeks to have regard to the wider water environment. The Water Environment (Water Framework Directive) Regulations 2017<sup>62</sup> transpose European legislation that requires member states to make plans to protect and improve the water environment. It seeks to improve the condition of all qualifying water bodies to a “good” status and prevent deterioration in the water environment.
- 4.149 North Hertfordshire is located at the watershed between the Great Ouse and Thames river catchments. Headwaters of river catchments are, by their nature, small in terms of volume. This means that environmental capacity for change can be limited.
- 4.150 Water Cycle Studies have been produced for both the Rye Meads catchment area<sup>63</sup> and Royston<sup>64</sup>, where identified foul treatment infrastructure issues have arisen as a result of potential future development. Both studies identify that technical solutions can be realised. Where appropriate, contributions will be sought and / or conditions used in accordance with Policy SP7.
- 4.151 Wastewater from some parts of North Hertfordshire is treated at Rye Meads on the Hertfordshire / Essex border. This site lies within a protected site of European importance and currently has capacity to serve additional development until 2026. We will work with the relevant bodies to ensure long-term wastewater treatment solutions are available which will not have an adverse impact upon the Lee Valley Special Protection Area.
- 4.152 Much of North Hertfordshire’s water supply comes from an unconfined aquifer sited beneath the District. We will ensure that development does not have an adverse impact upon groundwater.
- 4.153 This approach should prevent pollution of the water environment. However, it is also important to have regard to pollution and contamination in a broader context.
- 4.154 There are numerous sites in the District which are potentially affected by contamination as a consequence of their historical land uses. Our detailed policies set out the approach we will take to (potentially) contaminated sites and polluting uses.
- 4.155 Our Sustainability Appraisal says that this policy supports a number of the sustainability appraisal framework objectives.

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<sup>62</sup> For information on the Water Environment (Water Framework Directive) Regulations 2017, see: <http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx> and <https://www.legislation.gov.uk/ukxi/2017/407/contents/made>

<sup>63</sup> Rye Meads Water Cycle Strategy (Hyder, 2009); Rye Meads Water Cycle Strategy Review (Stevenage Borough Council, 2015)

<sup>64</sup> Royston Sewage Treatment Work Water Cycle Study (NHDC, 2012)

**Policy SP12: Green infrastructure, landscape and biodiversity**

We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will:

- a) Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure;
- b) Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;
- c) Protect, enhance and manage designated sites in accordance with the following hierarchy of designations and features:
  - Internationally designated sites
  - Nationally designated sites
  - Locally designated sites;
  - Non-designated sites that include important habitats and species
- d) Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and ensure measurable net gains for biodiversity; and
- e) Protect other open spaces and support provision of new and improved open space.

4.156 North Hertfordshire has a varied and attractive natural environment which is under increasing pressure from development, recreational uses and changing agricultural practices, particularly in the areas which are adjacent to the towns and villages.

4.157 The natural environment forms the setting to the towns and villages in which people live, work and spend their leisure time. Where possible, it should be protected and enhanced in the future to maintain the existing high quality of life that people in the District enjoy.

4.158 This Plan sets out a clear strategic approach for the protection, enhancement, creation and management of networks of green infrastructure. Green infrastructure refers to all assets within and between towns and villages, both urban and rural. It is a network of multi-functional open spaces, including urban parks, gardens, woodlands, hedgerows, watercourses and associated buffer zones, and green corridors in addition to protected sites, nature reserves and open countryside.

- 4.159 Benefits to be gained from green infrastructure include a healthy environment, improved biodiversity value, climate change mitigation and flood attenuation as well as enhanced networks for walking and cycling, which contributes to a carbon neutral development. The retention of substantial connected networks of green space in urban, urban fringe and adjacent countryside areas to serve growing communities is vitally important in ensuring these benefits are maximised.
- 4.160 Our detailed policies set out our approach to green infrastructure.
- 4.161 Much of North Hertfordshire is largely unspoilt, with very attractive landscape encompassing a range of natural, man-made and urban and rural spaces. The natural landscape to the west of Hitchin towards Hexton and Lilley follows the escarpment of the Chiltern Hills and part of the District here falls within the Chilterns Area of Outstanding Natural Beauty (AONB). There are also locally important landscapes which contribute to a feeling of remoteness in other parts of the District, for example Lilley Bottom and the East Anglian Heights.
- 4.162 Whilst there are no biodiversity sites designated at the European level in the District, for example Ramsar sites, Special Areas of Conservation or Special Protection Areas, there are a number of nationally designated sites. Strict protection and control will be applied to all national designations in accordance with the conservation of Species and Habitats Regulations (2010). These designations include six Sites of Special Scientific Interest (SSSIs) as shown on the Policies Map and eight designated Local Nature Reserves (LNRs).
- 4.163 Ancient woodland is a nationally agreed designation for land that has been woodland since at least 1600 AD. The District's woodlands will be managed over the plan period to provide recreation and amenity for local residents, and also to ensure their survival to benefit biodiversity. Ancient hedgerows are protected by the Hedgerow Regulations 1997 and will be protected and enhanced where possible to ensure their contribution to biodiversity and ecological networks.
- 4.164 Species or Habitats of Principal Importance as identified in S41 of the Natural Environment and Rural Communities Act 2006 are defined at the national level and the Hertfordshire Biodiversity Action Plan<sup>65</sup> sets out an approach to biodiversity at the county level. In addition to this, the Hertfordshire Local Nature Partnership (LNP) Guiding Principles have informed the policies in this Plan.
- 4.165 The District has over 300 designated Wildlife Sites<sup>66</sup>. The Hertfordshire Environmental Records Centre updates the list of designated Wildlife Sites on

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<sup>65</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, [http://www.hef.org.uk/nature/biodiversity\\_vision/index.htm](http://www.hef.org.uk/nature/biodiversity_vision/index.htm)

<sup>66</sup> [Please refer to the list held by the Hertfordshire Environmental Records Centre for the current list of designated Wildlife Sites](#)

a regular basis. Sites identified or designated as Wildlife Sites are afforded protection as sites of substantive nature conservation value.

- 4.166 Local Geological Sites are given the same level of protection as Wildlife Sites and are considered important for their educational or historical value. There are currently 11 Local Geological Sites in North Hertfordshire.
- 4.167 There are a wide range of important habitats within North Hertfordshire, including hedgerows, wildflower meadows, orchards, ponds, lakes, reed bed and fen, ancient woodlands in the south, chalk grasslands and chalk streams in the east, and wet woodlands along the River Hiz and its tributaries, and a wildlife corridor which runs in a south-west to north-east direction passing through the northern part of the district which is an important asset of food and habitat for flora and fauna, particularly birds. Many of these habitats are subject to specific designations, reflecting their value in terms of wildlife interest, for instance national sites such as Sites of Special Scientific Interest and Local Nature Reserves, and local sites such as local wildlife sites. The Biodiversity Action Plan for Hertfordshire and the Green Infrastructure Plan for North Hertfordshire identify the importance of such habitats.
- 4.168 North Hertfordshire is also host to a number of Local Geological Sites, which are identified as the most important sites for geology not covered by land protection designations, such as Sites of Special Scientific Interest. Our detailed policies set out the designations for biodiversity and geodiversity assets.
- 4.169 Our Sustainability Appraisal says that our policy directly addresses the environmental protection objectives as set out in our sustainability appraisal and recognises the need to provide environmental protection in the context of accommodating significant growth.

#### **Policy SP13: Historic environment**

The Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting. We will pursue a positive strategy for the conservation and enjoyment of the historic environment through:

- a) Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting according to their significance;
- b) Identifying sites on the national register of Heritage at Risk or on the Council's 'At Risk' register;
- c) Periodic reviews of Conservation Areas and other locally designated assets; and
- d) Publication of detailed guidance.

- 4.170 The District has a rich built heritage with many ancient monuments (many being associated with the prehistoric Icknield Way), 44 conservation areas and over 2,500 listed buildings.
- 4.171 These factors make a strong positive contribution to North Hertfordshire but can be among the most vulnerable features of the District when major development is proposed.
- 4.172 National policy seeks to conserve the historic environment which contributes to the local distinctiveness of the area, but also to facilitate development where it would not lead to substantial harm. In addition to this, the historic environment is among environmental matters that must be considered when pursuing sustainable development. The Council will take a positive and proactive approach to this historic environment. This section is our heritage strategy setting out the main features of the historic environment in North Hertfordshire.
- 4.173 Currently identified Heritage assets in North Hertfordshire include:
- Over 2,500 Listed Buildings
  - 44 Conservation Areas
  - 13 Registered Parks and Gardens
  - 62 Scheduled Ancient Monuments
  - Over 1,000 sites of Archaeological Interest
- 4.174 Listed Buildings are designated by central Government. With the District's fine urban and rural history, the statutory list includes buildings and structures of a wide range of sizes, ages, types and uses and of varying architectural styles, methods of construction and materials, both local and imported.
- 4.175 Of the 2,500 listed buildings within North Hertfordshire, 29 buildings have the highest Grade I listing, whilst a further 135 are Grade II\* listed.
- 4.176 The forty-four Conservation Areas in North Hertfordshire include (parts of) settlements of varying characters from the historic linear core of Barkway to the original town centre and residential neighbourhoods of Letchworth Garden City.
- 4.177 Conservation Areas are designated under separate legislation to that which is used for local plans. Appraisal and review can therefore take place on a rolling-basis alongside and / or outside of the local plan process.
- 4.178 Over the lifetime of this Plan, we will carry out a programme of work relating to our Conservation Areas with priority for locations with potential development pressures and where there have been significant changes since the designation was first made. The reviews will include the production of character statements and will provide opportunities to consider amending boundaries.

- 4.179 We will consider the need to develop supplementary guidance for Conservation Areas in the form of management plans. Where this is pursued, it will become a material consideration in the determination of relevant applications.
- 4.180 Historic England maintains a national register of Heritage at risk for sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. The Council will also explore, with parish councils and designated neighbourhood planning groups, the possibility of developing a list of locally designated heritage assets at risk. If implemented, we would work with Historic England, owners and occupiers to find new, appropriate uses and solutions to secure the future of heritage assets.
- 4.181 Historic assets can also form part of the green infrastructure network. Of the thirteen Registered Parks and Gardens in the District, one is Grade I (St Paul's Walden Bury); one is Grade II\* (Knebworth Park) and eleven are Grade II. These sites contain listed buildings and so also form part of their setting. The registered sites are of varying ages and character dating from the 18th century through to the early 20th century. Historic England's advice suggests about two-thirds of the sites on the register are of national significance.
- 4.182 Working with the Hertfordshire Gardens Trust and based on its advice the Council will, where possible, identify other sites of interest. These will be added to the Hertfordshire Historic Environment Record (HER) and will be considered by the Council as non-designated heritage assets, as defined in the NPPF, and given appropriate consideration in the determination of planning applications.
- 4.183 In addition, because there are no special controls for works within historic parks and gardens, we will consider serving Tree Preservation Orders outside conservation areas where the character of a site may be threatened by the loss of important trees.
- 4.184 North Hertfordshire has an especially rich archaeological heritage, including Archaeology Areas and Areas of Archaeological Interest.
- 4.185 There is archaeological evidence of human activity from early prehistoric times but with the District probably being best known for its late Iron Age and Roman remains.
- 4.186 In addition, there are Iron Age hill forts, a number of important ancient roads and routes including the Icknield Way and Roman Ermine Street and small mediaeval castles and moated manor sites.
- 4.187 As well as the sixty-two scheduled ancient monuments there are a number of sites within the District that have been identified as being of comparable national importance to the sixty-two scheduled ancient monuments.
- 4.188 In accordance with the NPPF, these will be considered in the same way as scheduled sites in the determination of development proposals. Many other

sites of interest are known and new sites are becoming known on a regular basis. Because of this, a finite list of sites and their areas cannot be identified. Sites of interest are included in the Hertfordshire Historic Environment Record, which is updated on an annual basis.

- 4.189 The Council recognises the importance of these heritage assets and has additionally been developing and adopting Registers of Buildings of Local Importance on a parish by parish basis in conjunction with Conservation Area reviews.
- 4.190 The detailed policies of this Plan identify those sites where impact upon the historic environment must be carefully managed.
- 4.191 Our Sustainability Appraisal says that our policy directly addresses the sustainability appraisal framework objectives relating to the protection, conservation and enhancement of heritage assets and landscapes.

## Strategic Housing Sites

- 4.192 The following policies identify our Strategic Housing Sites and set out site-specific measures to be addressed in any proposals. These are in addition to matters set out in the detailed policies of this Plan, such as affordable housing and open space, which apply in all cases.
- 4.193 The supporting text to Policy SP8 sets out the key findings of our Sustainability Appraisal in relation to housing. Each Strategic Housing Site has additionally been subject to an individual appraisal which has informed the policies below. Further details can be found in the Environmental Report, which should be referred to for more information<sup>67</sup>.
- 4.194 All strategic sites will be informed by a Strategic Masterplan. We encourage their production to be undertaken pro-actively and collaboratively with the Council and key stakeholders in accordance with Policy SP9 Design and Sustainability and the individual site policy requirements. Planning applications must be accompanied by a Strategic Masterplan, and adherence to it and any further masterplanning and design requirements will be secured through conditions and/or legal agreements.

### Policy SP14: Site BA1 – North of Baldock

Land to the north of Baldock, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,800 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

- a) A new mixed-use local centre/s to provide for a range of day to day local needs including additional along with additional neighbourhood-level provision of around 500m<sup>2</sup> (net) convenience retail provision and 1,400m<sup>2</sup> (net) of comparison retail and food and beverage floorspace;
- b) Structural planting to create a sense of place, integration into surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the north and east;

<sup>67</sup> Sustainability Appraisal of the North Hertfordshire Local Plan (CAG, 2022)

- c) A new link road connecting the A507 North Road to the A505 Baldock bypass including a new bridge across the railway;
- d) Sustainable transport measures to include:
  - i. a secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way;
  - ii. safe access routes to / from, and upgrades to, Baldock station;
  - iii. sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development; and
  - iv. the use of Bygrave Road / Ashwell Road from the south-western edge of the allocated site to the link road as a sustainable transport corridor; and
  - v. comprehensive integration into the existing pedestrian and cycle, public transport and road networks
- e) At least 28 serviced plots for self-build development;
- f) Provision of an appropriate site for a care home for older people in Use Class C2 in accordance with the locational criteria in Policy HS4;
- g) A community hall and GP surgery;
- h) Up to 6 forms of entry (FE) of additional primary-age education provision;
- i) Up to 8 forms of entry (FE) of additional secondary-age education provision. A secondary school larger than 6FE will be supported where:
  - i. it is located at the south of the allocation site; and
  - ii. safe, sustainable and direct routes to school are provided from Clothall Common;
- j) Address existing surface water flood risk issues, particularly to the south of Ashwell Road, through SUDs or other appropriate solution;
- k) Appropriate mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including:
  - i. Ivel Springs Local Nature Reserve;
  - ii. Bygrave Road local wildlife site; and
  - iii. identified protected species and priority habitats;
- l) Built development contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road; and
- m) Sensitive treatment of heritage assets and their settings including:

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| <ul style="list-style-type: none"><li>i. an access solution from the A507 North Road which satisfactorily addresses potential impacts;</li><li>ii. retaining framed views of St Mary's Church from within and beyond the site; and</li><li>iii. using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy.</li><li>iv. iv. Ivel Springs Scheduled Ancient Monument</li></ul> |
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- 4.195 Land to the north of Baldock is the largest, single development site allocated through this Plan. A total of 2,800 homes can be accommodated here, 1,400 of which are anticipated to be built within the plan period to 2031.
- 4.196 The location of the site, and the way in which Baldock has historically developed, enables substantial new development within relatively close proximity to both the train station and Baldock town centre.
- 4.197 This site enables growth to meet needs arising from the surrounding areas in such a way that does not erode the narrow gaps between the towns of Hitchin, Letchworth Garden City and Baldock.
- 4.198 The site is also large enough to support new schools, local facilities and a new link road, including an additional road bridge over the railway so that not all traffic has to use the Station Road bridge and the White Horse crossroads.
- 4.199 At minimum, the site will contain a 6FE secondary school to ensure the demands arising from within the development can be met. A larger school of 8FE would additionally serve existing residents of Clothall Common and adjoining new development. Appropriate measures to ensure pupils can safely and conveniently walk or cycle to school from the south of the railway line will be required to support this scale of provision.
- 4.200 A range of sustainable transport measures will be required. Critically, this will include measures that allow safe access to the northern side of Baldock station and the town centre as well as routes through the development to provide access to the wider countryside for all Baldock residents.
- 4.201 National policy encourages the creation of inclusive and mixed communities meeting the needs of all age groups. A small proportion of plots will be reserved for those wishing to build their own home. Land will also be reserved for a home for older people who need greater levels of care. A minimum of 50-60 bed spaces are likely to be required in order to support the provision of communal facilities and on-site staff. The care home site should be sustainably located close to key facilities in line with the requirements of Policy HS4.
- 4.202 To the north, the allocation extends to the line of Bridleway Bygrave 001. This right of way is considered the most appropriate long-term, defensible

boundary for the Green Belt<sup>68</sup>. Additional planting may be required to reinforce its role. However, there is a clear ridgeline located approximately 200 metres to the south of this which is considered the most appropriate limit for built development.

- 4.203 To the south of the ridgeline, the site faces towards the existing town. To the north it relates to the countryside beyond. This area would be most appropriate for the provision of some types of open space, school playing fields and / or replacement habitat where it creates an appropriate transition between the rural and urban.
- 4.204 Along the eastern edge, the boundary to the north of Ashwell Road is defined by a field boundary hedgerow which should be reinforced. The boundary and ridgeline to the south of Ashwell Road are less well defined.
- 4.205 The masterplanning process should address these issues and, where possible, mitigate against adverse impacts upon the wider landscape.
- 4.206 The site and surrounding area has been specifically identified as (potentially) hosting a variety of habitats and species protected by legislation. This includes the corn bunting<sup>69</sup>. Appropriate measures will be required as part of any application. This may range from the localised retention of habitats on-site to biodiversity offsetting. This is where habitats lost are re-provided at an appropriate alternate location.
- 4.207 Baldock and its surrounds are home to a wide-range of heritage assets. This includes sites associated with ancient settlements, the town centre Conservation Area and a range of individually listed buildings.

**Policy SP15: Site LG1 – North of Letchworth Garden City**

Land to the north of Letchworth Garden City, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 900 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. This should follow and implement Garden City principles.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

<sup>68</sup> Green Belt Review (NHDC, 2016 & 2018)

<sup>69</sup> Blackhorse Farm, Baldock. Guidance Note; Corn Bunting (BSG Ecology, 2016)

- a) The most appropriate points of vehicular access considering landscape and traffic impacts;
- b) Comprehensive integration into the existing pedestrian and cycle, public transport and road networks;
- c) An appropriate education solution which delivers a new 2FE primary school on-site;
- d) Measures required to address nearby heritage assets including the Scheduled Ancient Monument at Radwell Lodge and the Croft Lane and Norton Conservation Areas;
- e) The approach to existing trees and hedgerows around and within the site, with the presumption that trees will be retained and any hedgerow losses kept to a minimum;
- f) Neighbourhood-level retail and community facilities providing around 900m<sup>2</sup> (net) of retail and food and beverage floorspace and a GP surgery;
- g) At least 9 serviced plots for self-build development;
- h) Provision of an appropriate site for a care home for older people in Use Class C2 in accordance with the locational criteria in Policy HS4 subject to up-to-date assessment of likely future needs and existing supply;
- i) Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;
- j) Structural planting to create a sense of place, integration into the surrounding landscape and a long-term, defensible Green Belt boundary, particularly to the north-west and east;
- k) Diversion and / or re-provision of the Letchworth Greenway to provide a revised route around the new urban edge; and
- l) Undertake a detailed odour assessment to demonstrate no adverse impact on future residents and occupants of non residential buildings.

4.208 Letchworth holds a special place as the world's first garden city. Although development of the town to Ebenezer Howard's original vision of 32,000 residents has been achieved, it is considered there remains scope for a sensitive extension of the town to the north, which respects the town's original ideals while making provision for the needs of the 21<sup>st</sup> Century. A masterplan will be required for this site which demonstrates how these principles will be incorporated.

4.209 The masterplan will also be required to demonstrate an access solution which works in both highway and urban design terms. Previous work has shown that a new access from Norton Road could be accommodated in landscape terms<sup>70</sup>. However, this needs to be balanced against a requirement to

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<sup>70</sup> Land north of Letchworth: landscape sensitivity study (LUC, 2013)

properly integrate this site with the existing Garden City. At the same time, any impacts upon the existing local highway network need to be managed within acceptable limits.

- 4.210 Sites at this scale generate enough demand to support the provision of new primary schools on-site. Site LG1 will follow this principle. However, the irregular shape of the site and the location of surrounding schools mean that this requires further consideration through the masterplanning process to ensure existing school intake and travel patterns are not unduly affected.
- 4.211 Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable. Our evidence also identifies a requirement for a new GP surgery in Letchworth to serve new development<sup>71</sup>.
- 4.212 A small proportion of plots will be reserved for those wishing to build their own home. To ensure sufficient provision of homes for older people, any application should be supported by up-to-date evidence of housing need. This will determine whether it is necessary to make provision for a care home. These normally require a minimum of 50-60 bed spaces in order to support the provision of communal facilities and on-site staff so an accurate picture of existing supply across Letchworth and the wider district will be essential. Any care home site should be sustainably located close to key facilities in line with the requirements of Policy HS4.
- 4.213 This site forms part of the elevated northerly edge to Letchworth. Much of the site is relatively flat though falls away to the north-west towards Pix Brook and to the north / north east to the Ivel Valley, with several ordinary watercourses on the site draining broadly in these directions.
- 4.214 Our evidence shows that, within the plateau on which most of the site sits, there is only low landscape sensitivity to development. In the peripheral areas, there are views across a much wider landscape which continues into neighbouring Central Bedfordshire<sup>72</sup>.
- 4.215 Although parts of the north-eastern boundary are quite clearly defined, there are currently limited features demarcating the north-west and eastern edges of the site. These should be addressed in a comprehensive strategy which limits any harm to existing green infrastructure and the wider landscape, preserves the setting of nearby heritage assets and creates new defensible limits to the town.
- 4.216 The Letchworth Greenway is an off-road circular route around the edge of the town. It was constructed in 2003 to celebrate the town's centenary. Development of this site will result in incorporation of part of the existing Greenway into the urban area. These affected sections should be re-routed

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<sup>71</sup> Infrastructure Delivery Plan Update (RS Regeneration, 2018)

<sup>72</sup> Land north of Letchworth: landscape sensitivity study (LUC, 2013)

and re-provided as part of any application. The possibility of providing radial link paths from the existing urban area, through the site to the Greenway (and beyond) should be explored as part of a comprehensive green infrastructure strategy.

- 4.217 An odour assessment will need to demonstrate that a suitable distance is provided between Letchworth Garden City Water Recycling Centre and sensitive development (defined as buildings which are regularly occupied) as part of the detailed masterplanning of the site.

#### **Policy SP16: Site NS1 – North of Stevenage**

Land to the north of Stevenage within Graveley parish, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 900 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

- a) Integration with adjoining development in Stevenage Borough including site-wide solutions for access, sustainable travel, education, retail, and other necessary medical and social infrastructure to include:
  - i. 2FE of primary-age education provision either wholly within the site or in conjunction with the adjoining land allocated for development in Stevenage Borough ensuring adequate primary school capacity across both sites over the lifetime of the developments;
  - ii. travel provision designed having regard to the Stevenage Mobility Strategy and including:
    - Effective links into the existing pedestrian and cycle, public transport and road networks; and
    - an upgraded junction at the intersection of Graveley Road / North Road; and
  - iii. neighbourhood-level retail facilities subject to an up-to-date assessment of local demand and supply;
- b) A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;

- c) At least 9 serviced plots for self-build development;
- d) Structural planting to create a sense of place, integration into surrounding landscape and a long-term, defensible Green Belt boundary to the north;
- e) Integration of existing public rights of way to provide routes through the site to the wider countryside including:
  - i. Footpath Graveley 006 and Bridleway Gravely 008 along the perimeter of the site; and
  - ii. Footpath Graveley 007 as a south-east to north-west route through the site and link path from the urban area to the Stevenage Outer Orbital Path;
- f) Sensitive consideration of existing settlements, landscape features and heritage assets including:
  - i. Graveley village and Conservation Area;
  - ii. the St Nicholas & Rectory Lane Conservation Area including the Grade I listed St Nicholas Church and Rook's Nest; and
  - iii. Chesfield Park.
  - iv. Church of St Etheldreda
  - v. Manor Farm; and
- g) Detailed design and layout of the site to be informed by site-specific assessments to mitigate any landscape, heritage and Green Belt impacts to the fullest reasonable extent.

4.218 The area north of Stevenage is currently undeveloped farmland in the parish of Graveley. Adjoining land within Stevenage Borough to the south has been identified for development and this provides an opportunity for a coherent extension of the town to the north<sup>73</sup>. A masterplanning exercise for this site will need to consider the collective implications of these allocations and demonstrate appropriate solutions. This may lead to some facilities which will serve the whole development being located wholly within either North Hertfordshire's or Stevenage's administrative areas.

4.219 It is envisaged that principal access to the site will be in the form of a looped estate road, one end of which will be in Stevenage Borough. The northern end of this road will emerge at, or close to, the existing junction of the B197 at Graveley Road / North Road. A new arrangement, possibly a roundabout, will need to be provided. Any transport proposals should consider the effects on adjacent networks and communities such as Graveley, and propose suitable mitigation; the analysis should also consider cumulative impacts.

4.220 The site will need to integrate provision for walkers, cyclists and public transport in line with the aims of the Stevenage Mobility Strategy. This will include connections to the wider sustainable travel network. These measures,

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<sup>73</sup> Stevenage Borough Local Plan 2011-2031 (May 2019)

along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.

- 4.221 Development at this scale would normally generate a requirement for the on-site provision of a 2FE primary school. The relationship with the adjoining land in Stevenage means that, in this instance, it may be possible to co-locate education provision for the two schemes to ensure the most effective outcome.
- 4.222 Our evidence suggests that the three housing allocations to the north of Stevenage within the District will generate a requirement for two additional GPs<sup>74</sup>. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed patterns of provision within Stevenage.
- 4.223 The retail forecasts supporting the plan suggest that approximately 1,300m<sup>2</sup> of A-class floorspace could be accommodated within this site to meet the needs arising from the new housing<sup>75</sup>. Equally it is recognised that Site NS1 is located in close proximity to existing and proposed convenience supermarkets and proposed local facilities within Stevenage. Any application should be supported by an up-to-date assessment of local retail requirements to ensure provision within this site is appropriately scaled to meet the needs generated by the development.
- 4.224 Existing field boundaries in this area are generally quite well defined. However, in order to preserve the setting and separation of Graveley village and its Conservation Area, it is considered most appropriate to draw back the allocation and Green Belt boundaries to a new alignment. This will require new planting and sensitive design and layout to preserve the setting of the Conservation Area.
- 4.225 These perimeter areas also incorporate statutory rights of way which should be retained. A further footpath bisects the development and this should be incorporated as a green route from the Stevenage urban area, through the development site to the countryside beyond.
- 4.226 This route also forms a recognised link to the Stevenage Outer Orbital Path (StOOP). StOOP is a 27-mile walking route around the town using footpaths and other routes that are open to the public.
- 4.227 The site is in close proximity to a number of heritage assets. Sensitive design and layout will be required to ensure that any harm to their settings is minimised. Assessment of any impact upon the historic environment must be comprehensive and should not stop at the administrative boundary. To the south-east of the site, the adjoining land within Stevenage Borough is known colloquially as 'Forster Country' in recognition of author EM Forster. His

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<sup>74</sup> North Hertfordshire Infrastructure Delivery Plan September 2016 (Updated January 2018)

<sup>75</sup> North Hertfordshire Retail Study Update (Nathaniel Lichfield & Partners, 2016)

childhood home of Rook's Nest is Grade I listed with a large part of its historic landscape setting protected by a the St Nicholas' and Rectory Lane Conservation Area. This conservation area also contains and provides the setting for a Grade I listed, twelfth century church.

- 4.228 To the east lies Chesfield Park. Although not formally recognised through statutory listings or registers, the house and surrounding parkland are important local features. These are generally well separated from the allocated site by an existing tree belt but the transition between these areas will need to be considered.

#### **Policy SP17: Site HT1 – Highover Farm, Hitchin**

Land to the east of Hitchin, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 700 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

- a) Neighbourhood-level retail facilities providing approximately 500m<sup>2</sup> (net) of retail and food and beverage floorspace;
- b) Principal access from Stotfold Road with provision for sustainable modes of transport and comprehensive integration into the existing pedestrian and cycle, public transport and road networks;
- c) At least 7 serviced plots for self-build development;
- d) Approximately two hectares of land reserved for provision of a new primary school;
- e) Appropriate separation distances from the adjoining railway embankment to safeguard residential amenity;
- f) Lower density development and / or green infrastructure provision as informed by detailed landscape assessments at the north of the site to:
  - i. maintain appropriate visual and physical separation between Hitchin and Letchworth Garden City;
  - ii. address surface water flood risk; and

- iii. respect the setting of the scheduled burrows to the north-east;
- g) Sensitive consideration of other designated and non-designated heritage assets at Highover Farm including the Grade II listed Threshing Barn;
- h) Undertake Contaminated Land Preliminary Risk Assessment, particularly relating to current and historic agricultural use; and
- i) Undertake ecological appraisal in relation to Stotfold Road Verges and Hitchin Railway Banks Wildlife Sites.

- 4.229 The land at Highover Farm provides opportunity for a strategic-scale site on the edge of Hitchin to address locally arising needs.
- 4.230 Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable.
- 4.231 This development will necessitate a new principal access from Stotfold Road. However, it is important to ensure that this does not result in new development 'turning its back' on the remainder of Hitchin.
- 4.232 A site at this scale will generate sufficient demand to support a new primary school on site. This will need to be at least 1FE in size. Further information on likely pupil yields, along with an understanding of any extent to which the nearby Highover JMI School may be able to meet future demands, will determine if it is necessary to deliver a 2FE school on-site.
- 4.233 A number of existing roads run to the edge of the allocated land, including Highover Way and High Dane. These provide opportunities to integrate development with the surrounding area whilst ensuring that any such routes do not create an alternate access from Stotfold Road to the industrial areas located between the railway lines
- 4.234 The most appropriate solutions will be determined through the Development Management process having regard to the detailed policies of this Plan.
- 4.235 Although the gap between Hitchin and Letchworth Garden City is relatively narrow in this location, it is considered that Stotfold Road and the Cambridge railway provide definitive, defensible boundaries. Notwithstanding this point, it will be necessary to demonstrate an appropriate design solution as the site tapers to its northern end to respect this separation and nearby heritage assets.
- 4.236 The Highover Farm complex, at the south-west of the allocation site, is an important and long-evolved complex of agricultural buildings recognised on the Council's register of locally important heritage assets. In 2018, the Threshing Barn, which lies within this complex, was Grade II listed.

**Policy SP18: Site GA2 – Land off Mendip Way, Great Ashby**

Land to the north-east of Great Ashby within Weston parish, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 600 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

- a) Neighbourhood-level facilities providing approximately 500m<sup>2</sup> (net) of retail and food and beverage floorspace and other necessary medical and social infrastructure;
- b) Four hectares of land at the north of the allocation site, broadly bounded by Footpaths Weston 044 and Weston 027 and Dell Spring reserved for education use to accommodate 2FE of primary-age provision and 4FE of secondary age provision;
- c) Principal access from Mendip Way with:
  - i. provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy; and
  - ii. comprehensive integration into the existing pedestrian and cycle, public transport and road networks;
- d) Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;
- e) A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;
- f) At least 6 serviced plots for self-build development;
- g) Structural planting along site boundaries as informed by detailed landscape assessments to reinforce the revised Green Belt boundary and mitigate landscape impacts;
- h) Address existing surface water flood risk issues, particularly running south-east from Dell Spring to Newberry Grove, through SUDs or other appropriate solution;
- i) Appropriate mitigation, compensation and / or enhancement of key features of biodiversity including:

- i. local wildlife sites at Tilekiln Wood, Parsonsgreen Wood, New Spring Wood, Brooches Wood and Claypithills Spring Wood;
  - ii. identified protected species and priority habitats; and
  - iii. retention of green infrastructure connectivity and corridors to the wider countryside;
- j) Integration of existing public rights of way within and adjoining the site to provide routes to the wider countryside including
- i. Footpaths Weston 027 and Weston 044 and Bridleway Weston 033 as features which help define the perimeters of the site; and
  - ii. Footpath Weston 029 as a potential green corridor through the site;
- k) Provision of a green infrastructure corridor beneath the current alignment of the pylon lines to respect statutory safety clearance requirements for residential development; and
- l) Lower intensity development and / or green infrastructure provision to the north of the site to minimise harm to the setting of listed buildings.

4.237 Great Ashby is a relatively new parish, representing the residential area adjoining Stevenage that has been substantially completed since the turn of the century. For the purposes of our settlement hierarchy it is considered to be a town.

4.238 Land to the north-east of the existing settlement limits is identified for the development of approximately 600 homes within the parish of Weston.

4.239 Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable. Our evidence identifies that the three housing allocations to the north of Stevenage within the District will generate a requirement for two additional GPs. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed patterns of provision within Stevenage.

4.240 Great Ashby's existing primary school is significantly oversubscribed. As a consequence, it draws its intake from a very tight catchment area. There is also no local secondary school and Hertfordshire County Council has identified future pressures on secondary-age provision in the Stevenage area as a key concern.

4.241 Development of this site provides the opportunity to address these issues. Reserving sufficient land within this site to deliver 2FE of primary-age and 4FE of secondary-age provision will meet the requirements arising from the

site itself and also help alleviate pressures arising from existing and planned development in Great Ashby. Together these will help to create a more sustainable residential neighbourhood at the north-east of Stevenage enabling more short-distance journeys to school.

- 4.242 It is currently anticipated that the secondary element of a new school will not be required before the late 2020s at the earliest. To ensure an appropriately sized site, additional school playing fields would be required on land beyond the allocation boundary to the south-west of Footpath Weston 027 and Warrensgreen Wood towards Warrens Green Lane. This land is retained within the Green Belt to ensure appropriate control over any built structures.
- 4.243 The Stevenage Mobility Strategy aims to significantly increase the proportion of journeys undertaken on foot, by bike and by public transport over the plan period. Sites on the edge of Stevenage will need to make appropriate provision for sustainable modes of transport, and appropriate contributions to relevant sustainable travel schemes across the town, to ensure that they meet these aims.
- 4.244 There are local concerns that Back Lane, a narrow minor road which leads to Church Lane in Graveley, could be used by increased numbers of vehicles leaving the site, and that junctions in Graveley itself will suffer from congestion as a result of increased flows. This issue should be specifically addressed in the Transport Assessment for the site as part of the consideration of likely development impacts upon the wider highway network.
- 4.245 These measures, along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.
- 4.246 Much of the revised Green Belt boundary has been drawn along the routes of public rights of way. Although clearly defined features, parts of their alignments cut across more open land. Structural planting will reinforce the new boundary as well as providing visual containment of the development.
- 4.247 Distinct areas of woodland lie between the site and the existing development at Great Ashby. These should be sensitively incorporated into the development having regard to their status as local wildlife sites. These woods, and the connections from them to the wider countryside, will be integral to the green infrastructure of the site. This will also include incorporation of key rights of way.
- 4.248 A green infrastructure corridor currently runs through Great Ashby following the alignment of the overhead power lines. This should additionally be carried through the new development to provide a continuous link through the neighbourhood to the wider countryside. The width of the corridor will be informed by the health and safety clearance requirements imposed by National Grid (or any other relevant body).

- 4.249 The site adjoins a number of Grade II listed buildings at Tile Kiln Farm and care should be taken in the detailed design of any scheme to ensure this area retains an appropriate setting.

#### **Policy SP19: Sites EL1, EL2 & EL3 – East of Luton**

Land to the east of Luton, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,100 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements

- a) A new mixed-use local centre/s to provide for a range of day-to-day local needs including additional neighbourhood-level provision of around 250m<sup>2</sup> (net) convenience retail provision and 850 m<sup>2</sup> of comparison retail and food and beverage floorspace and other necessary social infrastructure;
- b) Structural planting to create a sense of place, integration into the surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the east and mitigate landscape impacts;
- c) Principal access to be taken from Luton Road and integrated into Luton's existing highway network via Crawley Green Road with:
  - i. provision for sustainable modes of transport;
  - ii. comprehensive integration into the existing pedestrian and cycle, public transport and road networks; and
  - iii. appropriate transport mitigation measures secured to address impacts on Luton;
- d) 4FE of primary-age and 4FE of secondary-age education provision to ensure the needs arising from this allocation can be met within the site with any secondary education solution designed so as not to preclude the potential for future expansion;
- e) Appropriate mechanism(s) to ensure that all the affordable housing derived from the 1,950 homes for Luton's unmet needs address affordable housing needs from Luton Borough;
- f) Built development contained within the Breachwood Ridge and avoiding adverse impacts on the wider landscape of the Lilley Valley

or the Chilterns AONB as informed by detailed landscape assessments;

- g) Integration of existing public rights of way within and adjoining the site to provide routes to the wider countryside including:
  - i. Footpath Offley 001 as a route from south-east Luton to the rural area; and
  - ii. Footpaths Offley 039, Offley 002 and Offley 003 as potential north-west to south-east green corridors through the site;
- h) Address existing surface water flood risk issues, particularly along the south-western perimeter of the site, through SUDs or other appropriate solution;
- i) Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces;
- j) Appropriate mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including:
  - i. the adjoining local wildlife sites at Stubbocks Wood; and
  - ii. priority deciduous woodland habitat at Brickkiln Wood;
- k) Sensitive integration of existing settlements and heritage assets, including
  - i. minimising the visual impacts of development upon the historic parts of Cockernhoe, including relevant listed buildings;
  - ii. using the location of the Mangrove Green and Cockernhoe areas of archaeological significance to inform a site-wide green infrastructure strategy; and
  - iii. retaining an appropriate setting to the adjoining Putteridge Bury;
- l) Undertake Contaminated Land Preliminary Risk Assessment, particularly relating to historic landfill; and
- m) Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.

4.250 Three adjoining sites are identified to the East of Luton totalling 2,100 dwellings. Around 150 homes will meet requirements arising from within North Hertfordshire, with the remaining 1,950 homes addressing needs that cannot be physically accommodated within Luton. The contribution towards unmet needs from Luton will include the provision of both market and affordable homes. The District Council will work with Luton Borough Council to secure appropriate mechanisms for nomination rights in any legal agreement(s) relating to the site(s).

- 4.251 Our assessment shows that the land broadly bounded by Mangrove Green, Brick Kiln Lane and Brickkiln Wood (site EL3 and parts of site EL1) is most supportable in terms of impacts upon landscape and Green Belt. Beyond these limits, impacts become more pronounced<sup>76</sup>.
- 4.252 However, this needs to be balanced against the acute levels of unmet needs arising from Luton and the associated requirements of the NPPF and Duty to Co-operate. It is considered that the strategic allocation represents North Hertfordshire's reasonable maximum contribution<sup>77</sup>.
- 4.253 Our assessments show that this level of development can be accommodated without a significant adverse impact on the wider highway networks of Luton and Hertfordshire<sup>78</sup>. This will be achieved, in part, by ensuring that education needs arising from the allocation will be met within the site itself. In the period beyond 2028, it may prove necessary to expand secondary provision to ensure wider education needs across the rural west of the District can be met. This matter will be kept under review and subject to further investigation and / or planning application(s) at the appropriate time.
- 4.254 The site will need to integrate provision for walkers, cyclists and public transport in line with the aims of the NHDC Transport Strategy and the sustainable travel strategy set out in the Luton Local Plan. This will include connections to the wider sustainable travel network.
- 4.255 The eastern section of site EL1 and all of site EL2 will require sensitive design and landscaping (including structural planting) to visually contain development from longer views. The revised Green Belt boundaries predominantly follow existing, recognisable features such as roads, tree belts and rights of way. Where necessary, additional planting should be provided for reinforcement and to mitigate against impacts upon the wider landscape.
- 4.256 The site is in close proximity to the Luton Airport noise corridors and mitigation measures may be required, particularly towards the south-east of the site which lies closest to the flight path.
- 4.257 The allocation will adjoin existing small settlements including Cockernhoe, Mangrove Green and Tea Green as well as the registered park at Putteridge Bury. The relationship of these areas to the new development will need to be carefully considered, notably for the two greens at Cockernhoe Green and Mangrove Green.
- 4.258 East of Luton lies within the Thames Water area with wastewater draining to their facility at East Hyde south east of Luton. Previous work identifies that this treatment works should have sufficient capacity to accommodate this

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<sup>76</sup> North Herts Site Selection Report (Peter Brett Associates, 2016)

<sup>77</sup> A review conducted by Sir Michael Heseltine suggested that authorities should "leave no stone unturned" in seeking solutions to growth. This has been broadly accepted as the benchmark against which the Duty to Co-operate is tested, especially where unmet needs exist.

<sup>78</sup> East of Luton Urban Extension Stage 2 – Traffic Modelling Results (AECOM, 2016); Preferred Local Plan Model Testing (AECOM, 2016)

planned development, it is recognised that upgrades to the existing infrastructure network may be required. Scheme promoters should work with Thames Water, and together, to identify the likely nature of infrastructure required to ensure this can be programmed appropriately.



# **SECTION THREE - DEVELOPMENT MANAGEMENT POLICIES**



## SECTION THREE - DEVELOPMENT MANAGEMENT POLICIES

### 5 Economy & Town Centres

#### Policy ETC1: Appropriate uses in Employment Areas

Within the safeguarded Employment Areas, and the Employment Allocations (BA10 and RY9), as shown on the Policies Map, planning permission will be granted for office, research and development, industrial processes, industrial and storage and distribution uses provided:

- a) For allocated sites any relevant site-specific criteria are met; and
- b) Any Use Class B8 development is easily accessible from the primary road network.

Planning permission for other uses will be granted as an exception to the above criteria provided they are:

- i. Ancillary to the above uses;
- ii. Essential to the continued operation of an established premises;
- iii. Would bring comparable benefits to office, research and development, industrial processes, industrial and storage and distribution uses in the same location; or
- iv. Would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time.

Conditions and legal agreements will be used to limit uses to ensure that development meets, and will continue to meet, identified employment needs

- 5.1 Within the four main towns there are a number of established Employment Areas, where the majority of employment premises are located. They include certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses. They are well-established areas and are a valuable resource to the District.
- 5.2 Over the lifetime of this Plan these will be supplemented by the new allocations identified by Policy SP3 which will become Employment Areas covered by this policy. Detailed considerations for these sites are set out in the Chapter 13 of this Plan which must be taken into account.
- 5.3 In order to maintain an adequate level of employment land to meet the needs of the local economy, we will protect defined Employment Areas from uses which would undermine their purpose or be better located in other areas of the District. The Council does not wish to inhibit the ability of existing firms to expand. It will be supportive of the redevelopment of sites which would lead to

an improvement in the quality of employment floorspace suited to modern day needs.

- 5.4 However, the Council recognises that Employment Areas are often sought-after locations for a number of other uses. It is recognised that there is a need for some flexibility to meet the needs of uses, including sui generis uses such as motor trade uses and taxi vehicle depots<sup>79</sup>. These uses tend to cause conflict in other parts of the towns, such as town centres or residential areas as a result of impacts on residential amenity and living conditions.
- 5.5 Motor vehicle premises, in particular, usually include a mixture of sales and repairs. The sale of motor vehicles tends to provide lower density of employment than normally expected in an employment area. The amount of the retail sales element on larger developments will be restricted in order to protect the availability of, and maximise the use of, employment land. In addition, in order to prevent the change of use of buildings to shops a condition will be imposed on any grant of permission removing permitted development rights. These considerations apply to the sale of all types of vehicles.
- 5.6 Development proposals for uses in employment areas that are not for office, research and development, industrial processes, industrial and storage and distribution uses which seek to make use of the exception criteria of this policy will be considered on their merits. When assessing such proposals, the Council will have regard to (as applicable in each instance):
- employment generation on site;
  - impact on relevant town centres, including details of any sequential and / or impact testing;
  - where appropriate, the level and type of retail involved on the site;
  - any potential benefits to the community or surrounding businesses from the proposed use;
  - the proportion of the site to be used for sales and display as opposed to repairs and servicing, in the case of motor trade uses;
  - accessibility by non-car modes of transport; and
  - any evidence clearly demonstrating that:
    - the land or premises is no longer required to meet future employment needs of the District;
    - the land or premises is inappropriate or unfeasible for employment use, based on market conditions or amenity / living condition problems; and
    - no other suitable sites outside designated employment areas are viable and available.
- 5.7 A number of the District's Employment Areas are identified through the Hertfordshire Waste Local Plan as Employment Land Area of Search (ELAS) and parts of them may be acceptable for waste uses. The Hertfordshire

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<sup>79</sup> 'Sui generis' is a term used to mean any use which does not fall within the use classes defined in the Use Classes Order.

County Council ELAS SPD<sup>80</sup> sets out specific considerations for each employment area.

- 5.8 The Council is required to make provision for sufficient employment land over the plan period. To ensure that development meets identified employment needs, both now and in the future, conditions and legal agreements will be used.

**Policy ETC2: Employment development outside Employment Areas and Employment Allocations BA10 and RY9**

Planning permission for employment uses outside of allocated Employment Areas and Employment Allocations BA10 and RY9 will be granted provided that:

- a) The proposal is:
  - i. within a defined settlement boundary or the built core of a Category B village; or
  - ii. for small scale offices or other small employment development; and
  - iii. is appropriate to the location in terms of size, scale, function, catchment area and / or historic and architectural character; and
- b) There would be no significant adverse impacts on living conditions.

The Council will only permit the loss of existing employment uses on unallocated sites, where it can be demonstrated that:

- i. the land or premises is no longer required to meet future employment needs of either the local community or the District, demonstrated through evidence of at least twelve months of active marketing;
- ii. the existing use has a significant adverse impact on the amenities of surrounding land uses; or
- iii. the existing use is detrimental to highway safety.

- 5.9 There are a number of employment sites across North Hertfordshire that are outside the designated Employment Areas and Employment Allocations but which provide sources of local employment and services. These are in other parts of the main towns including town centres, in larger villages, and sometimes within category B and C villages or in the countryside following the re-use or redevelopment of agricultural buildings. Some have been there for a long time and may not be in the most appropriate location while others exist perfectly well adjacent to other uses such as residential and / or in their wider setting. Planning Applications seeking non-employment uses on such sites will need to be supported with evidence that at least twelve months of active

<sup>80</sup> Hertfordshire County Council Employment Land Area of Search SPD (2015)

marketing has been undertaken. This will include an assessment of market signals, including that the marketing has been conducted appropriately given the terms, rental values and / or sales values of the site and similar properties, the benefits of the proposed uses and the impact on the community of such a loss of employment land.

- 5.10 These sites are often small scale, although there are larger office developments in and around Hitchin and Letchworth Garden City town centres for example. The provision and retention of appropriate dispersed employment sites contributes to sustainable development aims by reducing the need to travel for local residents, something which is advocated in the NPPF. We will have regard to these factors to determine whether the proposed use is appropriately located.
- 5.11 The Council will permit appropriate proposals for farm and other land-based diversification schemes that benefit the rural area. The re-use or redevelopment of rural buildings for employment purposes will be subject to Policy CGB4.

### **Policy ETC3: New retail, leisure and other main town centre development**

Planning permission for new retail, leisure and other main town centre uses<sup>81</sup> will be granted provided that:

- a) The sequential test is passed;
- b) Where the town centre development is outside of the town centre, an impact assessment is provided based on the following minimum floorspace thresholds demonstrating there is no unacceptable harm to the vitality or viability of a designated town centre:
  - Hitchin: 2,500 gross sq.m and above;
  - Letchworth Garden City: 1,000 gross sq.m and above;
  - Baldock, Royston and elsewhere: 500 gross sq.m and above;
- c) Within retail allocation sites, as shown on the Policies Map, any relevant site-specific criteria are met;
- d) The proposal is appropriate to the area in terms of use, size, scale, function, catchment area, historic and architectural character; and
- e) There would be no significant adverse impact upon living conditions.

The Council will use planning conditions or legal agreements to limit uses to ensure that the identified retail needs are met, and will continue to be met, through the allocated sites.

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<sup>81</sup> Main town centre uses are defined in the Local Plan Glossary

- 5.12 Our evidence establishes the need for additional retail, commercial and leisure floorspace in the District over the period to 2031<sup>82</sup>. This Plan identifies six allocated sites where a substantial proportion of these needs will be met.
- 5.13 In assessing proposals for main town centre uses, we will adopt the 'sequential approach' as set out in Government guidance<sup>83</sup>. Therefore, retail uses will be considered in the following order of preference:
- 1) within town centres, on allocated sites within town centres, or in local centres;
  - 2) the edge of centres; and
  - 3) out of centre, only where there are no available, suitable and viable sites which are sequentially preferable.
- 5.14 Business uses within town centres can add to the vitality and viability of centres. Office workers within a town centre will create more custom for shops and services. The Council is therefore generally supportive of new office development in town centres in accordance with the sequential test. Office development will be encouraged above ground floor retail.
- 5.15 The District has a number of local scale leisure facilities such as leisure centres and swimming pools. The provision of large-scale leisure, entertainment and cultural facilities within the District is limited but this reflects the size of its catchment and the fact that residents also have good access to facilities in neighbouring towns such as Stevenage, Luton and Cambridge. North Hertfordshire's location within the catchment area of these larger centres will limit the potential for further commercial leisure and entertainment facilities.
- 5.16 Nevertheless, the first preference for the location of leisure facilities is within the defined town centre boundaries.
- 5.17 With regard to retail use, the edge of centre is generally taken to mean up to 300m from the primary shopping frontage. For other main town centre uses, edge of centre means up to 300m from the town centre boundary<sup>84</sup>.
- 5.18 This Plan identifies thresholds for the application of the impact test in North Hertfordshire's towns in line with our evidence<sup>85</sup>. Applications for main town centre uses on sites outside the town centres, not otherwise in accordance with the development plan and exceeding the thresholds in Policy ETC3 must also be assessed against the impact considerations set out in Government guidance before planning permission will be granted.

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<sup>82</sup> Town Centre and Retail Study (NLP, 2016)

<sup>83</sup> Paragraph 24 of the 2012 NPPF

<sup>84</sup> Annex 2 of the 2012 NPPF

<sup>85</sup> North Hertfordshire Town Centre and Retail Study Update (NLP, 2016)

- 5.19 The Council is required to make provision for sufficient retail land over the plan period. To ensure that development meets identified retail needs, both now and in the future, conditions and legal agreements will be used.

#### **Policy ETC4: Primary Shopping Frontages**

Town Centre boundaries for Hitchin, Letchworth Garden City and Royston are shown on the Policies Map. Within the designated Primary Shopping Frontages, planning permission will be granted at ground-floor level:

- a) For shops; or
- b) For other main town centre uses<sup>86</sup> if it does not, individually or cumulatively, undermine the retail function of the centre in the daytime or detract from the centre's vitality and viability.

#### **Policy ETC5: Secondary Shopping Frontages**

In the Secondary Shopping Frontages of Hitchin, Letchworth Garden City, Baldock and Royston, as shown on the Policies Map, planning permission will be granted at ground-floor level:

- a) For shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways; or
- b) For other main town centre uses<sup>87</sup> if it does not individually or cumulatively, undermine the retail function of the centre or detract from the centre's vitality and viability.

- 5.20 We want to ensure that the town centres maintain their primary retail function whilst increasing their diversity with a range of complementary uses, promoting competitive, flexible town centre environments. The concept of shopping as a leisure activity supports the encouragement of uses which increases the vitality throughout the day, extending the range of services for local people throughout the day and into the evening. The main function of the primary shopping area is retail, but town centres in general need a variety of other services such as banks, restaurants, pubs and personal services, which add interest and vitality and extend the use of the centres into the evening.
- 5.21 Too many non-retail uses can create 'dead frontages' (units not normally open during normal shopping hours or which attract relatively few customers), reduce the interest and attraction of the primary shopping area, and harm the retail function. This is particularly a problem where there are a number of units in a row which are not shops. This is something the Council is keen to prevent.

<sup>86</sup> Main town centre uses are defined in the Local Plan Glossary

<sup>87</sup> Main town centre uses are defined in the Local Plan Glossary

- 5.22 We monitor all retail units within the four main town centres on an annual basis, as well as those in the local centres. There is evidence in some centres that shop units are being lost to non-shop uses in the core shopping areas.
- 5.23 Within Primary Frontages we will retain the attractiveness of the essential and continuous shopping cores of our town centres; only shops will generally be permitted here.
- 5.24 For Secondary Frontages, the policy is more flexible, allowing shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways, based on their contribution to vitality and viability and their ability to attract people to the centre.
- 5.25 Evidence in the form of predicted footfall, opening times and linked trips will be required for any application seeking to meet part b of policies ETC4 and ETC5 to assess the impact upon daytime retail function, vitality and viability. Where a shop unit has been vacant for an extended period of time (normally at least one year), documentary evidence should demonstrate that all reasonable attempts to sell or let the premises for the preferred use(s) as set out in part a. of Policies ETC4 and ETC5 have failed.

#### **Policy ETC6: Local Centres**

Within Local Centres, as shown on the Policies Map or identified in approved masterplans for the strategic site allocations, planning permission will be granted where:

- a) It is for a shop, financial and professional services, café or restaurant, pub or drinking establishment, takeaway or use classes F1 or F2 at ground floor level; and
- b) The centre would continue to provide a range of uses including shops to meet day-to-day needs and the vitality and viability of the centre would be maintained.

Proposals for over 500 sq.m gross will not generally be suitable in local centres.

- 5.26 Local centres consist of village centres such as Codicote, Knebworth and Ashwell, and neighbourhood centres such as Walsworth (Hitchin), Jackmans (Letchworth Garden City) and Great Ashby. These centres vary in size from five units up to around twenty-five units. Their composition also varies with some being almost all retail units, while others contain a mix of retail, food and drink and community facilities.
- 5.27 Local Centres are identified as forming part of our retail hierarchy in Policy SP4. The general locations of local centres are shown on the Policies Map. Detailed maps for each centre showing where the provisions of Policy ETC6 are applied are contained in Appendix 3.

- 5.28 The village centres of Codicote and Knebworth are large enough to provide a focus for the communities local to them and a range of everyday shopping facilities and services. This includes: convenience stores, post offices, hairdressers, dry cleaners and food and drink establishments.
- 5.29 The Council considers that it is important that the neighbourhood centres continue to provide a mix of shopping, services and community facilities, and in particular retail units. A predominance of shops is considered to be necessary to secure the future viability of these centres. However, some non-retail uses may be appropriate in the centres where local community retail needs are already met.
- 5.30 In all local centres, the Council wants to retain local facilities and at the same time prevent changes to non-retail uses that would be more appropriate in larger centres or employment areas.
- 5.31 Where a vacant shop premises is subject to a proposed change of use where planning permission is required, then documentary evidence will be necessary to show that all reasonable attempts to sell or let it for use as a shop for a year or more have failed. If there are other vacant units in the centre this will also be taken into account.

#### **Policy ETC7: Local community shops and services in towns and villages**

Planning permission for small-scale proposals providing new shops and services to serve the day-to-day needs of the local community will be granted where:

- The site is within a defined settlement boundary;
- In the case of Category B villages, the site is within the built core; or
- In the case of Category C settlements, the proposed development meets the criteria of Policy CGG2b.

280 sqm will generally be used as a guide to determine small scale. This reflects the Use Classes Order 2020 and recognises that some such facilities will fall within Class E or other use classes.

Planning permission for the loss or change of use of any shops, services or facilities outside the defined retail hierarchy will be granted where:

- a) There is another shop, service or facility of a similar use available for customers within an 800m walking distance; and
- b) The proposed replacement use would complement the function and character of the area.

An exception to criterion (a) above will only be permitted if it can be demonstrated that the unit is no longer required to meet the needs of the local community, including through evidence of at least twelve months active marketing.

- 5.32 Scattered local shops, services and other facilities in towns and rural areas provide residents with access to important goods and services. They also minimise the need to travel. The less mobile are particularly reliant on these facilities which include shops, post offices, pubs and petrol filling stations<sup>88</sup>.
- 5.33 New facilities of an appropriate scale and location within towns, villages and smaller settlements will generally be supported, subject to meeting the criteria of Policy CGB2b where applicable.
- 5.34 However, given the high value of residential land in the rural area, there is often pressure from landowners to change the use of, or redevelop, existing facilities for residential purposes. This may be the case even where the business is thriving, if the return on an existing use is less than can be gained from residential development.
- 5.35 These facilities should be protected wherever possible and the policy seeks to prevent their loss. However, where it can be shown such facilities are no longer needed and not viable, then permission may be granted for a change of use. Planning Applications seeking a change of use that is not for shops, services or similar facilities will need to be supported with evidence that at least twelve months of active marketing has been undertaken. This will include an assessment of market signals, including that the marketing has been conducted appropriately given the terms, rental values and / or sales values of the site and similar properties, the benefits of the proposed use(s) and the impact on the community of such a loss of shops, services or similar facilities.
- 5.36 Convenient walking distance, as set out in the policy, will be taken to be up to 800m for most existing users of the current facility, in line with Government guidance<sup>89</sup>.
- 5.37 Some local facilities, such as pubs, can be listed as an Asset of Community Value (ACV). This provides additional protections if the owners wish to change the use of, demolish and / or sell the facility. The fact that a facility is an ACV can be an additional material consideration in the determination of any planning applications. The Monitoring and Delivery section of this Plan provides additional information on ACVs.

#### **Policy ETC8: Tourism**

Planning permission for tourism-related development will be granted, subject to the sequential approach set out in Policy ETC3 where it:

- a) Increases the attractiveness of the District as a tourist destination;

<sup>88</sup> This policy is generally directed at Policies for main town centre uses (as defined in the 2012 NPPF). Applications for relevant sui generis uses including petrol filling stations will also be considered against this policy. Policies for other community uses will be considered against Policy HC1.

<sup>89</sup> *Manual for Streets* (Department for Transport, 2007). This will be measured as the distance from prospective customers' places of residence to the alternate facility.

- b) Improves visitor accommodation; or
- c) Delivers sustainable tourist and visitor attractions in appropriate locations.

- 5.38 Tourism can bring benefits to an area both directly as a source of employment and income for the local tourism industry, and indirectly through tourism expenditure (e.g. retail, catering, and accommodation).
- 5.39 The three historic market towns of Hitchin, Baldock and Royston, along with Letchworth Garden City make North Hertfordshire attractive to visitors. Its rural area is also a place for people to visit, for tourism as well as leisure.
- 5.40 The district of North Hertfordshire is itself not a major tourist destination. However, there are a wide range of attractions in the District, particularly those based on heritage and the countryside. Some, such as Letchworth, the world's first Garden City, Royston Cave and the British Schools and Museum in Hitchin are unique. Knebworth House and its grounds are a major day visitor destination in the region and unique nationally in their capacity for large music. The inclusion of a tourism policy reflects this sector's growing significance as a form of economic development, and its potential to diversify both urban and rural economies.
- 5.41 Tourism fulfils some of the aims of sustainable development because its survival depends upon conserving and maintaining the quality of the resources upon which it depends. Tourism provides an incentive and income to protect the built and natural environment, promoting these features for the enjoyment of local people and visitors, and enhancing local diversity and cultural traditions.
- 5.42 The Council supports proposals for new or extended tourist developments as a means to strengthen the local economy and increase visitors to the area in line with policies in the NPPF. To encourage sustainable forms of tourism, Policy ETC3 prioritises the location of possible developments within town centres in line with the sequential approach. Here, passenger transport can best be utilised and so limit associated traffic congestion.
- 5.43 Hotels and guest houses provide for both business and tourist visitors. Additional hotel bed-spaces should be encouraged in sustainable locations. The preferred locations for large hotels will be in town centres. Where there are no suitable sites, edge of town centre or other locations easily accessible by public transport may be considered.
- 5.44 However, in controlled circumstances, it may be appropriate to allow exceptions to a strictly sequential approach. Small hotels and guest houses may be appropriate in residential areas of towns and in villages.
- 5.45 Tourism growth trends indicate that the demand for bed and breakfast accommodation will increase. It is likely that the regular use of even one or

two rooms of a house for bed and breakfast accommodation will be a material change of use requiring planning permission.

- 5.46 For rural proposals, the need is to protect the countryside for its own sake, with aspects such as nature conservation, archaeology, landscape and agricultural land in mind.
- 5.47 In the rural area the Council will be supportive of appropriately located facilities that support the rural economy and rural businesses and which respect the character of the countryside. The Council will weigh the degree to which proposals can be accessible by a variety of modes of transport with benefits to the rural economy and the potential of widening access to the countryside.
- 5.48 The Council will consider all tourism-related development proposals that fall to be considered under this policy in terms of:
- the sustainability of the location, scale and extent of the development;
  - the expected level of activity;
  - the number of visitors;
  - the intensity of use; and
  - the impact on the highway network.

## 6 Countryside and Green Belt

### Policy CGB1: Rural Areas beyond the Green Belt.

In the Rural Areas beyond the Green Belt, as shown on the Policies Map, planning permission will be granted provided that the development:

- a) Is infilling development which does not extend the built core of a Category B village;
- b) Meets a proven local need for community facilities, services or affordable housing in an appropriate location;
- c) Is strictly necessary for the needs of agriculture or forestry;
- d) Relates to an existing rural building;
- e) Is a modest proposal for rural economic development or diversification; or
- f) Would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area.

- 6.1 The Rural Area beyond the Green Belt covers the countryside to the east and north of the District that lies outside of the towns and larger villages identified in Policy SP2. These areas do not meet the necessary criteria to be designated as Green Belt, but it is still necessary to impose restraints on development to prevent inappropriate schemes<sup>90</sup>.
- 6.2 Policy CGB1 sets out the broad typologies of development considered acceptable within the Rural Area Beyond the Green Belt. Where schemes fall within one or more of the categories above, they will be judged against other relevant policies of the Plan.
- 6.3 Policy SP5 explains that proposals within the Green Belt will be judged against the policies of the NPPF to determine whether they are acceptable in principle.

### Policy CGB2a: Exception sites for affordable housing in the Green Belt

Planning permission for limited affordable housing in the Green Belt

- Adjoining Category A villages; or
- Beyond the built core of Category B villages;

<sup>90</sup> The Council's definition of "Rural Areas beyond the Green Belt" is not intended to replicate the NPPF definition of "rural areas" which also includes development within villages, as covered by other policies of this Plan.

will be granted provided that the land is identified for such development in a Neighbourhood Plan or:

- a) It meets a proven local need as identified through a parish survey or other relevant study;
- b) There are no reasonable alternate, suitable and available sites:
  - i. within the defined boundaries of the relevant Category A settlement or the built core of the relevant Category B village; or
  - ii. otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified;
- c) The proposal would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;
- d) The proposed development would not have a substantial adverse impact on the openness or general policy aims of the Green Belt; and
- e) The public benefit of the proposal outweighs any harm that might arise against these aims.

Development permitted in Category C settlements within the Green Belt under Policy SP2 will also need to meet criteria (a) to (e) above.

### **Policy CGB2b: Community facilities, services and affordable housing in the Rural Area Beyond the Green Belt**

Planning permission for community facilities, services or affordable housing in the Rural Area Beyond the Green Belt

- Adjoining Category A villages; or
- Beyond the built core of Category B villages

will be granted provided that the land identified for such development in a Neighbourhood Plan or:

- a) It meets a proven local need as identified through a parish survey or other relevant study;
- b) There are no reasonable alternate, suitable and available sites:
  - i. within the defined boundaries of the relevant Category A settlement or the built core of the relevant Category B village; or
  - ii. otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified;
- c) Any affordable housing would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;

- d) The proposed development would not have a substantial adverse impact on the openness or general policy aims of the Rural Area beyond the Green Belt; and
- e) The public benefit of the proposal outweighs any harm that might arise against these aims.

Development permitted in Category C settlements in the Rural Area Beyond the Green Belt under Policy SP2 will also need to meet criteria (a) to (e) above

The provision of limited market housing to cross-subsidise schemes under this policy will be granted planning permission in exceptional circumstances where it can be demonstrated that the level of market housing proposed is strictly necessary to make the required development deliverable and would accord with criteria (d) and (e) of this policy.

- 6.4 The cost of housing in the District's villages is often higher than in the towns. As such, whilst there are problems of affordability across the District, they are most acute in the rural area.
- 6.5 This Plan proactively identifies a range of development allocations across the District. These will all be expected to contribute towards affordable housing provision and, where justified, new infrastructure resulting in a significant boost in new homes and facilities for local needs.
- 6.6 However, on occasion a small-scale need may still be identified for affordable housing or other types of community facilities to meet rural needs which cannot be met within the adjusted settlement boundaries of the main towns and villages. This policy continues North Hertfordshire's historic approach of allowing specified development on exception sites.
- 6.7 This exception sites policy does not override other relevant policies, such as those relating to biodiversity and landscape. Where a need is identified, it will be necessary to identify an appropriate site for the development.
- 6.8 Any applications under this policy should be supported by specific evidence of need commissioned, or otherwise endorsed by, the relevant Parish Council.
- 6.9 A number of the settlements identified in Policy SP2 are located relatively closely to one another and it may be possible to meet any such needs more sustainably in nearby settlements. In justifying the exception site, applicants should have regard to actual and potential sites both within the parish where development is proposed and in other, nearby locations. In assessing compliance with criterion b of the policies, the Council will have regard to potential alternate sites within both a 15 minute drive time and a 30 minute journey time using passenger transport where the locations are connected by a route providing at least five services per weekday.
- 6.10 Even where affordable housing is delivered under exception policies, residents may still require a significant income. In some instances, this has

led to providers requesting a relaxation of the local occupancy restrictions that are normally placed upon exception sites. This means that the eventual occupants of new homes are not necessarily those for whom the scheme was originally envisaged. In compiling evidence of need, applicants should give consideration to these issues (see Policy HS2 and supporting text).

- 6.11 In exceptional cases, it may be necessary to allow some enabling development. Where market housing is proposed, it must be justified by the submission of viability evidence which will be independently tested at the cost of the applicant.
- 6.12 In all cases, there will remain a general presumption against development which would have a significant adverse impact on the general aims of countryside and Green Belt policies.
- 6.13 Over the lifetime of this Plan, parish councils (or other relevant bodies) may be able to make use of new powers that will enable them to deliver the types of scheme envisaged by this policy directly, and without the need for planning permission<sup>91</sup>. However, in many instances, it may remain preferable to meet such needs through a planning application.

#### Policy CGB3: Rural workers' dwellings

Planning permission for isolated new homes in the countryside to support agricultural, forestry and other rural businesses will be granted provided that:

- a) There is a clearly established existing functional need;
- b) The unit and the rural business concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and should remain so;
- c) The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and
- d) The proposal responds appropriately to the site's local context and the needs of the business in terms of design, scale and function.

Where accommodation is proposed in association with a new business, applicants will need to demonstrate the business is viable with secure future prospects as an exception to criterion (b).

If a new home is deemed essential to support a rural business, it should first be permitted through a time-limited permission, or temporary accommodation such as a caravan. Permission for permanent dwellings will normally only follow in the event of a persistent need.

<sup>91</sup> The Localism Act (2011) includes powers such as Neighbourhood Development Orders and Community Right to Build. These can require examinations and / or referenda in order to be established.

Any temporary or permanent home will be restricted to the occupancy of a worker associated with the business. Planning permission for the removal of agricultural occupancy conditions will only be granted where:

- i. The circumstances which led to the imposition of the relevant condition(s) have significantly changed;
- ii. The building is demonstrably not required or suitable for an agricultural or rural business use; and
- iii. It is clearly evidenced that there is no further need in the locality for an agricultural worker's dwelling.

Where proposals are for development that would be inappropriate in the Green Belt, this policy will be used to help consider and assess any case of very special circumstances.

- 6.14 The significant majority of land in North Hertfordshire remains rural and in productive agricultural use. Agriculture and other rural businesses underpin both the rural economy and the landscape character of the rural areas.
- 6.15 In some limited cases there may be a need for workers to live in close proximity to a specific rural location or use<sup>92</sup>. A functional need test will be applied to establish whether it is necessary for one or more workers to be available at all times in order to sustain the business. This will need to be demonstrated over a period of time.
- 6.16 We will consider the history of the business and land holding to establish the recent pattern of use of the land and buildings. This will include consideration, for example, of whether any existing homes, or buildings suitable for conversion, have recently been sold separately from the land holding concerned. Such a sale could constitute evidence of a lack of need.
- 6.17 Agricultural occupancy conditions are normally imposed to recognise that permission would not otherwise have been granted. Removing these conditions can undermine policies which otherwise seek to restrict the building of new homes in the countryside.
- 6.18 Any such applications will be closely scrutinised. In particular, where criterion (ii) is met, the Council may subsequently resist future applications for further agricultural or rural business premises on the same site.

#### **Policy CGB4: Existing buildings in the Rural Area Beyond the Green Belt**

- a) Planning permission for the re-use, replacement or extension of buildings in the Rural Area beyond the Green Belt will be granted provided that:

<sup>92</sup> Paragraph 55 of the 2012 NPPF

- b) Any existing building to be converted for re-use does not require major extension or reconstruction;
- c) The resultant building(s) do not have a materially greater impact on the openness, purposes or general policy aims of the Rural Area beyond the Green Belt than the original building(s); and
- d) Any outbuilding(s) are sited as close as possible to the main building(s) and visually subordinate to them.

- 6.19 North Hertfordshire has a large number of rural buildings. The traditional houses in the rural area tend to be small cottages which would have been occupied by agricultural labourers. Many of the other rural buildings are barns and agricultural buildings. Such buildings define the character of parts of the District.
- 6.20 However, there are pressures for change to rural buildings which need to be managed. Smaller houses might be attractive in their own right, but often come under pressure for large extensions or complete rebuilding to a larger scale. Likewise, non-residential rural buildings sometimes become obsolete for their original purpose and come under pressure for re-use or replacement.
- 6.21 National policy provides clear guidance on proposals for the re-use, replacement or extension of buildings in the Green Belt which will be used, alongside the detailed design policies of this plan for relevant applications.
- 6.22 We consider that a broadly consistent approach is also justified in the Rural Area Beyond the Green Belt to ensure that similar proposals do not cause harm. Such harm may come from a variety of sources. The extension, alteration or replacement of buildings can change their character negatively, for example where a modest cottage, over time, becomes a mansion.
- 6.23 National guidance seeks to support economic growth in rural areas and also avoid the provision of new, isolated homes in the countryside<sup>93</sup>. Policy CGB4 should be read alongside that advice and viewed in light of the Council's consequential preference that rural buildings be re-used for economic development purposes where possible and consistent with the other policies of this Plan.
- 6.24 In some instances, buildings affected by this policy may additionally be listed or subject to other heritage designations and other relevant policies and guidance will need to be taken into account. All proposals will be considered against the general design policies of this Plan.

#### Policy CGB5: Urban Open Land

In areas of Urban Open Land, as shown on the Policies Map, planning permission will be granted provided that the development:

<sup>93</sup> Paragraphs 28 and 55 of the 2012 NPPF

- a) Would provide land or limited ancillary built facilities for:
  - i. outdoor sport, outdoor recreation or cemeteries;
  - ii. rural land uses or buildings appropriate in an urban fringe location; or
  - iii. landscaping, essential transport infrastructure or other earthworks associated with the development of adjoining allocated sites;
- b) Is low intensity in nature; and
- c) Would maintain openness and respect the transition from the urban area to the rural area beyond.

- 6.25 Green Belt and the Rural Area Beyond the Green Belt provide strong policy protections for the countryside of North Hertfordshire. However, it is important that these designations are, wherever possible, defined using clearly recognisable features.
- 6.26 To the south-east of Baldock, north-east of Royston and south of Little Wymondley, dual carriageway bypasses provide clear, defensible boundaries which can be used to help establish the limits of Green Belt and Rural Area designations.
- 6.27 Leaving all unallocated areas within these boundaries as undesignated 'white land' would mean some land parcels on the urban fringe would not benefit from any specific policy protections. They could be subject to speculative applications which would be detrimental to local character, or would not provide an appropriate transition from the urban to the rural.
- 6.28 However, it is also recognised that, in appropriate circumstances, this land could provide opportunities for the location of access roads or other transport infrastructure, general landscaping, school playing fields, sports pitches or other low-intensity uses associated with nearby development and / or the adjoining settlements. Where such uses are sought within Urban Open Land, all reasonable attempts should be made to maintain openness and careful consideration should be given to the scale of any ancillary buildings and treatments such as boundary fencing or bunding.
- 6.29 Intensive agricultural uses and larger rural buildings, such as new barns and storage facilities, will not be considered appropriate on Urban Open Land. However, it may be possible to accommodate some less-intensive rural land uses and facilities, such as paddocks or small holdings without prejudicing the overall aims of this policy.
- 6.30 In considering the intensity of any proposed uses of Urban Open Land, consideration will be given to the nature and scale of any associated secondary effects, such as vehicular movements, as well as the development itself.



## 7 Transport

### Policy T1: Assessment of transport matters

Planning permission will be granted provided that:

- a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network;
- b) Mechanisms to secure any necessary sustainable transport measures and / or improvements to the existing highway network are secured in accordance with Policy SP7;
- c) Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required; and
- d) For major developments, applicants demonstrate (as far as is practicable) how:
  - i. the proposed scheme would be served by public transport;
  - ii. safe, direct and convenient routes for pedestrians and cyclists will be provided; and
  - iii. comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured.

7.1 Every year, developers add around 20km of new highway to the Hertfordshire's road network. It is important to ensure quality and consistency in these works.

7.2 In assessing development proposals, we will generally be guided by the advice and responses of Hertfordshire County Council as the local highway authority who assess the impacts of development proposals on behalf of the Council as a Statutory Consultee to the planning process. The County Council support the use of Transport Statements, Assessments and supporting documents in order to do this. These reports also guide requirements within the development site.

7.3 Guidance published by the County Council sets out the thresholds at which these are required<sup>94</sup>. The current thresholds are set out below, though it should be noted that:

- site-specific circumstances may result in statements or assessments being requested for development below these thresholds; while
- guidance may be updated over the lifetime of this Plan.

<sup>94</sup> Roads in Hertfordshire – A Guide for New Development (HCC, 2011)

- 7.4 The most up-to-date requirements, including highway design standards, should be referred to as proposals are developed. We will also have regard to relevant national guidance in our decision-making<sup>95</sup>.

Table 1: Thresholds for Transport Statements and Transport Assessments

	Transport Statement	Transport Assessment
Residential	>50 homes	>80 homes
Business	>1,500m <sup>2</sup> Gross Floor Area (GFA)	>2,500m <sup>2</sup> GFA
Industrial	>2,500m <sup>2</sup> GFA	>4,000m <sup>2</sup> GFA
Warehousing	>3,000m <sup>2</sup> GFA	>5,000m <sup>2</sup> GFA
Non-food retail	>800m <sup>2</sup> GFA	>1,500m <sup>2</sup> GFA

- 7.5 Travel Plans should be provided for all developments which exceed the Transport Assessment Threshold. Travel Plans should set out measures that will be adopted by developers that encourage the use of sustainable modes for journeys and reduce single occupancy vehicular travel. We and / or the County Council may require other supporting documents to assess the development, particularly to ensure appropriate arrangements are in place to facilitate delivery, servicing and / or waste collection.
- 7.6 Transport models have been developed to support, and assess the proposals contained in, this Plan. Using these, we have identified a number of mitigation measures that would be needed to support the plan's implementation<sup>96</sup>. Developers should make use of these models and their results when preparing their proposals to ensure assessments are carried out consistently. Developers need to detail the design of schemes and test appropriate mitigation measures.
- 7.7 However, it is also recognised that the modelling carried out to support the Local Plan is more strategic in its nature and developers will be required to supplement these findings with additional local intelligence and modelling to ensure the impacts of their schemes on individual settlements, localities and / or junctions are fully understood and, where necessary, mitigated. Contributions will be sought towards the implementation of relevant schemes in the vicinity of the development site under the requirements of Policy SP7.
- 7.8 It is important to ensure that new developments offer appropriate and practicable sustainable transport alternatives. All major developments should

<sup>95</sup> Including advice in Paragraph 32 of the 2012 NPPF and Planning Practice Guidance.

<sup>96</sup> Preferred Local Plan Model Testing (AECOM, 2016); Infrastructure Delivery Plan (RS Regeneration, 2016)

set out how public transport, walking and cycling will be addressed. In doing so, it is recognised that it may not always be appropriate to incorporate clearly defined provision for all modes, and solutions will vary from urban to more rural areas<sup>97</sup>.

- 7.9 Notwithstanding this, development proposals should provide safe pedestrian access in all instances. On larger developments, demarcated cycle routes should additionally be provided along principal arterial roads. These should connect to lower order streets where safe on-street cycling can be encouraged or where shared spaces might be an appropriate response.

### Policy T2: Parking

Planning permission will be granted provided that:

- a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan;
- b) Parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document;
- c) Proposals have regard to relevant Supplementary Planning Documents, strategies or advice and;
- d) Applicants clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.

Variations from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.

- 7.10 Most development proposals generate demand for parking relating to different users be it for visitors, residents, employees or solely for operational purposes.
- 7.11 Parking is one tool that can be used to influence travel demand and mode of travel. Previous policies to influence car ownership based on maximum standards of parking provision at trip origin (residential parking) are acknowledged to be flawed. Experience in North Hertfordshire shows that insufficient parking provision in residential environments can have an adverse impact. Limiting parking availability at trip origins does not necessarily reduce car ownership and can displace vehicles onto the adjacent local highway network, diminishing the streetscape, causing increased levels of congestion, and potentially obstructing emergency vehicles.
- 7.12 It is now recognised and accepted that, in most locations, demand management through parking is most appropriate at the trip destination (for

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<sup>97</sup> Paragraph 29 of the 2012 NPPF

example commercial, leisure and retail parking). The need for greater parking control has developed in line with the growth of motorised traffic, particularly in the rise in ownership and use of private cars. The emphasis of sustainable transport is now placed on locating residential development where car use is less likely / and or necessary for many trips.

- 7.13 The main priority of this policy is, therefore, to seek to influence car use, through application and assessment of parking standards, promoting use of alternative modes of transport and travel planning, as opposed to restricting car ownership. Many residents may have cars, which influence car ownership levels, but choose to travel sustainably for school or commuting purposes.
- 7.14 Car parking can also impact on the design quality and flood risk of development and as such, consideration should be given to this in accordance with Policy D1: Design and Sustainability.
- 7.15 Parking standards for residential car and cycle parking are set out in Appendix 4 of this Plan. Parking provision in accordance with these standards will generally meet the day to day needs of the occupiers but without over provision. Relevant applications will be required to meet these standards. Recommended standards for other uses, and other types of parking, are set out in supplementary guidance<sup>98</sup>. This document also provides general guidance on issues such as design and layout.
- 7.16 Applications should have regard to this advice and other relevant plans and strategies including those produced by Hertfordshire County Council as the local highway authority and show how they have been taken into account in developing proposals. Advice will be regularly reviewed over the plan period to take account of changes in car ownership and travel patterns and mode share, national policy guidance and any other relevant matters.
- 7.17 The policy also introduces some flexibility in the application of the standards. Where development proposals seek to reduce the standard, applicants will be required to demonstrate justification for such variation based on the principles of the NPPF (paragraph 39 of the 2012 version) and taking into consideration impact on on-street conditions such as highway safety, available on-street capacity as well as likely pedestrian and environmental impacts.

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<sup>98</sup> Vehicle Parking at New Development Supplementary Planning Document (NHDC, 2011)

## 8 Housing strategy

### Policy HS1: Local Housing Allocations

Local Housing Allocations are listed by parish and settlement in Chapter 13 and shown on the Policies Map. Planning permission for residential development and associated infrastructure on these sites will be granted provided that:

- a) Development broadly accords with the indicative number of homes shown;
- b) Proposals successfully address site specific policy considerations; and
- c) Unless site-specific policy considerations state otherwise, a variety of homes are provided in accordance with the general policy requirements of this Plan.

Planning permission for other uses will be refused.

- 8.1 This Plan establishes targets to provide 13,550 homes in North Hertfordshire over the period 2011-2031. Approximately 75% of this number is accounted for by the general allowances and Strategic Housing Sites set out in Chapter 3 (see Policies SP8 and SP14 to SP19).
- 8.2 The remainder will be delivered through Local Housing Allocations within and adjoining the District's towns and villages. These are individually set out in the policies in the Communities chapter of this Plan.
- 8.3 An indicative number of homes is shown for each site based on our evidence<sup>99</sup>. We will take a design-led approach to each site as schemes are brought forward. This may result in housing numbers changing in response to the pre-application and planning application process and our policy approach allows for development to fall within a reasonable range of our initial expectations.
- 8.4 Chapter 13 also sets out detailed considerations for each site that must be taken into account. This includes specific requirements, such as the provision of space for school expansions, or mitigations. Beyond these, all developments will have to comply with any other relevant policies in this Plan.
- 8.5 Where local communities prepare neighbourhood plans, these allocations may be subject to additional requirements or change. Prospective applicants should be mindful of emerging and adopted neighbourhood plans in the parish or settlement where the site is located.

<sup>99</sup> Strategic Housing Land Availability Assessment (NHDC, 2016); Housing and Green Belt Background Paper (NHDC, 2016)

**Policy HS2: Affordable housing**

Planning permission for new homes will be granted provided that:

- a) Affordable housing is
  - i. provided in accordance with the following targets subject to viability:
 

Size of site (gross dwellings)	Target percentage of dwellings to be affordable
11 – 14 dwellings	25%
15 – 24 dwellings	35%
25 or more dwellings	40%
  - ii. delivered on-site unless robustly justified; and
  - iii. genuinely affordable to local people where rents or prices are linked to open-market values
- b) The size, type and tenure of any affordable housing meets:
  - i. the Council’s expectation that 65% of the affordable housing required by criterion (a)(i) will be rented and 35% other forms of affordable housing;
  - ii. the housing needs of the area including needs identified by relevant local authority housing register data, Neighbourhood Plans and any settlement- or parish-level surveys or assessments; and
  - iii. the requirements of Policy HS3 and will contribute to an appropriate mix of housing across the site as a whole;
- c) The affordable housing is secured for first and subsequent occupiers through an appropriate condition or legal agreement providing for
  - i. the retention of dwellings through the Council, a registered provider or similar body agreed with the Council; and
  - ii. where appropriate, review mechanisms
- d) Relevant Supplementary Planning Documents, strategies or advice have been taken into account.

Where development of a site is phased or divided into separate parts, or could reasonably be considered part of a larger development which would exceed the thresholds, it will be considered as a whole for the purposes of affordable housing provision.

8.6 North Hertfordshire is going to be affected by considerable housing growth over the plan period. However, if all the new houses were to be sold privately, the District’s own housing needs would fail to be met. New-forming households on lower incomes would not be able to afford to live locally.

- 8.7 These problems are well recognised across the country as a whole and the Government encourages local planning authorities to set out policies on affordable housing<sup>100</sup>, based on assessments of local housing needs.
- 8.8 Affordable housing is provided for those who cannot access open market housing. It includes social rented and affordable rented housing and intermediate housing, such as shared ownership schemes or other models where they meet the definition of Affordable Housing set in national policy. Affordable Housing is normally delivered in partnership with Registered Providers who assume long-term responsibility for the homes and can include schemes built through Community Land Trusts or other forms of co-operative provision. It is secured with planning conditions and legal agreements to make sure that the benefit of the housing continues in the long term.
- 8.9 At least one-third of new-forming households in the District over the plan period may require assistance with their housing<sup>101</sup>. Over the plan period, this target should be achievable. On most sites, targets to provide up to 40% affordable housing can be supported<sup>102</sup>. Policy SP7 sets out our approach where developers consider that the policy requirements of our plan will adversely affect viability. We will robustly examine any schemes which seek to make affordable housing provision at below target levels.
- 8.10 In circumstances where below target levels of affordable housing are agreed but the Council considers that viability may improve over the lifetime of the proposed scheme, review mechanisms will be built into any relevant agreements. This is more likely to occur in developments with long build-out times, where there is presently a limited comparable market with which to compare viability factors or where approvals are granted at a time of adverse economic conditions.
- 8.11 Our general expectation is that any affordable housing provision required and secured under this policy will be made on site. Although sites of between 10 and 14 units will deliver relatively low numbers of affordable homes, Registered Providers operating in the District are normally willing to take on these small groups of new homes. The onus will be firmly upon the applicant to robustly justify off-site provision or contributions in lieu. On Strategic Housing Sites, or other large schemes, a phased approach to affordable housing delivery will normally only be agreed where this is critical to ensuring viability and / or the provision of supporting infrastructure. The justification for any of these approaches will need to demonstrate how the scheme would contribute to the objective of delivering mixed and balanced communities.
- 8.12 Our normal approach will be to request 65% rented tenures and 35% other tenures for affordable housing to meet the needs of local people and ensure

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<sup>100</sup> As defined in Annex 2 of the 2012 NPPF

<sup>101</sup> Stevenage and North Hertfordshire Strategic Housing Market Assessment Update: Volume Two (ORS, 2016); Review of the Official Projections for North Hertfordshire (ORS, 2020)

<sup>102</sup> Local Plan Viability Assessment Update (DSP, 2016); Housing and Green Belt Background Paper (NHDC, 2016)

viability. This may change as the plan period progresses in response to new evidence or to reflect site-specific circumstances.

- 8.13 The strength of local house prices means that affordable housing products which are linked to open-market sales or rental values will remain out of reach for many households and this issue will need to be taken into consideration. Affordable rent for larger (3+ bed) properties will normally be capped at below 80% of the local market rent. For shared ownership products, the most appropriate initial purchase percentages will be assessed on a case-by-case basis based upon local sales values. The Council will also consider the likely impacts of any proposed service (or other) charges in determining affordability.
- 8.14 We will also need to respond to any changes at the national level such as funding regimes or proposals for new housing products, such as Starter Homes.
- 8.15 In all instances, the most appropriate mix of affordable housing will be negotiated having regard to relevant information including the results of the latest local (parish) or district-wide Housing Needs Surveys, the most recent Strategic Housing Market Assessment, the location of the site and nature of the proposed scheme as a whole.
- 8.16 All affordable housing will be secured through legal agreements. Where appropriate, these agreements will include mechanisms to ensure that those with local connections are given appropriate priority in the allocation of homes. This is particularly relevant for schemes outside of the main towns where occupants of affordable housing on both allocated and exception sites may need to demonstrate a connection either to the parish in which the housing is to be provided, or to another nearby parish where a specific need for affordable housing has been identified. A local connection to the District is normally required to be eligible for inclusion on the housing waiting list.
- 8.17 The Council has prepared supplementary guidance which provides further information on the provision of affordable homes in the District<sup>103</sup>. This will be updated and / or replaced over the lifetime of this Plan. Development proposals should have regard to this information and any other relevant housing strategies.
- 8.18 The situation regarding the provision of affordable housing on the edge of rural settlements as an exception to normal policies of rural restraint is considered in Policy CGB2.

### Policy HS3: Housing mix

Planning permission for new homes will be granted provided that:

<sup>103</sup> Draft Developer Contributions SPD (NHDC, 2022)

- a) An appropriate range of house types and sizes are provided taking into account:
  - i. the overall targets of this plan;
  - ii. the findings of the most up-to-date evidence including the most recent Strategic Housing Market Assessment, the Council's Self-Build Register and other relevant evidence of housing need;
  - iii. the location and accessibility of the site; and
  - iv. recent completions, existing permissions and sites in the five year supply; and
- b) The scheme would provide a density, scale and character of development appropriate to its location and surroundings.

- 8.19 National policy requires local plans to provide for a mix of housing that meets the requirements of different groups within the community<sup>104</sup>. Current evidence suggests it is most appropriate to target a broad balance between smaller (defined as 2-bed or less) and larger (3-bed or more) homes over the plan period.
- 8.20 The majority of completions since 2011 have been for smaller units whilst some of the sites identified through this Plan are specifically anticipated to focus upon small homes and / or flats. These are identified in the relevant site-specific considerations in Chapter 13.
- 8.21 On most suburban and edge-of-settlement sites, applicants should therefore make an initial assumption of 60% larger (3+ bed) and 40% smaller (1 or 2 bed) homes to ensure an overall mix is achieved. The most appropriate solution will be considered on a site-by-site basis having regard to this, up-to-date evidence of housing need, the criteria set out above and the outcomes from applying Policy HS2.
- 8.22 Given the design-led approach to development set out through this Plan, district-wide density standards have not been prescribed. Development on the periphery of settlements should generally be at a lower density to mark the transition to the rural area beyond. In town centres and close to the railway stations higher densities will be considered appropriate in principle but will require particular care in the design with respect to avoiding the sense of overcrowding or congestion. Further advice is set out in the Design policies of this Plan.

#### **Policy HS4: Supported, sheltered and older persons housing**

Planning permission for sheltered and supported housing in uses classes C2 and C3 will be granted provided that:

- a) there is good access to local services and facilities;

<sup>104</sup> Paragraph 50 of the 2012 NPPF

- b) the site is well served by public transport;
- c) appropriate levels of on-site landscaping, amenity space and car parking (for residents, visitors and staff) are provided; and
- d) it would accord with Policy HS3(b).

Planning permission for residential developments of 100 units or more will be granted provided that an element of accommodation within Use Class C3 for older persons housing is included under the requirements of Policy HS3(a) where this would be consistent with criteria (a) to (d) above.

- 8.23 Over the plan period, there will be a substantial increase in the number of and proportion of older residents in North Hertfordshire. The number of people aged 70 or over is predicted to increase by more than 10,000. By 2031, they will account for 1 in every 6 of the population, compared to 1 in 8 now<sup>105</sup>.
- 8.24 This reflects national trends. The 'baby boom' generation born in the period after World War II are now reaching, and surpassing, retirement age.
- 8.25 Older people are living longer, healthier lives and that the forms of specialist housing offered today might not offer the best solutions in future years. Government policy seeks to support people living at home for as long as possible<sup>106</sup>. As a result, the types of home that will be needed by our older residents will vary. Many will continue to live in their own homes with a minimum of support. Others may seek to downsize. However, some people will require more specialist accommodation or assistance.
- 8.26 Other groups will also have support needs, including people of all ages with physical or learning disabilities.
- 8.27 A number of models exist to meet the housing needs that this creates.
- Homes with extra care, sheltered housing and assisted living normally consist of self-contained accommodation in a purpose-built block or small group of homes. Care is provided for those who would like the comfort of knowing assistance is available, or cannot live completely on their own, but do not need significant levels of personal care; while
  - Care or nursing homes provide a degree of personal care and / or long-term assistance for those who cannot live independently.
- 8.28 Accommodation that is self-contained with only modest levels of care will normally fall within use class C3. For the purposes of planning, this will contribute towards the overall targets for new homes identified in Policy SP8. Accommodation with greater levels of care, support and / or communal facilities will tend to fall within use class C2. However, the distinction between these uses can be fine.

<sup>105</sup> Stevenage and North Hertfordshire SHMA update (ORS, 2015)

<sup>106</sup> Stevenage and North Hertfordshire SHMA update (ORS, 2015)

- 8.29 Some future sheltered and supported housing needs will be delivered by the market in response to perceived demand. Further accommodation will be delivered by registered providers. Individual proposals will be assessed having regard to the criteria above.
- 8.30 On larger housing sites we will expect a proportion of new homes to contribute towards the modelled demand for older persons housing<sup>107</sup>. This should include affordable housing provision where appropriate. The most appropriate form(s) of provision will be assessed on a case-by-case basis. On some sites, the provision of a modest number of bungalows or smaller housing units that meet Accessible and Adaptable standards (see Policy HS5) may be the most appropriate approach. On larger sites we may seek a wider range of provision including sheltered and / or supported housing across both the market and affordable elements of provision.
- 8.31 All of our Strategic Housing Sites will be large enough to support the provision of local facilities such as shops and bus routes. It should be possible for each of the sites identified in Policy SP14 to SP19 to accommodate the requirements of this policy. Any additional requirements for these sites in relation to C2 provision are set out in the site-specific policies.
- 8.32 On other sites, we will take a common-sense approach. Where an application is close to essential facilities, and can accommodate supported, sheltered or other older persons provision in a coherent way, we will expect it to be provided. In some instances, such as sites on the edge of villages with fewer facilities, it may not be as practical to insist on these types of homes.

#### **Policy HS5: Accessible and adaptable housing**

Planning permission for major residential development will be granted provided that:

- a) applicants demonstrate that at least 50% of homes can be built to the M4(2) Accessible and Adaptable standard; and
- b) on schemes where 10 or more affordable units will be delivered, 10% of these can additionally be built to the M4(3) wheelchair user standard<sup>108</sup>.

- 8.33 The Government's revised approach to technical standards for new development identifies three categories of accessibility:
- M4(1) – visitable dwellings
  - M4 (2) – accessible and adaptable dwellings; and
  - M4 (3) – wheelchair user dwellings<sup>109</sup>.

<sup>107</sup> The housing types encompassed by this are set out in Figure 38 of the Stevenage & North Hertfordshire Strategic Housing Market Assessment Update: Volume 2 (ORS, 2016)

<sup>108</sup> Under the requirements of Policy HS2, this will normally be on schemes of 25 or more homes.

<sup>109</sup> Building Regulations 2010, Approved Document M: Access to and use of buildings, 2015 edition

- 8.34 Our evidence demonstrates that it is both appropriate and viable to pursue the higher M4(2) and M4(3) standards in North Hertfordshire<sup>110</sup>. Requiring 50% of new homes on major residential schemes to meet the intermediate standard will make a positive contribution to future needs as the population ages. This requirement should be applied across both market and affordable homes.
- 8.35 The highest M4(3) standard should only be applied to homes where the District Council will be responsible for allocating or nominating a person to live in that dwelling<sup>111</sup>. A modest proportion of affordable homes will be required to adhere to this additional standard.
- 8.36 Compliance with M4(2) and M4(3) standards will be monitored through the Building Regulations regime as new homes are built. Planning permissions will be appropriately conditioned to say that this requirement must be met.
- 8.37 However, it is also necessary to ensure that schemes can be built out in accordance with a granted planning permission. Appropriate information should be submitted alongside planning applications. Applicants should demonstrate through their drawings and / or Design & Access statements that the standards can be accommodated when the scheme is built.

#### **Policy HS6: Relatives' and dependents' accommodation**

Planning permission for relatives' and dependents' accommodation formed by the adaptation or extension of the main dwelling will be permitted provided that:

- a) a genuine need for the accommodation is demonstrated;
- b) the annex is subordinate to the main dwelling and designed in such a way that it can be easily (re-)incorporated into the main house if use as an annex ceases;
- c) any development would not exceed the size of extensions that would otherwise normally be acceptable; and
- d) the occupation of the accommodation is restricted by condition.

Free standing annexes will be allowed where the above criteria are met and it can be demonstrated that adaptation or extension of the main house is not possible.

- 8.38 In certain instances, it can be desirable for additional residential accommodation to be provided alongside an existing dwelling. For example, a family with elderly or infirm relatives may wish to provide an annex for them. This is to be encouraged, because it can strengthen family ties and, where the

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<sup>110</sup> North Hertfordshire & Stevenage Strategic Housing Market Assessment Update: Volume 2 (ORS, 2016); Local Plan Viability Assessment Update (DSP, 2016)

<sup>111</sup> Planning Practice Guidance: Housing Optional Technical Standards, Paragraph: 009 Reference ID: 56-009-20150327

dependants were previously occupying a family-sized house, can increase the amount of available housing for others.

- 8.39 Where such accommodation can be provided as a self-contained planning unit such as through subdivision of the existing home or the provision of an additional dwelling, it will be treated as a windfall and normal policies will apply.
- 8.40 Where interdependent accommodation is proposed, or where subdivision or the creation of an additional dwelling would not otherwise be acceptable, this policy will be applied.
- 8.41 Case law surrounding the provision of annexes is complex. Anyone considering building an annex for relatives or dependents should seek professional advice and engage with the Council at an early stage in the process.

#### **Policy HS7: Gypsies, Travellers and Travelling Showpeople**

The Council will protect existing and allocated lawful pitches for Gypsies and Travellers.

The following site, as shown inset into the Green Belt on the Policies Map, is allocated for the provision of permanent Gypsy and Traveller pitches to meet the District's needs up to 2031:

- Policy CD6 - Land at Woodside Place, Danesbury Park Road is allocated for the provision of 4 permanent Gypsy and Traveller pitches.

This site is allocated solely for the accommodation of Gypsy and Travellers that meet the planning definition. Planning Permission will only be granted for development and occupation that meets the planning definition of Gypsy and Travellers. Other uses will not be permitted.

There is no identified need to allocate any transit or travelling showpeoples' sites.

- a) Planning permission for accommodation for Gypsies and Travellers or Travelling Showpeople will be granted where:
- b) it satisfies a demonstrated local need for accommodation;
- c) the intended occupants meet the planning definition of Gypsies and Travellers, or Travelling Showpeople, as set out in government guidance or case law;
- d) residents of the proposed site can access local services such as shops, schools, public transport and medical facilities within a reasonable distance from the site and where those facilities have capacity to meet the needs of the site's residents;
- e) the proposed site:

- i. does not conflict with any other development plan policy or national policy including flood risk, agricultural land classification, contamination and hazardous development, and has no significant adverse impact on the character and appearance of the countryside, or on features of significant biodiversity or heritage importance;
- ii. has no significant adverse impact on the amenity of nearby residents or adjoining land users and can be successfully screened and contained within a specified boundary;
- iii. has adequate and safe access from a suitable road, and adequate parking, storage, turning and servicing on site;
- iv. is capable of being serviced with water, electricity, sewerage and rubbish disposal; and
- v. will provide a safe, inclusive and secure environment for the residents in an appropriate location to meet their needs.

Where all the above criteria are met, proposals for sites for Gypsies, Travellers and Travelling Showpeople may be appropriate in the countryside as rural exception sites (in line with Policy CGB2b) but Green Belt policies would still apply.

- 8.42 The Local Plan should make appropriate provision to meet the needs of Gypsies, Travellers and Travelling Showpeople in North Hertfordshire. The Council's evidence<sup>112</sup> shows that there is no identified need for transit or travelling show people sites but a need to provide four additional pitches for Gypsies at Danesbury Park Road.
- 8.43 There is currently one private Traveller site at Pulmer Water in the parish of Codicote. This consists of twelve permanent pitches. There is a further site at Danesbury Park Road which currently benefits from a temporary planning permission and is allocated in this Local Plan to meet the identified need. Historically, the District has not been an area where significant numbers of Gypsies, Travellers or Travelling Showpeople have resided in or resorted to, which is supported by figures for unauthorised encampments and developments.
- 8.44 As with affordable housing, current government guidance allows Gypsy and Traveller sites to be located in the open countryside, as an exception to normal policies of control. This is in recognition of the particular difficulties that Gypsies and Travellers have obtaining and affording land within settlements.
- 8.45 The site at Pulmer Water has a complex planning history and consists of Gypsy and Traveller provision adjoining a caravan park with permission for residential use. A robust and up-to-date assessment of current occupation and the future needs arising from this site, alongside any needs from

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<sup>112</sup> Gypsy and Traveller Accommodation Assessment Study (2018); NHDC Note on Gypsy and Traveller provision (2020)

elsewhere in the District, will be required to inform the proposed early review of the Plan (see Policy IMR2 in the Delivery Chapter).

## 9 Design

<b>Policy D1: Sustainable design</b>
<p>Planning permission will be granted provided that development proposals:</p> <ul style="list-style-type: none"> <li>a) Respond positively to the site's local context;</li> <li>b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:                             <ul style="list-style-type: none"> <li>i. create or enhance public realm;</li> <li>ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);</li> <li>iii. reduce energy consumption and waste;</li> <li>iv. retain existing vegetation and propose appropriate new planting;</li> <li>v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;</li> <li>vi. future proof for changes in technology and lifestyle;</li> <li>vii. design-out opportunities for crime and anti-social behaviour; and</li> <li>viii. minimise the visual impact of street furniture and parking provision;</li> </ul> </li> <li>c) Have regard to the Design SPD, and any other relevant guidance;</li> <li>d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and</li> <li>e) For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.</li> </ul>

- 9.1 National guidance states that planning should achieve high quality and inclusive design for all development. Development proposals should consider the potential for minimising their impact on the environment both during construction and throughout the life of the development whilst creating development that responds to and enhances its surroundings. It's also recognised that good quality design is essential for health and well-being.
- 9.2 Development must respond positively to the site and the local context taking into consideration position, orientation, scale, height, layout, massing, detailing and use of materials.
- 9.3 A Landscape and Visual Impact Assessment (LVIA) should be undertaken to assess the significance and effect of development proposals on the landscape and peoples views and visual amenity. Design and Access Statements (DAS) are required for most planning applications. A DAS require applicants to

explain and justify the key elements of the proposal and show that the physical, economic, policy and social context of the site and its locality have been taken into account.

- 9.4 Public realm, publicly accessible space, creates the character and sense of place for our environment. Enhancing existing public realm or creating new using high quality materials, design and workmanship will result in a high quality environment that makes a positive contribution to a sense of place and healthy communities. Developers are expected to have regard to emerging advice and good practice to ensure that development schemes positively contribute to the public realm, local street scene and wider landscape through high quality design.
- 9.5 Sustainable Drainage Systems (SuDS) if incorporated into the layout of the development at the early stages can have a positive impact not only on the local drainage system but also on the landscape amenity and biodiversity of the site. Trees, shrubs and other soft landscaping provide a number of environmental benefits, ranging from climate change mitigation to the management of surface water drainage and flood risk. Further information is provided in Natural Environment Policy NE8: Reducing Flood Risk and NE9: Sustainable Drainage Systems
- 9.6 Using innovative design to reduce energy consumption and waste from the construction and use of buildings can optimise the potential of the site and have a positive influence on the environment. Development should seek to minimise carbon emissions and maximise opportunities for the generation of energy from renewable sources, so far as is practicable given other policies in this plan and viability considerations. The efficient use of new materials from local or sustainable sources, together with the reuse and recycling of materials will help to reduce the energy used and the waste created in the development. It will also help the development to achieve local character and distinctiveness. The policy encourages sustainable design, and the use of materials and technologies that will ensure that the energy used in the construction and throughout the life of the development will be minimised.
- 9.7 Existing vegetation should influence the layout and design of development. A vegetation condition survey should be undertaken to ascertain what plants within and adjoining the site, which would be affected by development, are worthy of retention and what protection measures should be put in place during construction. The British Standard BS5837: Trees in relation to design, demolition and construction – recommendations sets out guidance on tree retention, effect of trees on design considerations and means of protecting trees during construction.
- 9.8 Development proposals should consider how the scheme will integrate with the existing circulation patterns particularly pedestrian, cycle and public transport. Safe and secure pedestrian and cycle routes should be provided both within the site and linking into the wider network. The policy seeks to ensure that the design and location of new development makes it accessible to all potential users. There is a need to ensure that where appropriate, new

development includes facilities or open space that is conveniently located and easy to gain access to by all potential users.

- 9.9 The potential for future changes in technology and lifestyles should be considered when planning and designing schemes to ensure flexibility in the use of buildings throughout their life.
- 9.10 Creating safe and attractive places by designing-out opportunities for crime and anti-social behaviour through the incorporation of physical and management measures will help to minimise the risk of crime. Development should be built to the Police preferred minimum security standard of Secured By Design SBD Part 2. The location of parking areas should ensure that they create safe and secure places to leave and access vehicles.
- 9.11 Street furniture such as signs, lighting columns, bins and seats can create clutter and have a negative impact on the visual quality of an area. Similarly, parking areas need to be well designed and integrated into the development scheme. Good design can ensure that cars and street furniture are not dominant features in new developments.
- 9.12 Development proposals should be in line with current regulations and guidelines and any future changes in Legislation or to the Building Regulations that will affect the sustainability of a building. North Hertfordshire lies in an area of serious water stress. Both the Environment Agency and Anglian Water support the introduction of the optional water efficiency standard within the district therefore, the lower figure of 110 litres per person per day for water consumption is sought. The introduction of the lower standard will have a marginal impact on scheme viability in the area.
- 9.13 Building Futures<sup>113</sup> is an interactive tool for new development in Hertfordshire. Building Futures is mentioned in the Design SPD<sup>114</sup> and developers are strongly encouraged to look at this suite of documents, which provide practical and technical guidance on reducing the environmental impact of development, and will be helpful in enabling developments to satisfy this policy. Information on the Hertfordshire Design Review Panel and the way it can advise on development proposals is also available.
- 9.14 Sport England's Active Design guidance on how the design and layout of residential and other areas plays a vital role in keeping communities healthy and active should be considered.
- 9.15 Further guidance is set out in the Design SPD which covers key principles for all development within the District and specific principles for each of the four towns, the villages and the rural area. The Design SPD identifies other relevant guidance prepared for North Hertfordshire such as Conservation Area Statements, Town Centre Strategies, Urban Design Assessments, Landscape Character Assessments, the Green Space Strategy and the Green

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<sup>113</sup> Building Futures – A Hertfordshire web-based guide to promoting sustainability in development.

<sup>114</sup> Design SPD (NHDC 2011)

Infrastructure Plan. These documents are available to view on the Council's website and are updated on an on-going basis.

- 9.16 For development proposals in Letchworth Garden City reference should be made to the Letchworth Garden City Design Principles set out in Appendix 5 of this Plan.

**Policy D2: House extensions, replacement dwellings and outbuildings**

Planning permission for house extensions will be granted where:

- a) The extension is sympathetic to the existing house in height, form, proportions, roof type, window details, materials and the orientation of the main dwelling; and
- b) The extensions do not dominate adjoining properties and:
  - i. it is well related to the floor levels of adjoining properties,
  - ii. there is an appropriate distance between the proposed extension and the windows of the adjoining properties; and
  - iii. spacing between buildings ensures there is no harm to the character and appearance of the streetscene.

Planning permission for replacement dwellings and outbuildings will be granted where:

- c) The proposal does not harm the character and appearance of the site; and
- d) The location of the proposal does not have an adverse impact on the character and appearance of the streetscene or area.

- 9.17 There is a need to maintain a high-quality environment in residential areas and across the district as a whole whilst allowing flexibility with regard to house extensions, replacement dwellings and outbuildings. The policy requires that consideration is given to the effect that a proposal may have on the living conditions of neighbouring occupiers and the character and appearance of the locality in which they are proposed as these are matters that can often be overlooked with the desire for increased living space.

- 9.18 This policy also serves to protect the character and appearance of those remaining modest rural workers dwellings and to ensure that proposals for replacement or extension of dwellings in the countryside would not have a materially greater impact. Further guidance for proposals in rural areas is set out in the Countryside and Green Belt policies.

**Policy D3: Protecting living conditions**

Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions

Where the living conditions of proposed developments would be affected by an existing use or the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted.

- 9.19 All development has the potential to have an adverse impact on its neighbours, in a wide variety of ways. Such harm may arise from traffic generation, parking, loss of daylight and sunlight, noise, overlooking, pollution (including light pollution) and dominance as well as other issues.
- 9.20 A significant number of proposed sites for housing in the District are on previously developed land within urban areas. Such sites are often close to existing residential areas. Care is needed to ensure that the adverse impacts of any such development on neighbouring residents is minimised. It is not practical to provide absolute protection for existing residents' current living conditions, instead, there is a need to ensure that any impacts a development has are identified and appropriate mitigation built into the scheme.
- 9.21 In the rural area, farm diversification schemes can help support the District's rural economy. However, some diversification schemes could seriously affect the living conditions of the surrounding area, especially if they generate significant traffic.
- 9.22 There are two ways mitigation may occur. Either the development can incorporate measures to reduce the effect it has, or it can fund works off site to reduce the impact on those affected by it. This latter course of action may be appropriate for development such as the expansion of airfields, where there will inevitably be an increase in noise, but it may be possible to provide sound protection to those buildings affected by that noise.
- 9.23 This policy also covers the situation where there is an existing use which will have an adverse impact on a proposed residential development site. The proposed development will need to show that satisfactory living conditions will be achieved taking into account the nature of the existing development – for example, homes proposed in a noisy area.
- 9.24 London Luton Airport immediately adjoins the District to the west. Development potentially affected by noise from the airport will need to ensure that appropriate mitigation measures are incorporated. Site-specific criteria for relevant allocated sites are set out in the Communities section of this plan.

#### **Policy D4: Air quality**

Planning permission will be granted provided that development proposals:

- a) Give consideration to the potential or actual impact on local air quality, both during the demolition/ construction phase and as a result of its final occupation and use;
- b) Propose appropriate levels of mitigation to minimise emissions to the atmosphere and their potential effects upon health and the local environment; and
- c) Carry out air pollution impact assessments, where required, to determine the impact on local air quality of the development.

Where an air quality impact assessment demonstrates that a development is unacceptable from a local air quality perspective the development will be refused.

Where air pollution impact assessments are not required there will still be a requirement on developers to provide appropriate levels of mitigation to address emissions of pollutants to the atmosphere.

- 9.25 This policy supports Policy D3: Protecting living conditions but also encourages sustainable development, in particular sustainable transport (Policy SP6: Sustainable Transport). The District will be accommodating a significant amount of development during the plan period which will undoubtedly generate additional road traffic and put added pressure on existing road networks. Therefore, because the major source of local air pollution in the District originates from road traffic emissions it is important for this Plan to deal with the implications for air quality of the anticipated development.
- 9.26 The outcome of the air pollution impact assessment will be used to determine the nature and scale of the steps that should be taken to remove or reduce the scale of those concerns. Ideally this will occur at the design, planning and/or development stage, but may in certain circumstances rely on post development mitigation measures.
- 9.27 Two of the main roads that cross the District do so on a north – south axis: the A1(M) and A10. Another main road is the A505 that traverses the District on a southwest – northeast axis. It is the A505 that is currently directly associated with air quality concerns because it passes through the four main population centres of the District namely Hitchin, Letchworth Garden City, Baldock and Royston. Of particular concern is the area in the south of Hitchin. Notably Stevenage Road (A602) near the Hitchin Hill roundabout, which has been designated an Air Quality Management Area (AQMA) and the Payne’s Park roundabout at the A602 junction with the A505 which was designated an AQMA in 2016.
- 9.28 The NPPF<sup>115</sup> states that air pollution is a material planning consideration and more specifically that planning policies should sustain compliance with and contribute towards national objectives for air pollutants and the presence of AQMAs and their Action Plans. Furthermore, it states that the effects

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<sup>115</sup> Paragraph 124 of the 2012 version of the NPPF.

(including cumulative effects) of pollution on health should be taken into account. Therefore, because each local authority will have its own unique causes and contributing factors to elevated levels of air pollution it is vital that local development documents include policies to appropriately influence the District's specific development demands.

- 9.29 The policy addresses the protection of the health of the residents of proposed developments, as well as the protection of the residents of existing properties particularly, although not exclusively, those that live in close proximity to the District's roads. In addition to the air quality problems identified in Hitchin that are associated with elevated nitrogen dioxide (NO<sub>2</sub>), levels of NO<sub>2</sub> are close to exceeding a national air quality objective around the A505 in the Hitchin Street / Whitehorse Street area of Baldock. Furthermore, particulate matter air pollution is a public health concern, which is reflected by the presence of a national air quality objective and a public health outcome indicator.
- 9.30 The policy will allow the Council to achieve a consistent and transparent approach to the development of land where air quality concerns are relevant. It will also help to influence the nature of such developments so as to minimise or remove the potential for adverse impacts on air quality. Or where appropriate, identify and justify the need for and nature of measures to help to mitigate any otherwise unavoidable adverse air quality impacts from permitted developments.
- 9.31 The following are types of developments for which the Council would expect the submission of an air quality impact assessment:
- Within, or adjacent to an AQMA, applications for:
    - housing;
    - biomass or other forms of combustion boiler;
    - industrial developments;
    - car parks; and
    - any other development likely to significantly increase vehicle movements
  - Anywhere else in the District, applications that are considered to be 'major' in scale for example:
    - significantly increase car parking facilities;
    - significantly increase vehicle movements, particularly heavy duty vehicles;
    - introduce biomass or other combustion boilers and industrial processes of a particular scale;
  - Or that:
    - introduce humans to an area where air pollution is an issue, but where humans were previously not present
- 9.32 For other types of developments an air quality impact assessment will not be required but there will be a requirement for the developer to negotiate and agree air quality mitigation measures that are proportionate to the scale of the proposed development. This requirement is in place to provide an opportunity to address the cumulative impacts of smaller, or less sensitively located,

developments that nonetheless will be making a contribution to the emission of air pollutants.

- 9.33 A more detailed description of the type of air pollution mitigation required for developments and those developments considered to be 'major' can be found in the NHDC Air Quality Planning Guidance Document<sup>116</sup>.
- 9.34 Methods available to mitigate the impact of developments on air quality may fall into a number of categories and will be considered against other relevant policies in the Plan:
- appropriate parking standards
  - accommodating infrastructure to support the use of low emission vehicles
  - appropriate location and design of buildings
  - incentives to support initiatives for public transport, car sharing and using alternative modes of travel
  - contributions to improve road and traffic management, infrastructure to support alternative modes of travel and air quality monitoring
- 9.35 This is not an exhaustive list and more detail will be found in the NHDC supplementary Air Quality Planning Guidance Document.

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<sup>116</sup> North Herts Air Quality Planning Guidance Document (2016)

## 10 Healthy Communities

### Policy HC1: Community facilities

Planning permission for new community facilities will be granted provided that they are:

- a) Appropriate in scale having regard to their local context;
- b) Accessible by a range of transport modes; and
- c) Would meet an identified need in the local community.

Proposals for the redevelopment of sporting facilities will be supported where the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss of the existing facilities.

The loss of community facilities will only be permitted where this is justified by:

- i. the provision of replacement facilities, either on site as part of the development proposal or in an alternative appropriate location;
- ii. showing that there is no local need for the facility or service and that any appropriate, alternative community use of the existing premises to meet local needs is not required; or
- iii. demonstrating that the facility, or any reasonable replacement, is not, and will not be viable on that site.

- 10.1 The National Planning Policy Framework recognises that the planning system plays a role in facilitating social interaction and creating healthy, inclusive communities. Community and recreation facilities, together with green spaces play an important role in enabling people not only to participate in physical activities but also in cultural pastimes, all of which can help to enhance physical, spiritual and mental well being.
- 10.2 Community facilities include: town and village halls, community centres, sports halls, theatres, museums, libraries, places of worship, doctors and dental surgeries and schools. Development proposals which affect local shops and pubs will be considered under Policy ETC7: Scattered local shops and services in towns and villages.
- 10.3 The Local Plan can help towards meeting the objective of making communities healthier through the retention and provision of cultural, leisure and community facilities.
- 10.4 It is anticipated that many of the new community facilities that will be required over the lifetime of this Plan will be provided in association with the strategic developments allocated in this Plan. However, there may still be occasions where the provision of new, or extension of existing, facilities in other locations is required.

- 10.5 It is important that these facilities are situated within local communities so that they are accessible, help to reduce the need to travel and provide opportunities for people to participate in activities within their own community. One way that this can be achieved is through the shared use of facilities such as the dual use of school facilities for sport and other community uses in appropriate locations.
- 10.6 The Council's Community Halls Strategy and Indoor Sports Facility Strategy and Action Plan set out detailed guidelines for the provision of new community facilities which developers should take into account in the design of any new development<sup>117</sup>.
- 10.7 At the same time, existing facilities, whether publicly or privately owned, can be subject to development pressures for alternative uses. It is important that, where appropriate, such facilities are retained within the local community.
- 10.8 Some local facilities can be listed as an Asset of Community Value (ACV). This provides additional protections if the owners wish to change the use of, demolish and / or sell the facility. The fact that a facility is an ACV can be an additional material consideration in the determination of any planning applications. The Monitoring and Delivery section provides additional information on ACVs.

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<sup>117</sup> Community Halls Strategy for North Hertfordshire (NHDC, 2011); Indoor Sports Facility Study, (NHDC, 2016)

## 11 Natural Environment

### Policy NE1: Strategic green infrastructure

Planning permission will be granted provided that development:

- a) Protects, conserves and where possible enhances the strategic green infrastructure network;
- b) Avoids the loss, fragmentation, severance or negative impact on the function of the strategic green infrastructure network;
- c) Creates new strategic green infrastructure where appropriate and is accompanied by a plan for its long-term maintenance and management; and
- d) Has suitable mitigation measures or appropriate replacement to satisfactorily address adverse impacts on the strategic green infrastructure network.

- 11.1 Protection of those sites which contribute to the diversity of strategic green infrastructure throughout the District from inappropriate development is important. However, in some cases it needs to be acknowledged that appropriate mitigation measures would enable development to take place.
- 11.2 This policy will also ensure that when new strategic green infrastructure is created appropriate management and maintenance regimes are in place to provide the framework for its long-term use.
- 11.3 North Hertfordshire has significant strategic green infrastructure assets. These are identified in the North Hertfordshire District Green Infrastructure Plan<sup>118</sup> and include:
  - ancient woodlands (e.g. at Newton Wood),
  - biodiversity rich landscapes (e.g. Therfield Heath),
  - other valued landscapes and the Chilterns AONB (see also policies NE2 and NE3)
  - chalk streams, rivers, and valleys (e.g. Lilley Bottom and the Mimram valley).
  - the historic designed landscapes of Letchworth Garden City and the literary associations of Forster Country, north of Stevenage, and
  - the rights of way networks, and long distance walking and cycling connections, e.g. the Chiltern Way, Hertfordshire way, National Cycle Route No.12.
- 11.4 The plan also identifies areas of strategic green infrastructure deficiency as well as opportunities to create new strategic green infrastructure not yet identified. New development should be connected to strategic green infrastructure networks which provide high quality, direct linkages across the

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<sup>118</sup> North Hertfordshire District Green Infrastructure Plan (2009)

development where possible. Developers should use the guiding principles set out in the Green Infrastructure Plan to influence all development proposals from an early stage in the design process.

### Policy NE2: Landscape

Planning permission will be granted for development proposals that:

- a) Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management;
- b) Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;
- c) Are designed and located to ensure the health and future retention of important landscape features; and
- d) Have considered the long-term management and maintenance of any existing and proposed landscaping.

- 11.5 National policy<sup>119</sup> requires the protection and enhancement of valued landscapes. The emphasis of the policy is to ensure that the design of a development proposal is sensitive to the local context to ensure that the scheme makes a positive contribution to the landscape.
- 11.6 The policy aims to protect and enhance the quality of the natural environment by requiring development proposals to take into account the landscape character and environmental features and built form of its surrounding area.
- 11.7 The guidelines referred to at criterion 'a.' of the policy originate from the North Herts Landscape Study<sup>120</sup> which provides an assessment of the character of the landscape within the District. There are 37 separate landscape character areas covering the District, some lie totally within the District while some extend into adjoining districts. The study provides a description of the distinctive characteristics of each landscape character area based on factors such as the geology, landform, soil types and historical activities for each area.
- 11.8 The North Herts Landscape Study also identifies the inherent sensitivities of each character area in landscape and visual terms together with its capacity to accommodate a range of different types of development. Development should respect the sensitivities of each landscape character area and accord with the guidelines for managing change identified for each landscape character area in relation to built development and landscape management,

<sup>119</sup> Paragraph 109 of the 2012 NPPF.

<sup>120</sup> North Hertfordshire Landscape Study (Character, Sensitivity and Capacity) 2011

whilst recognising that some impacts on landscape are inevitable if future development needs are to be met.

### **Policy NE3: The Chilterns Area of Outstanding Natural Beauty (AONB)**

Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted provided that it:

- a) Is appropriate in scale having regard to national planning policy;
- b) Conserves and where possible enhances the Chilterns AONB's special qualities, distinctive character and biodiversity, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation;
- c) Is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;
- d) Has regard to the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;
- e) Has regard to the Chilterns Building Design Guide and technical notes by being of high-quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and
- f) Avoids adverse impacts from individual proposals (including their cumulative effects) unless these can be satisfactorily mitigated.

11.9 Part of the District between Hitchin, Lilley and Hexton (which follows the escarpment of the Chiltern Hills) has been recognised as being of national importance and forms part of the Chilterns Area of Outstanding Natural Beauty (AONB).

11.10 Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning status as National Parks.<sup>121</sup> The Chilterns AONB was designated in 1965 and extended in 1990. The Countryside and Rights of Way Act 2000 places a statutory duty on local authorities to have regard to the purpose of conserving and enhancing the natural beauty of AONBs when coming to decisions or carrying out their activities relating to, or affecting, land within these areas<sup>122</sup>.

11.11 The Chilterns AONB covers 13 local authorities and the Councils work together to safeguard the future of this shared nationally protected area through the Chilterns Conservation Board. The Board prepares a statutory

<sup>121</sup> Paragraph 115 of the 2012 NPPF

<sup>122</sup> Countryside and Rights of Way Act 2000 Section 185.

AONB Management Plan which has been endorsed by the Council as a material consideration in planning decisions<sup>123</sup>.

- 11.12 Proposals for development within the AONB will be considered against national guidance. Where the proposed use can be considered acceptable in principle, we will use the detailed policies of this Plan to determine whether permission should be granted.
- 11.13 The AONB is a nationally designated landscape and as such permission for major developments within its boundaries will be refused unless exceptional circumstances prevail as defined by national planning policy<sup>124</sup>. National guidance explains that whether a proposal constitutes major development is a matter for the relevant decision taker, taking into account the proposal in question and the local context<sup>125</sup>.
- 11.14 In determining compliance with criterion b, actions to conserve and enhance the AONB shall be informed by a landscape assessment, having considered any relevant landscape character assessments and landscape and visual impact assessments and shall focus upon:
- i. the Chilterns AONB's special qualities which include the steep chalk escarpment with areas of flower-rich downland, broadleaved woodlands (especially beech), commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures;
  - ii. the scope for enhancing and restoring those parts of the landscape which are previously developed, degraded or subject to existing intrusive developments, utilities or infrastructure;
  - iii. locally distinctive patterns and species composition of natural features such as chalk downland, trees, hedgerows, woodland, field boundaries, rivers and chalk streams;
  - iv. the locally distinctive character of settlements and their landscape settings, including the transition between man-made and natural landscapes at the edge of settlements;
  - v. visually sensitive skylines, geological and topographical features;
  - vi. landscapes of cultural, historic and heritage value;
  - vii. important views and visual amenity;
  - viii. Tranquillity, dark skies and remoteness and the need to avoid intrusion from light pollution, noise, and motion; and
  - ix. in the case of major development proposals, shall be informed by landscape and visual impact assessment, having considered all relevant landscape character assessments.
- 11.15 Development proposals which lie outside the AONB but within its setting can also have impacts on it. The Council's duty of regard applies to development outside but which would affect land in an AONB<sup>126</sup>. Although it does not have

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<sup>123</sup> Government's Planning Practice Guidance 8-004-20140306 paragraph 004.

<sup>124</sup> Paragraph 116 of the 2012 NPPF

<sup>125</sup> Government's Planning Practice Guidance 8-004-20140306 paragraph 005.

<sup>126</sup> Countryside and Rights of Way Act 2000 Section 85.

a defined geographical boundary, the setting of the Chilterns AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB. Advice on development in the setting of the AONB is contained within guidance produced by the Chilterns Conservation Board<sup>127</sup>.

#### **Policy NE4: Biodiversity and geological sites**

Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.

All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.

Applicants should, having regard to the status of any affected site(s) or feature(s):

- a) Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;
- b) Demonstrate that adverse effects can be avoided and / or satisfactorily minimised having regard to the hierarchy of protection below:
  - i. locating on an alternative site with a less harmful impact;
  - ii. providing adequate mitigation measures; or
  - iii. as a last resort compensated for.

The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.

- c) Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;
- d) Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites

<sup>127</sup> Chilterns Conservation Board position Statement on Development affecting the setting of the Chilterns AONB.

(locally designated sites and above), trees and hedgerows. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees; and

- e) Provide a long-term management and monitoring plan including mitigation measures as necessary.

Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.

- 11.16 Sites allocated in this Plan that have the potential to impact on designated biodiversity sites are required to provide an ecological survey and provide mitigation and/or off-setting measures as necessary. Where appropriate the Strategic Policies and Communities sections of this Plan provide site-specific policies relating to the impact on designated sites, for instance on Therfield Heath SSSI or Wain Woods SSSI.
- 11.17 Sites can contain important habitats or species even where they are not formally designated. These may be identified by the Hertfordshire Environmental Records Centre, other relevant sources (such as the Government's 'MAGIC' mapping tool) or through the survey process as being of ecological interest and should be afforded an appropriate level of protection.
- 11.18 Ecological surveys will be expected to involve an objective assessment of ecological value and identify any priority habitat, protected or priority species on site with survey data and site assessment to establish the potential impact. Surveys should be consistent with BS42020 Biodiversity- Code of Practice for Planning and Development, or as superseded, and use the DEFRA Biodiversity Metric<sup>128</sup>, or as superseded, or any statutorily prescribed alternative to assess ecological value and deliver measurable net gain.
- 11.19 Development proposals will be expected to maximise opportunities for net gains, or contribute to improvements in biodiversity. This methodology will ensure that appropriate mitigation or compensation is provided to meet the aims of national policy and is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site.
- 11.20 Where off-site compensation is delivered as a last resort, the ecological networks mapping system developed by the Herts and Middlesex Wildlife Trust and Local Nature Partnership should be used. This provides the basis of

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<sup>128</sup> The DEFRA Biodiversity Metric is a tool used to quantify the value of biodiversity at any site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of required offsite compensation.

The current Biodiversity Metric is available at :

<http://publications.naturalengland.org.uk/publication/6049804846366720>

targeted habitat creation to maximise the benefits to biodiversity of any required ecological measures.

- 11.21 Certain habitats (such as chalk grassland) are priority habitats for the District. Restoration, mitigation and any compensation measures should focus on these priority habitats as described in the Hertfordshire Biodiversity Action Plan<sup>129</sup>.
- 11.22 Developments are required to demonstrate how existing wildlife habitats such as trees, hedgerows, woodlands and rivers (and any connective features between them) will be retained, safeguarded and managed during and after development, including the provision of buffers where required.
- 11.23 Where necessary, a management plan outlining mitigation and monitoring measures may be required to sensitively manage any issues arising as a result of the development on biodiversity or geodiversity assets and will be secured through planning conditions or obligations.
- 11.24 Net gains can be delivered through the provision of soft landscaping, including trees, shrubs and other vegetation to support wildlife habitats as identified by the Hertfordshire Biodiversity Action Plan<sup>130</sup>. Similarly, the provision of permanent integrated features for wildlife can contribute to net gains, for instance the provision of bat and swift boxes, particularly where development borders open space.

#### **Policy NE5: Protecting open space**

Planning permission will only be granted for any proposed loss of open space provided that:

- a) It can be demonstrated that the open space is surplus to requirements and justified on the basis of:
  - i. the quality and accessibility of the open space;
  - ii. the extent to which the open space is serving its purpose;
  - iii. the quality and accessibility of alternative public open space; and
- b) It is mitigated against by:
  - i. re-provision of an appropriate open space taking into account quality and accessibility; and/ or
  - ii. financial contributions towards new or existing open space where:

<sup>129</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, [http://www.hef.org.uk/nature/biodiversity\\_vision/index.htm](http://www.hef.org.uk/nature/biodiversity_vision/index.htm)

<sup>130</sup> Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, [http://www.hef.org.uk/nature/biodiversity\\_vision/index.htm](http://www.hef.org.uk/nature/biodiversity_vision/index.htm)

- the required provision cannot reasonably be delivered on-site; or
- the required provision cannot be provided on site in full; and
- the proposal has over-riding planning benefits.

### **Policy NE6: New and improved open space**

Planning permission will be granted for development proposals that make provision for new and/or improved open space which:

- a) Meets the needs arising from the development having regard to the Council's open space standards and other relevant guidance;
- b) Contributes towards improving the provision, quality and accessibility of open space; and
- c) Incorporate any necessary open space buffer(s) for landscape, visual, ecological or air quality reasons.

Any on-site provision must include a long-term maintenance and management plan, and where required phasing plans, to demonstrate delivery.

Any built facilities within new or existing open space must be ancillary to the primary use and of an appropriate scale and design. Measures should be taken to integrate such facilities into the landscape

Proposals for new open spaces which meet identified needs will be encouraged in suitable locations, served by a choice of sustainable travel options.

Financial contributions towards the provision of open space will be considered only where it can be demonstrated that the requirements of policy NE5 part (b)(ii) are met.

Where a development is phased, or a site is either divided into separate parts or otherwise regarded as part of a larger development, it will be considered as a whole for the purposes of open space provision.

11.25 Types of open spaces for the purposes of this policy are categorised as:

- Parks and Gardens
- Amenity Green Space
- Provision for Children and Young People
- Outdoor Sports Facilities (including schools)
- Natural and Semi-Natural Greenspace
- Green Corridors
- Cemeteries and Churchyards
- Allotments and Community Gardens

- 11.26 In 2009 the Council commissioned the Green Space Study to understand the existing quantity and accessibility of different types of open space. To ensure the evidence was up-to-date in accordance with current national policy, the Council undertook a review of open space provision across the District in 2016.
- 11.27 The Open Space Review defines the types of open space, sets out the current provision of open space, identifying deficits, surpluses as well as priorities for improvement and suggested standards for open space provision associated with new development. The review analyses open space provision in the four main towns of Hitchin, Letchworth Garden City, Baldock and Royston, as well as in rural areas. The Council also currently has a number of Action Plans<sup>131</sup> that set out open space priorities, which along with other relevant guidelines<sup>132</sup> can be used when determining the type of open space required.
- 11.28 Over the plan period it is anticipated that some open spaces could come under pressure for development. It is therefore vital that any proposed loss of open space is carefully considered to ensure that both the existing and future population of North Hertfordshire has sufficient access to open space. In parts of the District where there are identified deficiencies in open space, any proposed loss would be subject to increased scrutiny.
- 11.29 As well as guarding against losses we also need to ensure provision of open space on new development and securing improvement to existing spaces.
- 11.30 It is vital to ensure that any on-site open space in new development is high quality, complements the landscape setting and is fully publically accessible to support sustainable and inclusive communities. Open space should be well integrated into the design of a scheme and located to achieve good access for all residents by suitable and sustainable modes of travel. Further to this, the provision of new open spaces across the District will be valuable in alleviating visitor and recreational pressure on designated biodiversity sites.
- 11.31 The Open Space Review outlines locations where there is currently under-provision of certain types of open space and should be used in determining the most appropriate type of open space required.
- 11.32 Designing new open spaces to meet community needs and enable community access can be extremely valuable in maximising access to open space. For example, enabling open spaces associated with schools to be used by the community can be helpful in meeting the demands for specific types of open space, such as playing fields.
- 11.33 In some developments, there may be a requirement for open space buffers to protect against sources of pollution, such as roads or railway lines, or for

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<sup>131</sup> The Council's Action Plans include: Cemeteries and Closed Churchyards Action Plan; Outdoor Play Provision Action Plan; Outdoor Sports Facilities Action Plan; and the Allotments Action Plan.

<sup>132</sup> Fields in Trust Guidelines (October 2015) or as superseded, Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard, <http://www.fieldsintrust.org/guidance>

landscape, visual or ecological purposes, for instance connective features such as hedgerows and watercourses. In these cases, it will be expected that the open space standards will be delivered alongside any buffer areas which are necessary.

- 11.34 The Council will support proposals for facilities within new and existing open spaces, for instance changing rooms or a kiosk, where the proposed facility is ancillary to the primary use and is of a scale and design that is commensurate with the primary use. The Council will consider larger facilities where they are appropriate to the use of the open space in accordance with national policy and guidance.
- 11.35 Long-term management and maintenance plans will be required to ensure that open spaces can continue to be enjoyed by the community in years to come.
- 11.36 It is acknowledged that some types of open space can only realistically be delivered on a larger scale due to the amount of space that would be required and management arrangements. In these circumstances it may be acceptable for financial contributions to be provided towards the provision of open space.
- 11.37 Where it can be demonstrated that open space cannot be provided on site a financial contribution towards the provision of new or enhancement of existing open space will be sought subject to the criteria set out in the policy. In such instances, the Council will direct such contributions towards areas with an identified open space deficiency or towards projects for new or improved open spaces. This is to ensure that the additional demand created by the proposed development is met.
- 11.38 This Plan does not designate Local Green Space. However, the Council will support the designation and enhancement of Local Green Space as proposed by local communities, for instance in Neighbourhood Plans, where appropriate.

#### **Policy NE7: Reducing flood risk**

Planning permission for development proposals will be granted provided that (as applicable):

- a) Development is located outside of medium and high-risk flood areas (flood zone 2 and 3) and other areas affected by other sources of flooding where possible;
- b) Where (a) is not possible, application of the sequential and exception tests is demonstrated where development is proposed in areas of flood risk using the Strategic Flood Risk Assessment (SFRA) and Environment Agency flood maps;
- c) A FRA has been prepared in accordance with national guidance that considers the lifetime of the development, climate change impacts and safe access and egress;

- d) It will be located, designed and laid out to ensure the risk of flooding is reduced whilst not increasing flood risk elsewhere;
- e) The impact of any residual flood risk will be minimised through flood resistant, resilient design and construction;
- f) Any flood protection and mitigation measures necessary will not cause harm to nature conservation, heritage assets, and/ or landscape and recreation and, where possible, will have a positive impact in these respects; and
- g) Overland flow routes and functional floodplain areas are protected from all development other than that which is “water compatible” and this must be designed and constructed to remain operational and safe for users during flood events, resulting in no net loss of flood plain storage and not impeding water flows or increasing flood risk elsewhere.

11.39 The PPG sets out the definitions for the zones of flood risk (rivers and sea flooding), ranging from zone 1 with a low probability of flooding to zone 3b which is the functional floodplain. It also sets out the sequential test and exception test which should be used to assess the suitability of a site for development.

11.40 Strategic Flood Risk Assessment (SFRA) has been carried out for the District, which will help to provide the basis for applying the sequential and exception tests for development sites. It is acknowledged that it may be necessary for water infrastructure to be provided. This is considered to be water-compatible development and therefore can be appropriate in areas of flood risk; although such development in Flood Zone 3b should be designed and constructed to: remain operational and safe for users during flood events, result in no net loss of flood plain storage and not impede water flows or increase flood risk elsewhere. In areas of flood risk development should take into account flood resilience measures.

11.41 Flood zone maps are produced by the Environment Agency. These maps define flood zones 1, 2 and 3, according to the NPPF. North Hertfordshire’s SFRA defines flood zone 3b. Proposals for development in an area at risk of flooding may be refused planning permission where it increases flood risk or conflicts with the sequential approach set in the NPPF.

11.42 Where development is proposed in an area at risk from flooding, the applicant will be required to demonstrate that the site passes the flood risk Sequential Test before providing a Flood Risk Assessment (FRA) as part of the planning application submission. The flood risk Exception Test may also need to be demonstrated at this stage. An FRA is applicable to development over 1 hectare in flood zone 1 and all types of development in flood zones 2 and 3. Flood risk impacts should be taken into account for the lifetime of the development, and consideration given to the mitigation that needs to be

provided for the increased future flood risk with predicted climatic changes. This should include appropriate consideration of downstream flood risks and, where necessary, on site attenuation to address this.

#### **Policy NE8: Sustainable drainage systems**

Planning permission for development will be granted provided that:

- a) The most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;
- b) It aims to mimic the natural drainage patterns and processes as far as possible; and
- c) Drainage solutions follow the SuDS hierarchy.

11.43 In addition to fluvial flooding, surface water and other forms of flooding provide a significant risk to development in North Hertfordshire. An increase in the number of hard, impermeable surfaces can prevent rainwater soaking naturally into the ground and generate additional rainwater runoff. However, incorporating sustainable drainage systems into a development scheme can help to reduce the impact of rainwater runoff and therefore surface water flooding.

11.44 The Flood and Water Management Act 2010 requires Sustainable Drainage Systems (SuDS) for new developments. SuDS need to be incorporated into the design of schemes from the outset. This is because many SuDS features will influence the layout of a development and may be interlinked with open space, highways, ecological and/or landscape features.

11.45 The Council will consult and work with the Lead Local Flood Authority<sup>133</sup> (LLFA), the Environment Agency and Internal Drainage Boards as required on development proposals that are at risk from flooding or may contribute to additional surface run off. At risk areas are identified in the SFRA and mitigation measures need to be considered when designing development in order to reduce the risk of flooding from surface water. When selecting appropriate drainage techniques, it is important to try and maximise the number of benefits, and to prioritise the most sustainable approaches taking into consideration appropriate design and financial viability issues. These techniques can be set out in the form of a hierarchy. Evidence will need to be provided that development has followed the surface water management hierarchy as detailed below.

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<sup>133</sup> Currently Hertfordshire County Council

Figure 5: Sustainable Drainage Hierarchy

Most Sustainable	SuDS Techniques	Flood Reduction	Pollution Reduction	Landscape & Wildlife Benefit
	Living roofs	✓	✓	✓
	Basins and ponds			
	<ul style="list-style-type: none"> <li>• Constructed wetlands</li> <li>• Balancing ponds</li> <li>• Detention basins</li> <li>• Retention ponds</li> </ul>	✓	✓	✓
	Filter strips and swales	✓	✓	✓
	Infiltration devices			
	<ul style="list-style-type: none"> <li>• Soakaways</li> <li>• Infiltration trenches and basins</li> </ul>	✓	✓	✓
Least Sustainable	Permeable surfaces and filter drains			
	<ul style="list-style-type: none"> <li>• Gravelled areas</li> <li>• Solid paving blocks</li> <li>• Porous paviers</li> </ul>	✓	✓	
	Tanked systems			
	<ul style="list-style-type: none"> <li>• Over-sized pipes/tanks</li> <li>• Storm cells</li> </ul>	✓		

11.46 For major development the LLFA is a statutory consultee in relation to the management of surface water drainage. Whilst SuDS is only a requirement for major development, it is recommended for all development to ensure surface water is appropriately managed. Developers should consult with the Lead Local Flood Authority and / or the Internal Drainage Board at the earliest possible opportunity, to ensure SuDS are incorporated at the design stage.

**Policy NE9: Water quality and environment**

Planning permission for development proposals will be granted provided that they make appropriate space for water, including (as applicable):

- Maintaining a minimum 8 metre<sup>134</sup> wide undeveloped buffer zone from all designated main rivers;
- Maintaining a minimum 5m wide undeveloped buffer zone for ordinary watercourses; and

<sup>134</sup> Water Resources Act 1991

- c) River restoration and resilience improvements where proposals are situated close to a river or considered to affect nearby watercourses.

- 11.47 Groundwater is an important resource for both water supply and biodiversity as it discharges into surface waters and wetlands, and maintains river and stream flows during dry spells. Most potable water (water which is safe to drink) in North Hertfordshire is abstracted from the ground. As a consequence, it can be vulnerable to pollutants. It is therefore important to protect these water resources from any potential pollutants and recapture as much water run off as possible. Development proposals therefore must demonstrate that available improvements in the efficiency of water use, surface drainage systems and pollution prevention measures have been optimised, and that they have strived to mitigate future problems. Policy NE11: Contaminated Land specifically sets the requirements for contaminated land.
- 11.48 The policy encourages development proposals to incorporate sustainable water management measures into the design. The policy will ensure that where development takes place that appropriate measures are taken to protect the development against flooding and ensure that the design of the development conserves precious water resources, improves water quality and enhances the natural environment. This will enhance and protect local biodiversity and wildlife corridors and ensure the preservation of acceptable flood flow routes is maintained.
- 11.49 The NPPF<sup>135</sup> emphasises the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats and promote biodiversity. River corridors are particularly effective in this way.
- 11.50 Rivers and watercourses enhance the quality of the environment. Their protection and enhancement will improve the enjoyment of these assets, enhancing biodiversity and make them more resilient to current and future pressures. This can be achieved through the use of buffers alongside watercourses and through restoration projects as part of development schemes.
- 11.51 Main rivers are watercourses shown to be designated as main on the Environment Agency's statutory flood map<sup>136</sup>. These are usually a larger stream or river with a significant effect on the overall drainage of a catchment area, however smaller watercourses can also be designated as main rivers. The Environment Agency has authority, powers, rights and responsibilities for regulating main rivers. Ordinary watercourses are any other river, stream, ditch or culvert (other than a public sewer) that is not a designated Main River. The responsibility for maintenance of these lies with anyone who owns the adjacent land or property. Where these fall in Internal Drainage Board (IDB)

<sup>135</sup> Paragraph 109 of the 2012 NPPF

<sup>136</sup> Flood Map for Planning: <https://flood-map-for-planning.service.gov.uk/>

land they are regulated by the IDB, outside of this North Hertfordshire District Council will be the regulator.

- 11.52 Where proposals are considered to affect nearby watercourses or sites that are situated close to a river, the Council will seek river restoration and resilience improvements as part of the proposal. In some instances, financial contributions may be appropriate towards these measures the restoration of rivers.

**Policy NE10: Water conservation and wastewater infrastructure**

Planning permission for new development will be granted provided that;

- a) It does not result in the deterioration of any watercourse in accordance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD);
- b) It helps contribute towards the Water Framework Directive (WFD) actions and objectives;
- c) It helps achieve the objectives set out in the Anglian and Thames River Basin Management Plans;
- d) Mechanisms for delivering any necessary new or improved water and/ or wastewater infrastructure are secured under the requirements of Policy SP7; and
- e) Adequate foul water treatment and disposal already exists or can be provided in time to serve the development.

New development around Stevenage within the Rye Meads Sewage Treatment Works Catchment will need to demonstrate that additional potable water supply and consequential wastewater treatment capacity can be achieved and implemented ahead of development without significant environmental impact, including adverse effects on designated sites.

- 11.53 North Hertfordshire is located at the watershed between the Great Ouse and Thames river catchments. Headwaters of river catchments are small which means as a consequence there is very little dilution available for large sewage discharges.
- 11.54 As a result there is little environmental capacity that can be taken up without causing a breach of statutory environmental targets including the Water Environment (Water Framework Directive) Regulations 2017 (WFD). Additionally water supply also has implications under the WFD, not just water quality. The Great Ouse and Thames catchments are both highly water stressed. Any proposed increase in groundwater abstraction from these catchments is also likely to have implications on compliance with WFD regulations.
- 11.55 The WFD is being implemented in the UK largely through River Basin Management Plans (RBMP) which detail the pressures facing the water

environment and what actions need to be taken in order for the WFD to be met in each area. For North Hertfordshire this includes both the Thames and Great Ouse RBMPs<sup>137</sup>. Working with the Environment Agency and key stakeholders will be important to deliver future outcomes of these plans and improve the District's water environment.

- 11.56 At present only the River Ivel is at a "good" status while the rest of the water bodies in North Hertfordshire are failing. Further information in relation to the water bodies in North Hertfordshire is available on the Environment Agency's Catchment Data Explorer<sup>138</sup> including measures that will help achieve their objectives. Developers will be expected to contribute towards measures and objectives through their development proposals.
- 11.57 The Stevenage Water Cycle Strategy (WCS) requires that for new development to proceed in the area, it will need to be demonstrated that it can be delivered within the water resource and water quality constraints. Developers will need to ensure that additional potable water supply requirements can be met and that waste water will not exceed available treatment capacity. Any necessary upgrades to infrastructure will have to be implemented ahead of the development. Rainwater harvesting and grey water reuse need to be strategically planned across larger sites and a strategy of retrofitting water efficiency features could also take place in the area. Reducing potable demand for water will reduce the consequent loading on the sewerage network.
- 11.58 In Royston, the Environment Agency and the wastewater undertaker have agreed that in principle a technically feasible engineering solution can be delivered to accommodate all of the growth proposed. Should a new permit be required in order to meet the requirements of the Water Framework Directive, this would involve a tightening of standards and would necessitate a costly upgrade of Royston Sewage Treatment Works.
- 11.59 Drainage strategies should be used to demonstrate that a proposed development has considered the available surface and foul water drainage options during a scheme's preparation stage to ensure that adequate infrastructure is in place before development commences.

#### **Policy NE11: Contaminated land**

Planning permission for development affecting or affected by contaminated land will be granted provided that:

- a) A contaminated land study / contaminated land risk assessment is submitted as part of the application;

<sup>137</sup> For information see: <https://www.gov.uk/government/publications/great-ouse-catchment-flood-management-plan>

<sup>138</sup> <http://environment.data.gov.uk/catchment-planning/>

- b) Appropriate mechanisms are in place to investigate, characterise the risks and remediate the contamination to remove the risks, or reduce the risk to an acceptable level; and
- c) The site is suitable for use taking account of ground conditions, groundwater vulnerability and pollution arising from previous land use and land remediation in reference to relevant guidance (and any subsequent updates)<sup>139</sup>

- 11.60 The District will be accommodating a significant amount of development during the plan period. This policy supports Policy SP11 in protecting and enhancing the environment in the context of accommodating significant development. As a significant proportion of the District's housing growth will take place on previously developed land, it is important for this Plan to deal with the implications of contamination.
- 11.61 Decisions should ensure that the site is suitable for its new use taking account of ground conditions, pollution arising from previous uses and any proposals for land remediation.
- 11.62 Much of the area covered by this plan overlies Secondary and Principal Aquifers. Abstractions are located throughout the plan area, with WFD aquifers and rivers present. Source Protection Zones (1 to 3) and landfills are present within the plan area, and mostly in the areas around Hitchin, Letchworth, Baldock, Royston, Ashwell and Stevenage. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The use of groundwater for local drinking water supplies in the area makes it particularly vulnerable to pollution.
- 11.63 Certain new activities need to be deterred in sensitive areas based on their intrinsic hazard to sensitive receptors (e.g. groundwater, Principal Aquifers, Source Protection Zones). Close to sensitive receptors a precautionary approach is likely to be taken even where the risk of failure is low as the consequences may be serious or irreversible.
- 11.64 Where risks from landfill gas are likely to arise, where land contamination may be reasonably suspected, or particularly environmentally sensitive developments (e.g. petrol filling stations) are proposed for sensitive sites, developers are encouraged to hold pre-application discussions. A Preliminary Risk Assessment (PRA) should be undertaken as the first stage in assessing these risks and is a requirement for validating relevant planning applications.

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<sup>139</sup> Groundwater Protection: Principles and practice (GP3), <https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>; Model Procedures for the Management of Land Contamination, <https://www.gov.uk/guidance/land-contamination-risk-management>

- 11.65 The policy will allow the Council to achieve a consistent and transparent approach to the redevelopment of land where contamination of the ground may be a constraint. It will also help to meet the objectives of the Water Framework Directive. The policy also allows us to approve higher value land uses on sites where serious contamination may make other types of development unviable. Receptors to contamination include human beings, the historic built environment and the natural environment, including controlled waters as defined in Section 4 of the *Contaminated Land Statutory Guidance* (DEFRA, 2012)<sup>140</sup>.
- 11.66 The contaminated land assessment / study will need to demonstrate how the site will be safely managed before, during and after development and highlight any remedial action where required. Development must ensure that water quality is not compromised and improvements to water quality will be secured where appropriate, in accordance with the Water Framework Directive.

#### **Policy NE12: Renewable and low carbon energy development**

Proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy. Proposals for other renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon:

- i. Landscape quality, landscape character and visual amenity, including consideration of cumulative impacts of development;
- ii. Environmental assets;
- iii. The historic environment, including the impact on the setting of historic assets ;
- iv. The transport network;
- v. Air quality;
- vi. Aviation interests; and
- vii. The amenity of residents.

In assessing renewable and low carbon energy proposals against the above criteria the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes where this is relevant.

Proposals for decentralised energy schemes associated with development of the strategic sites allocated in the Plan will be encouraged subject to an assessment of the impacts.

In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure must be removed and the site restored to its former state or a condition agreed with the Council.

<sup>140</sup> Currently defined in Section 4 of the DEFRA Contaminated Land Statutory Guidance, April 2012.

- 11.67 The UK Renewable Energy Strategy<sup>141</sup> sets out how the UK will ensure that 15% of all energy will come from renewable sources by 2020. Renewable sources of energy include wind, wave, tidal, hydro or solar power and biomass fuels. Nationally, the increased use of renewable and low carbon technology will contribute to improving energy security, increased economic activity and help to slow down climate change through the reduction of greenhouse gas emissions. The National Planning Policy Framework says that local plans should maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily.
- 11.68 The Hertfordshire Renewable and Low Carbon Energy Technical Study<sup>142</sup> identifies energy opportunity areas in the District. This may assist developers to choose the appropriate renewable technology, depending on the location of the development. The Study also identified that there may be areas of opportunity to investigate decentralised energy schemes, this could be particularly relevant in those areas where larger scale development may take place. Broadly, decentralised energy schemes refer to energy that is generated off the main grid and can include micro-renewables, heating and cooling. Schemes can serve a single building or a whole community. Although development proposals for renewable and low carbon energy will be supported in appropriate locations, it is also important that development proposals incorporate energy efficient measures to help reduce the demand for energy in the first place. The Council is mindful that an appropriate balance must be maintained between the benefits of renewable energy and other constraints and considerations in accordance with National Planning Practice Guidance (PPG).
- 11.69 Renewable energy technologies evolve rapidly in response to technical innovation and consequently funding regimes can also change significantly. This can result in differing levels of interest in development proposals for renewable technology and indeed changes to where those developments might best be located.

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<sup>141</sup> Department of Energy and Climate Change, 2009

<sup>142</sup> Hertfordshire Renewable and Low Carbon Energy Technical Study, AECOM, July 2010

## 12 Historic Environment

**Policy HE1: Designated heritage assets**

Planning applications relating to Designated heritage Assets or their setting shall be accompanied by a Heritage Assessment/Justification Statement that:

- i. Assesses the significance of heritage assets, including their setting;
- ii. Justifies and details the impacts of any proposal upon the significance of the designated heritage asset(s); and
- iii. Informs any necessary measures to minimise or mitigate against any identified harms.

Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

- a) Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;
- b) Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and
- c) Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.

Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.

- 12.1 Designated heritage assets include Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens. National guidance states that great weight should be given to the conservation of those assets<sup>143</sup>, including (where appropriate) securing an asset's optimum viable use.
- 12.2 The Council recognises the significance of designated heritage assets within the District and the contribution they make to defining local character, providing a sense of place and achieving sustainable development. Their conservation and preservation is an important consideration within the planning process and is recognised within specific legislation<sup>144</sup> and national planning policy. The Council will require applicants to assess the significance of the designated heritage asset, including its setting, and justify and detail the

<sup>143</sup> Paragraph 132 of the 2012 NPPF

<sup>144</sup> Planning (Listed Buildings and Conservation Areas) Act 1990

impact of the proposal upon the significance of the asset to ensure proposals preserve the significance of assets.

- 12.3 The NPPF sets out that substantial harm to designated heritage assets should generally be avoided, unless specific exception criteria are met<sup>145</sup>. In some cases where proposals will lead to less than substantial harm to a designated heritage asset, it is necessary to weigh any harm against the public benefits of the proposal including (where appropriate) securing an asset's optimum viable use<sup>146</sup> and ensure that necessary mitigation measures are identified to minimise any identified harm. Sites allocated in this Plan that have the potential to lead to less than substantial harm to a designated heritage asset and or its setting have been weighed against the public interest test and mitigation or guidance measures are set out in this Plan where necessary<sup>147</sup>.
- 12.4 North Hertfordshire contains forty-four conservation areas. These have been designated due to their particular historic or architectural significance. The conservation area boundaries are shown on the Policies Map. Particular care will be required when considering the scale, layout, design and materials of development proposals within or adjacent to conservation areas. They must be designed to harmonise with their surroundings and in conservation areas preserve or enhance the character or appearance of the heritage asset. The Council will provide guidance for shopfront design and advertising within conservation areas to encourage high quality design and enhance the character and significance of conservation areas.

#### Policy HE2: Heritage at risk

Planning permission will be granted for proposals that seek to conserve or provide new uses for designated heritage assets identified on the national register, or the Council's 'At Risk' register maintained by the Council, that are justified and appropriate to the significance of the asset to return a heritage asset to beneficial use.

Proposals that harm the significance of heritage assets included on national and local registers will be resisted unless the need for, and the benefits of, the development in that location clearly outweigh that harm, taking account of the asset's significance and importance, and all feasible solutions to avoid and mitigate that harm have been fully assessed.

- 12.5 As part of its heritage strategy the Council will maintain and review a list of heritage assets at risk and work with Historic England, owners and occupiers to find new, appropriate uses and solutions to secure the future of heritage assets. Generally, the Council will work constructively with landowners to

<sup>145</sup> Paragraphs 132 and 133 of the 2012 NPPF

<sup>146</sup> Paragraph 134 of the 2012 NPPF

<sup>147</sup> See Policies SP14 to SP19 and the Communities section for guidance and mitigation. The Housing and Green Belt Background Paper (NHDC, 2016) sets out how the strategy in this Plan has been balanced against heritage and other harms.

seek to prevent heritage assets from becoming 'at risk' in the first place, trying to find appropriate uses where possible.

- 12.6 Where possible, planning obligations shall be sought to contribute to the conservation of such assets and legal agreements will be used to ensure the repair of assets alongside new developments. Proposals that lead to substantial harm to, or loss of, the significance shall comply with the test detailed in paragraph 133 of the 2012 NPPF.

### **Policy HE3: Non-designated heritage assets**

Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that assesses the scale of harm to, or loss of significance of the non-designated asset and, where the proposal results in the loss of a non-designated heritage asset:

- a) The replacement building contributes to preserving the local character and distinctiveness of the area; and
- b) Where the asset is located in a conservation area a continuous contract for the demolition and redevelopment of the site has been secured, unless there are justifiable grounds for not developing the site.

- 12.7 North Hertfordshire has a rich heritage of designed landscapes and historic buildings, many of which are not designated, but contribute to a strong sense of place and contribute much to the character of historic towns, villages and the wider countryside.
- 12.8 Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. This policy is concerned with those non-designated heritage assets that are locally listed, such as buildings of local interest.
- 12.9 Buildings of local interest are those identified on Registers of Buildings of Local Interest adopted by the Council and are selected based on criteria found in those documents.
- 12.10 Buildings that do not satisfy the criteria for buildings of local interest but which have townscape merit and contribute to the special interest of a Conservation Area are identified as 'positive buildings' and often form notable groups that help to define the streetscape.
- 12.11 As and when a Conservation Area review is undertaken, further additions to the Buildings of Local Interest Register or positive buildings will be identified.
- 12.12 Where appropriate, the Council intends to continue its programme of producing local lists for each town and parish. This will be in accordance with

historic England's published advice for the establishment and management of local lists<sup>148</sup>.

- 12.13 The Council will seek to conserve the character and significance of parks and gardens identified as locally important heritage assets and include these on the Hertfordshire Historic Environment Record or identified on adopted local lists or maps of heritage assets.
- 12.14 Because of the developing programme for producing local lists and the ongoing potential for discovering assets of interest, the Council will determine development proposals affecting all identified non-designated heritage assets in accordance with the NPPF.

#### Policy HE4: Archaeology

Permission for development proposals affecting heritage assets with archaeological interest will be granted provided that:

- a) Developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation.
- b) It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and
- c) Where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.

Where archaeological sites have been assessed to meet the criteria for inclusion on adopted registers or maps of locally important heritage assets these shall be treated in the same way as archaeology areas and areas of archaeological significance.

Areas of as yet, unknown archaeology may be identified during research, or through the planning or plan making process. These sites or areas should be treated in the same way as archaeology areas and areas of archaeological significance.

- 12.15 Scheduled Ancient Monuments (SAMs) are the most important archaeological and historical sites and are given statutory protection. Historic England is responsible for identifying SAMs and any works on them require special permission from the Government. There are currently 60 SAMs in North Hertfordshire, and this list is under constant review.
- 12.16 There are also a number of archaeological areas and Areas of Archaeological Significance across North Hertfordshire which, although not nationally

<sup>148</sup> Historic England (2016) Local Heritage Listing. Historic England Advice Note 7.

recognised or designated are considered to be of local importance. This is because they contain or have the potential for moderate or high archaeological remains within them. Known heritage assets of national and local significance are recorded on the Hertfordshire Historic Environment Record. The Historic Environment Record is a dynamic dataset, which is updated constantly to reflect new discoveries made in Hertfordshire. This data is available to view on the 'Heritage Gateway'<sup>149</sup>.

- 12.17 This does not mean that areas outside the SAMs or Areas of Archaeological Significance are without archaeological potential, and important archaeological remains may exist elsewhere within the District. The Council will seek to protect other valuable remains throughout the District. From time-to-time alterations to existing areas of archaeological significance, or identification of new areas will be required based on new data or understanding of significance.
- 12.18 Where development proposals will affect any of these areas, prospective developers will be required to undertake an archaeological assessment (if necessary with a field evaluation) of the site in line with Government guidance and in consultation with the County Council's Historic Environment Unit. A full report of this recording work and any findings should be submitted to the local planning authority for approval before an application can be determined.
- 12.19 In the event of previously unknown archaeological remains being uncovered after works have commenced on site, both the Council and Historic England should be informed. Should the remains be deemed important enough to schedule, Scheduled Monument Consent will be required.

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<sup>149</sup> [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

# SECTION FOUR - COMMUNITIES



## SECTION FOUR - COMMUNITIES

### 13 Communities

13.1 This chapter sets out the site allocations for development for each community in North Hertfordshire. It identifies the detailed site-specific policy criteria for each local housing allocation. Retail and employment allocations are also identified and site-specific policy criteria are provided where considered necessary.

13.2 All development sites listed in this chapter are shown on the Policies Map. The communities are generally based on the established network of town and parish boundaries<sup>150</sup> and are arranged alphabetically as follows:

- Ashwell;
- Baldock;
- Barkway;
- Barley;
- Bygrave;
- Caldecote;
- Clothall;
- Cockernhoe, Mangrove Green and East of Luton
- Codicote;
- Graveley and North of Stevenage;
- Great Ashby and north-east of Stevenage;
- Hexton;
- Hinxworth;
- Hitchin;
- Holwell;
- Ickleford;
- Kelshall;
- Kimpton;
- King's Walden;
- Knebworth;
- Langley;
- Letchworth Garden City;
- Lilley;
- Lower Stondon;
- Newnham;
- Nuthampstead;
- Offley;
- Pirton;
- Preston;
- Radwell;
- Reed;
- Royston;
- Rushden;
- Sandon;
- St Ippolyts & Gosmore;
- St Paul's Walden;
- Therfield;
- Wallington;
- Weston; and
- Wymondley.

13.3 Information on new homes is provided for each community. This is based upon any proposed housing allocations in that area along with new homes built since 2011 and existing planning permissions. These figures are not a

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<sup>150</sup> Exceptions to this include where development is proposed on the edge of an existing settlement but using land (partly) in an adjoining parish. Sites on the edge of Baldock but in Clothall parish, for example, are included in the Baldock section.

target and do not necessarily represent the maximum number of new homes that will be built<sup>151</sup>.

*Note: For the avoidance of confusion, sites have kept the same reference number throughout the preparation and examination of the Plan. References for sites that were included in the Preferred Options or submission versions of the Plan but have not been carried forward to this final version of the Plan have not been re-used. Any new sites have been given the next available reference number. This means that site allocation references for individual communities do not necessarily run sequentially.*

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<sup>151</sup> The housing requirements set out in Policy SP8 include allowances for windfall development. These are sites which come forward for development outside of the local plan process. It is not possible to say exactly where in the District these schemes will occur.

## Ashwell

### *Introduction*

- 13.4 Ashwell is the northernmost parish in the District (and county). The village of Ashwell has a relatively good range of facilities. At the 2011 census the population of the parish was 1,870, and there were 841 dwellings in the parish. Apart from the village the parish also includes a wide tract of countryside and some scattered farms.

### *Role in settlement hierarchy*

- 13.5 Ashwell is identified as a Category A village. A development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to allow for Ashwell's development needs during this Plan period.

### *Heritage*

- 13.6 Ashwell has one conservation area, covering much of the central part of the village, and numerous listed buildings. The parish church of St Mary is Grade I listed. To the north of the village the grounds of Ashwell Bury are designated as a historic park and garden. To the south-west of the village lies the Arbury Banks Scheduled Ancient Monument.

### *Housing*

- 13.7 No sites are allocated for housing in Ashwell. 117 homes have been built or granted planning permission since 2011.

### *Economy*

- 13.8 The facilities of Ashwell are designated as a Local Centre under Policy SP4. The extent of the neighbourhood centre is shown on a map in Appendix 3. Any applications in this area will be considered in accordance with the detailed policies of this Plan.

## Baldock

### *Introduction*

- 13.9 Baldock is a market town near the source of the River Ivel. It lies on the site of a Roman town which stood at the junction of the Icknield Way and the Roman roads to Godmanchester, Braughing, and St Albans. The site of the Roman town appears to have been abandoned after the Roman withdrawal. The modern town was founded by the Knights Templar in the twelfth century on an area of land which formerly belonged to Weston. A parish was created for the new town which covered a relatively small area. The town's original parish boundaries were Icknield Way to the north, Station Road / Clothall Road to the east, South Road / Crabtree Lane to the south and Weston Way / Norton Road to the west. Baldock has since grown beyond those medieval boundaries to take in areas which formerly belonged to Norton, Bygrave, Clothall, Weston and Willian.
- 13.10 Hitchin, Letchworth Garden City and Baldock lie very close to each other and have strong relationships linking them in terms of housing markets and job movements. That said, each town retains a distinct identity of its own. The needs for development arising from the three towns are comparatively high, but the gaps separating the towns are small and of great importance if the town's urban areas and identities are to be kept distinct. Managing growth in this relatively developed part of the District whilst allowing each town to retain its identity is one of the challenges to be addressed.
- 13.11 At the 2011 census the population of Baldock (defined as the unparished area) was 10,280, and there were 4,491 dwellings in the town.

### *Role in settlement hierarchy*

- 13.12 Baldock is classed as a town in Policy SP2. A boundary for the town is shown on the Policies Map. Beyond this boundary is classed as Green Belt.

### *Heritage*

- 13.13 Baldock has one conservation area, covering the town centre and older parts of the town. Most of the town's listed buildings are on one of the four streets radiating from the Town Hall crossroads: Hitchin Street, Church Street, Whitehorse Street and High Street. The parish church of St Mary is a Grade I listed building.
- 13.14 Baldock also has an important history as a Roman settlement, which was centred on Walls Field to the east of the town centre, which is a scheduled ancient monument. A large area around this is also of archaeological significance.

## Housing

13.15 Eight housing sites are allocated in and around Baldock. These will deliver an estimated 3,360 new homes (1,960 during the plan period to 2031). A further 238 new homes have been built or granted planning permission since the start of the plan period in 2011.

Ref	Strategic Housing Sites	Dwelling estimate
BA1	Land North of Baldock (see Policy SP14)	2,800 homes
Ref	Local Housing Allocations and site specific <u>policy criteria</u>	Dwelling estimate
Policy BA2	Land south-west of Clothall Road (Clothall parish)	200 homes
	<ul style="list-style-type: none"> <li>• Creation of appropriate, defensible Green Belt boundary along the south-eastern perimeter of the site;</li> <li>• Appropriate mitigation measures for noise associated with the A505 to potentially include insulation and orientation of living spaces;</li> <li>• Proposals to be informed by a site-specific landscape assessment;</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Consider and mitigate against potential adverse impacts upon Weston Hills Local Wildlife Site;</li> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	
Policy BA3	Land south of Clothall Common (Clothall parish)	245 homes
	<ul style="list-style-type: none"> <li>• Deliver a southern link road connecting the B656 Royston Road to Wallington Road or the A507 Clothall Road within the southern bypass;</li> <li>• Provision of suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA4;</li> <li>• Consideration of the most appropriate routes and movements for all modes between the allocation site, the</li> </ul>	

	<p>existing Clothall Common estate and the wider transport network;</p> <ul style="list-style-type: none"> <li>• Site layout to take account of existing wastewater infrastructure;</li> <li>• Appropriate solution for short- and long-term education requirements having regard to up-to-date assessments of need;</li> <li>• Appropriate mitigation measures for noise associated with the A505 to include: <ul style="list-style-type: none"> <li>○ appropriate insulation and orientation of living spaces; and</li> <li>○ maintaining or limited re-profiling of the existing bunding towards the east of the site with no housing permitted on or beyond its (revised) alignment;</li> </ul> </li> <li>• Incorporate alignment of former Wallington Road and Bridleway Clothall 027 as green corridor through the site;</li> <li>• Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• Proposals to be informed by a site-specific landscape assessment;</li> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	
<p>Policy BA4</p>	<p>Land east of Clothall Common (part in Clothall parish)</p>	<p>50 homes</p>
	<ul style="list-style-type: none"> <li>• Provision of suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA3;</li> <li>• Consideration of the most appropriate routes and movements for all modes between the allocation site, the existing Clothall Common estate and the wider transport network;</li> <li>• Site layout to take account of existing wastewater infrastructure;</li> <li>• Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> </ul>	

	<ul style="list-style-type: none"> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution; and</li> <li>Archaeological survey to be completed prior to development.</li> </ul>	
Policy BA5	Land off Yeomanry Drive	25 homes
	<ul style="list-style-type: none"> <li>Site layout to take account of existing wastewater infrastructure;</li> <li>Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;</li> <li>Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>Appropriate treatment of site boundaries to maintain access to, and integrity of, Footpath Baldock 036 and east-west green corridor;</li> <li>Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>Archaeological survey to be completed prior to development.</li> </ul>	
Policy BA6	Land at Icknield Way	26 homes
	<ul style="list-style-type: none"> <li>Site layout to take account of existing wastewater infrastructure;</li> <li>Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>Investigate and provide adequate mitigation measures/remediation for contamination where identified from previous employment use;</li> <li>Incorporate footpath Baldock 001 through the site;</li> <li>Archaeological survey to be completed prior to development;</li> <li>Adequate mitigation measures for noise associated with the railway to potentially include insulation and orientation of living spaces; and</li> <li>Sensitive design to respect setting of Baldock Conservation Area.</li> </ul>	
Policy BA7	Land rear of Clare Crescent	20 homes
	<ul style="list-style-type: none"> <li>Archaeological survey to be completed prior to development;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution.</li> </ul>	
Policy BA11	Deans Yard, South Road	20 homes
	<ul style="list-style-type: none"> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and</li> <li>• Archaeological survey to be completed prior to development;</li> <li>• Sensitive design to enhance the setting of Building of Local Interest;</li> <li>• Investigate and provide adequate mitigation measures/remediation for contamination associated with previous use.</li> </ul>	
Total allocated sites*		3,360 homes
Completions and permissions		238 homes
Total allocated, completed and permitted 2011-2031*		2,198 homes

\* Land North of Baldock is allocated for 2,800 homes in total with 1,400 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031

### *Economy*

13.16 The town's current employment areas are relatively modest. In part this is due to the town's close proximity to the major employment area east of Letchworth Garden City. This Plan proposes extending the current small employment area on Royston Road into a larger business park to take advantage of the good location close to the junction with the bypass and within reasonably close proximity of the railway station and town centre.

13.17 In order to help deliver additional local jobs in the District in combination with residential development over the plan period, Policy SP3 identifies that 19.6 hectares of employment land should be allocated at Baldock. Given the site's location adjacent to the A505 it provides an ideal location for employment development and it is considered this will allow for future growth over the plan period.

Ref	Employment allocations and site-specific policy criteria	Hectares
<i>New employment allocation</i>		
Policy BA10	Royston Road	19.6
	<ul style="list-style-type: none"> <li>• A masterplan to be secured prior to the approval of any detailed matters;</li> <li>• Ensure access arrangements control HGV movements to direct vehicles towards the A505 rather than through Baldock;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• Landscaping to enhance the ecological value of the railway corridor and reinforce a defensible Green Belt boundary to the east;</li> <li>• Undertake Contaminated Land Preliminary Risk Assessment, particularly in relation to current and historic agricultural use;</li> <li>• Provide adequate mitigation measures for noise associated with the railway line and for any potential employment activity in relation to Clothall Common;</li> <li>• Retaining framed views of St Mary's Church from within and beyond the site;</li> <li>• Archaeological survey to be completed prior to development; and</li> <li>• Use of green roofs on buildings in order to create a less harsh urban-rural transition to the Green Belt on the eastern side of this allocation.</li> </ul>	
<i>Designated employment areas</i>		
BE1	Bondor Business Centre	2.5
BE2	Royston Road	3.3

13.18 Baldock's town centre provides for day-to-day shopping, with a range of shops mostly along High Street and Whitehorse Street and a large supermarket on the edge of the town centre. A traditional street market is held in the High Street on Wednesdays, whilst specialist farmers and craft markets are occasionally held. Baldock has been bypassed twice: first by the north-south A1 in the 1963 and then by the east-west A505 in 2006. Following the second bypass's opening a programme of enhancement works were carried out to the town centre improving the quality of the street-scene.

- 13.19 The shops along High Street and Whitehorse Street lie within the designated town centre. Proposals here will be determined in line with our detailed policies on shopping frontages.

*Infrastructure & mitigation*

- 13.20 It is anticipated that development of the large, greenfield sites around Baldock will occur sequentially with those to the south of the town coming forward first and being used to support some of the upfront costs associated with our Strategic Housing Site to the north of Baldock.
- 13.21 Over the plan period, the education requirement for Baldock will see up 8FE of additional schools provision. The exact configuration of the education infrastructure is still to be finalised.
- 13.22 With regards to primary provision it is likely that 2FE will be provided south of the railway and 6FE to the north.
- 13.23 Our Strategic Policy for north of Baldock sets out our expectations in relation to that site, including provision of a new secondary school.
- 13.24 Ahead of, or alongside this, some expansion of Knights Templar School may be possible. Equally, it may be necessary to include some secondary provision to the south of the town in the short- to medium-term until the long-term arrangements are finalised and put in place.
- 13.25 The Station Road / Clothall Road / Royston Road junction is identified as pinch point in the Council's transport modelling. Provision of a new road associated with BA1 linking the A507 with the A505 will help mitigate this issue enabling movement from north to east without the need to use the junction.
- 13.26 Additionally a southern link road is proposed to enable the development of site BA3. This will improve connectivity to the south of the town providing the ability to bypass this junction. The detailed alignment of the link road will be determined through the Development Management process. This may require the existing bunding at the eastern end of the proposed link road to be re-profiled. The agreed route of the southern link road through the bunded area will mark the outer limits of built development in this part of the site.
- 13.27 Baldock has historically experienced air quality issues associated with traffic in the town. However, these measures should help to ensure that relevant Air Quality Objectives are not exceeded as a consequence of growth. Detailed assessments will be required in line with Policy D4 when larger sites (including BA1 to BA4) are brought forward for development.
- 13.28 For much of its length, the A505 Baldock Bypass provides the most appropriate, defensible Green Belt boundary to the south of the town. This requires the removal of some land to the south of Wallington Road lying outside of the allocated housing areas and which should generally remain

undeveloped. Our detailed policies set out the approach we will take to areas of Urban Open Land.

- 13.29 Heritage and archaeology are key considerations in Baldock owing to the rich history of the settlement. It is considered that sites closest to the scheduled ancient monuments (namely BA2, BA3, BA5 and BA11) can avoid substantial harm to the significance of this asset. Sensitive design will be a critical factor in the development of these sites.
- 13.30 The mapped extent of surface water flooding, illustrates a potential issue in Baldock, although this may not reflect the true nature of the extent of flooding in the area. SUDs techniques will need to be employed to ensure that the issue is adequately mitigated and risk is not increased.

## Barkway

### *Introduction*

13.31 Barkway is located in the rural area to the east of the District. At the 2011 census the population of the parish was 775 people, living in 329 dwellings. The village has a limited range of facilities including a primary school, garage, pub and golf course.

### *Role in settlement hierarchy*

13.32 Barkway is one of five villages where a greater amount of development has been allocated. It is the largest in population terms of three villages located in the area to the east of the A10 and to the south of Royston. Despite this, facilities are limited and so residents would presently be likely to travel to either Royston to the north or Buntingford to the south for many day to day items. A development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to allow for Barkway's development needs during this Plan period.

### *Heritage*

13.33 Many properties in the village date back to the 17<sup>th</sup> and 18<sup>th</sup> century although there are also a number from the 16<sup>th</sup> century and even some from the 15<sup>th</sup> century. The older part of the village has a linear form with many of the oldest properties fronting the High Street. Many are rendered, with some displaying distinctive pargetting (ornamental plasterwork), whilst several properties have thatched roofs. Barkway has had a village church for over 1000 years, although the current flint and stone church dates back to the 13<sup>th</sup> century. The designated conservation area covers much of the historic linear section of the village. The parish church of St Mary Magdalene is a Grade I listed building. To the north-east of the village the Cockenach estate is designated as a historic park and garden.

### *Housing*

13.34 Two sites are allocated in Barkway for an estimated 160 new homes. A further 57 homes have been built or granted planning permission within the parish since 2011.

Ref	Local Housing Allocations and site specific <u>policy criteria</u>	Dwelling estimate
Policy BK2	Land off Windmill Close	20 homes
	<ul style="list-style-type: none"> <li>Contribution towards travel by sustainable modes of transport between Barley and Barkway schools; and</li> <li>Archaeological survey to be completed prior to development.</li> </ul>	

Policy BK3	Land between Cambridge Road & Royston Road	140 homes
	<ul style="list-style-type: none"> <li>• Development should be set back from the road;</li> <li>• Lower density housing would be appropriate on the eastern part of the site;</li> <li>• Incorporation of Bridleway Barkway 017 as a north-south green corridor through the site;</li> <li>• Appropriate treatment of northern boundary to maintain alignment and integrity of Bridleway Barkway 018;</li> <li>• Explore opportunities for connecting road from Royston Road to Cambridge Road having regard to heritage considerations (below);</li> <li>• Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for pedestrian and cycle access;</li> <li>• Contribution towards travel by sustainable modes of transport between Barley and Barkway schools;</li> <li>• Provision of local convenience shop;</li> <li>• Approximately 1.5 hectares of land at the south-west of the site secured as a reserve site for primary education;</li> <li>• Site layout designed to integrate with any future use of land identified for school site;</li> <li>• Development should include extensive tree planting, maintenance of the existing boundaries and hedgerows;</li> <li>• Development should include measures to minimise impact on Newsells Park Stud, in terms of proximity of built development, noise and increased activity; and</li> <li>• Sensitive design to respect setting of Cokenach Registered Park and Garden and listed buildings within Newsells estate to include: <ul style="list-style-type: none"> <li>○ Reinforcing of hedgerows and landscaping along site boundaries; and</li> <li>○ Access arrangements designed to minimise harm to heritage assets</li> </ul> </li> </ul>	
Total allocated sites		160homes
Completions and permissions		57 homes
Total allocated, completed and permitted		217 homes

### *Economy*

13.35 The visible economic activity of the village is limited to a petrol filling station/garage-and car repair business. Barkway Park Golf Club is also located near to the edge of the village.

*Infrastructure & mitigation*

- 13.36 The existing first school in Barkway is federated with the first school in neighbouring Barley with different year groups taught in each village. Current estimates suggest that the additional pupils likely to arise from the sites in Barkway can be accommodated in the existing schools. Contributions to support sustainable travel between the two sites should be secured from new developments. Both school sites are constrained and are considered difficult to expand. Hertfordshire County Council hold a reserve school site in the village, lying within site BK3. A reserve site will be retained providing the opportunity to respond to any further increase in the number of pupils from the two villages.
- 13.37 We will work with the County Council and Diocese (who operate the schools in Barkway and Barley) to explore the most appropriate long-term education solution.
- 13.38 Although Barkway has a range of local facilities, there is presently no shop in the village. The development of land to the north of the village provides an opportunity to remedy this and support the long-term role of the village.
- 13.39 Newsells Park Stud is an established rural business which lies directly to the north of site BK3. The stud is a specialist business which relies on the adjoining pasture land to create the best conditions for rearing foals. Development on site BK3 will need to take into account any potential impact from noise, increased activity and other forms of disturbance both during construction and throughout the occupancy of the scheme.

## Barley

### *Introduction*

13.40 Barley is located in the rural area on the eastern edge of the District. At the 2011 census the parish had a population of approximately 662 people and 287 dwellings. It has a reasonable range of services for a village of its size. These services include a primary school, doctor's surgery, post office and general store, petrol filling station/garage and two public houses.

### *Role in settlement hierarchy*

13.41 Barley is identified as a Category A village in the settlement hierarchy. General development will be permitted within the defined village boundary. Beyond the village boundary, land is classified as Rural Area beyond the Green Belt.

13.42 Whilst Barley is smaller than the neighbouring village of Barkway, it does have a wider range of facilities and so does attract visits from both Barkway and other nearby settlements. However, for many requirements residents visit the nearby town of Royston.

### *Heritage*

13.43 Barley has grown slowly but more or less continuously over recent centuries and so contains a wide variety of buildings. This includes buildings from the start of the 17<sup>th</sup> century as well as St Margaret of Antioch Church which originally dates from the 12<sup>th</sup> century. The Barley Conservation Area covers much of the village.

### *Housing*

13.44 There are no sites allocated for residential development in Barley. 17 homes have been granted planning permission or built since 2011.

### *Economy*

13.45 The economy of Barley is mixed and reflects the relatively diverse range of facilities and businesses that exist in the village. In addition to those mentioned above this also includes a coach hire company, doctor's surgery and livery operation.

## Bygrave

### *Introduction*

13.46 Bygrave is a small village to the north-east of Baldock. The older part of the village is clustered around the parish church just off the road from Baldock to Ashwell. More recent development has been built along the main road towards Baldock, notably at Lower Bygrave in the mid-twentieth century. The parish extends up to the edges of Baldock, and used to include part of the town; Baldock Station and the surrounding area were historically in Bygrave parish, gradually being transferred to Baldock between 1881 and 1928.

13.47 At the 2011 census the population of the parish of Bygrave was 304 and there were 108 dwellings in the parish.

### *Role in settlement hierarchy*

13.48 Bygrave village is identified as a Category C settlement where only limited affordable housing or facilities for local community needs will be allowed. Most of the parish, including the village itself, is within the Green Belt.

### *Housing*

13.49 Our Strategic Housing Site to the north of Baldock (see Policy SP14) is mostly within the parish of Bygrave. No other housing sites are allocated in Bygrave. There have been two homes built or granted planning permission in the parish since 2011.

### *Economy*

13.50 Site BA10, Royston Road, Baldock, is mostly in the parish of Bygrave and is discussed on the Baldock page. No other employment sites are allocated in Bygrave.

## Caldecote

### *Introduction*

- 13.51 Caldecote is North Hertfordshire's smallest parish. Whilst it remains administratively a separate parish, it now shares a joint parish council with neighbouring Newnham. The village today is much smaller than it was in medieval times; the church (now closed) was rebuilt in the 14<sup>th</sup> century, just before the village was effectively abandoned (around the time of the Black Death), leaving just a manor house and a couple of farm cottages.
- 13.52 Away from the shrunken village, the parish does include a couple of buildings on the A1, including a petrol filling station with shop. Apart from this the parish has little in way of facilities.
- 13.53 Population statistics are not available for Caldecote separately due to its small size. The combined population of the three parishes of Caldecote, Newnham and Radwell at the 2011 census was 209 and there were 97 dwellings across the three parishes.

### *Role in settlement hierarchy*

- 13.54 Caldecote is identified as a Category C settlement where only limited affordable housing or facilities for local community needs will be allowed. The whole of the parish is designated as Rural Area beyond the Green Belt within which there is general restraint on development.

### *Housing*

- 13.55 No sites are allocated for housing in Caldecote. There have been no planning permissions granted or new homes built in the parish since 2011.

## **Clothall**

### *Introduction*

- 13.56 Clothall is a long, thin parish stretching from the southern edges of Baldock to the District's southern border with East Hertfordshire near Luffenhall. The parish contains the small village of Clothall and the hamlet of Luffenhall. It also gives its name to the Clothall Common area of Baldock, which used to be part of Clothall parish before being transferred to Baldock.
- 13.57 The village contains a village hall and church but has few other facilities.
- 13.58 At the 2011 census the population of the parish of Clothall was 150 and there were 67 dwellings in the parish.

### *Role in settlement hierarchy*

- 13.59 Clothall is identified as a Category C settlement where only limited affordable housing or facilities for local community needs will be allowed. Much of the parish, including the village itself, is washed over with Green Belt, with southern and eastern parts of the parish classed as Rural Area Beyond the Green Belt.

### *Housing*

- 13.60 Some of the allocated housing sites on the south-eastern edges of Baldock are in the parish of Clothall. For further discussion of these, see the Baldock page. No other housing sites are allocated in Clothall. There have been no planning permissions granted or new homes built within that part of Clothall parish outside of the Baldock urban area since 2011.

## **Cockernhoe, Mangrove Green and East of Luton**

### *Introduction*

- 13.61 Cockernhoe and the area east of Luton is part of Offley parish. The Cockernhoe ward of Offley parish covers the area between Luton and Lilley Bottom Road and includes Cockernhoe, Mangrove Green and Tea Green. There are also a number of scattered farms and Putteridge Bury.
- 13.62 The remainder of Offley parish is discussed in its own section of this chapter.
- 13.63 At the 2011 census the population of the Cockernhoe ward of Offley parish was 493 and there were 205 dwellings in the ward.

### *Role in settlement hierarchy*

- 13.64 Cockernhoe & Mangrove Green is identified as a Category A village. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to include both the village of Cockernhoe & Mangrove Green and the adjoining expansion of Luton. Outside this boundary the rest of the Cockernhoe ward is classed as Green Belt.

### *Heritage*

- 13.65 This area includes the Putteridge Bury historic park and garden, now used by the University of Bedfordshire.

### *Housing*

- 13.66 Our strategic site to the East of Luton is located in Cockernhoe ward. This will deliver 2,100 homes over the plan period. The significant majority of these homes are included as an allowance towards unmet needs arising from Luton. No further local housing allocations are proposed in this area. Five homes have been built or granted planning permission within the Cockernhoe ward of Offley parish since 2011.

Ref	Strategic Housing Sites	Dwelling estimate
EL1, EL2 & EL3	Land East of Luton (see Policy SP19)	2,100 homes
Total allocated sites		2,100 homes
Completions and permissions		5 homes
Total allocated, completed and permitted		2,105 homes

*Economy*

- 13.67 There is a school and a village hall in Cockernhoe and public houses in Tea Green and Mangrove Green. Outside the village, there is significant employment generated by the Putteridge Bury campus of the University of Bedfordshire.
- 13.68 There are likely to be small scale opportunities for additional employment development associated with the East of Luton sites, notably in the neighbourhood centre. Opportunities for other employment development on those sites will be considered through the masterplanning process.

## Codicote

### *Introduction*

- 13.69 The parish of Codicote covers an area much wider than just the village as it includes some developed parts of Oaklands (Pottersheath) and areas north of Welwyn (Danesbury). It also includes hamlets such as Nup End to the north as well as a number of scattered farms.
- 13.70 The village of Codicote has a relatively good range of facilities, including a school, shops, several public houses, village hall, car repairs garage and a church.
- 13.71 At the 2011 census the population of the parish was 3,344 and there were 1,496 dwellings in the parish.

### *Role in settlement hierarchy*

- 13.72 Codicote is one of five villages where a greater amount of development has been allocated. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent but also allow for Codicote's future development needs.
- 13.73 The part of Oaklands in Codicote parish is also identified as a Category A village under Policy SP2. The rest of the parish is classed as Green Belt.

### *Heritage*

- 13.74 The village has one conservation area covering the linear part of the settlement which grew up along the High Street (B656). The wider parish also includes parts of the Ayot St Lawrence and Old Knebworth conservation areas, and also parts of the Ayot House and Knebworth Park designated historic parks and gardens.

### *Housing*

- 13.75 Four sites are allocated in and around Codicote village for an estimated 315 new homes. A further 97 homes have been built or granted planning permission within the parish since 2011.

Ref	Local Housing Allocations and site-specific <u>policy criteria</u>	Dwelling estimate
Policy CD1	Land south of Cowards Lane	73 homes
	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li>• Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</li> <li>• Contribution towards expansion of Codicote Primary School;</li> <li>• Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</li> <li>• Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street;</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; and</li> <li>• Consider and mitigate against potential adverse impacts upon Hollards Farm Meadow Local Wildlife Site and adjoining priority woodland habitat.</li> </ul>	
<p>Policy CD2</p>	<p>Codicote Garden Centre, High Street</p>	<p>54 homes</p>
	<ul style="list-style-type: none"> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</li> <li>• Contribution towards expansion of Codicote Primary School;</li> <li>• Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</li> <li>• Access through site to adjoining sports field and community centre;</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat;</li> <li>• Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles; and</li> <li>• Retain and strengthen existing boundary hedgerows.</li> </ul>	
	<p>Land north of The Close</p>	<p>48 homes</p>

<p>Policy CD3</p>	<ul style="list-style-type: none"> <li>• Appropriate solution for expansion site of Codicote Primary School to be secured to accommodate additional pupils arising from this site;</li> <li>• Contribution towards expansion of Codicote Primary School;</li> <li>• Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• Sensitive incorporation of Footpaths Codicote 007 and 008 as features within the site providing a connection from the High Street to the wider countryside; and</li> <li>• Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate approach to nearby Grade II* listed The Bury.</li> </ul>	
<p>Policy CD5</p>	<p>Land south of Heath Lane</p>	<p>140 homes</p>
<ul style="list-style-type: none"> <li>• Land to the east of the current alignment of footpath Codicote 014 to be reserved and secured for education use to enable expansion of the existing school to accommodate additional pupils arising from the allocated sites;</li> <li>• Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Consider and mitigate against potential adverse impacts upon nearby features of biodiversity interest including: <ul style="list-style-type: none"> <li>○ Codicote Lodge Icehouse &amp; surrounds Local Wildlife Site;</li> <li>○ Heath Plantation Local Wildlife Site;</li> <li>○ Meadow NW of First Spring Local Wildlife Site; and</li> <li>○ Priority deciduous woodland habitat adjoining the site;</li> </ul> </li> <li>• Sensitive incorporation of existing rights of way, including footpaths Codicote 014, 015 &amp; 016 as green corridors through</li> </ul>		

	<p>the site connecting the existing village to the wider countryside;</p> <ul style="list-style-type: none"> <li>Proposals to be informed by a site-specific landscape assessment, particularly ensuring development at the south-west of the site does not encroach beyond acceptable limits into longer views across the Mimram Valley;</li> <li>Lower density of development to southern edge of site to respect local character; and</li> <li>Sensitive treatment of Heath Lane frontage to minimise impact upon nearby Listed Buildings.</li> </ul>
Total allocated sites	315 homes
Completions and permissions	97 homes
Total allocated, completed and permitted	412 homes

13.76 A site at Danesbury Park Road has been identified for four additional Gypsy and Traveller pitches to meet identified needs.

Ref	Site	Pitch estimate
Policy CD6	Land at Woodside Place, Danesbury Park Road	4

### *Economy*

13.77 The facilities of Codicote are designated as a village centre under policy SP4. Proposals in this area will be determined in accordance with our detailed policies. The extent of the village centre is shown on the map in Appendix 3.

### *Infrastructure and mitigation*

13.78 The existing 1 FE Codicote school regularly fills most of its available places from the local area. Its current site is physically constrained. Expansion of the existing primary school is required to accommodate demand from the additional residential development within sites CD1, CD2, CD3 and CD5 as well as other dwellings that may come forward in Codicote. Expansion of the existing primary school will require site CD5 to come forward first to provide the land with the other three sites coming forward shortly after to ensure the necessary contributions for the expansion are available at the right time.

13.79 Our transport modelling does not identify a requirement for any specific mitigation measures in Codicote. However, there can be localised pinch points on the High Street, particularly at peak times or when delays or

incidents on the A1(M) result in the B656 being used as an alternate route between Welwyn Garden City and Hitchin.

- 13.80 Some minor roads leading to/from Codicote may require mitigation. This includes Bury Lane/Park Lane to Old Knebworth and St Albans Road. The effects of increased traffic through the village centre could also be offset by environmental improvements.
- 13.81 Sites in Codicote will need to ensure that any transport assessments appropriately take these issues into account and contribute reasonably to any necessary mitigation measures which may seek to address these issues.
- 13.82 Codicote lies within the Thames Water area and the water company have identified localised constraints in wastewater infrastructure. Prospective applicants should work with Thames Water, and together, to identify the likely cumulative nature of infrastructure required.

## Graveley and North of Stevenage

### *Introduction*

13.83 The parish of Graveley includes the village and the surrounding areas to the north and east. This incorporates Jacks Hill, Manor Farm and Chesfield. The area to the south abuts the Stevenage Borough Council administrative boundary.

13.84 The village includes a school, two public houses, a village hall and a church. At the 2011 census the population of the parish was 487 and there were 198 dwellings in the parish.

### *Role in settlement hierarchy*

13.85 Graveley is identified as a Category A village. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent but also allow for Graveley's future development needs.

13.86 Most of the parish is covered by the Green Belt, but the southern part of the parish contains the North of Stevenage strategic site and the eastern part of the parish contains a site adjoining Great Ashby (discussed on the Great Ashby page).

### *Heritage*

13.87 The village contains one conservation area, which includes the majority of the listed buildings. The parish church of St Mary is a Grade I listed building. There are also a number of heritage assets in the hamlet of Chesfield, including listed buildings and the ruined church of St Etheldreda.

### *Housing*

13.88 Our strategic site to the north of Stevenage is located in Graveley parish. One site is allocated within the village for an estimated 8 new homes. A further 10 homes have been built or granted planning permission since 2011.

Ref	Strategic Housing Sites	Dwelling estimate
NS1	Land North of Stevenage (see Policy SP15)	900 homes
Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
	Land at Milksey Lane	8 homes

Policy GR1	<ul style="list-style-type: none"> <li>• Sensitive design to minimise impacts upon Graveley Conservation Area;</li> <li>• Archaeological survey to be completed prior to development; and</li> <li>• Maintain Public Right of Way (Graveley 018) through the site.</li> </ul>
Total allocated sites	908 homes
Completions and permissions	10 homes
Total allocated, completed and permitted 2011-2031*	793 homes

\* Land North of Stevenage is allocated for 900 homes in total with 775 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031.

## Great Ashby and north-east of Stevenage

### Introduction

13.89 Great Ashby is a relatively new parish, representing the residential area adjoining Stevenage. Formerly part of Graveley parish (and a small strip of Weston parish), the new parish covers the residential estate adjoining the north east Stevenage.

13.90 At the 2011 census the population of the parish of Great Ashby was 5,706 and there were 2,172 dwellings in the parish.

### Role in settlement hierarchy

13.91 Great Ashby adjoins Stevenage and so for the purposes of settlement hierarchy is considered part of the town.

### Heritage

13.92 There are no conservation areas or listed buildings within Great Ashby.

### Housing

13.93 Two sites are allocated in and around Great Ashby for an estimated 930 new homes. There have been no new homes built or granted planning permission within Great Ashby since 2011.

Ref	Strategic Housing Sites	Dwelling estimate
GA2	Land North-East of Great Ashby (Weston parish) (see Policy SP18)	600 homes
Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy GA1	Land at Roundwood (Graveley parish)	330 homes
	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>Sensitive integration into existing settlement in terms of development layout and building orientation;</li> <li>Principal vehicular access taken from existing residential streets within Great Ashby;</li> <li>Provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;</li> <li>• Contribution towards appropriate GP provision across the north of Stevenage sites;</li> <li>• Maintain general integrity of Weston Road, including as a through route for pedestrians and cyclists;</li> <li>• Retention and sensitive treatment of priority woodland habitats surrounding site to north and west;</li> <li>• Consider and mitigate against any adverse impacts upon adjacent local wildlife site at Parsonsgreen Wood;</li> <li>• Integration of Footpath Graveley 010 as a perimeter feature around the north of the site; and</li> <li>• Sensitive design and landscaping around northern and western peripheries to minimise impacts upon wider landscape and heritage assets, including the setting of the Scheduled Ancient Monument at Chesfield Church.</li> </ul>
Total allocated sites	930 homes
Completions and permissions	0 homes
Total allocated, completed and permitted	930 homes

### *Economy*

13.94 The facilities of Great Ashby are designated as a neighbourhood centre under Policy SP4. The extent of the neighbourhood centre is shown on the map in Appendix 4. Proposals in this area will be considered in accordance with the detailed policies of this Plan.

### *Infrastructure and mitigation*

13.95 Our Strategic Policies set out the key requirements in relation to the land at north-east of Great Ashby (see Policy SP18).

13.96 School place provision in Great Ashby is a key issue. The existing primary school at Round Diamond was built to serve the original development but is regularly oversubscribed. This results in some children having to travel further afield for their education.

13.97 Hertfordshire County Council (HCC) have identified expansion potential at The Leys Primary School within Stevenage as an option for providing additional capacity in the wider north Stevenage and Great Ashby area.

13.98 Our proposals for site GA2 also require consideration of education provision, reserving land to provide a new 2FE primary / 4FE secondary 'all through'

school. These measures will ensure sufficient provision to serve Great Ashby as a whole.

- 13.99 The Stevenage Mobility Strategy aims to significantly increase the proportion of journeys undertaken on foot, by bike and by public transport over the plan period. Sites on the edge of Stevenage will need to make appropriate provision for sustainable modes of transport, and appropriate contributions to relevant sustainable travel schemes across the town, to ensure that they meet these aims.
- 13.100 Our transport modelling does not identify any specific mitigation scheme requirements for Great Ashby. There are however local concerns that Back Lane, a narrow minor road which leads to Church Lane in Graveley, could be used by increased numbers of vehicles leaving the new development sites, and that junctions in Graveley itself will suffer from congestion as a result of increased flows. These issues are also part of wider network issues concerning junction 8 of the A1(M) and alternative routeings to this, which are being reviewed by the Council and HCC, and which will propose mitigation measures in the area. These will be reflected in future iterations of the Infrastructure Delivery Plan. Any transport proposals should consider the effects on adjacent networks and communities such as Graveley, and propose suitable mitigation; the analysis should also consider cumulative impacts.
- 13.101 It is also recognised that there are localised highway issues in the area, particularly relating to on-street car parking<sup>152</sup>. The parking issues have arisen, in part, as a result of national planning policies in place at the time Great Ashby was developed which restricted the amount of off-street car parking the District Council could require. These measures, along with wider transport and mobility proposals arising from development of the site, will be developed in consultation with Hertfordshire County Council and Stevenage Borough Council.
- 13.102 Some elements of potential solutions to these issues, such as the use of Traffic Regulation Orders (TROs) to deal with parking issues, lie outside the direct control of the planning system and it is therefore not for this Local Plan to dictate the most appropriate solution(s).
- 13.103 It is recognised that a careful balance needs to be struck between facilitating new development, encouraging sustainable travel choices, ensuring safe vehicular access throughout Great Ashby, the provision of parking places and the need to ensure that any measures which might be implemented do not simply displace problems to other less appropriate locations.
- 13.104 We will continue to work with the Community Council, Stevenage Borough Council and highway authority to determine the most appropriate solution(s). Sites in Great Ashby will need to ensure that any transport assessments

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<sup>152</sup> This also explains why high-level traffic modelling, which will not contain this level of intelligence, considers there to be sufficient capacity.

appropriately take these matters into account and contribute reasonably to any necessary mitigation measures, or wider strategies which may seek to address these issues.

- 13.105 Our evidence identifies that the three housing allocations proposed to the north of Stevenage within the District will generate a requirement for two additional GPs. The most appropriate location and format for this provision will be determined in consultation with health service providers also having regard to existing and proposed patterns of provision within Stevenage.
- 13.106 Thames Water have identified that additional wastewater infrastructure capacity is likely to be required to support development at Great Ashby. Applicants should provide sufficient detail alongside any applications to demonstrate that these requirements have been understood and addressed.

## Hexton

### *Introduction*

13.107 The parish of Hexton contains the village and surrounding countryside. It adjoins Central Bedfordshire to the north, east and west. Most of the parish is covered by the Chilterns Area of Outstanding Natural Beauty.

13.108 The village includes a school, shop, public house, village hall and church.

13.109 At the 2011 census the population of the parish was 123 and there were 52 dwellings in the parish.

### *Role in settlement hierarchy*

13.110 Hexton is identified as a Category A village. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent.

13.111 Beyond the village boundary, the whole of the parish is designated as Green Belt.

### *Heritage*

13.112 The parish contains the Hexton Conservation Area which includes a number of listed buildings. Ravensburgh Castle is a Scheduled Ancient Monument. The grounds of Hexton Manor are designated as a historic park and garden.

### *Housing*

13.113 There are no sites allocated for residential development in Hexton. Planning permission has been granted for four new homes since 2011.

## Hinxworth

### *Introduction*

13.114 The parish of Hinxworth contains the village and surrounding farmland. It adjoins Central Bedfordshire to the west and north. There is a village hall, public house and church, but little else by way of facilities.

13.115 At the 2011 census the population of the parish was 313 and there were 127 dwellings in the parish.

### *Role in settlement hierarchy*

13.116 Hinxworth is identified as a Category B village, within which infilling development which does not expand the built up area into the surrounding countryside will be allowed.

### *Heritage*

13.117 The parish contains the Hinxworth Conservation Area which includes a number of listed buildings.

### *Housing*

13.118 There are no sites allocated for residential development in Hinxworth. Three new homes have been built or granted planning permission since 2011.

## Hitchin

### *Introduction*

- 13.119 Hitchin is one of North Hertfordshire's main towns. Historically it forms the main market town serving the area, and administratively it was the base for the Hitchin Rural District Council, which until 1974 covered most of the territory which now comprises North Hertfordshire.
- 13.120 Hitchin, Letchworth Garden City and Baldock lie very close to each other and have strong relationships linking them in terms of housing markets and job movements. That said, each town retains a distinct identity of its own. The needs for development arising from the three towns are comparatively high, but the gaps separating the towns are small and of great importance if the town's urban areas and identities are to be kept distinct. Managing growth in this relatively developed part of the District whilst allowing each town to retain its identity is one of the challenges to be addressed.
- 13.121 At the 2011 census the population of Hitchin (defined as the unparished area of the town) was 32,731 and there were 14,702 dwellings in the unparished area. A further 870 people and 329 dwellings are found in the part of St Ippolyts parish which falls within Hitchin Priory ward, giving a combined population of 33,601 for the urban area of Hitchin, making it the most populous individual urban area in the District, narrowly overtaking Letchworth Garden City, which had been larger in the 2001 census.
- 13.122 The town has grown over the years and has absorbed the former village of Walsworth within its urban area, as well as smaller hamlets such as Bearton Green, giving different parts of the modern town different characters. In the east of the town Walsworth Common / Purwell Meadows forms a major open space along the River Purwell.
- 13.123 The town has some small areas of relative deprivation, notably on the Westmill estate in the north-west of the town. The Council is working with partners to try and regenerate the neighbourhood centre there and improve community facilities.

### *Role in settlement hierarchy*

- 13.124 Hitchin is classed as a town under Policy SP2. A settlement boundary is defined for the town (shown on the Policies Map), within which new development is encouraged. Beyond the settlement boundary is Green Belt.

### *Heritage*

- 13.125 Hitchin developed around its long thin medieval market place, which ran parallel to the River Hiz and stretched from Bancroft in the north to Bridge Street and Tilehouse Street in the south, adjoining Hitchin Priory. The parish church of St Mary's is between the historic market place and the river. Both Hitchin Priory and the parish church of St Mary's are Grade I listed buildings.

13.126 Infilling within the historic market place created the streets of Sun Street and Bucklersbury to the south and High Street and Churchyard to the north, leaving the smaller area now known as Market Place which forms the visual and commercial heart of the town. This area is covered by the Hitchin Conservation Area, which also includes some of the early suburban areas, notably between Walsworth Road and Wymondley Road which developed between the old town and the railway.

13.127 Separate conservation areas cover the area around Hitchin Station and nearby Ransom’s Recreation Ground, Hitchin Hill Path, Butts Close, and the hamlet of Charlton to the south-west of the town.

*Housing*

13.128 Seven sites are allocated in and around Hitchin for an estimated 971 new homes. The significant majority of these will be built at our Strategic Housing Site at Highover Farm. A further 871 homes have been built or granted planning permission in Hitchin since 2011.

Ref	Strategic Housing Sites	Dwelling estimate
HT1	Land at Highover Farm (see Policy SP17)	700 homes
Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy HT2	Land north of Pound Farm (St Ippolyts parish)	84 homes
	<ul style="list-style-type: none"> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• No residential development within Flood Zone 2;</li> <li>• Maintain appropriate buffer zone from Ippolitts Brook at south-east of site;</li> <li>• Consider and mitigate against any adverse impacts upon adjoining priority habitat (deciduous woodland) and key features of interest of adjacent local wildlife site (Folly Alder Swamp);</li> <li>• Retain and reinforce planting along southern and eastern boundaries to ensure integrity of revised Green Belt boundary; and</li> <li>• Sensitive design towards south-west of site and in areas viewed from Mill Lane to minimise harm to heritage assets.</li> </ul>	
Policy	Land south of Oughtonhead Lane	46 homes

HT3	<ul style="list-style-type: none"> <li>• Access from Westbury Close or Long Innings whilst maintaining the general integrity and character of Oughtonhead Lane (Restricted Byway Hitchin 003);</li> <li>• Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI;</li> <li>• Retain and reinforce planting along western and southern boundaries to ensure integrity of revised Green Belt boundary; and</li> <li>• Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.</li> </ul>	
Policy HT5	Land at junction of Grays Lane & Lucas Lane	16 homes
	<ul style="list-style-type: none"> <li>• Improvements to Grays Lane to provide access to sites HT5 and HT6 whilst maintaining appropriate access to, and integrity and character of, Bridleway Hitchin 004 and Byway Open to All Traffic Hitchin 007;</li> <li>• Retain and reinforce planting along western boundaries to protect openness of Green Belt beyond the allocation;</li> <li>• Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI; and</li> <li>• Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.</li> </ul>	
Policy HT6	Land at junction of Grays Lane & Crow Furlong	53 homes
	<ul style="list-style-type: none"> <li>• Improvements to Grays Lane to provide access to sites HT5 and HT6 whilst maintaining appropriate access to, and integrity and character of, Bridleway Hitchin 004 and Byway Open to All Traffic Hitchin 007;</li> <li>• Consider and mitigate against any adverse impacts upon adjoining priority habitat (deciduous woodland);</li> <li>• Consider and mitigate against potential adverse cumulative impacts of sites in this area on Oughtonhead Lane SSSI;</li> <li>• Retain and reinforce planting along western and southern boundaries to ensure integrity of revised Green Belt boundary;</li> <li>• Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB; and</li> <li>• Archaeological survey to take place prior to development.</li> </ul>	
Policy HT8	Industrial Area, Cooks Way	12 homes
	<ul style="list-style-type: none"> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Higher intensity development to take account of site location and surrounding completed schemes; and</li> <li>• Development should not prejudice future use of the safeguarded rail aggregate depot.</li> </ul>	
Policy HT10	Former B&Q site	60 homes
	<ul style="list-style-type: none"> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Enhance routes to nearby open space and / or on-site provision of open space;</li> <li>• Higher intensity development to take account of site location and surrounding completed schemes; and</li> <li>• High quality and innovative design accentuating the site's corner location and as a gateway to the Hitchin Station area.</li> </ul>	
Total allocated sites		971 homes
Completions and permissions		871 homes
Total allocated, completed and permitted		1,842 homes

### *Economy*

13.129 Hitchin contains a number of existing employment areas spread across the town. The largest of these is at Wilbury Way. Although no new sites for employment uses are proposed in Hitchin in this Plan, protection of the existing employment areas will be important to ensure the future of the economy and support wider economic growth.

13.130 The following sites are designated employment areas shown on the Policies Map. Applications will be considered in accordance with our detailed policies.

Ref	Designated employment areas	Hectares
HE1	Wilbury Way	38.9
HE2	Burymead Road	7.1
HE3	Station approach	1.4
HE4	Land adjacent to Priory Park	0.9

13.131 Hitchin town centre is the District's largest town centre. It has a good range of shops, with the primary shopping area being largely around Market Place and

along High Street and Bancroft, with secondary shopping areas along Hermitage Road, Bucklersbury and Sun Street.

- 13.132 The Churchgate Centre and its surrounds make an important contribution to the vitality of the town centre. It supports a significant amount of retail floorspace, provides the location of Hitchin Market and ensures a large quantity of surface level car-parking in easy access of the shops and facilities.
- 13.133 However, our evidence also recognises that this area lacks amenity value and is largely a negative contribution to the Hitchin Conservation Area and to the setting of individual listed buildings<sup>153</sup>.
- 13.134 A need for additional retail floorspace has been recognised by the Council and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. The retail capacity projections<sup>154</sup> are district wide and can be met within the district. They are based on the projected additional spend on retail from an increased population and retaining market shares from competing centres. The capacity projections for Hitchin indicate the potential for growth of 11,100 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance advises that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail.
- 13.135 For allocation purposes, the capacity has been distributed between three of the four town centres in the District. Baldock does not have an allocation due to no sites being presented as available to the Council.
- 13.136 Our evidence sees the Churchgate Centre and the surrounding area as a location where up to 4,000 gross sq.m of additional retail floorspace could be provided as part of a comprehensive mixed-use redevelopment across the entire allocated site. Redevelopment of this area at a suitable scale and reflecting the historic properties of Hitchin town centre has the potential to enhance the character, appearance and significance of this area.
- 13.137 Paynes Park could deliver up to 3,000 gross sq.m additional retail floorspace and overall the remaining potential retail capacity for Hitchin of 4,100 gross sq.m will need to be met on a district wide basis. The retail study briefing note<sup>155</sup> indicates in its summary table that by 2031 the District as a whole will have effectively met its current capacity projections.
- 13.138 A concept framework / masterplan will be initiated by the District Council to address the requirements of Policies HT11 and HT12. It will consider existing and potential land uses, capacities for development and place-making. It will illustrate the disposition and connectivity of current and potential land uses including retail; employment/commercial; housing; community facilities; formal/informal public open space; the market; links to car parks, bus stops,

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<sup>153</sup> Heritage Assessment of Churchgate, Hitchin (Amec Foster Wheeler, 2016)

<sup>154</sup> North Hertfordshire Retail Study Update (NLP, 2016); Retail Background Paper (NHDC, 2016)

<sup>155</sup> Retail Study Briefing Note (Lichfields, 2017)

key footpaths, cycle tracks and vehicular routes as well as guidance on how these routes will align through and around the framework / masterplan area connecting to surrounding neighbourhoods. The framework / masterplan will also consider the phasing and deliverability of any site-specific proposals.

- 13.139 The schemes will be main town centre uses led. Consequently, no specific housing allocation is identified, and any residential units here will contribute towards the other allowances identified in Policy SP8(c) of this Plan.
- 13.140 A number of high-level, site-specific criteria are identified below. Any scheme here will need to take these into account and take a comprehensive approach to the treatment of heritage assets to ensure an appropriate scheme.
- 13.141 Any major planning application within the allocation area on the Policies Map, should have regard to the concept framework / masterplan. Any major planning application which comes ahead of the concept framework / masterplan will be considered in accordance with the criterion in Policy HT11.
- 13.142 The Hitchin Town Centre Strategy review will commence in advance of the second period of the Local Plan; being informed by the preceding Concept Framework.

Ref	Town Centre Uses allocations and site-specific criteria	
Policy HT11	Churchgate and its surrounding area	Mixed-use
	<ul style="list-style-type: none"> <li>• Redevelopment to provide 4,000 gross sq.m of additional shop, café, restaurant, pub, drinking establishment or takeaway town centre uses at ground floor level, subject to an up-to date assessment of retail capacity and supply.                             <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> <li>• Preparation of a concept framework / masterplan to enable:                             <ul style="list-style-type: none"> <li>○ Identification of suitable, long-term location(s) for Hitchin Market;</li> <li>○ Provision of high quality public realm including strengthened pedestrian links between Market Place, Queen Street, Portmill Lane, Bancroft and along the River Hiz;</li> <li>○ Preservation and enhancement of heritage assets including Hitchin Conservation Area and listed buildings, including:                                     <ul style="list-style-type: none"> <li>▪ Protection of key views of Grade I listed St Mary's Church, including from Hollow Lane;</li> </ul> </li> </ul> </li> </ul>	

	<ul style="list-style-type: none"> <li>▪ Consideration and sensitive treatment of key listed buildings and their settings including the Sun Hotel, the Biggin and various buildings in Market Place;</li> <li>▪ Retention and enhancement of terracing to River Hiz having regard to identified Flood Zone;</li> <li>▪ Any replacement buildings required to:             <ul style="list-style-type: none"> <li>• respect existing building frontage lines on Sun Street and Market Place; and</li> <li>• provide architectural variation to reflect rhythm of historic building plots.</li> </ul> </li> <li>• Archaeological survey to be completed prior to development; and</li> <li>• Ensure an appropriate level of car parking is retained and / or provided across the town as a whole.</li> </ul>	
<p>Policy HT12</p>	<p>Paynes Park</p>	<p>Mixed use</p>
<ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 3,000 gross sq.m of additional shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply.             <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> <li>• Preparation of a concept framework / masterplan to enable:             <ul style="list-style-type: none"> <li>○ Preservation and enhancement of heritage assets including Hitchin Conservation Area and listed buildings, including:</li> <li>○ Protection and enhancement of Paynes Park House and The Cock Public House which lie within the site boundary;</li> <li>○ Respect for the setting of the Green Hythe, Bank Flat and 3-4 High Street which are adjacent to the site;</li> <li>○ Incorporating and maintaining alignment of PROW along West Alley (Hitchin 090);</li> <li>○ Environmental improvements to the area and frontage along Paynes Park; and</li> </ul> </li> <li>• Ensure an appropriate level of car parking is retained and/or provided across the town as a whole.</li> </ul>		

13.143 Policy SP4 identifies there are seven local centres in Hitchin, which will be encouraged to thrive and are protected under policy ETC6. They are:

- Grove Road;

- Nightingale Road;
- Ninesprings;
- Redhill Road;
- Walsworth Road;
- Walsworth (Cambridge Road); and
- Westmill (John Barker Place).

13.144 The extent of these centres is shown on the maps in Appendix 3.

*Infrastructure and mitigation*

13.145 Our Strategic Policies set out the key requirements in relation to the land at Highover Farm (see Policy SP17).

13.146 This includes a presumption in favour of an on-site primary school. The cumulative demand arising from the remaining sites within Hitchin will create further demand for additional school places.

13.147 Land at Bearton Green was identified as a reserve school site in the previous local plan. This is currently used as a detached playing field by William Ransom Primary to allow the school to expand. This land could be used to facilitate expansion of other existing primary schools by providing detached playing fields.

13.148 Hertfordshire County Council will need to undertake further work to understand the dynamics of school place allocations within Hitchin and to identify the most appropriate location(s) to make any additional primary school provision.

13.149 Some expansion of existing secondary schools is considered feasible. This Plan removes the Priory School from the Green Belt to facilitate additional provision where this is considered the most suitable approach.

13.150 Our transport modelling identifies that a number of junction improvement schemes will be required in Hitchin by 2031:

- A505 Cambridge Road / Willian Road / Woolgrove Road
- A505 Upper Tilehouse Street / B655 Pirton Road
- A505 & A602 Paynes Park
- A602 / B656 / Gosmore Road
- Cadwell Lane / Wilbury Way / Woolgrove Road

13.151 A number of these highway mitigation schemes are on the routes of the A505 and A602 as they pass through the town. It is notable from the transport work that the majority of these schemes would be required even if no further development was being proposed through this Plan.

13.152 All schemes in Hitchin will be required to make reasonable contributions towards the funding of these works and to walking and cycling schemes in

Hitchin which aim to influence mode share and free up capacity for new development. In some cases, existing traffic or background growth may result in junction capacity issues, and new development will further increase these problems. However any additional capacity developed to resolve existing or background growth issues will also be taken up by new development, and appropriate contributions are therefore likely to be required.

13.153 Any highway mitigation scheme at the A602 / B656 / Gosmore Road roundabout will need to consider the effects upon the Air Quality Management Area which has been declared on the approach to this junction.

13.154 Anglian Water recognise that there is capacity within the environmental consent for Hitchin Water Recycling Centre to accommodate planned growth in the town. Local upgrades may be required for certain schemes, notably site HT2. The need for such upgrades will be determined at the planning application stage when Anglian Water is approached by the developer.

## Holwell

### *Introduction*

13.155 Holwell is a small parish on the border with Bedfordshire. Until 1897 it was part of Bedfordshire. The parish contains the village of Holwell and the surrounding rural area. There is a village hall and church, but little else by way of facilities.

13.156 At the 2011 census the population of the parish of Holwell was 361 and there were 164 dwellings in the parish.

### *Role in settlement hierarchy*

13.157 Holwell is defined as a Category B village within which infilling development that does not extend the built up area into the surrounding countryside will be allowed. The whole parish is classed as Rural Area Beyond the Green Belt.

### *Housing*

13.158 There are no sites allocated for residential development in Holwell. 30 homes have been built or granted planning permission since 2011.

## Ickleford

### *Introduction*

13.159 Ickleford lies to the north of Hitchin. Apart from the village the parish includes some scattered farms and tracts of countryside. The village of Ickleford has a relatively good range of facilities, including a school, shops, public houses, village hall and church.

13.160 At the 2011 census the population of the parish of Ickleford was 1,833 and there were 844 dwellings in the parish.

13.161 The civil parish extends north to the District and county boundary with neighbouring Central Bedfordshire. The area at the north of Ickleford parish is considered under a specific section of this chapter on Lower Stondon. This is the settlement within Central Bedfordshire that immediately adjoins North Hertfordshire.

### *Role in settlement hierarchy*

13.162 Ickleford is identified as one of five villages where a greater amount of development has been allocated. The development boundary of Ickleford is shown on the Policies Map to indicate the area within which further development will be allowed. Most of the rest of the parish is classed as Green Belt, save a small area in the far north of the parish on the Bedfordshire border which is rural area beyond the Green Belt.

### *Heritage*

13.163 Ickleford has one conservation area which covers the central area of the village, covering the two greens (Upper Green and Lower Green) between which the village grew. The parish church of St Katherine's is a Grade I listed building.

### *Housing*

13.164 Three sites are allocated around the edge of Ickleford village for an estimated 199 new homes. 36 further new homes have been built or granted planning permission since 2011.

Ref	Local Housing Allocations and site specific <u>policy</u> criteria	Dwelling estimate
Policy IC1	Land at Duncots Close	9 homes
	<ul style="list-style-type: none"> <li>Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>No built development in north-east corner of site to protect views from Grade I listed church;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts;</li> <li>• Archaeological survey to be completed prior to development; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Policy IC2	Burford Grange, Bedford Road	40 homes
	<ul style="list-style-type: none"> <li>• Provision of a pedestrian crossing point over the A600 to connect to the existing footpath network and ensure safe access;</li> <li>• Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures;</li> <li>• Consider and mitigate against any adverse impacts upon key features of interest of adjoining local wildlife site (Westmill Lane);</li> <li>• Site layout designed to take account of existing wastewater infrastructure;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Retention of planting at south and west of the site to ensure integrity of revised Green Belt boundary; and</li> <li>• Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism.</li> </ul>	
Policy IC3	Land at Bedford Road	150 homes
	<ul style="list-style-type: none"> <li>• Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures;</li> <li>• Approximately two hectares of land secured as a-reserve site for a primary school;</li> <li>• Appropriate junction access arrangements to Bedford Road;</li> <li>• Sensitive incorporation of Footpaths Ickleford 013 &amp; 014 as green routes around the edge of the site including appropriate measures to reinforce the new Green Belt boundary along their alignment;</li> <li>• Integration of Bridleway Ickleford 015 as a green corridor through the site;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Sensitive treatment of priority deciduous woodland habitat or, where this cannot be (fully) retained, compensatory provision elsewhere within or adjoining the site;</li> <li>• Development proposals to be informed by site-specific landscape assessment;</li> <li>• Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li>• Archaeological survey to be completed prior to development;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; and</li> <li>• Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism.</li> </ul>
Total allocated sites	199 homes
Completions and permissions	36 homes
Total allocated, completed and permitted	235 homes

*Infrastructure and mitigation*

13.165 Our transport modelling work does not identify any specific mitigation works that are required on the Ickleford road network. Development here will, however, contribute toward traffic generation within Hitchin and appropriate contributions will be sought towards identified schemes in the town. Any transport assessments for sites in Ickleford should also consider the junction of the A600 and Turnpike Lane, where improved facilities for pedestrians and cyclists may mitigate higher traffic volumes.

13.166 Site IC3 will require the creation of a new access onto the A600 Bedford Road. The most appropriate solution, along with any consequential works – such as changes to speed limits entering / exiting the village from / to the north – will be explored through transport assessments.

13.167 Ickleford Primary is a 1FE school. However, it is located on a constrained site. The school premises lie partially within the conservation area and the original school building is listed. There is no capacity to expand within the current site but the advantages of keeping the school at the historic centre of the village are recognised in both functional and heritage terms.

13.168 As well as serving Ickleford, the school also admits pupils from northern Hitchin as well as outlying rural areas and settlements. The amount of development proposed for Ickleford may result in a need for additional primary school provision. However, it is not possible to say at this point exactly how or when this provision might be needed. The additional demand created by new

development in Ickleford may be offset, either in whole or in part, by changes to school admission patterns outside of the village.

- 13.169 Site IC3 reserves sufficient land to provide a new primary school of up to 2FE should this prove necessary. This would allow for the relocation of the existing school and / or additional provision to meet requirements arising from new development if this is determined to be the most appropriate solution. The Council will work with the school, Hertfordshire County Council and other stakeholders as required to monitor the demand for school places. All options for the retention of the existing school in its current form, its expansion within or adjoining its existing site or splitting provision across the two sites will be fully explored before any decision is taken to relocate Ickleford Primary to the reserve site within IC3.
- 13.170 In considering this issue, regard will need to be given to the nature of the existing school's catchment, the relationship with other schools on the northern edges of Hitchin and the most desirable format(s) for delivering primary education in the village.
- 13.171 Anglian Water consider there is capacity in the relevant treatment works to support the level of growth proposed. There have been local incidents of sewer flooding and all sites will be required to robustly assess wastewater drainage requirements.
- 13.172 Hertfordshire County Council, as minerals planning authority, has identified a potential resource block (and associated buffer) to the north of Hitchin. Sites IC2 and IC3 lie within these areas. These sites will be subject to consultation with the mineral planning authority to determine whether prior extraction or any other relevant measure is necessary to avoid sterilisation of any minerals resource.

## **Kelshall**

### *Introduction*

13.173 Kelshall is a small village in hilly country to the south-west of Royston. It is one of a group of villages established by the Saxons along the line of the chalk ridge from Baldock to Royston.

13.174 Kelshall has a village hall and church but few other facilities.

13.175 At the 2011 census the population of the parish of Kelshall was 163 and there were 65 dwellings in the parish.

### *Role in settlement hierarchy*

13.176 Kelshall has limited facilities and is identified as a Category B village within which infilling development which does not extend the built up area of the village into the surrounding countryside will be allowed.

### *Housing*

13.177 No sites are allocated in Kelshall for residential development. Four new homes have been built or granted planning permission in the parish since 2011.

## Kimpton

### *Introduction*

13.178 Kimpton parish is on the south-western edge of the District. The village of Kimpton has a relatively good range of facilities, including a school, shop, public houses, village hall and church. Apart from the village itself, the parish also includes the smaller settlements of Peters Green and Blackmore End as well as some scattered farms and a wide tract of countryside.

13.179 At the 2011 census the population of the parish of Kimpton was 2,167 and there were 884 dwellings in the parish.

### *Role in settlement hierarchy*

13.180 Kimpton is identified as a Category A village under policy SP2. It has been excluded from the Green Belt with its settlement boundary being shown on the Policies Map. Blackmore End is classed as a Category B settlement. It has also been excluded from the Green Belt and infilling development that does not extend the built up area into the surrounding countryside will be permitted. Peters Green is a Category C settlement. Development here will be restricted to limited affordable housing and facilities for local community needs in accordance with our detailed policies.

### *Heritage*

13.181 Kimpton has two conservation areas. Kimpton Village covers the eastern part of the village around the church and green, and Kimpton Bottom lies at the western end of the village. The parish church of St Peter and St Paul is a Grade I listed building.

### *Housing*

13.182 One site is allocated in Kimpton for an estimated 13 new homes. 43 homes have been built or granted planning permission since 2011.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy KM3	Land north of High Street	13 homes
	<ul style="list-style-type: none"> <li>Address existing surface water and groundwater flood risk issues through SUDs or other appropriate solution; and</li> <li>Sensitive design to minimise impacts upon the adjoining conservation area.</li> </ul>	
Total allocated sites		13 homes
Completions and permissions		43 homes
Total allocated, completed and permitted		56 homes

### *Economy*

13.183 Kimpton has a small employment area along Claggy Road. This is not sufficiently large to designate as an employment area, but does perform an important role in providing local employment and facilities. The Council will therefore seek to protect the employment function of this area under policy ETC4: Employment development outside employment areas.

### *Infrastructure and mitigation*

13.184 There are known flooding issues in Kimpton, from both surface water and groundwater, particularly along Claggy Road which acts as a flood route into the High Street. Development in Kimpton will be required to achieve the equivalent of greenfield run off rates to ensure existing issues are not exacerbated.

## King's Walden

### *Introduction*

13.185 King's Walden parish lies on the western edge of the District, close to Luton Airport. The largest village in the parish is Breachwood Green. It also includes the smaller village of King's Walden (including Ley Green). The parish also includes several scattered smaller hamlets and farms and the surrounding countryside. Breachwood Green has a school, public house, village hall and church. King's Walden has a shop, public house and church.

13.186 At the 2011 census the population of the parish of King's Walden was 1,015 and there were 410 dwellings in the parish.

### *Role in settlement hierarchy*

13.187 Breachwood Green is classed as a Category A village in Policy SP2. It has been excluded from the Green Belt and development will be supported within the defined settlement boundary. The rest of the parish is designated as Green Belt, including the settlement of King's Walden itself.

### *Heritage*

13.188 There are no conservation areas in the parish. The parish church of St Mary's is a Grade I listed building.

### *Housing*

13.189 One site is allocated in King's Walden parish, at Breachwood Green, for an estimated 16 new homes. 11 homes have been built or granted permission since 2011.

Ref	Local Housing Allocations and site specific policy_criteria	Dwelling estimate
Policy KW1	Land west of The Heath, Breachwood Green	16 homes
	<ul style="list-style-type: none"> <li>• Appropriate noise monitoring and mitigation measures, to potentially include insulation and appropriate orientation of living spaces, demonstrating WHO and BS8223 standards will be met;</li> <li>• Reprovision of existing allotments subject to up-to-date assessments of need;</li> <li>• Sensitive treatment on site frontage to minimise impacts upon setting of nearby Listed buildings on The Heath;</li> <li>• Reinforce western site boundary to screen views, enhance Green Belt boundary and maintain rural setting of Listed buildings on Brownings Lane; and</li> </ul>	

	<ul style="list-style-type: none"> <li>Provision of green corridor through the site linking Footpath Kings Walden 008 with Footpath Kings Walden 014.</li> </ul>
Total allocated sites	16 homes
Completions and permissions	11 homes
Total allocated, completed and permitted	27 homes

### *Infrastructure and mitigation*

13.190 Breachwood Green is located on the approach and departure flightpaths from Luton airport and any schemes will need to demonstrate that noise issues have been appropriately addressed and that internal noise levels within any new homes are within relevant guideline levels.

13.191 This site is currently in use as allotments and, subject to appropriate surveys and evidence at the point of any application, will need to be replaced. There is a second allotment site within Breachwood Green at Colemans Road and consideration should be given as to whether land in this area may be able to accommodate the displaced plots.

13.192 Thames Water have identified that some improvements may be required to existing wastewater infrastructure. However, it is considered that this can be dealt with through the planning application process and / or by condition.

## Knebworth

### *Introduction*

13.193 Knebworth parish lies on the southern edge of the District between Stevenage and Welwyn. The village of Knebworth has a good range of facilities including a railway station, school, doctors and dentists, library, a range of shops, village hall and churches. The railway and A1(M) both cross the parish. East of the A1(M) is Knebworth village, which grew up around Knebworth Station. West of the A1(M) is Old Knebworth, adjoining the Knebworth House estate. Apart from the two villages the parish also includes the Knebworth House parkland and surrounding countryside.

13.194 At the 2011 census the population of the parish of Knebworth was 4,496 and there were 2,002 dwellings in the parish.

### *Role in settlement hierarchy*

13.195 Knebworth is identified one of five villages where a greater amount of development has been allocated. It is excluded from the Green Belt with a settlement boundary shown on the Policies Map. General development will be permitted in this area. The rest of the parish is designated Green Belt. Old Knebworth is identified as a Category B village within the Green Belt where limited infilling will be allowed.

### *Heritage*

13.196 Knebworth village has moved twice. The original village was in what is now Knebworth Park, clustered around the parish church of St Mary and St Thomas. The church, which is a Grade I listed building, now stands alone in the park, after one of the owners of Knebworth House moved the village to enlarge the park. The village's new location was what is now called Old Knebworth. The settlement now called Knebworth grew up around the railway station a little way to the east of Old Knebworth.

13.197 Knebworth has three conservation areas. The Old Knebworth Conservation Area covers that village, whilst the Deards End Lane and Stockens Green conservation areas cover suburban parts of the main village with particular distinctive characteristics. Knebworth Park is designated as a historic park and garden. The smaller Homewood estate, built as the dower house to Knebworth House, is also a designated historic park and garden.

### *Housing*

13.198 This Plan identifies three local housing allocations within Knebworth for an estimated 584 new homes. A further 175 homes have already been built or granted planning permission within the parish. This includes development adjoining the southern edge of Stevenage Borough.

Ref	Local Housing Allocations and site specific policy_criteria	Dwelling estimate
Policy KB1	<p data-bbox="496 315 788 349">Land at Deards End</p> <ul data-bbox="496 389 1437 1451" style="list-style-type: none"> <li>• Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</li> <li>• Sensitive design and / or lower density housing at east of site to respect setting of Deards End Lane Conservation Area and listed buildings;</li> <li>• Creation of appropriate, defensible Green Belt boundary along north-western perimeter of site;</li> <li>• Detailed scheme layout to be informed by site-specific visual impact assessment to mitigate Green Belt impacts to the fullest reasonable extent;</li> <li>• Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient Monument);</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces;</li> <li>• Consider and mitigate against potential adverse impacts upon Knebworth Woods SSSI and priority habitat (deciduous woodland) adjoining site; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	200 homes
Policy KB2	<p data-bbox="496 1482 788 1516">Land off Gipsy Lane</p> <ul data-bbox="496 1556 1437 2013" style="list-style-type: none"> <li>• Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</li> <li>• Sensitive design and / or lower density housing where site affects setting of Stockens Green Conservation Area;</li> <li>• Creation of appropriate, defensible Green Belt boundary along southern perimeter of site;</li> <li>• Approximately two hectares of land to the south of Gipsy Lane and adjoining the existing settlement reserved as an appropriate site for provision of a new Primary School;</li> </ul>	184 homes

	<ul style="list-style-type: none"> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation;</li> <li>• Address existing surface water flood risk issues, including any run-off from A1(M), through SUDs or other appropriate solution;</li> <li>• Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient Monument);</li> <li>• Appropriate noise mitigation measures, to potentially include buffer strip, insulation and appropriate orientation of living spaces; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Policy KB4	Land east of Knebworth	200 homes
	<ul style="list-style-type: none"> <li>• Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;</li> <li>• Structural landscaping and planting to provide and / or reinforce Green Belt boundary to east;</li> <li>• Land north of Watton Road reserved for long-term secondary education needs;</li> <li>• Integrate Bridleway Knebworth 001 as part of green infrastructure strategy;</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution;</li> <li>• Preserve views from Knebworth to wider countryside along dry valley to south of Watton Road; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Total allocated sites		598 homes
Completions and permissions		175 homes
Total allocated, completed and permitted		759 homes

*Economy*

13.199 The facilities of Knebworth are designated as a village centre in our retail hierarchy under Policy SP4. Applications in this area, outside of the allocated housing site, will be assessed using our detailed development management

policies. The village centre is shown on the Policies Map and the detailed in Appendix 3.

### *Infrastructure and mitigation*

- 13.200 The new homes in Knebworth will require additional school places. There is currently one primary school in Knebworth to the east of the High Street. This takes 60 Reception aged pupils each year. In recent years, school places have been filled by local children and the catchment is relatively tightly drawn.
- 13.201 Land will be reserved within Site KB2 to provide an additional primary school that will meet the needs arising from new development at the west of Knebworth and provide capacity to serve some existing residential areas. Land at the south-east of the KB2 allocation is most suited for this provision which should additionally seek to maximise the distance of the school from the A1(M).
- 13.202 There is currently no secondary education provision in Knebworth. Pupils travel to a variety of schools in Hitchin, Stevenage and Welwyn Garden City.
- 13.203 Making smaller-scale secondary provision may be an appropriate solution which meets future needs, benefits existing residents and provides a more sustainable approach.
- 13.204 It is currently anticipated that any secondary school provision in Knebworth will not be required until the late 2020s at the very earliest. To ensure an appropriately sized site can be made available, land to the north of Watton Lane at the east of the village is reserved for this purpose. We will continue to work with Hertfordshire County Council, the Parish Council, the landowner and Knebworth Primary School to monitor long-term education needs across the Stevenage School Place Planning Area and explore the most appropriate education solution for this site.
- 13.205 Our transport modelling does not identify any specific mitigation scheme requirements for Knebworth. However, the high street, including the junction of Stevenage Road/London Road/Watton Road and Station Road, is a known pinch point, particularly when delays or incidents on the A1(M) result in the B197 being used as an alternate route between Welwyn Garden City and Stevenage. There are also issues of poor pedestrian/cycle access along Station Road under the railway line, and similar issues at Gun Lane and new development will be expected to identify any necessary improvements to walking/cycling conditions in these locations and make reasonable contributions to secure their delivery.

- 13.206 Some of the capacity issues here arise from the way in which the local highway is managed and in particular, the provision of short-stay on-street parking adjacent to the shops<sup>156</sup>.
- 13.207 Highway management measures, such as the use of Traffic Regulation Orders (TROs), lie outside the direct control of the planning system and it is therefore not for this Local Plan to dictate the most appropriate solution(s).
- 13.208 It is recognised that a careful balance needs to be struck between ensuring the continued vitality of the local centre, providing access to local facilities and supporting the new development planned for Knebworth. We will continue to work outside of the local plan process to identify and implement the most appropriate future strategy.
- 13.209 Sites in Knebworth will need to ensure that any transport assessments appropriately take these issues into account and contribute reasonably to any necessary mitigation measures, or wider strategies which may seek to address these issues.
- 13.210 Planning permission has been granted for a new library, doctors' surgery and pharmacy on the site of the current library within the identified village centre.
- 13.211 Knebworth lies within the Thames Water area with wastewater draining to their facility at Rye Meads near Hoddesdon. Previous work identifies that this treatment works should have sufficient capacity to handle all planned development within its catchment until at least 2026 with a reasonable prospect of being able to accommodate development to 2031.
- 13.212 However, it is also recognised that there are constraints in the infrastructure connecting to Rye Meads and capacity from Knebworth is an issue that has been identified. Scheme promoters should work with Thames Water, and together, to identify the likely nature of infrastructure required to ensure this can be programmed appropriately.

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<sup>156</sup> This also explains why high-level traffic modelling, which will not contain this level of intelligence, considers there to be sufficient capacity.

## Langley

### *Introduction*

13.213 Langley is one of the District's smaller parishes. Historically it was part of the parish of Hitchin, becoming a separate civil parish in 1894. The parish of Langley has no meaningful facilities. Apart from the small village of Langley the parish also includes a wide tract of countryside and some scattered farms.

13.214 At the 2011 census the population of the parish of Langley was 175 and there were 71 dwellings in the parish.

### *Role in settlement hierarchy*

13.215 Langley is identified as a Category C settlement, within which only limited additional development will only be allowed to meet defined local needs. The parish is classed as Green Belt, apart from a small area which falls within the land west of Stevenage which is safeguarded for potential long-term development by Policy SP8.

### *Housing*

13.216 No sites are allocated in Langley for residential development. Seven new homes have been built or granted planning permission since 2011.

## Letchworth Garden City

### *Introduction*

- 13.217 Letchworth is the world's first garden city based on Ebenezer Howard's original concept of a self contained settlement combining both town and country living. Much of the town is the product of a Master Plan, with areas of low, medium and higher density housing, industry, open space and the town centre in broadly separate land uses with attractively planned landscapes. Large open spaces are integrated into the town's layout, notably at Norton Common and Howard Park and Gardens.
- 13.218 The original masterplan for the garden city was focussed on the area between the three parallel roads of Wilbury Road / Norton Road in the north, Icknield Way across the middle of the area, and Hitchin Road / Baldock Road (the A505) to the south. After the Second World War development spread beyond the original masterplan, with the Grange estate to the north and the Jackmans, Lordship and Manor Park estates to the south.
- 13.219 The town's administrative boundaries also include the three villages of Willian, Norton and the old village of Letchworth, which were the three pre-garden city parishes covering the area. Today Willian remains a distinct village, being slightly separated from the urban area of Letchworth by one or two thin fields. Norton abuts the urban area with no clear point where Norton ends and the garden city begins. The old village of Letchworth, which stretched from St Mary's Church and Letchworth Hall up the length of Letchworth Lane to the corner shop on Baldock Road, is effectively absorbed within the urban area of the garden city.
- 13.220 At the 2011 census the population of Letchworth Garden City (including Willian and Norton) was 33,249 and there were 14,271 dwellings in the town<sup>157</sup>.

### *Role in settlement hierarchy*

- 13.221 Letchworth Garden City is the District's second largest urban area, with only slightly fewer people than neighbouring Hitchin. Letchworth has largely grown to fill most of the space between Hitchin and Baldock, leaving little room for further growth that does not erode the separation between those towns. North and south of the town are the villages of Stotfold (in Central Bedfordshire) and Willian. A settlement boundary is defined for the town (shown on the Policies Map) within which new development is encouraged. Beyond the settlement boundary is Green Belt.

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<sup>157</sup> At the time of the 2011 census this was the area of the Letchworth Garden City parish, which has subsequently been abolished. The area is the same as the combined five Letchworth wards on NHDC.

## Heritage

13.222 As the world's first garden city, the importance of the original design and layout of the Garden City is recognised in the two conservation area designations, Letchworth and Croft Lane. There are many listed buildings in the town. There are also conservation areas for the old villages of Willian and Norton.

13.223 The Broadway and Broadway Gardens are designated as a historic park and garden, as is Howard Park and Gardens.

13.224 New development within Letchworth Garden City will need to demonstrate how it accords with the Letchworth Garden City Design Principles as set out in Appendix 5.

## Housing

13.225 Twelve sites are allocated in Letchworth for an estimated 1,485 additional dwellings. A further 693 homes have been built or granted planning permission since 2011 and the town will see more than 2,000 new homes built over the plan period.

Ref	Strategic Housing Sites	Dwelling estimate
LG1	Land north of Letchworth (see Policy SP15)	900 homes
Ref	Local Housing Allocations and site specific policy_criteria	Dwelling estimate
Policy LG3	Land east of Kristiansand Way and Talbot Way	120 homes
	<ul style="list-style-type: none"> <li>Structural planting to reinforce Green Belt boundary along north-eastern perimeter of site;</li> <li>Appropriate mitigation measures for noise associated with motorway and / or adjoining employment are to potentially include insulation and orientation of living spaces;</li> <li>Ensure appropriate residential amenity for any properties adjoining employment area, especially if access to the site is via Flint Road;</li> <li>Re-provision of allotments if access to the site is from the west. Re-provision prior to commencement of development, within the vicinity of the site and the same or better quality;</li> <li>Proposals to be informed by a site-specific landscape assessment;</li> <li>Retention of Public Right of Way Letchworth Garden City 026 and diversion if necessary;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Sensitive design and / or lower density housing where the site affects setting of the Norton Conservation Area and nearby Grade II Listed Buildings on Church Lane and Norton Road; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	
Policy LG4	Land north of former Norton School, Norton Road	45 homes
	<ul style="list-style-type: none"> <li>• Appropriate access arrangements to minimise impact upon Croft Lane Conservation Area;</li> <li>• Address existing surface water flood risk through SUDs or other appropriate solution, particularly on the western boundary of the site;</li> <li>• Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area, the setting of the Croft Lane Conservation Area and setting of the Grade II Listed Croft Corner and Grade II Listed Treetops; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	
Policy LG5	Land at Birds Hill	86 homes
	<ul style="list-style-type: none"> <li>• Higher density/flatted development may be achieved given surrounding built form, subject to heritage considerations;</li> <li>• Appropriate mitigation measures for noise associated with railway and / or adjoining employment are to potentially include insulation and orientation of living spaces;</li> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses;</li> <li>• Sensitive design where site affects setting of the Letchworth Conservation Area and Grade II Listed buildings on Birds Hill; and</li> <li>• Retention of the following non-designated heritage assets<sup>158</sup> or, where this cannot be achieved, justification for their loss: <ul style="list-style-type: none"> <li>○ Gunmetal &amp; Bronze, Letchworth Casting Co. Ltd, Casting House</li> <li>○ Ogle</li> <li>○ Vantage Point, Tenement Factory</li> </ul> </li> </ul>	
	Land off Radburn Way	35 homes

<sup>158</sup> As identified in *Design Principles for Industrial Premises in Letchworth Garden City*, Letchworth Garden City Heritage Foundation, 2015

Policy LG6	<ul style="list-style-type: none"> <li>• Re-provision or relocation of any garages lost as a result of development subject to up-to-date evidence of occupation and demand; and</li> <li>• Off-site compensatory reprovision of former priority orchard habitat.</li> </ul>	
Policy LG8	Pixmore Centre, Pixmore Avenue	80 homes
	<ul style="list-style-type: none"> <li>• Higher density/flatted development may be achieved given surrounding built form, subject to heritage considerations;</li> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; and</li> <li>• Sensitive design where site affects setting of the Letchworth Conservation Area and various Grade II Listed buildings in the vicinity of the site.</li> </ul>	
Policy LG9	Former Lannock School	45 homes
	<ul style="list-style-type: none"> <li>• Lower density development with retention of some existing trees and green space to retain sense of openness and accord with Garden City principles;</li> <li>• Site layout designed to take account of existing wastewater infrastructure; and</li> <li>• Address existing surface water flood risk issues through SUDs or other appropriate solution.</li> </ul>	
Policy LG10	Former playing field, Croft Lane	37 homes
	<ul style="list-style-type: none"> <li>• Sensitive design and lower density development to minimise harm to the Croft Lane Conservation Area and setting of the Grade II Listed Buildings along Cashio Lane, Croft Lane and Norton Road;</li> <li>• Access arrangements to minimise impact upon heritage assets; and</li> <li>• Provide archaeological survey prior to development.</li> </ul>	
Policy LG13	Glebe Road industrial estate	10 homes
	<ul style="list-style-type: none"> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Sensitive design and / or lower density housing where site affects the Letchworth Conservation Area;</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses</li> <li>• Address potential surface water flood risk through SUDs or other appropriate solution; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Policy LG15	Garages, Icknield Way	25 homes
	<ul style="list-style-type: none"> <li>• Address potential surface water flood risk through SUDs or other appropriate solution.</li> </ul>	
Policy LG16	Foundation House	47 homes
	<ul style="list-style-type: none"> <li>• Ensure appropriate residential amenity for any properties adjoining employment area;</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses;</li> <li>• Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area;</li> <li>• Archaeological survey to be completed prior to development;</li> <li>• Address potential surface water flood risk through SUDs or other appropriate solution; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Policy LG18	Former Depot, Icknield Way	55 homes
	<ul style="list-style-type: none"> <li>• Address potential surface water flood risk through SUDs or other appropriate solution; and</li> <li>• Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses.</li> </ul>	
Total allocated sites		1,485 homes
Completions and permissions		693 homes
Broad location – Letchworth Garden City town centre		50 homes
Total allocated, completed and permitted 2011-2031*		1,928 homes

\*Land North of Letchworth is allocated for 900 homes in total with 600 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031.

## *Economy*

13.226 Letchworth Garden City plays a significant role in the District's economy, with a major employment area centred on Works Road and Avenue One. The town centre also provides a range of shops and employment opportunities.

Ref	Designated employment areas	Hectares
LE1	Works Road	70.9
LE2	Blackhorse Road	11.8
LE3	Icknield Way	11.4
LE4	Spirella	2.8

13.227 Letchworth has the second largest town centre in the District as identified on the Policies Map. The town centre contains both primary and secondary frontage located in the main retail area around Eastcheap, Leys Avenue, Station Road and the Garden Square shopping centre. These areas will be defined on the Policies Map.

13.228 A need for additional retail floorspace has been recognised by the Council and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. The retail capacity projections<sup>159</sup> are district wide and can be met within the District. They are based on the projected additional spend on retail from an increased population and retaining market shares from competing centres. The capacity projections for Letchworth indicate the potential for growth of 9,200 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance advises that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail.

13.229 For allocation purposes, the capacity has been distributed between three of the four town centres in the District. Baldock does not have an allocation due to no sites being presented as available to the Council.

13.230 Letchworth has the potential capacity to meet wider District needs, recapturing trade that is currently diverted to Hitchin. There are a number of

<sup>159</sup> North Hertfordshire Retail Study Update (NLP, 2016); Retail Background Paper (NHDC, 2016)

opportunities within the town centre boundary that could accommodate this additional provision as detailed in the policies below.

Ref	Town Centre Uses allocations and site-specific criteria	
Policy LG19	<p>The Wynd, Openshaw Way</p> <ul style="list-style-type: none"> <li>• Redevelopment to provide 4,500 gross sq.m of additional shop, café or restaurant, pub or drinking establishment or takeaway town centre uses at ground floor level, subject to an up-to date assessment of retail capacity and supply. <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout, flood risk and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout, flood risk and transport terms.</li> </ul> </li> <li>• No net loss of residential accommodation;</li> <li>• Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</li> <li>• A public pedestrian link should be provided through the site from Norton Way South and Howard Gardens;</li> <li>• Sensitive design to respect Letchworth Conservation Area and the listed building at 52-58 Leys Avenue; and</li> <li>• Address existing flood risk issues, including any run-off, through preparation of a site-specific flood risk assessment and the provision of SUDs or other appropriate solution.</li> </ul>	Mixed use
Policy LG20	<p>Gernon Road</p> <ul style="list-style-type: none"> <li>• Redevelopment to provide 1,000 gross sq.m of additional shop, café or restaurant, pub or drinking establishment or takeaway town centre uses at groundfloor level, subject to an up-to date assessment of retail capacity and supply. <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> </ul>	Mixed use

	<ul style="list-style-type: none"> <li>• Development should seek to retain parts of the library that make a positive contribution to the appearance and street-scene;</li> <li>• Development should enhance the setting of Broadway Gardens;</li> <li>• Preservation or enhancement of the setting of the listed museum;</li> <li>• Sensitive design to respect Letchworth Conservation Area and Letchworth Museum, Vasant Hall and Town Hall listed buildings; and</li> <li>• Address existing surface water flood risk issues, including any run-off, through SUDs or other appropriate solution.</li> </ul>	
<p>Policy LG21</p>	<p>Arena Parade</p>	<p>Mixed use</p>
	<ul style="list-style-type: none"> <li>• Redevelopment to provide 5,000 gross sq.m of additional shop, café or restaurant, pub or drinking establishment or takeaway town centre uses at ground floor level, subject to an up-to date assessment of retail capacity and supply. <ul style="list-style-type: none"> <li>○ Other Main Town Centre Uses at ground floor level where these can additionally be accommodated in design, layout and transport terms.</li> <li>○ Main Town Centre Uses and / or residential on upper or basement floorspace where these can additionally be accommodated in design, layout and transport terms.</li> </ul> </li> <li>• No net loss of residential accommodation;</li> <li>• Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</li> <li>• Maintenance of building lines along Broadway and Eastcheap;</li> <li>• Improve east to west pedestrian links;</li> <li>• Vehicle access/egress and servicing should be from Broadway;</li> <li>• Sensitive design to respect Letchworth Conservation Area and the Town Hall and Broadway Chambers listed buildings; and</li> <li>• Address existing surface water flood risk issues, including any run-off, through SUDs or other appropriate solution.</li> </ul>	

13.231 The allocation of sites LG19, LG20 and LG21 will not prejudice other re-development proposals, which would be of benefit to the vibrancy and vitality of the town centre; taking into consideration of the Local Plan as a whole.

13.232 The Letchworth Garden City Town Centre Strategy review will commence within twelve months of the adoption of this plan, which working with

landowners, the local community, the Business Improvement District and other key stakeholders will consider up-to-date retail projections and if growth is still required, how to accommodate that growth.

13.233 The schemes will be main town centre uses led. Consequently, no specific housing allocation or requirement is identified, and any residential units here will contribute towards the windfall / other allowances identified in Policy SP8(c) of this Plan. The projected additional 50 homes in the housing trajectory for Letchworth Garden City are expected to be completed within the broad location defined as the Town Centre Boundary on the Policies Map.

13.234 Policy SP4: Town and Local Centres identifies two neighbourhood centres in Letchworth. Proposals in these areas will be determined using our detailed policies. The centres are:

- Jackmans; and
- The Grange.

13.235 The extent of these neighbourhood centres is shown on the maps in Appendix 3.

#### *Infrastructure and mitigation*

13.236 The provision of more than 2,000 homes across Letchworth Garden City will require a range of supporting infrastructure.

13.237 Our strategic policy for the land north of Letchworth (see Policy SP15) sets out a range of matters that will need to be considered. The cumulative impacts of a number of smaller developments across the town will also need to be addressed.

13.238 Any further primary school places that are required in addition to the proposed new school north of Letchworth will be met through expansions. Hertfordshire County Council have confirmed that the expansion of Fearnhill School can meet demand for additional secondary school places beyond 2028.

13.239 Our transport modelling identifies two specific junctions where works will be required to support traffic growth in Letchworth Garden City over the plan period:

- A505 / Norton Way; and
- Junction 9 of the A1(M), known locally as Letchworth Gate

13.240 It is notable from the transport work that both of these schemes would be required even if the development being proposed through this Plan did not occur.

13.241 New development in Letchworth will be required to make reasonable contributions towards these projects and / or other schemes in nearby locations (see Baldock and Hitchin sections of this chapter in particular) where

traffic generation arising from new development will have an impact. In addition, contributions will be required towards walking and cycling schemes in Letchworth which aim to influence mode share and free up capacity for new development.

13.242 However, appropriate funding arrangements will need to be made. These need to reflect the fact that background traffic growth triggers the requirements with new development then utilising some of the additional capacity that would be provided.

13.243 This issue should be explored further through the transport assessments that will accompany any planning applications on these sites. This will help to determine the most appropriate approach, and any other local measures which may be required, on a case-by-case basis.

13.244 Anglian Water have previously identified that there is sufficient capacity within the environmental consent at Letchworth Water Recycling Centre to accommodate the levels of growth being proposed.

## Lilley

### *Introduction*

13.245 Lilley is in the northwest of the District. The village of Lilley has a limited range of facilities. Apart from the village the parish also includes the surrounding countryside, most of which is within the Chilterns Area of Outstanding Natural Beauty.

13.246 Lilley has a public house, village hall and church. At the 2011 census the population of the parish of Lilley was 386 and there were 161 dwellings in the parish.

### *Role in settlement hierarchy*

13.247 Lilley is identified as a Category B village, within which infilling development that does not extend the built up area into surrounding countryside will be allowed. The whole parish is also classed as Green Belt.

### *Heritage*

13.248 Lilley has one conservation area covering the central part of the village.

### *Housing*

13.249 No sites are allocated in Lilley for residential development. Nine new homes have been built or granted planning permission since 2011.

## Lower Stondon

### *Introduction*

13.250 Lower Stondon lies outside of North Hertfordshire in neighbouring Central Bedfordshire. It consists of the original village core and more recent development which lies between the A600 Bedford Road and Henlow airfield in Henlow parish. This development extends to the administrative boundary between the two authorities.

13.251 Land within North Hertfordshire adjoining Lower Stondon lies within Ickleford parish. The remainder of Ickleford parish has its own section in this chapter.

### *Role in settlement hierarchy*

13.252 Land within North Hertfordshire adjoining Lower Stondon is identified as a Category A village. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed.

13.253 Land beyond this boundary forms part of the Rural Area Beyond the Green Belt.

### *Heritage*

13.254 The Grade II\* listed Old Ramerick Manor lies immediately to the east of the settlement boundary.

### *Housing*

13.255 Planning permission has been granted for 144 homes adjoining Lower Stondon. Four further new homes have been completed adjacent to this site since 2011.

## Newnham

### *Introduction*

13.256 Newnham is a small parish to the north of Baldock, containing village of Newnham and the surrounding countryside. Newnham shares a parish council with the neighbouring small parish of Caldecote.

13.257 Population statistics are not available for Newnham separately due to its small size. The combined population of the three parishes of Caldecote, Newnham and Radwell at the 2011 census was 209 and there were 97 dwellings across the three parishes.

13.258 Newnham has a village hall and church, but little else by way of facilities.

### *Role in settlement hierarchy*

13.259 Newnham is identified as a Category B village, where infilling development will be allowed which does not extend the built up area of the village into surrounding countryside. Most of the parish (including the village) is classed as Rural Area Beyond the Green Belt, except the southernmost part of the parish which is within the Green Belt.

### *Heritage*

13.260 A conservation area covers almost the whole village.

### *Housing*

13.261 No sites are allocated in Newnham for residential development. Three new homes have been built or granted planning permission since 2011.

## **Nuthampstead**

### *Introduction*

13.262 Nuthampstead is a small parish located in the far east of the District, to the south east of Royston. Historically it was part of the parish of Barkway, becoming a separate civil parish in 1866. The area is characterised by thick woodland and rich farmland and is on the county boundary with Essex. Nuthampstead's dwellings are grouped in the hamlets of Nuthampstead and Morrice Green. Apart from a pub at Nuthampstead there is little by way of facilities.

13.263 At the 2011 census the population of the parish of Nuthampstead was 142 and there were 52 dwellings in the parish.

### *Role in settlement hierarchy*

13.264 Nuthampstead is identified as a Category C settlement, within which only limited additional development to meet community needs will be permitted. The parish is classed as Rural Area Beyond the Green Belt, within which there is general restraint on development.

### *Housing*

13.265 No sites are allocated in Nuthampstead for residential development. No new homes have been built or granted planning permission since 2011.

### *Economy*

13.266 In terms of the economy of the local area, there are, unusually for this size of settlement, two industrial areas in the parish providing premises for a range of businesses. These are not sufficiently large to designate as an employment area, but do perform an important role in providing local employment and facilities. Our detailed policies set out our approach to employment development outside of formally allocated areas.

## Offley

### *Introduction*

13.267 Offley is a large parish in the western part of the District between Luton and Hitchin. The parish is split into two wards: Offley and Cockernhoe. At the 2011 census the population of the whole parish was 1,398 and there were 607 dwellings in the parish. Of these, 493 people and 205 dwellings were in the Cockernhoe ward (discussed on the Cockernhoe, Mangrove Green and East of Luton page of this chapter) and the remaining 905 people and 402 dwellings were in the Offley ward (the subject of this page).

13.268 The village of Offley (also known as Great Offley) has a relatively good range of facilities, including a school, shop, public houses, village hall and church. Apart from Offley, the ward includes the surrounding countryside and the hamlet of Little Offley. The northern part of the ward is designated as part of the Chilterns Area of Outstanding Natural Beauty.

### *Role in settlement hierarchy*

13.269 Offley is identified as a Category A village, with a settlement boundary shown on the Policies Map. The remainder of the ward is classed as Green Belt.

### *Heritage*

13.270 Offley has one conservation area covering the core of the village. The parish church of St Mary Magdalene is a Grade I listed building.

### *Housing*

13.271 No sites are allocated in Offley. Since 2011, 84 new homes have been built or granted planning permission in the Offley ward of the parish.

## Pirton

### *Introduction*

13.272 Pirton is a medium sized village in the north-west of the District, on the border with Central Bedfordshire. The parish contains the village and the surrounding countryside, with just a couple of isolated buildings outside the village itself. The village has a reasonable range of facilities, including a school, shop, public houses, village hall and church. The western part of the parish is designated as part of the Chilterns Area of Outstanding Natural Beauty.

13.273 At the 2011 census the population of the parish of Pirton was 1,274 and there were 521 dwellings in the parish.

### *Role in settlement hierarchy*

13.274 Pirton is designated as a Category A village, with a settlement boundary shown on the Policies Map within which development will be allowed. The majority of the remainder of the parish is classed as rural area beyond the Green Belt, apart from a small section of Green Belt in the south-east of the parish.

### *Heritage*

13.275 Pirton has a conservation area covering much of the older part of the village, including the site of the castle, Great Green and Little Green. The parish church of St Mary is a Grade I listed building. To the west of the village in the Chilterns, High Down House is also a Grade I listed building. There are three Scheduled Ancient Monuments (SAM), a moated site at Rectory Farm, Toot Hill Motte and Bailey and an Anglo-Saxon settlement to the east of Priors Hill and north of Danefield Road.

### *Housing*

13.276 No sites are allocated in Pirton by this Plan. 139 homes have been built or granted planning permission since 2011.

## Preston

### *Introduction*

13.277 Preston is a small village to the south of Hitchin. Historically it was part of the parish of Hitchin, becoming a separate civil parish in 1894. The parish covers the village and surrounding countryside. The village has a school, village hall, public house and a church. It is also home to the former manor house of Temple Dinsley.

13.278 At the 2011 census the population of the parish of Preston was 420 and there were 158 dwellings in the parish.

### *Role in settlement hierarchy*

13.279 Preston is classed as a Category A village, with a boundary within which development will be allowed. The remainder of the parish is designated as Green Belt.

### *Heritage*

13.280 The grounds of Temple Dinsley form a historic park and garden, whilst much of the village is covered by a conservation area.

### *Housing*

13.281 One site is allocated in Preston for an estimated 21 new homes. A further 29 homes have been built or granted planning permission since 2011.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy PR1	Land off Templars Lane	21 homes
	<ul style="list-style-type: none"> <li>Consider and mitigate against potential adverse impacts upon nearby Wain Wood SSSI;</li> <li>Sensitive design that considers any impacts upon the setting of Preston Conservation Area and adjacent listed buildings;</li> <li>Retention of hedgerow boundary with Butchers Lane; and</li> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Total allocated sites		21 homes
Completions and permissions		29 homes
Total allocated, completed and permitted		50 homes

*Infrastructure and mitigation*

13.282 Wain Woods SSSI (Site of Special Scientific Interest) lies approximately 200m to the north of Preston and is accessed by the Public Rights of Way network. Any potential impacts that could be associated with an increase in visitor numbers to the SSSI, such as trampling of vegetation or dog fouling should be addressed through mitigation measures such as interpretation leaflets.

## Radwell

### *Introduction*

13.283 Radwell is a small parish to the north of Baldock on the River Ivel and on the border with Central Bedfordshire. The village essentially comprises one street, with a village hall and church but little else by way of facilities. The parish also includes the Baldock Service Station at junction 10 of the A1(M).

13.284 Population statistics are not available for Radwell separately due to its small size. The combined population of the three parishes of Caldecote, Newnham and Radwell at the 2011 census was 209 and there were 97 dwellings across the three parishes.

### *Role in settlement hierarchy*

13.285 Radwell is classed as a Category C settlement where only limited development to meet defined community needs will be permitted. The southern part of the parish is classed as Green Belt, whilst the northern part is classed as Rural Area Beyond the Green Belt.

### *Housing*

13.286 No sites are allocated for residential development in Radwell. Since 2011, 10 new homes have been either built or granted planning permission.

## Reed

### *Introduction*

13.287 Reed is located to the east of the A10, approximately 3 miles south of Royston. Reed forms part of the group of Saxon villages established on the chalk ridge which dominates the area. The village has a school, village hall and a church.

13.288 At the 2011 census the population of the parish of Reed was 310 and there were 134 dwellings in the parish.

### *Role in settlement hierarchy*

13.289 Reed is identified as a Category A village in the settlement hierarchy. A settlement boundary is shown on the Policies Map within which development will be allowed. The remainder of the parish is classed as rural area beyond the Green Belt.

### *Heritage*

13.290 The village is located just east of Ermine Street, the old Great North Road and now the A10. The Saxon parish church of St Mary is a Grade I listed building. Much of the village is covered by the conservation area. The village has a loose-knit layout, with the fields and open spaces in and around the village forming an important part of the village's character.

### *Housing*

13.291 One site is allocated in Reed for an estimated 22 new homes. A further 14 new homes have been built or granted planning permission since 2011.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy RD1	Land at Blacksmiths Lane	22 homes
	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>Sensitive design required where the site affects the Reed Conservation Area and adjacent listed buildings; and</li> <li>Existing Right of Way should be incorporated or diverted as appropriate.</li> </ul>	
Total allocated sites		22 homes
Completions and permissions		14 homes
Total allocated, completed and permitted		36 homes

## Royston

### *Introduction*

13.292 Royston lies in a shallow bowl set in the East Anglian Heights chalk escarpment, overlooking and bounded by the Cambridgeshire Plain to the north. At the time of the 2011 census the town had a population of 15,781 and there were 6,800 dwellings in the town. Development of the town has tended to be informed by the busy roads running through and around the town and the Cambridge to London railway line which bisects the town.

13.293 The town historically straddled Hertfordshire and Cambridgeshire; the original county boundary was Icknield Way. The town did not exist at the time of the Domesday Book. Instead it appears to have been founded in the medieval period and did not become a separate parish until 1540. Prior to that it straddled the parishes of Barkway, Reed and Therfield (in Hertfordshire) and Melbourn and Bassingbourn (in Cambridgeshire). The boundary was last changed as recently as 1989 after the construction of the A505 bypass.

13.294 On the south-western edge of Royston is Therfield Heath, which forms an important open heathland. As well as providing open space for the town it is a rare chalk grassland habitat, and is protected as a Site of Special Scientific Interest and a Local Nature Reserve. Therfield Heath is also recognised for its historic and archaeological importance.

### *Role in settlement hierarchy*

13.295 Royston is the third largest of the four towns in North Hertfordshire when measured by population. The relative isolation of the town means that it plays an important service role for many of the surrounding villages in both Hertfordshire and Cambridgeshire. A settlement boundary is defined for the town (shown on the Policies Map) within which additional development will be allowed.

### *Heritage*

13.296 The town grew up around the crossroads of Icknield Way and Ermine Street, although the market place is not at the crossroads itself but to the south-east. One theory as to why the market is not at the crossroads is that Ermine Street originally approached the town from the south-east along Grange Bottom, avoiding the steepest parts of the hill to the south, and that the present line of High Street / London Road is a result of medieval realignments. The town centre is covered by a conservation area.

13.297 The parish church of St John's is a Grade I listed building, being originally the church of an Augustinian Priory, becoming the parish church after the dissolution of the monasteries. The Old Palace at 23 Kneesworth Street, 18 Melbourn Street and Royston Cave are also Grade I listed buildings.

13.298 Therfield Heath contains Scheduled Ancient Monuments due to the presence of prehistoric barrows. The round barrow cemetery is the largest known example of its type in Hertfordshire, and provides important information on the beliefs and social organisation of early prehistoric communities.

### *Housing*

13.299 Four sites are allocated in Royston for almost 500 new homes. 1,421 further homes have been built or granted planning permission since 2011. This includes two large sites of around 300 homes each at the eastern and western edges of the town.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy RY4	Land north of Lindsay Close	100 homes
	<ul style="list-style-type: none"> <li>• Access connecting from Old North Road in the west to Burns Road at the east;</li> <li>• Appropriate mitigation measures for noise associated with the A505 Royston Bypass to potentially include insulation and appropriate orientation of living spaces;</li> <li>• Site design and landscaping to mitigate landscape impacts;</li> <li>• Protect and enhance tree belts where possible;</li> <li>• Address existing surface water flood risk through SUDs or other appropriate solution, particularly to the east of the site;</li> <li>• Site layout design to take account of existing wastewater infrastructure;</li> <li>• Undertake a detailed assessment of the impact of the Royston Water Recycling Centre in relation to odours, lighting, noise and traffic impacts impacts to demonstrate no adverse impact on future residents; and</li> <li>• To provide evidence to demonstrate that a suitable distance is provided from Royston Water Recycling Centre and sensitive development (buildings that are regularly occupied) as part of the detailed planning of the site.</li> </ul>	
Policy RY7	Anglian Business Park, Orchard Road	60 homes
	<ul style="list-style-type: none"> <li>• Higher density/flatted development may be achieved given surrounding built form;</li> <li>• Appropriate mitigation measures for noise associated with the railway to potentially include insulation and orientation of living spaces;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Ensure appropriate residential amenity for any properties adjoining employment area or likely to be affected by existing, permitted operations;</li> <li>• Address potential surface water flood risk through SUDs or other appropriate solution; and</li> <li>• Site layout designed to take account of existing wastewater infrastructure.</li> </ul>	
Policy RY10	Land south of Newmarket Road	300 homes
	<ul style="list-style-type: none"> <li>• Provide a site-specific landscape assessment and tree survey. Retention of trees and hedgerows where possible;</li> <li>• Design and layout to respond to topography;</li> <li>• Address potential surface water flood risk through SUDs or other appropriate solution;</li> <li>• Archaeological survey to be completed prior to development; and</li> <li>• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.</li> </ul>	
Policy RY11	Land at Barkway Road	18 homes
	<ul style="list-style-type: none"> <li>• Sensitive treatment of western boundary to maintain integrity of Bridleway Royston 010</li> </ul>	
Total allocated sites		478 homes
Completions and permissions		1,421 homes
Total allocated, completed and permitted		1,899 homes

### *Economy*

13.300 The economy of Royston is split between the town centre functions and the large employment area to the north of the town although both are covered by the Business Improvement District (BID) area.

13.301 In order to help deliver the additional local jobs estimated to be needed in the District over the plan period, Policy SP3 identifies that 10.9 hectares of employment land should be allocated at York Way. The existing employment area is currently thriving feeding off both the Hertfordshire and Cambridge economies, with a wide range of businesses located there including many operations associated with Johnson Matthey.

Ref	Employment allocations and site-specific policy criteria	Hectares
Policy RY9	Land north of York Way	10.9
	<ul style="list-style-type: none"> <li>• Site is within Health and Safety Executive (HSE) Consultation Zone;</li> <li>• Site should deliver a new access to the Orchard Road employment area from the A505;</li> <li>• Address existing surface water flood risk issues, including any run-off, through SUDs or other appropriate solution;</li> <li>• Sensitive design / layout considering views to and from the Scheduled Ancient Monuments located on Therfield Heath; and</li> <li>• Compensatory or offsetting measures for loss of existing grassland habitat.</li> </ul>	
<i>Designated employment areas</i>		
RE1	Orchard Road	38.9

13.302 The town centre contains a range of small independent shops and services as well as a small number of national retailers. There is also a wide range of eating and drinking establishments in the town centre.

13.303 The town centre contains both primary and secondary shopping frontages which will be defined on the Policies Map for the main retail area around the High Street, Market Hill, Lower King Street and Melbourn Street.

13.304 A need for additional retail floorspace has been recognised by the Council and national guidance is clear that, where this is the case, sites should be allocated where this need can be met. The retail capacity projections<sup>160</sup> are district wide and can be met within the District. They are based on the projected additional spend on retail from an increased population and retaining market shares from completing centres. The capacity projections for Royston indicate the potential for growth of 7,100 gross sq.m to 2031. Whilst the retail projections go to 2031, national planning guidance warns that such projections are rarely reliable beyond five years. The Council will monitor such projections through the monitoring framework over the plan period to help inform decision making on any planning applications that include retail.

13.305 For allocation purposes, the capacity has been distributed between three of the four town centres in the District. Baldock does not have an allocation due to no sites being presented as available to the Council.

<sup>160</sup> North Hertfordshire Retail Study Update (NLP, 2016); Retail Background Paper (NHDC, 2016)

13.306 There is no immediate identified need (up to 2021) for additional retail floorspace as a result of existing permissions and filling of vacant units, however, post 2021 additional floorspace will be needed, which should be accommodated at the Town Hall site.

13.307 This scheme will be main town centre uses led. Consequently, no specific housing allocation or requirement is identified, and any residential units here will contribute towards the other allowances identified in Policy SP8(c) of this Plan.

Ref	Retail allocations and site-specific criteria	Hectares
Policy RY12	Town Hall Site, Melbourn Street	1.4
	<ul style="list-style-type: none"> <li>• Redevelopment to provide approximately 4,000m<sup>2</sup> of gross of additional main town centre use floorspace;</li> <li>• Provision of residential accommodation on upper floors;</li> <li>• Retention or re-provision of civic uses across the town or onsite;</li> <li>• Retention of existing trees where possible;</li> <li>• Ensure an appropriate level of car parking is retained and / or provided across the town centre as a whole;</li> <li>• Consideration of retaining the Town Hall; and</li> <li>• Sensitive high-quality design given the prominent location of the site as a gateway to the town centre and to respect the setting of Royston Conservation Area and Banyers Hotel and No18 Melbourn Street listed buildings.</li> </ul>	

### *Infrastructure and mitigation*

13.308 More than 1,000 homes are planned for Royston over the period 2011-2031. This will require the provision of supporting infrastructure.

13.309 The A505 Royston Bypass provides the most appropriate, settlement boundary to the north of the town. This requires the removal of some land within the bypass, but beyond the existing and proposed employment areas, which should generally remain undeveloped. Our detailed policies set out the approach we will take to areas of Urban Open Land.

13.310 Hertfordshire County Council has recently provided additional First School capacity within the town. As a consequence, it is considered that existing first school sites have been developed to capacity.

13.311 Land for a new 2FE first school has been secured within the new development currently being built to the east of the town.

13.312 In its role as Highway Authority, Hertfordshire County Council has recently developed a new county-wide transport model, 'COMET'. This has identified that a number of improvement schemes will be required in Royston by 2031. Particular congestion points identified included:

- A505/ A10 Roundabout;
- A505/ A1198 Roundabout; and
- A10/ Newmarket Road/ Melbourn Street Roundabout

13.313 In line with the Transport Strategy, development in Royston will be required to consider the implications of their schemes on these locations and make reasonable contributions towards improvements and / or other schemes improving walking and cycling in Royston which aim to influence mode share. These will be reflected in future iterations of the Infrastructure Development Plan.

13.314 There are known capacity constraints in the wastewater treatment works at Royston<sup>161</sup>. Specific evidence has been prepared to help identify potential solutions. We will work together with developers and Anglian Water to ensure sufficient capacity is available for new developments to proceed. Where appropriate 'Grampian conditions' – which prevent development from occurring until such as time as specific conditions are met – will be used.

13.315 For site RY4, an odour assessment will need to demonstrate that a suitable distance is provided between the Water Recycling Centre and sensitive development (defined as buildings which are regularly occupied) as part of the detailed planning of the site.

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<sup>161</sup> Royston Sewage Treatment Work Water Cycle Study (NHDC, 2012)

## Rushden

### *Introduction*

13.316 Rushden is a small village to the south-east of Baldock. It shares a parish council with neighbouring Wallington, although they remain separate parishes. The village has a public house, village hall and church.

13.318 At the 2011 census the population of the parish of Rushden was 242 and there were 103 dwellings in the parish.

### *Role in settlement hierarchy*

13.318 Rushden is classed as a Category B village, where infilling development that does not extend the built core of the village will be allowed. The whole parish is classed as Rural Area Beyond the Green Belt.

### *Heritage*

13.319 There are two conservation areas in Rushden, one covering the core of the village around the church, and the other covering Southern Green to the east. The Julians estate to the north of the village is designated as an historic park and garden.

### *Housing*

13.320 There are no sites allocated for residential development in Rushden. Six new homes have been built or granted planning permission since 2011.

## Sandon

### *Introduction*

13.321 Sandon is a village to the east of Baldock. The parish covers a large area of countryside as well as the main village, including numerous small hamlets such as Roe Green and Green End. The main village has a school, village hall and church.

13.322 At the 2011 census the population of the parish of Sandon was 495 and there were 214 dwellings in the parish.

### *Role in settlement hierarchy*

13.323 Sandon is classed as a Category A village, with a settlement boundary within which further development will be allowed shown on the Policies Map. The remainder of the parish is classed as Rural Area Beyond the Green Belt.

### *Heritage*

13.324 There are two conservation areas in Sandon, one for the main village and one for Roe Green. The parish church of All Saints is a Grade I listed building.

### *Housing*

13.325 There are no sites allocated for residential development in Sandon. 17 new homes have been built or granted planning permission since 2011.

## St Ippolyts & Gosmore

### *Introduction*

13.326 St Ippolyts is a parish to the south of Hitchin. As well as St Ippolyts village it includes Gosmore and the southern part of the urban area of Hitchin. The parish includes a significant rural area, especially to the south of the village.

13.327 Whilst St Ippolyts and Gosmore are perceived as separate villages, it is hard to say where one ends and the other begins. The core of St Ippolyts is around the church on the hill to the east and the core of Gosmore is along Gosmore High Street to the west, but the largely developed area between the two has an ambiguous identity with some properties having St Ippolyts postal addresses and others having Gosmore postal addresses. Facilities in this conjoined pair of villages include a school, shop, public houses, village hall and church.

13.328 At the 2011 census the population of the parish of St Ippolyts was 2,047 and there were 799 dwellings in the parish. Of these, 870 people and 329 dwellings were found in the part of the parish which falls in Hitchin Priory ward, leaving 1,177 people and 470 dwellings in the more rural part of the parish.

### *Role in settlement hierarchy*

13.329 The northern part of the parish forms part of the town of Hitchin. St Ippolyts & Gosmore is classed as a Category A village, with the boundary drawn so as to include the main built area of both settlements. The settlement boundary is shown on the Policies Map within which development will be allowed.

13.330 In the south of the parish is part of the West of Stevenage site. This land is safeguarded for long-term potential development by Policy SP8. The remainder of the parish is classed as Green Belt.

### *Heritage*

13.331 There are two conservation areas, one for the original hilltop settlement part of St Ippolyts and one for Gosmore. The medieval farmhouse at Almshoe Bury and the parish church of St Ippolyts are both Grade I listed buildings.

### *Housing*

13.332 Two sites are allocated in St Ippolyts and Gosmore for an estimated 52 new homes. A further 55 homes have been built or granted planning permission in the parish since 2011.

13.333 Site HT2, Pound Farm, which is in the parish but on the edge of Hitchin, is covered in the Hitchin section of this document.

Ref	Local Housing Allocations and site specific policy_criteria	Dwelling estimate
Policy SI1	Land south of Waterdell Lane	40 homes
	<ul style="list-style-type: none"> <li>Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li>Additional planting to provide a continuous hedgerow boundary around the south-west of the site; and</li> <li>Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces</li> </ul>	
Policy SI2	Land south of Stevenage Road	12 homes
	<ul style="list-style-type: none"> <li>Archaeological survey to be completed prior to development;</li> <li>Trees should be incorporated into the design of the development;</li> <li>Maintain the existing right of way through the site; and</li> <li>Appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living</li> </ul>	
Total allocated sites		52 homes
Completions and permissions		55 homes
Total allocated, completed and permitted		107 homes

## St Paul's Walden

### *Introduction*

13.334 St Paul's Walden is a rural parish in the west of the District. The main village in the parish is Whitwell, with St Paul's Walden itself and the hamlet of Bendish being smaller settlements.

13.335 Whitwell has a school, shop, village hall, and public houses. St Paul's Walden has a public house and church.

13.336 At the 2011 census the population of the parish of St Paul's Walden was 1,293 and there were 537 dwellings in the parish.

### *Role in settlement hierarchy*

13.337 Whitwell is classed as a Category A village, with a boundary shown on the Policies Map within which further development will be allowed. The remainder of the parish is classed as Green Belt.

### *Heritage*

13.338 There are conservation areas for both Whitwell and Bendish. The parish church of All Saints is a Grade I listed building. The parks of St Paul's Walden Bury and The Hoo are both designated as historic parks and gardens.

### *Housing*

13.339 No sites are allocated for residential development in St Paul's Walden. 54 homes have been built or granted planning permission since 2011.

## Therfield

### *Introduction*

13.340 Therfield is a village to the east of the District, south of Royston. It has a school, public house, village hall and churches. The surrounding parish includes a sizable rural area, including Therfield Heath in the north on the edge of Royston.

13.341 At the 2011 census the population of the parish of Therfield was 556 and there were 217 dwellings in the parish.

### *Role in settlement hierarchy*

13.342 Therfield is identified as a Category A village, with a settlement boundary within which additional development will be allowed shown on the Policies Map. The remainder of the parish is classed as Rural Area beyond the Green Belt.

### *Heritage*

13.343 Therfield has a conservation area covering much of the older part of the village, including the remains of the motte and bailey castle.

### *Housing*

13.344 One site is allocated in Therfield for an estimated 12 new homes. 24 further homes have been either built or granted planning permission since 2011.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy TH1	Land at Police Row	12 homes
	<ul style="list-style-type: none"> <li>• Sensitive treatment of western boundary to maintain integrity of Footpath Therfield 022;</li> <li>• Any infiltration drainage SuDS (or other features) must have regard to Environment Agency groundwater bore holes;</li> <li>• Design with sensitivity to the nearby listed buildings and their setting;</li> <li>• Retain open space to the southeast corner of the allocation from the edge of the hedgerow of the western boundary and directly eastwards to Police Row, to prevent coalescence between Therfield and Hay Green;</li> <li>• An assessment of the impact of development on the Therfield Conservation Area must be undertaken to address the</li> </ul>	

	<p>opportunity to make a sensitive entrance to the Conservation Area; and</p> <ul style="list-style-type: none"> <li>• Archaeological survey to be completed prior to development.</li> </ul>
Total allocated sites	12 homes
Completions and permissions	24 homes
Total allocated, completed and permitted	36 homes

## Wallington

### *Introduction*

13.345 Wallington is a small village to the east of Baldock. It shares a parish council with neighbouring Rushden, but remains a separate parish. The village has a village hall and church, but little else by way of facilities. The parish also includes the surrounding countryside.

13.346 At the 2011 census the population of the parish of Wallington was 150 and there were 60 dwellings in the parish.

### *Role in settlement hierarchy*

13.347 Wallington is classed as a Category B village, where infilling development that does not extend the built core of the village will be allowed. Most of the parish is classed as Rural Area beyond the Green Belt, except a small area on the western edge of the parish which is Green Belt.

### *Heritage*

13.348 The Wallington Conservation Area covers most of the village.

### *Housing*

13.349 There are no sites allocated for residential development in Wallington. Two new homes have been built or granted planning permission since 2011.

## Weston

### *Introduction*

13.350 Weston is a medium sized village to the south of Baldock. The parish is large, stretching from the southern edges of Baldock down to the north-eastern edges of Stevenage at Great Ashby. The village sits on a plateau, which drops sharply away on the edge of Baldock as the Weston Hills.

13.351 The village has a school, shop, village hall, public house and church, and some small businesses. Beside the main village the parish also includes the hamlet of Halls Green (also with a public house) and several other smaller hamlets and isolated farms and dwellings.

13.352 At the 2011 census the population of the parish of Weston was 1,054 and there were 441 dwellings in the parish.

### *Role in settlement hierarchy*

13.353 Weston is classed as a Category A village, with a settlement boundary defined on the Policies Map within which additional development will be allowed. In the south of the parish site GA2 at Great Ashby is mostly in Weston parish. Most of the rest of the parish is classed as Green Belt, apart from the eastern edges of the parish which are classed as rural area beyond the Green Belt.

### *Heritage*

13.354 The Weston Conservation Area covers the older parts of the village. The parish church of Holy Trinity is a Grade I listed building.

### *Housing*

13.355 One site is allocated in Weston for an estimated 40 new homes. A further eight new homes have been built or granted planning permission.

Ref	Local Housing Allocations and site specific policy_criteria	Dwelling estimate
Policy WE1	Land off Hitchin Road	40 homes
	<ul style="list-style-type: none"> <li>• Site layout to take account of existing wastewater infrastructure;</li> <li>• Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution;</li> <li>• Western hedgerow to be maintained and strengthened to form a robust boundary; and</li> <li>• Archaeological survey to be completed prior to development.</li> </ul>	

Total allocated sites	40 homes
Completions and permissions	8 homes
Total allocated, completed and permitted	48 homes

### *Economy*

13.356 Weston has a number of small businesses, notably at Weston Barns on Hitchin Road. This is not sufficiently large to designate as an employment area, but does perform an important role in providing local employment and facilities. The Council will therefore seek to protect the employment function of this area under the detailed policies of this Plan.

## Wymondley

### *Introduction*

13.357 Wymondley is a parish to the east of Hitchin. It was created in 1937 by the merger of the two former parishes of Great Wymondley and Little Wymondley. Despite the names, Little Wymondley has long been the more populous, overtaking Great Wymondley between the 1851 and 1861 censuses.

13.358 As well as the villages of Great and Little Wymondley the parish includes the hamlets of Titmore Green, Redcoats Green and Todds Green. The parish also includes the surrounding rural area, stretching from the edges of Hitchin in the north to the edges of Stevenage in the south.

13.359 Great Wymondley has a public house, village hall and church. Little Wymondley has a school, non-food shop, churches and public houses.

13.360 At the 2011 census the population of the parish of Wymondley was 1,153 and there were 480 dwellings in the parish.

### *Role in settlement hierarchy*

13.361 Little Wymondley is one of five villages where a greater amount of development has been allocated. The settlement boundary is shown on the Policies Map within which additional development will be allowed.

13.362 Great Wymondley is classed as a Category B village, where infilling that does not extend the built core of the village into the surrounding countryside will be allowed.

13.363 In the south of the parish is part of the West of Stevenage site. This land is safeguarded for long-term potential development by Policy SP8. The remainder of the parish is classed as Green Belt.

### *Heritage*

13.364 A conservation area covers most of Great Wymondley village. Wymondley Bury, The Priory and the parish church of St Mary at Great Wymondley are all Grade I listed buildings.

### *Housing*

13.365 One site is allocated in Wymondley for an estimated 300 additional homes. 31 further homes have been built or granted planning permission in the parish since 2011.

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy WY1	<p data-bbox="475 315 932 349">Land south of Little Wymondley</p> <ul style="list-style-type: none"> <li data-bbox="480 389 1326 461">• Appropriate solution for primary education requirements having regard to up-to-date assessments of need;</li> <li data-bbox="480 483 1342 555">• Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;</li> <li data-bbox="480 577 1406 864">• Undertake site specific Flood Risk Assessment to address existing surface water and fluvial flood risk issues, particularly along Stevenage Road, including the site's access, and help inform SuDS or other appropriate solution to ensure that pre-existing flooding issues along Stevenage Road are not exacerbated. Hertfordshire County Council, as Lead Local Flood Authority (LLFA), and Stevenage Borough Council should be consulted;</li> <li data-bbox="480 887 1422 994">• Sensitive integration into the existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access;</li> <li data-bbox="480 1016 1390 1196">• Transport Assessment to identify and secure a package of improvements to Stevenage Road through Little Wymondley which mitigate the severance impact of the road between the north and south of the village and improves accessibility for non-motorised highway users;</li> <li data-bbox="480 1218 1278 1290">• Proposals to be informed by a site-specific landscape assessment;</li> <li data-bbox="480 1312 1374 1420">• Appropriate mitigation measures for noise associated with A602 Wymondley Bypass to potentially include landscaping and / or insulation and appropriate orientation of living spaces;</li> <li data-bbox="480 1442 1390 1514">• Access to the site to take into account the impact on heritage assets and surface water flooding;</li> <li data-bbox="480 1536 1374 1608">• Minimise impact upon the heritage assets and their settings near the site, to include; <ul style="list-style-type: none"> <li data-bbox="576 1621 1374 1693">○ Any access from Stevenage Road to consider impact upon setting of Listed Buildings;</li> <li data-bbox="576 1715 1390 1787">○ Consideration of key views from Wymondley Bury and St Mary's Church;</li> <li data-bbox="576 1809 1166 1845">○ Reinforcing existing boundary planting;</li> <li data-bbox="576 1868 1374 1899">○ Retention of significant groups of trees within the site;</li> </ul> </li> <li data-bbox="480 1912 1390 1980">• Archaeological survey to be completed prior to development; and</li> </ul>	300 homes

	<ul style="list-style-type: none"> <li>Undertake Contaminated Land Preliminary Risk Assessment, particularly in relation to historic landfill;</li> </ul>
Total allocated sites	300 homes
Completions and permissions	31 homes
Total allocated, completed and permitted	331 homes

### *Economy*

13.366 Wymondley has a number of small businesses, notably along Stevenage Road in Little Wymondley. This is not sufficiently large to designate as an employment area, but does perform an important role in providing local employment and facilities. The Council will therefore seek to protect the employment function of this area under the detailed policies of this Plan.

### *Infrastructure and mitigation*

13.367 Wymondley JMI School is currently 0.5FE but has the potential to expand to 1FE on the existing site. There is also the opportunity to explore moving the school to a new site within the land south of Little Wymondley. However, this would result in some existing residents having to travel further to school across Stevenage Road. This issue should be explored through any application.

13.368 Our transport modelling identifies the junction between Hitchin Road and Arch Road in Great Wymondley as a location where a mitigation scheme will be required to support new development. Some minor roads leading to and from the villages within Wymondley parish may require other traffic management measures which will also need to be investigated and will be reflected in future iterations of the Infrastructure Development Plan. Mitigation could include environmental improvements to the village centre. The mitigation of these issues will be part of the wider package of measures identified through the wider consideration of network issues concerning A1(M) J8 and alternate routeings to this.

13.369 Any development on site WY1 will need to make appropriate contributions, recognising that developments in Hitchin, Letchworth and, to a lesser degree, Stevenage are all likely to contribute to traffic movements through this junction.

13.370 Anglian Water recognise that improvements to wastewater infrastructure may be required to support the proposed development.

13.371 There are known flooding issues in Wymondley from both surface and river fluvial flooding. The key flood route broadly follows the alignment of Stevenage Road with an additional surface water flood route along Priory Lane. Hertfordshire County Council Wymondley Flood Investigation Report, November 2014, makes recommendations to reduce the risk of flooding along

Stevenage Road. These recommendations relate to measures upstream and outside of the site. However, implementation of an appropriate flood attenuation scheme on the site may support these measures and benefit the village by reducing the overall flooding risk.

13.372 Any development to the south of Little Wymondley will be required to achieve the equivalent of greenfield run off rates to ensure existing issues are not exacerbated. Opportunities will also be sought to alleviate existing problems.

13.373 The A602 Wymondley Bypass provides the most appropriate, defensible Green Belt boundary to the south of the village. This requires the removal of some land from the Green Belt that lies within the bypass but which should generally remain undeveloped. Our detailed policies set out the approach we will take to areas of Urban Open Land.



# **SECTION FIVE - IMPLEMENTATION MONITORING AND REVIEW**



## SECTION FIVE - IMPLEMENTATION MONITORING AND REVIEW

### 14 Delivery

14.1 One of the key tests that the Local Plan must meet is to ensure that it is effective. This means that it should be capable of being delivered within the plan period and based on effective joint working on cross-boundary strategic priorities. This section demonstrates how this will be achieved through implementation and monitoring.

#### Implementation

14.2 Alongside the Council there are many organisations that will contribute towards the delivery of the aims of the Local Plan. For example:

- **Hertfordshire County Council** has a significant role to play in relation to education and highways alongside other functions;
- **North Hertfordshire Homes** and other providers in relation to the delivery of affordable housing;
- The **health authorities** will need to ensure there are the right medical facilities at the right time;
- the **water companies** and the **Environment Agency** in relation to water supply and treatment;
- The **development industry** will play a significant role in bringing development forward, together with the provision of or contribution towards infrastructure alongside other forms of funding;
- North Hertfordshire has seven **neighbouring authorities**, each producing their own local plans. We will ensure that these plans complement each other and address issues which cross local authority boundaries;
- Communities can also choose to become **neighbourhood planning areas** to help shape and deliver development and infrastructure in their areas;

14.3 The Council will continue to work in partnership with these and other relevant bodies and will put further mechanisms in place to ensure delivery within the plan period. Some of the key methods and schemes that will be used to ensure delivery are summarised below:

#### *Infrastructure Delivery Plan and Key Infrastructure:*

14.4 Ensuring that existing and new communities are sustainable involves a co-ordinated and flexible approach to the provision of infrastructure. An

Infrastructure Delivery Plan (IDP) has been prepared as a background document to support the Local Plan and assist as a delivery mechanism<sup>162</sup>.

- 14.5 It takes into account the growth targets and sets out the infrastructure that is likely to be needed to support growth within the District to 2031. We have worked with a variety of infrastructure providers to understand likely future requirements.
- 14.6 Predicting infrastructure needs so far into the future is not straightforward. The precise detail of most development schemes is not known and the nature of public services can change along the way.
- 14.7 The IDP represents current strategic thinking and provides a guide for planning future infrastructure. It will continue to be updated on an iterative basis over the lifetime of the plan to reflect change.
- 14.8 Notwithstanding this point, the IDP has identified a number of areas where significant interventions will be required to support the delivery of the plan:
- **Strategic Transport** – The scale of growth within the District will result in a significant number of new trips on a transport network that is already under stress in certain areas. Congestion issues are particularly focused within Hitchin and junctions relating to the A1(M). Not only as a result of growth in North Hertfordshire, but also in relation to existing issues and development in nearby authorities. There is a clear need to focus on promoting sustainable travel modes to limit the impacts of growth whilst delivering significant physical mitigation measures. Our transport modelling has helped to identify 11 specific schemes that will be required in the District over the period to 2031 as well as other schemes in neighbouring Stevenage which are influenced by this Plan’s proposals<sup>163</sup>.
  - **School Places** – The County Council believe that, in many areas, existing schools are reaching, or at, capacity. This is addressed in this Plan through the provision of new schools or school expansion on Strategic Housing Sites and elsewhere. Schemes will need to demonstrate acceptable education solutions in order to gain planning permission;
  - **Sewerage Infrastructure** – Our evidence has highlighted potential capacity issues with wastewater treatment capacity, particularly at Royston Sewage Treatment Works and Rye Meads Sewage Treatment Works. Technical solutions are possible and further detailed discussions are taking place with the water companies and the Environment Agency to inform appropriate mitigation measures.
- 14.9 Whilst these issues are not absolute constraints to the Local Plan, continued and proactive engagement with relevant parties, such as the developers, Highways Agency and Highways Authority, the Local Education Authority, the Environment Agency and Water companies, the Hertfordshire Local

<sup>162</sup> North Hertfordshire Infrastructure Delivery Plan (RS Regeneration, 2016; RS Regeneration & NHDC, 2018)

<sup>163</sup> AECOM transport modelling (AECOM, 2016)

Enterprise Partnership and the Hertfordshire Local Nature Partnership is fundamental in achieving appropriate solutions.

- 14.10 The IDP should be referred to for a full programme of mitigation measures required to support the Local Plan. Delivery of these schemes will be monitored on an on-going basis through our Authority Monitoring Reports.

*Developer Contributions and Other Funding Sources:*

- 14.11 The development industry will also be expected to reasonably contribute to the delivery of the Local Plan. Our approach to securing infrastructure and mitigation measures through new development is set out in Policy SP7. At the same time, it is acknowledged that the sites and schemes identified in this Plan are unlikely to make sufficient contributions to support the full range of infrastructure envisaged by the IDP.
- 14.12 This does not mean that development cannot occur. The Council will continue to work in partnership with other agencies to enable much needed funding for infrastructure. This might include:
- **Local Enterprise Partnerships (LEPs)** – LEPs are partnerships between businesses and local authorities set up by Government to support growth. North Hertfordshire is covered by the Hertfordshire LEP.
    - LEPs receive substantial funding settlements from central Government to meet strategic growth priorities and are responsible for then identifying specific projects which contribute to their aims;
  - **Central funding** – although a number of bodies are likely to ‘bid’ to the District Council for infrastructure contributions in the form of developer contributions, they also have access to their own funding programmes. Major hospital works, for example, are often ultimately funded directly through the Department for Health. Highways England similarly receive direct settlements to deliver key projects. This includes the proposed conversion of the A1(M) between Junction 6, near Codicote, and Junction 8, near Little Wymondley to a ‘SMART’ motorway. This will provide additional capacity by creating a third lane in each direction through hard-shoulder running at peak times.
  - **Grants and programmes** – Where individual projects meet specific objectives, they can receive grant funding. Well known examples include lottery funding, particularly where there are heritage or health benefits.

*Development Management through the Planning Application Process*

- 14.13 This is a key mechanism for ensuring development is delivered appropriately. The Council has a primary role in determining planning applications and ensuring that they are delivered in accordance with this Local Plan, other elements of the statutory Development Plan, national policy and legislation<sup>164</sup>.

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<sup>164</sup> Planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. As well as this Local Plan, the Development Plan includes

- 14.14 A number of schemes have been worked up in tandem with this Plan to ensure early delivery and compliance with policy. A pro-active approach will continue to be taken to all schemes. This should not only promote delivery, but should also ensure that developers are fully aware of how their planning applications will be assessed. Appropriate conditions and/or planning obligations will be used to ensure delivery of infrastructure and appropriate mitigation measures are put in place for schemes.
- 14.15 An estimate of the number of new homes has been provided against each site. However, as set out in the policies of this Plan, these figures are not binding and the Development Management process will be used to explore design-led solutions on individual sites. Where it proves possible to deliver higher numbers of homes within the policy framework of the plan, this will be supported and will contribute greater flexibility to the plan by increasing the 'buffer' of new homes over and above the targets in Policy SP8.

*Supplementary Planning Documents (SPDs), other plans and documents:*

- 14.16 Where appropriate, local authorities can set out further guidance that supports the policies in the Local Plan. Formal guidance takes the form of Supplementary Planning Documents (SPD). Current guidance includes that on parking standards and design.
- 14.17 There are also Town Centre Strategies for each of the four towns while communities are choosing to prepare Neighbourhood Plans for their area to assist implementation.
- 14.18 The Council will review SPD and other guidance on an on-going basis throughout the lifetime of this Local Plan.

*Council Owned Land and Property*

- 14.19 The Council can use its own assets to assist in delivery and promote growth. Protection and improvement of environmental assets on Council owned land will also be important.

*Acquisition powers*

- 14.20 The Council can use its resources to assemble land and sites. However, it is envisaged that almost all of the development that is set out in, or will be controlled by, this Plan will be delivered by third parties.
- 14.21 Recent legislation provides greater opportunities for local communities to take control of assets in their local areas. This includes the community Right to Bid which gives local people additional time to develop a strategy where local

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any Neighbourhood Plans produced by local communities and the Waste Local Plan and Minerals Local Plan produced by Hertfordshire County Council.

facilities which have been identified as an Asset of Community Value are earmarked for sale by their owners.

- 14.22 As a last resort, the Council's Compulsory Purchase powers can be used to ensure implementation of the policies and priorities of the Local Plan. This includes for buildings identified as Assets of Community Value which are perceived to be under threat. However, the Council's preferred approach remains pro-active negotiation with, and advising of, landowners, developers and other relevant parties to assist the delivery of schemes and the retention of important local facilities.
- 14.23 Where a local community considers that an Asset of Community Value is under threat and that they may wish to request the use of the Council's Compulsory Purchase powers, they should contact the Council for further advice on the appropriate procedure(s) and any financial implications.

## Monitoring

- 14.24 A monitoring framework will allow us to assess whether the policies in this Plan are being successfully implemented. This will be set out in, and form the basis of, our authority monitoring reports (AMRs) that we must produce annually.
- 14.25 The AMR will show whether policies are working or having the right effect. It will demonstrate whether we are meeting the targets we have set for ourselves, or on track to do so.
- 14.26 As well as tracking the direct effects of implementing the plan, monitoring also allows us to consider the wider social, economic and environmental impacts. There is considerable cross-over here with the requirements of environmental assessment legislation which requires on-going monitoring of significant effects<sup>165</sup>.
- 14.27 The table below sets out some of the key indicators and targets (where applicable) that will be measured. These will be supplemented by other indicators and contextual data on matters such as unemployment rates, retail vacancies and travel choices.
- 14.28 The table is followed by a housing trajectory setting out how the delivery of new homes is currently anticipated to occur over the plan period. Figure 6 over-page shows the anticipated housing trajectory. This will be kept up-to-date in future monitoring reports. This programme of delivery will allow the plan to demonstrate a five-year land supply at the point of adoption and, subsequently, on an on-going basis<sup>166</sup>.

<sup>165</sup> Sustainability Appraisal of the North Hertfordshire Local Plan (CAG, 2021)

<sup>166</sup> Further information on the calculation of five-year land supply is set out in the Housing and Green Belt Background Paper (NHDC, 2016)

14.29 Although many of these indicators will be influenced by the implementation of this plan they are also subject to wider forces, such as the state of the economy, and the choices made by individuals, businesses and other service providers. Failure to meet these targets should not necessarily be read as a failure of the plan and future monitoring reports will identify where external factors have influenced performance.

Table 2: Key Indicators and Targets for Monitoring Policies

Strategic Policy	Indicator	Target
SP1	Number of designated neighbourhood planning areas	(none)
SP1	Number of Neighbourhood Plans submitted and compliant and made	(none)
SP2	Housing completions by settlement type	For at least two-thirds of development to occur within or adjoining identified towns
SP3	Employment floorspace completions by location	For at least 90% of business development to occur within designated employment areas or allocated employment sites
SP4	Retail floorspace completions by location	For at least 75% of retail development to occur within identified centres
SP4	% of primary frontages in retail use	For at least 66% of units and floorspace within the primary frontage to remain in retail use
SP4	Land-use in local centres	For at least one unit in all centres to remain in use as a shop
SP4	Services available in villages	(none)
SP7	s106 / CIL Monitoring	(none)
SP7	Infrastructure delivery	To ensure the timely delivery of infrastructure necessary to support the plan

Strategic Policy	Indicator	Target
SP8	Housing completions	For housing completions to remain broadly aligned to the trajectory established in the plan
SP8	Five-year land supply	To maintain a five-year land supply at all times
SP8	2031 land supply	To ensure projected completions over the period to 2031 will meet or exceed the housing targets of the plan
SP8	Housing completions on previously developed land	For at least 20% of homes over the plan period to be on previously developed land
SP8	Affordable housing completions	For at least one-third of housing completions to be for affordable housing
SP8	Affordable housing supply by scheme type	For affordable housing to meet target levels of provision
SP8	Housing completions by size	To supply a broadly even split between small (1- or 2-bed) and large (3+ bed) properties
SP11	Applications permitted against the advice of the Environment Agency or Lead Local Flood Authority	To not permit development against the advice of these statutory agencies
SP12	Number and area of designated biodiversity sites	No loss of designated sites in terms of number or area
SP12	Open space provision in new development (permissions)	For new development to achieve current open space standards
SP12	Open space provision per 1,000 population	For district-wide provision to achieve current open space standards
SP13	Number and status of Conservation Areas	No loss of designated areas and for all areas to be supported by up-to-date appraisals

Strategic Policy	Indicator	Target
SP13	Number and status of Listed Buildings	No loss of Listed Buildings and for no buildings to be at risk

### Policy IMR1: Five Year Housing Land Supply

In order to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, we will:

- a) Deliver the total housing requirement of 13,000 net dwellings over the plan period on a stepped basis. The Council's five year housing land supply will be measured against housing requirement targets of:
  - 350 dwellings per annum for the plan period from 2011 to 31 March 2020;
  - 500 dwellings per annum for the plan period from 1 April 2020 to 31 March 2024; and
  - 1,120 dwellings per annum for the remainder of the plan period from 1 April 2024 to 2031;
- b) Add any shortfall in housing delivery since the plan's start date, spread evenly over the remaining plan period, to the calculation of the requirement;
- c) Ensure that the supply of specific, deliverable sites included a buffer (moved forward from later in the plan period) in line with national planning policy; and
- d) Monitor housing completion and permissions on an ongoing basis to ensure the housing trajectory is based upon robust and up-to-date information and assumptions.

14.30 Figure 6 over-page shows the anticipated housing trajectory. This will be kept up-to-date in future monitoring reports. This programme of delivery will allow the plan to demonstrate a five-year land supply at the point of adoption and, subsequently, on an on-going basis.

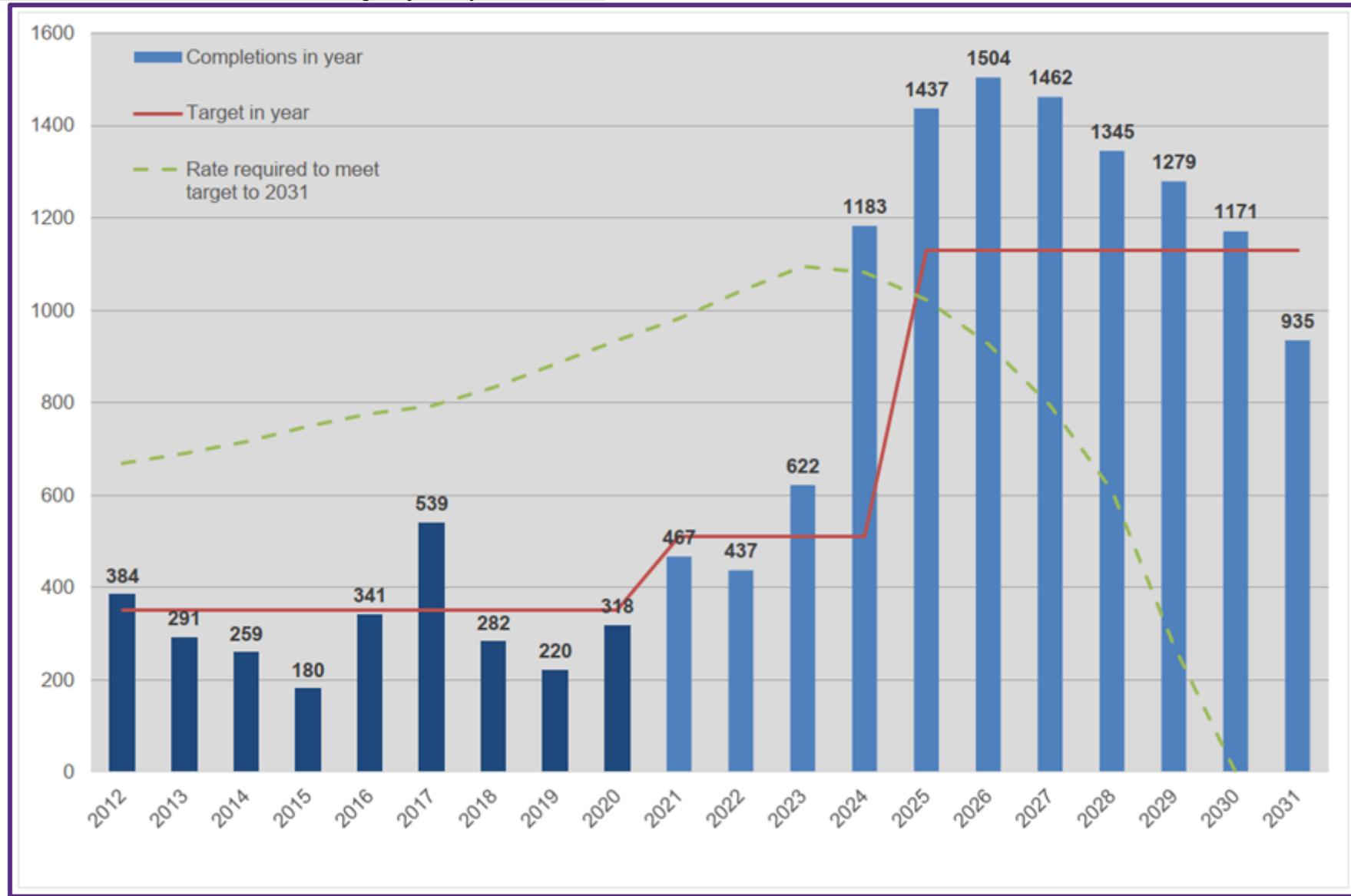
14.31 In order to achieve this, the plan uses a stepped approach to the housing requirement. For the period to 1 April 2020, a housing requirement of 350 dwellings per annum is applied recognising that the quantum of development delivered from the start of the plan period in 2011 to this date is fixed. This increases to 500 dwellings per year between 2020 and 2024 before rising to a requirement for 1,120 dwellings per annum over the remaining years of the plan period.

- 14.32 This approach is linked to development strategy set out in this plan. A significant proportion of future new homes will be delivered upon new strategic sites. Delivery of these sites requires their release from the Green Belt which is achieved through this plan. However, this means that in the first half of the plan period from 2011 to 2021, reliance has been placed upon sites permitted under the previous policy regime and extant planning permissions.
- 14.33 In the second half of the plan period from 2021, the Local Housing Allocations released from the Green Belt will be critical to maintaining the delivery profile and a rolling five-year land supply. It is anticipated that the Strategic Housing Sites will become the main component of new housing supply in the latter years of the plan. The stepped approach to housing delivery over the plan period allows a better match with actual and anticipated delivery.
- 14.34 The same circumstances support a measured approach to meeting the shortfalls in housing delivery that have occurred since 2011. To this end the plan does not seek to meet the full extent of any backlog of delivery within the first five years (known as the Sedgefield approach) but rather seeks to meet this backlog over the remainder of the plan period (the Liverpool approach).
- 14.35 In addition to the measures above, national policy requires a buffer, moved forward from later in the plan period, to be applied to the calculation of the five year supply<sup>167</sup>. This buffer should be a minimum of 5% but, where there has been a record of persistent under delivery of housing, this should be increased to 20%.
- 14.36 In the period from the start of the plan period on 1st April 2011 to 31st March 2020 the delivery of housing completions in the District were well below the 650 dwellings per annum that would be necessary if the requirement were to be met evenly over the whole plan period, averaging 313 dwellings per annum. This necessitates the application of a 20% buffer at the point of the plan's adoption.
- 14.37 The buffer requirement will be added to both the housing requirement and any backlog in delivery to be met over the five year period under assessment.
- 14.38 These approaches are set out in Policy IMR1 and will be the basis of the housing land supply calculations that are produced for monitoring purposes over the plan period. The delivery of sites will be monitored and will inform the plan review set out in Policy IMR2.

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<sup>167</sup> Paragraph 47 of the 2012 NPPF

Figure 6: North Hertfordshire housing trajectory 2011-2031



## Review

### Policy IMR2: Local plan early review

The Council will undertake a whole plan review of the Local Plan 2011-2031 by the end of 2023 at the latest. This will determine whether this Plan needs to be updated either in whole or in part. All policies will be reviewed but with particular regard paid to the following matters that were specifically identified during the preparation and examination of this plan:

- Housing requirements for the District and wider housing market areas;
- Housing delivery having regard to the progress and implementation of the Strategic Housing Sites and Local Housing Allocations identified in this plan and the rates of development being achieved measured against the stepped approach and housing trajectory set out in this plan;
- The safeguarded land to the West of Stevenage;
- The outcomes of the process(es) to comprehensively explore new settlement options in the District;
- Gypsy and Traveller provision
- The identification of needs for retail, leisure, office and other main town centre uses;
- Options for long-term secondary education provision in the Stevenage area; and
- Broad alignment with the statutory five-year time limit for reviews of the East Hertfordshire and Stevenage local plans (required by November 2023 and May 2024 respectively) to allow co-ordinated consideration of the above matters.

The review will have regard to up-to-date information and be conducted in line with Government policy and statutory requirements. Subject to the outcomes of that review, a new plan or policies will be prepared to a new time horizon of at least 2041.

The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint plan or policies based upon wider functional geographies.

14.39 The Government expects plans to be regularly reviewed every five years<sup>168</sup> and we will need to update our Local Plan more regularly than has happened in the past. National guidance recognises that plans can be reviewed in whole or in part to respond flexibly to changing circumstances<sup>169</sup>. We will use the

<sup>168</sup> Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

<sup>169</sup> Paragraph 153 of the 2012 NPPF

monitoring framework, set out above, to keep the effects of this Plan under review.

- 14.40 Where monitoring shows that we are consistently failing to meet relevant targets, or are unlikely to do so in the future, or that wider conditions have changed to the extent that the strategy in this plan is no longer appropriate, we will initiate a review of the Plan that relates to those specific issue(s) identified.
- 14.41 In addition to our monitoring, we recognise local plans should normally set out where development will occur over a 15-year period from the point of adoption<sup>170</sup>. This Plan shows how we will meet our needs over the period to 2031, 10 years from the anticipated date of adoption.
- 14.42 Policy IMR2 therefore commits to an early, whole plan review to commence by the end of 2023 that will allow the Council to consider longer-term requirements, including in relation to a number of specific issues identified through the production of this plan.
- 14.43 We consider that this Plan makes maximum use of reasonable and available development sites at the time of writing. On-going processes are likely to supplement the range of spatial options available in North Hertfordshire in the period after 2026. It is considered most appropriate to let these 'run their course' in order to properly inform longer-term planning.
- 14.44 The Council has resolved to fully explore the possibilities of a new settlement within the District. Our work to date recognises the long-term nature of these projects. Further work will be initiated to identify potential locations where any new settlement(s) might be located and this continues to be progressed.
- 14.45 At the same time, future decisions by other bodies may significantly influence future options for growth in North Hertfordshire. We will continue to work with central government, the Hertfordshire Growth Board and other relevant agencies to better understand the likely nature of these<sup>171</sup>.
- 14.46 The outcomes of these deliberations and the new settlement process will be reflected in the review process outlined in Policy IMR2. We currently consider it most likely that this review will result in a need to comprehensively update the local plan, recognising that this cannot be prejudged at this time. Our present intention is that any comprehensive review of this Plan will be completed by the mid-2020s at the latest. It will roll the Plan forward to a new time horizon of at least 2041 and deliver any specific additional or updated policies and sites that are identified as being needed.
- 14.47 This Plan recognises the requirements of the Duty to Co-operate and makes a positive contribution towards unmet development needs from Luton. This

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<sup>170</sup> Paragraph 157 of the 2012 NPPF

<sup>171</sup> The Hertfordshire LEP, for example, has identified a long-list of potential strategic transport projects over the period to 2050 which could unlock new locations or directions for growth.

maximises the contribution that we feel can be made from that part of the District within the Luton Housing Market Area (HMA).

- 14.48 We have actively worked with the other authorities in the HMA – Luton, Central Bedfordshire and Aylesbury Vale – to understand the extent to which the market area as a whole can accommodate development needs over the period to 2031<sup>172</sup>. The authorities in the Luton HMA jointly commissioned and subsequently agreed a Growth Options Study. This demonstrates sufficient potential capacity within the Luton HMA to accommodate Luton’s unmet housing needs for the current round of plans. If there proves to be insufficient capacity within the Luton HMA in the future, it will be necessary to look further afield for potential solutions. This would be likely to involve a number of authorities.
- 14.49 We will also work with these and other relevant authorities to understand, and holistically plan for, any long-term strategic infrastructure requirements arising from future growth. This will include consideration of any infrastructure that may be required within North Hertfordshire to facilitate the delivery of growth proposed in other authorities’ plans or other long-term aspirations that may come to fruition over the plan period. Any proposals to expand London Luton Airport beyond the limits of its current planning permission would fall within the scope of this commitment.
- 14.50 NHDC is a co-commissioning authority for the A505 Corridor Study along with Luton Borough Council, Central Bedfordshire Council, Hertfordshire County Council and other neighbouring authorities as appropriate. The outcomes of this Study will determine the likely long-term cumulative traffic impacts of growth in the wider area on both Luton and North Hertfordshire and potential measures to mitigate these.
- 14.51 We will continue to engage constructively in these processes and, if necessary, consider how best to reflect the outcomes. Dependant on the nature of any issues raised, it may be possible to deal with this through partial or focused reviews of any relevant policy/ies.
- 14.52 Beyond these defined events, there may be changes in circumstances that we cannot currently foresee, or are yet to understand the full implications of, but which have a substantial impact upon the District. This might be a major change to the way in which the planning system operates, as suggested in the Government’s 2020 White Paper, or structural changes to the population or the way we live, work or spend our leisure time in response to Brexit, Covid-19, climate change or any other future event. It is anticipated that the review process outlined in IMR2 will be the most appropriate means of considering these matters but the Council may also consider focussed reviews of individual or small groups of policies prior to this where necessary.

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<sup>172</sup> Luton Housing Market Area Growth Study (Land Use Consultants, 2017)



# APPENDICES



## Appendix 1: Superseded Policies

The schedule below is taken from the Local Development Scheme, January 2016 and sets out how, where and when (if appropriate) policies within the saved District Local Plan No. 2 with Alterations (1996) will be replaced. Those policies which were not saved by the Secretary of State in September 2007 do not appear in the schedule.

District Local Plan No.2 with Alterations To be replaced		Replacement Policy contained in the North Hertfordshire Local Plan 2011 – 2031	
Policy 2	Green Belt	Policy SP5	Countryside and Green Belt
Policy 3	Settlements within the Green Belt	Policy SP2	Settlement hierarchy and Spatial Distribution
Policy 4	North East Stevenage		Not applicable
Policy 5	Excluded villages	Policy SP2	Settlement hierarchy and Spatial Distribution
Policy 6	Rural area beyond the Green Belt	Policy CGB1	Rural areas beyond the Green Belt
Policy 7	Selected villages beyond the Green Belt	Policy SP2	Settlement hierarchy and Spatial Distribution
		Policy D1	Sustainable design
Policy 8	Development in towns	Policy SP2	Settlement hierarchy and Spatial Distribution
Policy 9	Royston's development limits	Policy SP2	Settlement hierarchy and Spatial Distribution
		Policy CGB1	Rural areas beyond the Green Belt
		Policy CGB5	Urban Open Land
Policy 11	Chilterns Area of Outstanding Natural Beauty	Policy NE3	The Chilterns Area of Outstanding Natural Beauty (AONB)

District Local Plan No.2 with Alterations To be replaced		Replacement Policy contained in the North Hertfordshire Local Plan 2011 – 2031	
Policy 14	Nature conservation	Policy SP12	Green Infrastructure, landscape and biodiversity
		Policy NE1	Strategic Green Infrastructure
		Policy NE4	Biodiversity and geological sites
Policy 16	Areas of archaeological significance and other archaeological areas	Policy HE4	Archaeology
Policy 19	Historic parks and gardens	Policy HE1	Designated heritage assets
Policy 21	Landscape and open space patterns in towns	Policy NE4	Protecting open space
		Policy NE6	New and improved open space
Policy 25	Re-use of rural buildings	Policy CGB4	Existing buildings in the Rural Area Beyond the Green Belt
Policy 26	Housing proposals	Policy SP8	Housing
		Policy HS1	Local housing allocations
Policy 28	House extensions	Policy D2	House extensions, replacement dwellings and outbuildings
Policy 29	Rural housing needs	Policy CGB2a	Exception sites for affordable housing in the Green Belt
		Policy CGB2b	Community facilities, services and affordable housing in the Rural Area Beyond the Green Belt
Policy 29A	Affordable housing for urban local needs	Policy HS2	Affordable housing

District Local Plan No.2 with Alterations To be replaced		Replacement Policy contained in the North Hertfordshire Local Plan 2011 – 2031	
Policy 30	Replacement or extension of dwellings in the countryside	Policy CGB4 Policy D2	Existing buildings in the Rural Area Beyond the Green Belt House extensions, replacement dwellings and outbuildings
Policy 33	Relatives and staff accommodation	Policy CGB3 Policy HS6 Policy D2	Rural workers dwellings Relatives' and dependents' accommodation House extensions, replacement dwellings and outbuildings
Policy 34	Residential caravans and mobile homes		No replacement policy
Policy 36	Employment provision	Policy SP3 Policy ETC1	Employment Appropriate uses in employment areas
Policy 37	Business uses (B1 Use Class)	Policy SP3 Policy ETC1	Employment Appropriate uses in employment areas
Policy 39	Leisure uses	Policy ETC3	New retail, leisure and other main town centre development
Policy 42	Shopping	Policy SP4 Policy ETC3	Town Centres, Local Centres and Community Shops New retail, leisure and other main town centre development
Policy 43	Shopping areas in town centres	Policy ETC4 Policy ETC5	Primary shopping frontages Secondary shopping frontages
Policy 45	Shopfronts	Policy D1	Sustainable design
Policy 47	General aviation		No replacement policy

District Local Plan No.2 with Alterations To be replaced		Replacement Policy contained in the North Hertfordshire Local Plan 2011 – 2031	
Policy 51	Development effects and planning gain	Policy SP7	Infrastructure requirements and developer contributions
Policy 55	Car parking standards	Policy T2	Parking
Policy 57	Residential guidelines and standards	Policy SP9	Design and sustainability
		Policy D1	Sustainable design
Policy 58	Letchworth Garden City design principles	Policy SP13	Historic Environment
		Policy SP15	North of Letchworth Garden City
		Policy D1	Sustainable design

## Appendix 2: Local Plan Designations

The Local Plan Policies Map includes the following designations, which are set by, and specifically relate to, policies in the Plan:

- Green Belt
- Rural Area Beyond the Green Belt
- Urban Open Land
- Employment Areas
- Employment Sites
- Housing Sites
- Neighbourhood Centres
- Settlement Boundaries
- Town Centre Boundaries
- Primary Shopping Frontage
- Secondary Shopping Frontages
- Mixed use Allocations
- Safeguarded Land
- Gypsy / Traveller Site

The Policies Map also includes the following designations, which although referred to by policies in the Plan, are not the responsibility of the Local Plan and the extents of the designations are not set by the Local Plan process. The relevant authority listed next to the allocation (below) is responsible for their designation. Their extents may change throughout the duration of the Local Plan and so viewing the organisations websites is recommended for the most up-to-date position (In the case of Conservation Areas, whilst the local authority is responsible for setting their extent it is a separate process to the Local Plan):

Designation	Designating authority
Sites of Special Scientific Interest	Natural England
Area of Outstanding Natural Beauty	Natural England
Conservation Areas	North Hertfordshire District Council

Additionally there are a number of other designations which policies in the Local Plan refer to; however, as the Local Plan does not control their designation or set their extents and they are so numerous and extensive that they would confuse the other designations, they are not included on the Policies Map. Again the authority listed next to the allocation is responsible for their designation and so viewing the organisations websites is recommended for the most up-to-date position (again, in the case of designations that are the responsibility of the District Council the process for setting their extents is separate to the Local Plan).

<b>Designation</b>	<b>Designating authority</b>
Flood Risk	Environment Agency
County Wildlife Sites	Herts and Middlesex Wildlife Trust / Natural England / Hertfordshire County Council
Local Nature Reserves	North Hertfordshire District Council / Herts and Middlesex Wildlife Trust
Scheduled Ancient Monuments	Historic England
Archaeological Areas	Historic England
Listed Buildings	Historic England
Air Quality Management Areas	North Hertfordshire District Council
Contaminated land	North Hertfordshire District Council
Waste Site Allocations	Hertfordshire County Council
Minerals Site Allocations	Hertfordshire County Council

ALL LAYERS CAN BE VIEWED USING THE COUNCIL INTERACTIVE ONLINE MAPPING SYSTEM.

### **Appendix 3: Local Centres**

The star symbol on the adopted Policies Map denotes the general location of the Local Centres identified by Policy SP4. The buildings or areas shown edged and hatched on the following plans shows their extent and the areas to which relevant policies will be applied.

### Ashwell Village Centre

### NORTH HERTFORDSHIRE DISTRICT COUNCIL



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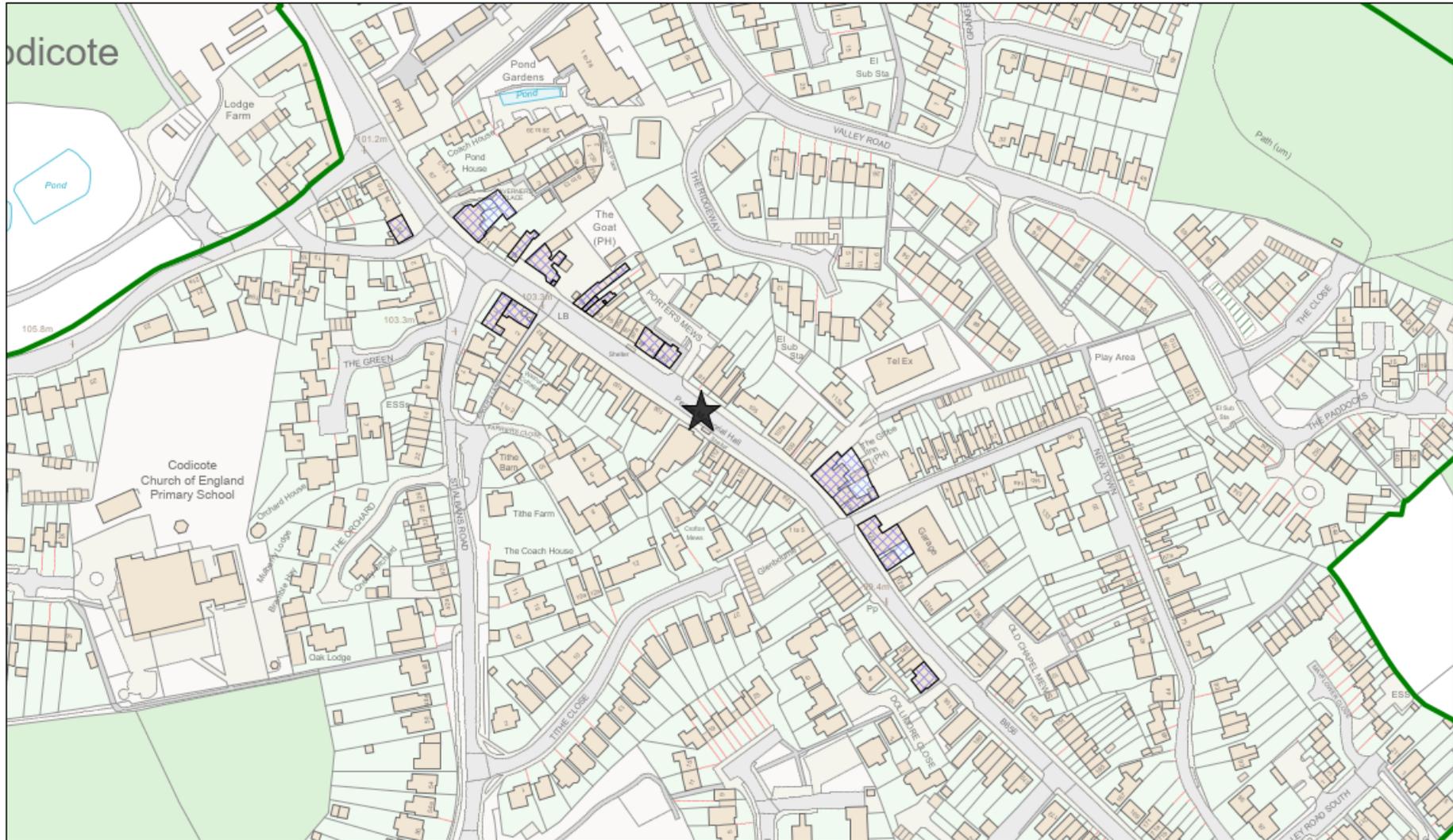
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Codicote Village Centre

NORTH HERTFORDSHIRE DISTRICT COUNCIL



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**Great Ashby Neighbourhood Centre**

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**



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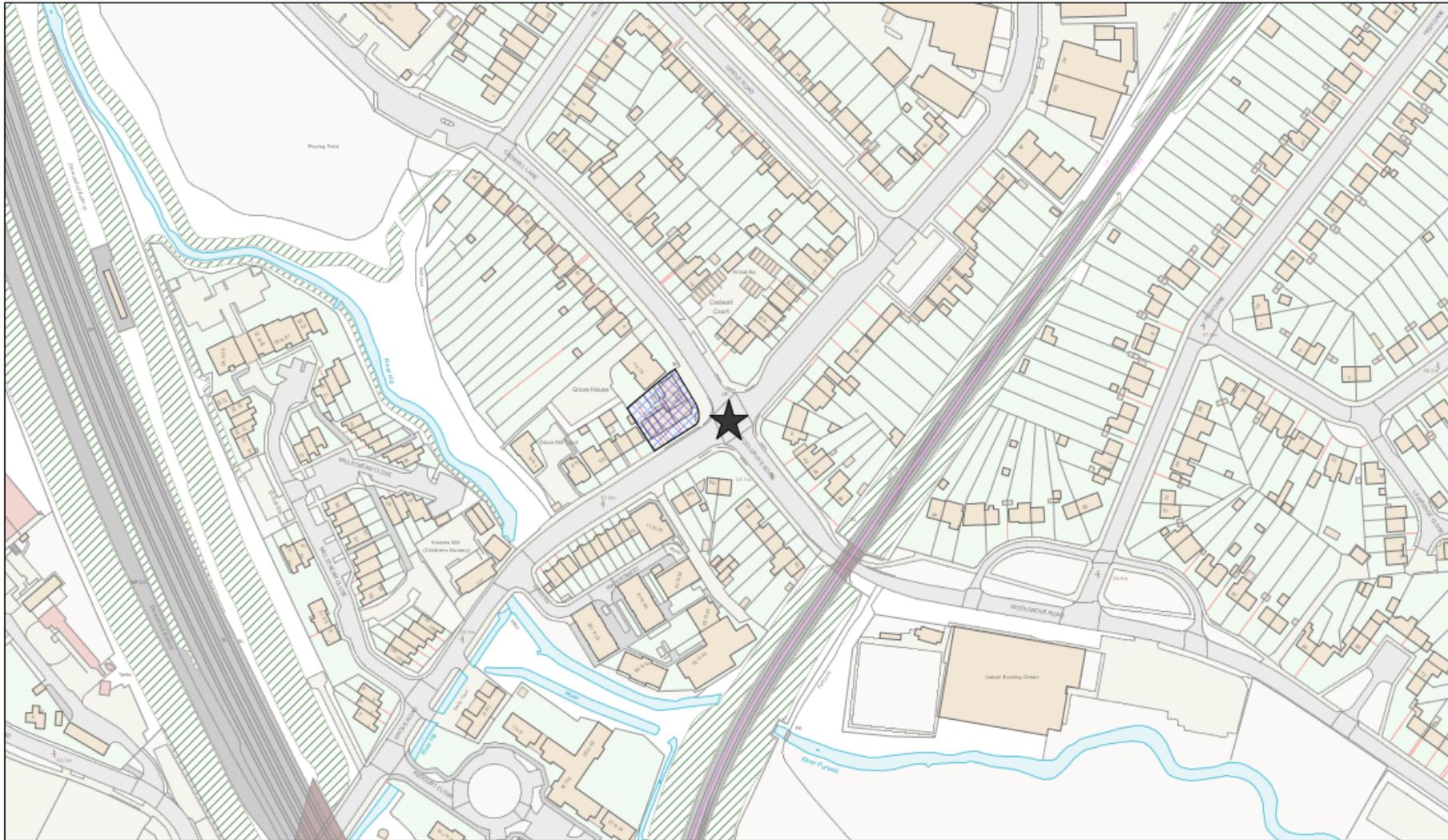
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### Grove Road Neighbourhood Centre

### NORTH HERTFORDSHIRE DISTRICT COUNCIL

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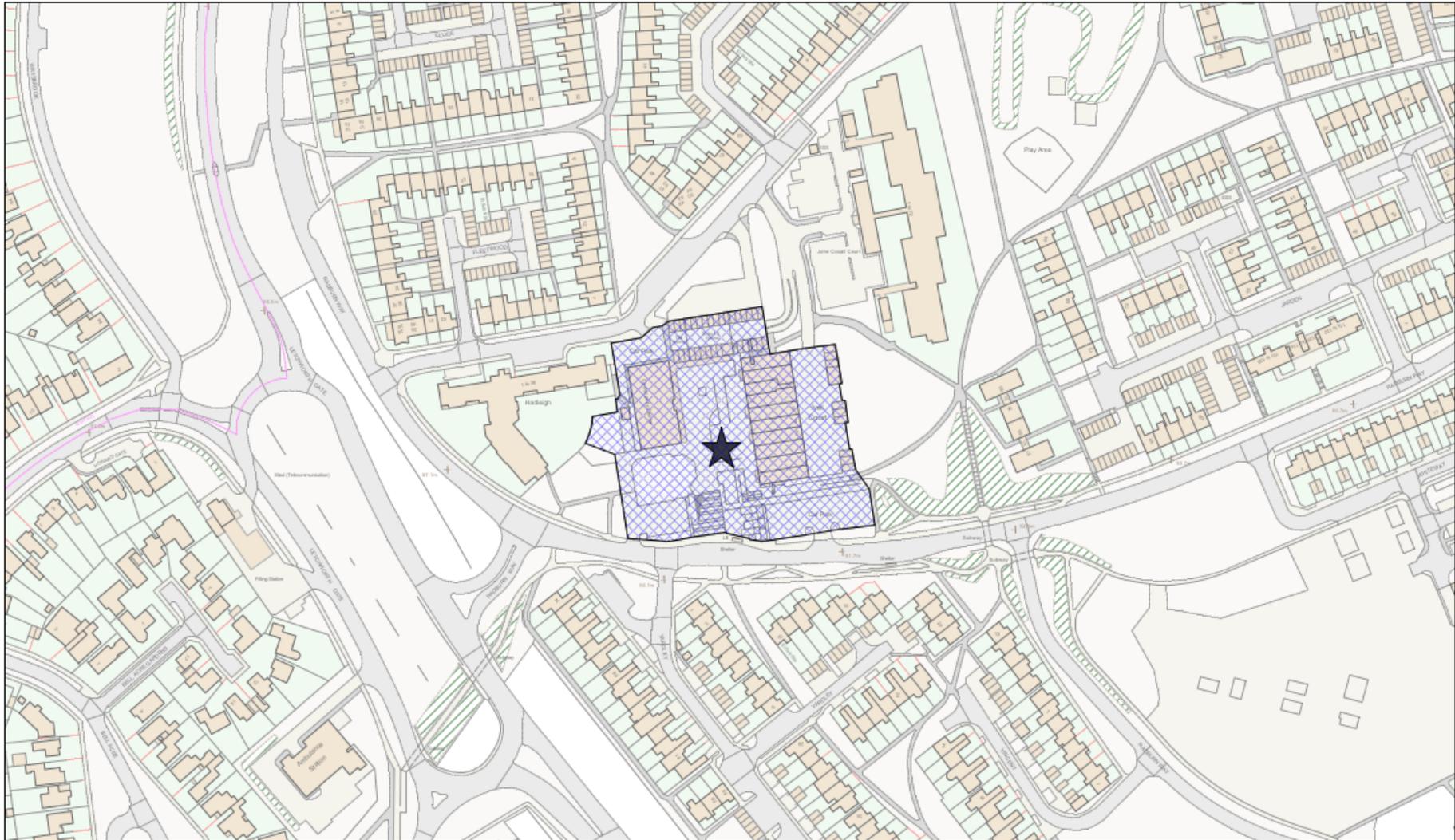
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**Jackmans Neighbourhood Centre**

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

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### Knebworth Village Centre

### NORTH HERTFORDSHIRE DISTRICT COUNCIL



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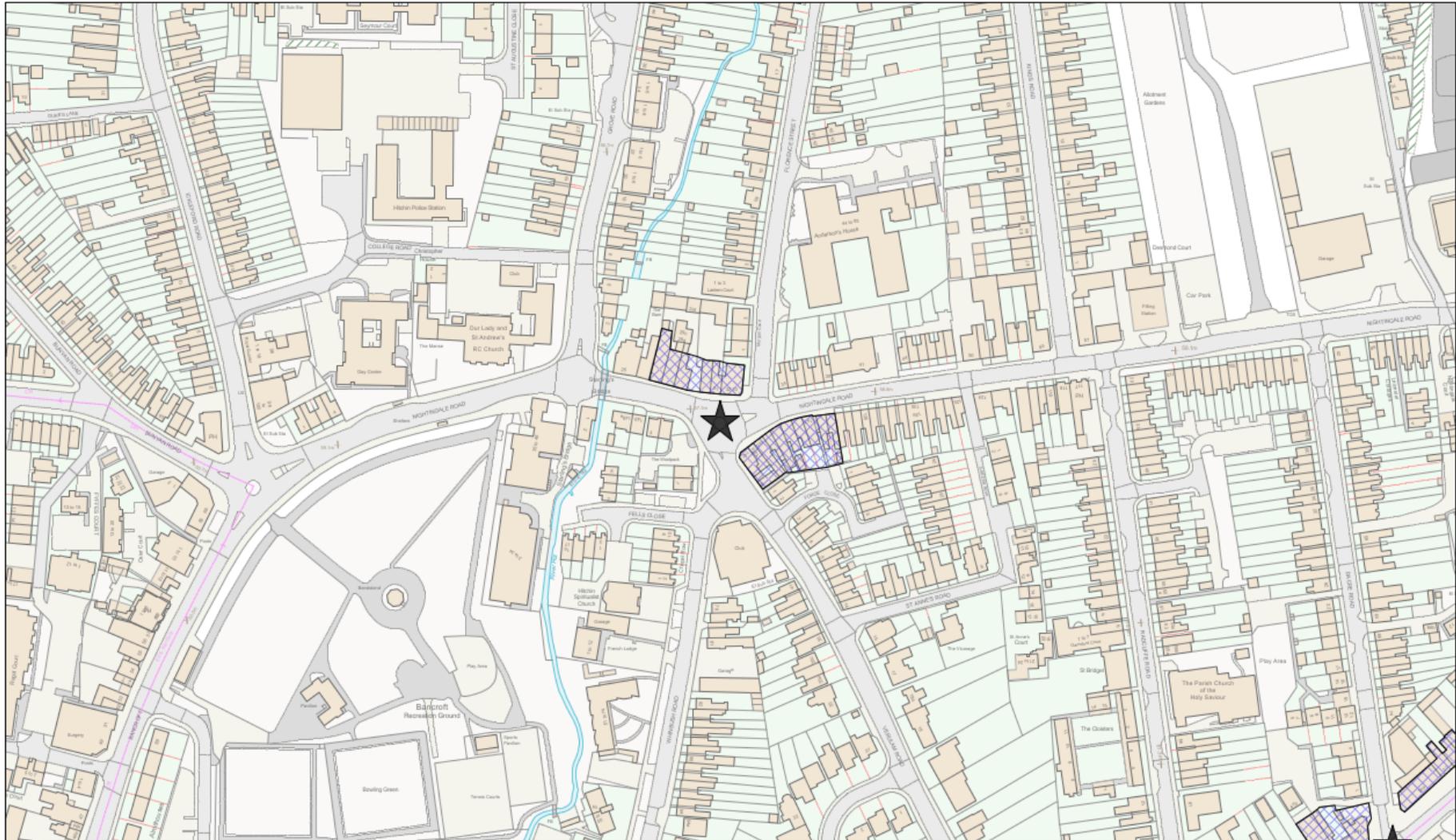


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# Nightingale Road Neighbourhood Centre

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

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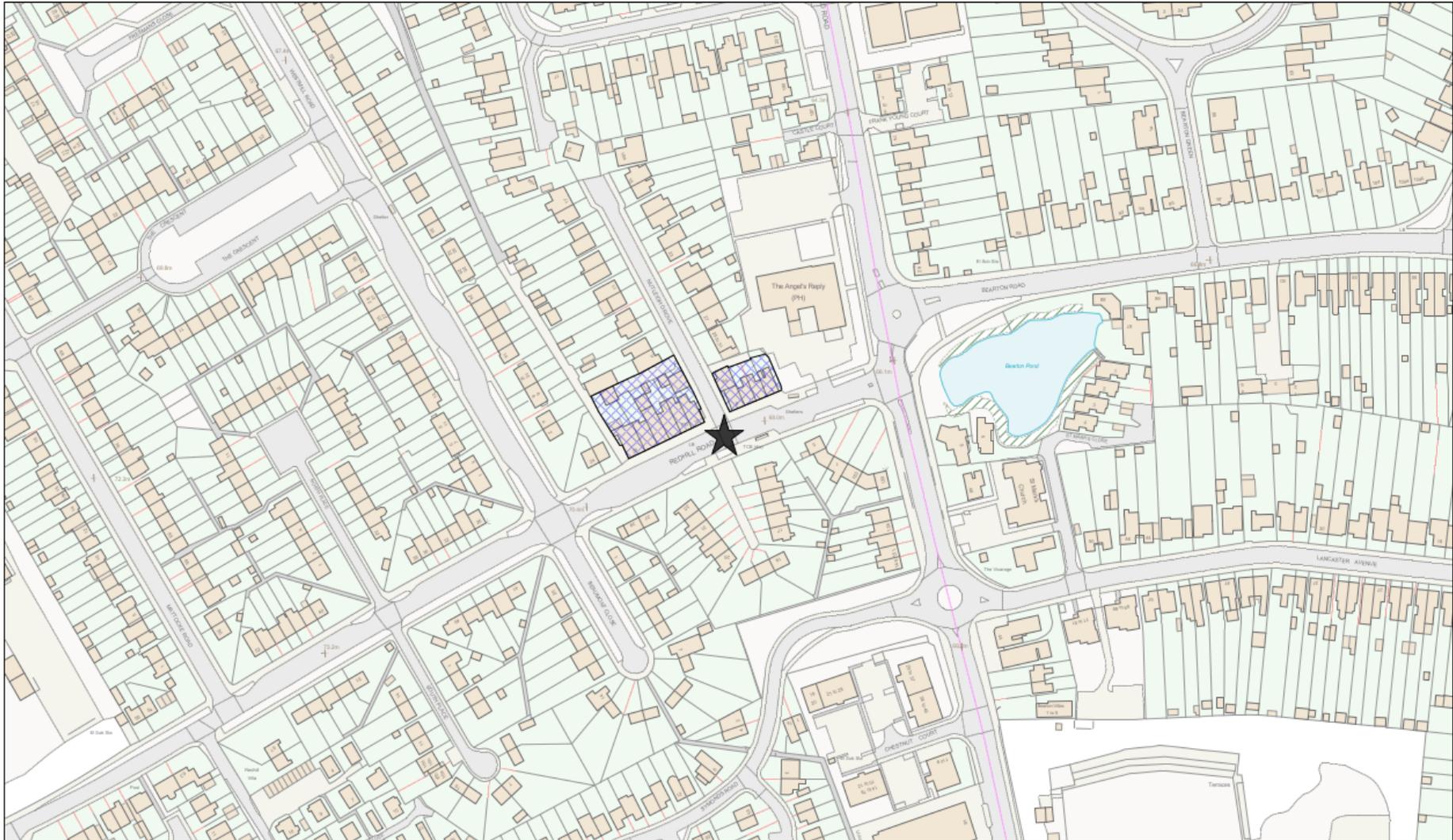




### Redhill Road Neighbourhood Centre

### NORTH HERTFORDSHIRE DISTRICT COUNCIL

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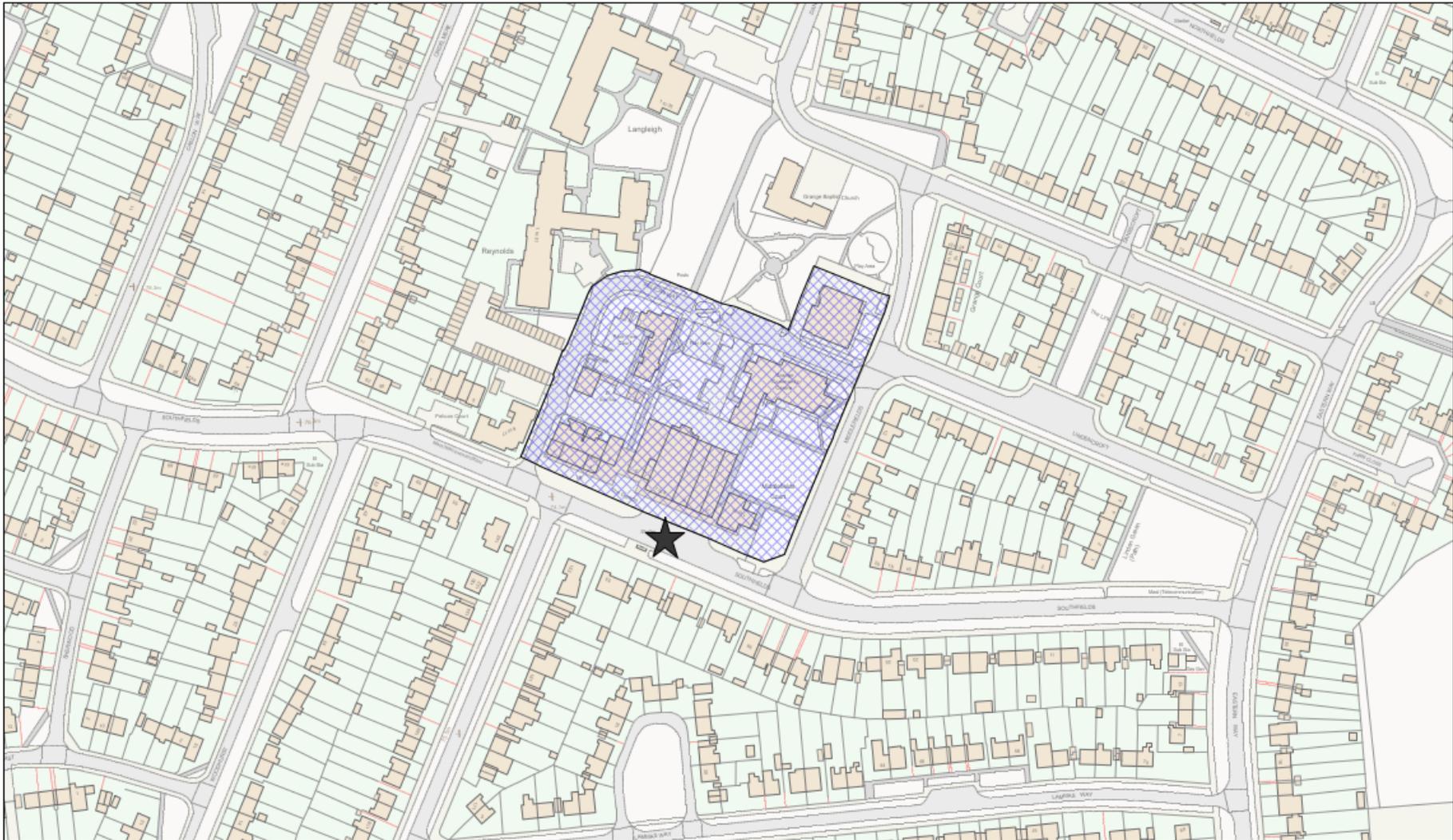
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### The Grange Neighbourhood Centre

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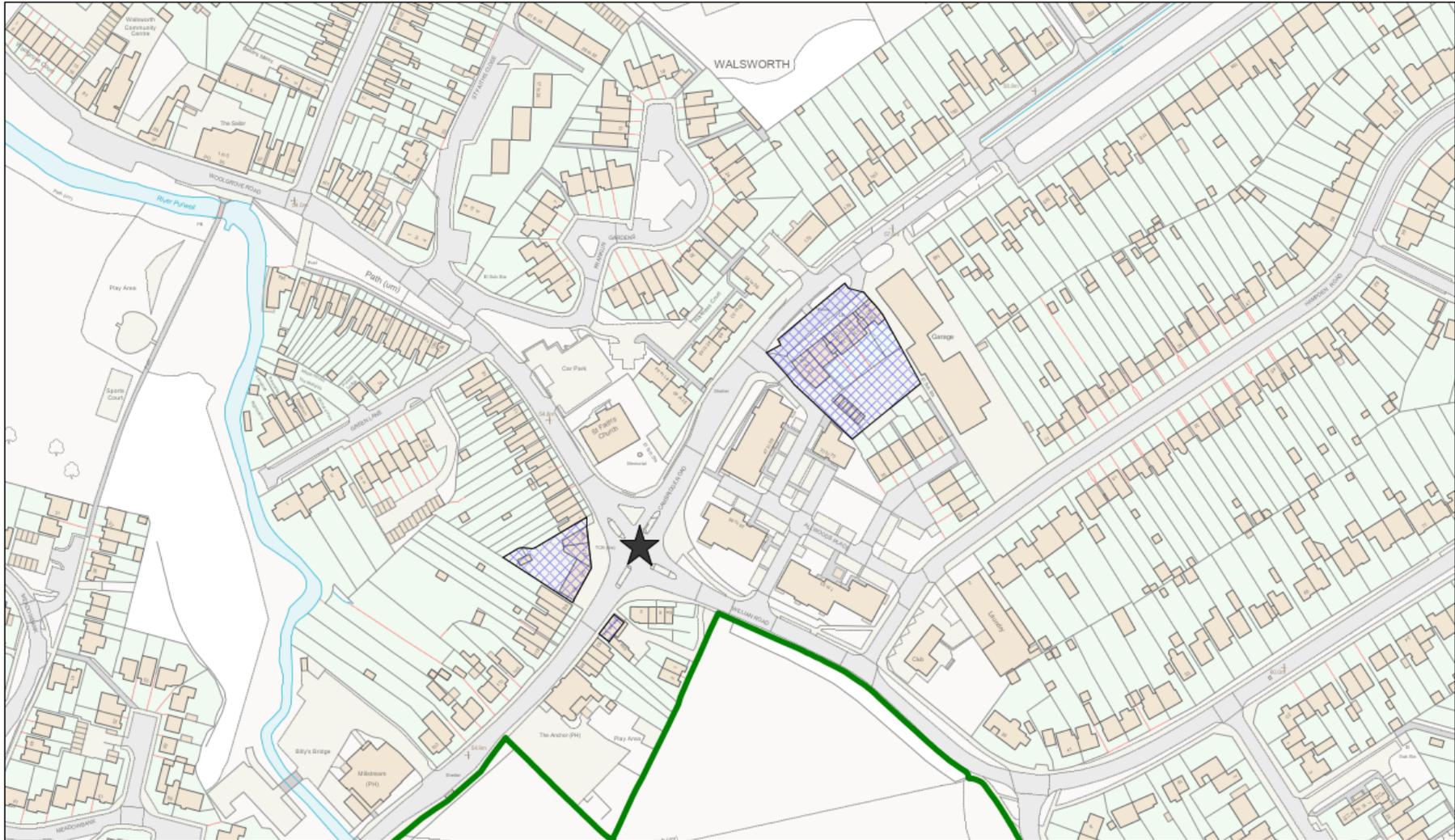
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**Walsworth (Cambridge Road) Neighbourhood Centre**

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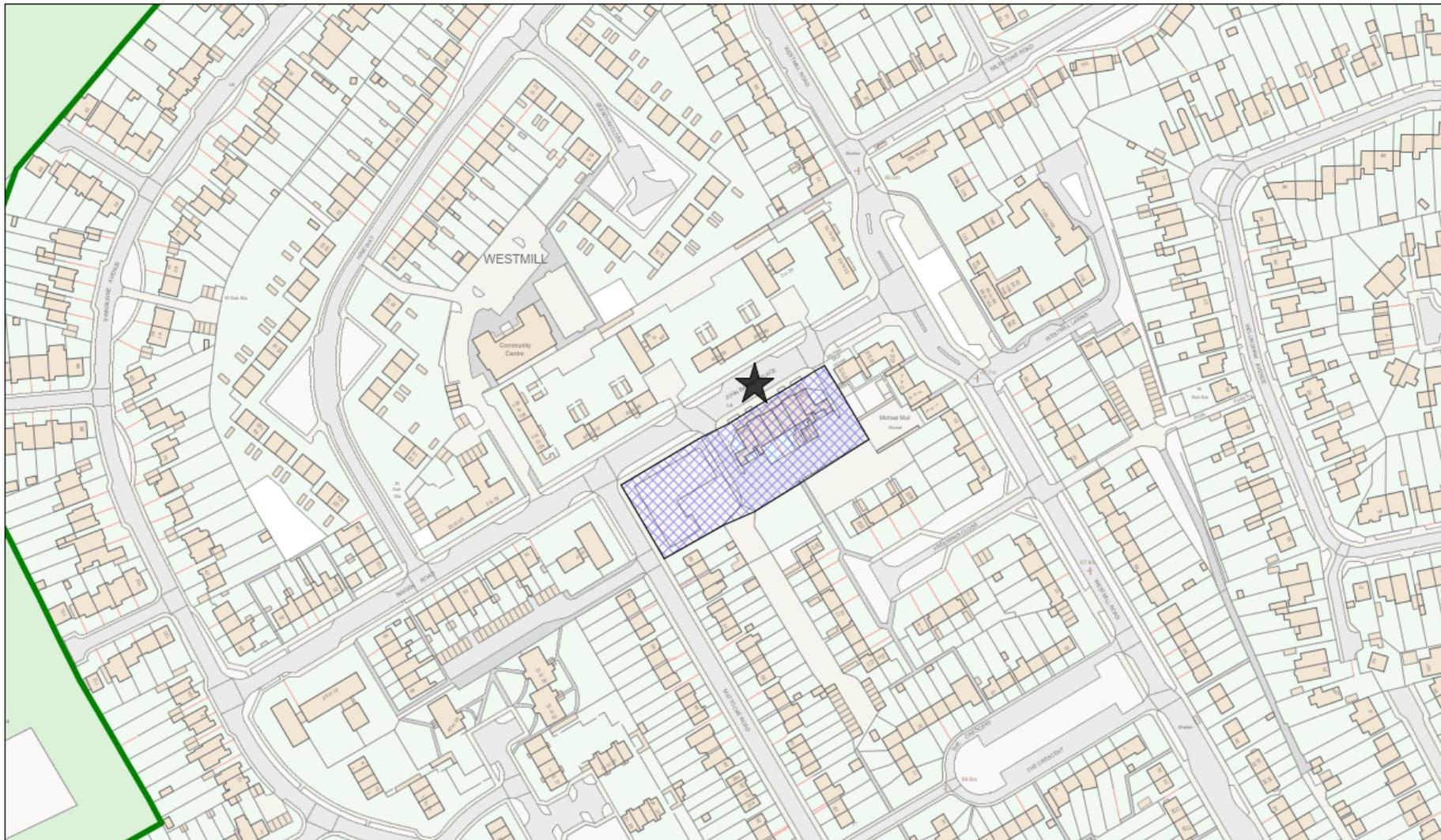




### Westmill (John Barker Place) Neighbourhood Centre

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

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## Appendix 4: Car Parking Standards

### Residential Parking Standards

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
1 bedroom	1 space per dwelling minimum	1 secure covered space per dwelling. None if garage or secure area provided within curtilage of dwelling
2 – 3 bedrooms	2 spaces per dwelling minimum	
Retirement developments (e.g. warden assisted independent living accommodation)	1 space per dwelling minimum	1 secure and covered space for residents per 5 units.

The above standards will also require visitor / unallocated parking as set out below to be added. Garages will be counted towards meeting the standards only if they are at least 7m x 3m measured internally. Reductions from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.

### Visitor/Unallocated Parking

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
Visitor / unallocated	Between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number) with the higher standard being applied where there are no garages in the schemes and the lower standard applied where every dwelling in the scheme is to be provided with a garage	For above C3 general housing - if no garage or secure area is provided within curtilage of dwelling then 1 covered and secure space per dwelling in a communal area for visitors  For C3 retirement developments - 1 covered and secure visitor space per 3 units

For the above visitor and unallocated parking standards, reductions in provision will be considered where:

1. Alternative publicly available off-street parking is available within 2 minutes' walk of the site;
2. Visitor parking arising from small-scale (i.e. infill) development can be accommodated on-street without compromising highway safety, the amenity of existing residents or the ability for businesses to operate; or
3. Relevant evidence is submitted by the applicant which supports a reduction in standard and considers existing and future car ownership and likely visitor demand.

## Appendix 5: Letchworth Garden City Design Principles

1. For development proposals in Letchworth, their overall layout and design should, as far as practicable, reflect 'Garden City' layout and design principles. Creative reinterpretation of the principles in the light of modern requirements will be sought, and a knowledge of the quality and variety of early garden residential development in the Garden City is a pre-requisite to the success of any proposals. The following notes are intended to give a guide to examples which might be studied, with benefit.
2. The term 'Garden City' is equated with open residential development, characteristically low density and generously landscaped with mature trees and hedges set amongst individual houses. This is only partly true. Many of the finest early Garden City layouts depended on a successful corporate design for the scheme as a whole, in addition to the individual features mentioned above. The key to success in the best of examples quoted below is the appreciation of the way houses are grouped to form a sequence of outdoor spaces related to each other and to the overall setting.
3. The broadest overall effect is that of the vista. This has a formal quality exemplified by the broad tree-lined swathe which projects the main axis of the town across Norton Common, and was very effectively handled in the section of Broadway between the J.F. Kennedy Gardens and the Sollershotts where a double avenue of Lime trees was planted. Other principal approach roads of the town were treated in this manner, for example Norton Way South and Pixmore Way. In the latter, the articulated building lines of the early Letchworth U.D.C. Council housing was notably successful.
4. In contrast, the principle of closure represented the breaking down of the street picture into sequences by means of closing the view at key points, particularly at road junctions. Notable examples are the view southwards into Rushby Mead from Hillshott analysed in detail below; The Crescent between Pixmore Way and Baldock Road where a series of spaces is created along a curved road; or more formally, in Jackmans Place around the triple road junction where a focal block is set across the view line. The use of an informal design approach should not be at the expense of purposeful design of space framed by buildings, an aspect always emphasised by Barry Parker and Raymond Unwin, consultant architects for the original Letchworth Plan of 1904 and much of the subsequent detailed layout of housing.
5. Within the street picture, accents were often created by variations in the building line. For example, the splayed arrangement of the tree blocks of Silver Birch Cottages in Station Road added visual interest to an otherwise monotonous road. Greens were used to create a corporate sense of design, for example at Westholm, Ridge Road and in the section of Lytton Avenue between Gernon Road and Pixmore Way.
6. Finally, group design was used as a means of giving identity to the various roads within the Garden City. The residential cul-de-sac, was one of the earliest instances of the use of a feature which is now common in housing layouts. Other means of grouping include the linking together of blocks at street corners, as at the junction of Ridge Avenue and Hillshott, and the use of linking walls and garages as in the groups at the junction of Lytton Avenue and South View.

Occasionally, corners would be treated with blocks of striking design, for example the twin 'L' blocks which frame the north side of the junction between Sollershott East and Field Lane or the block boldly set diagonally across the acute angled junction between Sollershott East and South View.

## Glossary

This Glossary gives a definition for a number of terms used in this Local Plan and / or in consideration of planning matters. These definitions are correct at the point of publication but may be changed or superceded by any relevant changes in legislation, national policy etc.

### Adoption

Confirmation, usually by a legal notice, stating the final adoption of a planning policy document by a Local Planning Authority.

### Affordable Housing

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with the detailed definitions set out in the National Planning Policy Framework, falling into one or more of the following categories:

- Affordable housing for rent
- Starter Homes
- Discounted market sales housing
- Other affordable routes to home ownership

### Allocated Site/Site Allocation

Sites which are identified for a specific use e.g. housing or Green Belt on the Local Plan Policies Map.

### Annual Monitoring Report / Authority Monitoring Report (AMR)

A report which must be produced by a Local Planning Authority every year which presents data on key matters affecting the planning and development of their area. This includes reporting on progress with the Local Plan, any Neighbourhood Plans and any targets included in local plan policies. The two terms are used interchangeably but normally mean the same thing.

### Biodiversity

The variety of life in all forms (e.g. wildlife, plants etc).

### Biodiversity Action Plan (BAP)

An overarching framework for habitat and species conservation, which works on the basis of partnership to identify local priorities and targets.

## **Brownfield site/Previously Developed Land (PDL)**

Brownfield Land is land which has been previously developed. For land to fall under PDL it must be, or have been, occupied with a permanent structure within the site's curtilage. Excluded from PDL is land occupied by forestry or agricultural buildings, mineral extraction or waste disposal sites, residential gardens, parks, recreational grounds, and allotments as well as land that was previously developed but the remains of any structure have blended into the landscape.

## **Buildings of Local Interest**

Buildings designated by the local planning authority to be of local significance and included in a local list. Although they are not statutorily protected, close scrutiny will be given to any development affecting them. They are referred to as non-designated heritage assets.

## **Community Infrastructure Levy (CIL)**

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. The CIL must be collected through the preparation of a Charging Schedule, supported by a range of infrastructure planning and economic viability evidence.

## **Comparison Goods/Convenience Goods**

Comparison goods include clothing, shoes, household appliances, books, etc, where the customer can make a comparison between different retailers. This differs from convenience goods, which include everyday items such as food and drink.

## **Conservation Area**

An area defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as 'an area of special architectural and historic interest, the character or appearance of which it is desirable to preserve or enhance.' Councils must publish a map showing the boundaries of these areas where extra planning controls apply and also produce a conservation area proposals statement.

## **Deliverable Site**

To be considered deliverable for housing development, sites should:

- Be available now;
- Offer a suitable location for development now and contribute to the creation of sustainable, mixed communities; and
- Have a reasonable prospect that housing will be delivered on the site within five years.

## **Density**

A measurement of how intensively land is occupied by built development. For housing, this is often measured in dwellings per hectare (dpha).

## **Department for Levelling Up, Housing and Communities (DHLUC)**

The Government department which sets policy on local government, housing, urban regeneration, planning and fire and rescue. Formerly called the Ministry for Housing, Communities and Local Government (MHCLG).

## **Design and Access Statement**

A document that explains the design concepts, implications and justification associated with a planning application. This includes how an applicant has carefully considered how everyone, including disabled people, older people and young children, will be able to use the development.

## **Developer Contribution**

In-kind or financial contributions provided by developers to contribute to the cost of infrastructure and other items, in order that the development is acceptable in planning terms and accords with the policies in the Local Plan. This can take the form of a legal agreement or the operation of a tariff-based system for contributions. Legal agreements may take the form of a 'planning obligation', which is a legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

## **Development Plan**

Local Plans, Waste & Minerals Plans and Neighbourhood Plans, which have been adopted or made under powers in the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011.

## **Development Plan Document (DPD)**

Planning policy documents which carry the most weight. Once they have been prepared they have to be submitted to the relevant Secretary of State. They are then examined by an independent planning inspector to make sure that they meet legislative, regulatory and national policy requirements. Local Plans are a form of DPD.

## **Development Management**

The process by which proposals for new development are assessed by the Local Planning Authority. This is undertaken primarily through the determination of planning applications.

## Duty to co-operate

Local Authorities have a legal obligation to co-operate on strategic planning issues that cross administrative boundaries.

## Evidence Base

The range of reports, studies, data and surveys specifically collected and used to inform Local Plan preparation.

## Exception Site

Exception sites are sites for certain forms of development identified in a policy, such as affordable housing in rural locations where market housing would not normally be permitted.

## Functional Economic Area

The **area** over which the local **economy** and its key **markets** operate.

## Geodiversity

Geodiversity is the variety of rocks, minerals, fossils, landforms, sediments and soils, together with the natural processes which form and alter them.

## Green Belt

Designated land – primarily open land – around built-up areas designed to limit urban sprawl and to define town and country areas. It is generally protected land with a strong presumption against development.

## Green Infrastructure (GI)

A concept recognising the environmental, social and economic, often multi-functional value of the network of natural environmental components and green and blue spaces that lies within and between towns and villages. In the same way that the transport infrastructure is made up of a network of roads, railways and airports, etc. Green Infrastructure has its own physical components, including parks, rivers, street trees and moorland.

## Greenfield Sites

Greenfield sites are land which is not previously developed and can include agricultural land in rural areas, but also undeveloped land within the urban area.

## Housing Market Areas

The geographic area defined by household demand and preference for all types of housing, reflecting the key functional linkages between places where people live and work.

### **Index of Multiple Deprivation (IMD)**

This is a dataset published by the Government, and provides an overall measure of 'deprivation' across a range of indicators, against which social and economic conditions in one area can be compared to other areas in England.

### **Infill Development**

The development of a relatively small gap between existing buildings.

### **Infrastructure Delivery Plan (IDP)**

An evidence document supporting the Local Plan. This will set out a range of existing, planned and required infrastructure within the local authority area. It will set out the key infrastructure projects which will be critical to the successful delivery of the Local Plan.

### **Listed Buildings**

Buildings or other built structures included in the statutory list of buildings of special architectural or historic interest of national significance. Listing decisions are made by the Secretary of State for Culture, Media and Sport and the listing system is administered by Historic England (formerly English Heritage).

### **Local Development Document (LDD)**

A collective legal term for planning policy documents, including all parts of the Local Plan, Neighbourhood Plans and Supplementary Planning Documents.

### **Local Development Scheme (LDS)**

The project plan for the Local Plan. It identifies and describes the Development Plan Documents and when they will be produced. It is subject to updating following production of Authority Monitoring Reports to check progress or where there are significant changes in the timetable since the last LDS was produced.

### **Local Enterprise Partnership (LEP)**

A body designated by the Government to create or improve the conditions for economic growth in an area. North Hertfordshire falls within the area covered by the Hertfordshire LEP

### **Local Nature Partnership (LNP)**

A body designated by the Government to protect and improve the natural environment in an area and the benefits derived from it.

### **Local Nature Reserve (LNR)**

A statutory designation made by local authorities (under the National Parks and Access to the Countryside Act 1949) relating to places with wildlife or geological features that are of special interest locally. LNRs are designated to support biodiversity and geodiversity, and offer opportunities for people to learn about and enjoy the natural environment.

### **Local Plan (LP)**

The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. “Local Plan” is the name that most authorities give to the main Development Plan Document (DPD) for their area.

### **Local Transport Plan (LTP)**

A plan which sets out sub-regional objectives, strategies and policies for transport, detailing the schemes and initiatives that will be delivered, together with the performance indicators and targets used to monitor progress.

### **Local Wildlife Site (LWS)/Local Geological Site (LGS)**

Previously known as Sites of Importance for Nature Conservation (SINC), or alternatively Site of Biological Interest (SBI)/Site of Geological Interest (SGI). These are areas of land with significant wildlife or geological value. Typically they can comprise an area of woodland, grassland meadows or a local water body.

### **Localism Act**

Enacted in late 2011, the Act contains a wide range of legislative changes, including many affecting local authorities and local spatial planning. The Act introduced the legislative basis for: the abolition of Regional Strategies; a new ‘duty to co-operate’; changes to the Community Infrastructure Levy (CIL) system; and neighbourhood planning.

### **Main Town Centre Uses**

Retail development (including warehouse clubs and factory outlet centres), leisure, entertainment facilities, intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls), offices, and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

### **Major Development**

Defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 as:

development involving any one or more of the following—

- a) the winning and working of minerals or the use of land for mineral-working deposits;
- b) waste development;
- c) the provision of dwellinghouses where—
  - i. the number of dwellinghouses to be provided is 10 or more; or
  - ii. the development is to be carried out on a site having an area of 0.5 hectares or more
- d) and it is not known whether the development falls within sub-paragraph (c)(i);
- e) the provision of a building or buildings where the floor space to be created by the
- f) development is 1,000 square metres or more; or
- g) development carried out on a site having an area of 1 hectare or more.

### **Masterplan**

An outline of the vision for the development of an area indicating the broad principles which should be followed in its development.

### **National Planning Policy Framework (NPPF)**

Introduced by the Government in 2012, this replaced the majority of adopted national planning policy, including most Planning Policy Statements and Planning Policy Guidance notes. The NPPF is supplemented by remaining guidance, and a number of other policy statements. The NPPF sets out national priorities for delivering sustainable development and economic growth, including a very wide range of policies and guidance, relating to themes such as housing, environment and economy, and procedural matters (such as plan-making and decision-taking). The NPPF is periodically updated. The most recent version was published in 2021.

### **Neighbourhood Plan**

A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood (made under the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011). A neighbourhood plan would, once brought into effect, comprise part of the statutory Development Plan for the area. It would therefore, alongside any adopted Local Plan documents, need to be considered when assessing any development proposals affecting the area.

### **Net New Homes**

Additional new homes which have been built. Net housing figures are the total (gross) number of new homes built minus any loss of housing.

### **Plan Period**

Refers to the time period of operation for a Local Plan.

## **Planning and Compulsory Purchase Act 2004**

This is the main piece of legislation that allows local authorities to produce Local Plans. It sets out a number of legal steps that must be followed when Local Plans are produced.

## **Planning Condition**

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

## **Preferred Options Report**

Refers to an optional stage in the preparation of a Local Plan document, involving consultation on a set of preferred policy options.

## **Previously Developed Land (PDL)**

See entry for 'Brownfield site'.

## **Registered Provider (of Social Housing)**

Independent, not-for-profit private sector organisations providing social housing. They are the UK's major provider of homes for rent, as well as providing opportunities for shared ownership. They were previously also known as 'Registered Social Landlords' or 'Housing Associations'.

## **Renewable and low carbon energy**

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, the sun and from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

## **Safeguarded Land**

Sites reserved in Local Plans to accommodate potential development needs beyond the current plan period. These sites are proposed to be taken out of the Green Belt but are not allocated for development in the current Local Plan.

## **Scheduled Monument**

A nationally important historic building or structure or archaeological site, given protection against detrimental and unauthorised change. When designated, Scheduled Monuments are added to the schedule (which has been kept since 1882) of monuments whose preservation is given priority over other land uses. Scheduled Monuments are also sometimes referred to as 'Scheduled Ancient Monuments'.

## **Self and Custom Build Housing**

Self-build and custom housebuilding covers a wide spectrum of housebuilding projects where individuals or groups are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation.

## **Shared Ownership**

An arrangement where the ownership of a property is shared, usually between a Registered Social Landlord (RSL) and a private purchaser.

## **Special Protection Areas (SPA) and Special Areas of Conservation (SAC)**

Protected sites known as 'European Sites' that are identified for the importance of their habitat and / or the species that are present within them.

## **Statement of Community Involvement (SCI)**

Sets out how the Council will consult and engage with the community and other stakeholders in the production of all documents within the Local Plan, and when determining planning applications.

## **Strategic Flood Risk Assessment (SFRA)**

A document which is normally produced by a local planning authority in consultation with the Environment Agency, and which forms the basis for preparing appropriate policies for flood risk management at the local level.

## **Strategic Housing Land Availability Assessment (SHLAA)**

A systematic assessment of the availability of land which is developable and deliverable for new housing within an area. The assessment includes a 'Call for Sites' where landowners and the public can promote sites as being suitable for housing development.

## **Strategic Housing Market Assessment (SHMA)**

A study across an identified largely 'self contained' housing market to assess how the market operates and is likely to operate in the future. A SHMA assesses past, current and future trends in housing type and tenure, household size, and housing need, and of the housing needs of specific groups with particular requirements.

## **Supplementary Planning Document (SPD)**

A planning policy document which provides supplementary information in respect of the policies contained in the Local Plan, and which focus on particular issues or places. They are subject to consultation, but are not subject to an independent examination.

## **Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)**

These terms are often used interchangeably and are often used to mean the same thing, although they technically have different definitions. It refers to assessing the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

## **Sustainable Development**

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

## **Sustainable Drainage Systems (SuDS)**

These systems aim to mimic the natural movement of water from a development, slowing run-off, reducing flood risk, improving water quality and potentially providing attractive features.

## **Sustainable Modes of Transport**

Sustainable modes of transport refers to the broad subject of transport that is sustainable in the senses of social, environmental and climate impacts.

## **Transport Assessment (TA)**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

## **Travel Plan**

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action which is articulated in a document that is regularly reviewed.

## **Urban Extensions**

The planned expansion of a city or town which can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities.

## **Use Classes Order**

The Town and Country Planning (Use Classes) Order 1987 and subsequent amendments, group a number of land uses into categories or 'Use Classes'. Changes of use within the same Use Class or between certain different Use Classes

as set out in the General Permitted Development Order (GPDO) are normally deemed to have consent and do not in most cases require specific planning permission.

### **Vitality and Viability (Town Centres)**

Terms used to assess the health of a town centre or other centre as measured by a number of indicators, such as the overall floorspace for retail and leisure, diversity of uses, range of goods that are sold, retailer representation, expenditure retention, rental values, level of vacancies, pedestrian 'footfall' figures, etc.

### **Windfall Schemes**

Sites not specifically identified in the development plan

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# **North Hertfordshire Local Plan 2011-2031**

## **Schedule of Additional Modifications**

This schedule sets out the additional modifications made to the North Hertfordshire Local Plan 2011-2031 prior to its adoption. Additional modifications are changes made to the plan by the Local Planning Authority following the examination and included in the adopted version of the Plan. Additional modifications must not materially affect the policies in the document. They are in addition to the Main Modifications recommended by the Inspector in his report on the Local Plan examination.

Additional modifications normally relate to factual information, the correction of identified errors in the text or other minor typographical changes.

Text added to the plan by the additional modifications is shown in **bold**. Text which has been removed from the plan by the additional modifications is shown ~~struck through~~. Text in *italics* describes changes that are made but where the individual examples and / or detailed text from the Local Plan has not been reproduced.

Changes are shown relative to the Plan as it stood at the end of the examination (i.e. the submitted Plan incorporating the Main Modifications recommended by the Inspector in his report of 8 September).

The Inspector's Report identifies that a number of potential changes to the Plan which were previously consulted do not amount to Main Modifications necessary for soundness. However, the report makes clear the Council is entitled to make these changes as additional modifications and they are included within this schedule where appropriate.

Policy, paragraph and criteria references are shown as per the proposed adoption version of the Plan..

Policy / Paragraph	Modification	Reason / source
	<b>GENERAL AND DOCUMENT-WIDE UPDATES</b>	
General / document-wide	<p><i>The following changes have been made to the Plan in its preparation for adoption but are not individually listed as changes in the schedule of Additional Modifications:</i></p> <ul style="list-style-type: none"> <li>• <i>Formatting changes to ensure that all page, paragraph, policy, criteria and footnote numbering run sequentially and consistently following incorporation of all Main Modifications and additional modifications;</i></li> <li>• <i>Internal cross-referencing to reflect the above;</i></li> <li>• <i>New front cover;</i></li> <li>• <i>Document appearance updated to match current North Herts Council corporate branding and style guides including, but not limited to, use of logo;</i></li> <li>• <i>Contents page updated to show correct headings and page numbers;</i></li> <li>• <i>Glossary of terms updated to ensure entries, definitions and terminology are correct at point of issue;</i></li> <li>• <i>Minor typographical and grammatical errors ('spell check' errors) that do not alter the meaning or intent of the relevant part of the plan such as the capitilisation of individual words, removal of double spaces, spelling corrections, grammatical symbols (full stop, semi-colons, apostrophes, hyphens etc.), presenting words in the correct tense or plural / singular for their context etc.</i></li> </ul>	To ensure the adopted Plan reads correctly
General / document-wide	Replace relevant references to national policy to read "Paragraph [number] of the <b>2012</b> NPPF" (or equivalent wording)	To reflect the fact that the Local Plan was examined against the requirements of the (now superceded) 2012 version of the NPPF and that decisions will be made using the most up-to-date version.
General / document-wide	Replace relevant references to the Green Belt Review to read "Green Belt Review (NHDC 2016 & <b>2018</b> )" (or equivalent wording)	Factual update; To include reference to the further evidence produced for the examination
General / document-wide	Replace relevant references to sustainability appraisal to read "Sustainability Appraisal of <b>the</b> North Hertfordshire Local Plan <del>Submission Version</del> (CAG <del>2016</del> <b>2022</b> )" (or equivalent wording)	Factual update; The Local Plan will be accompanied by a consolidated / final version of the Sustainability Appraisal to meet legal requirements

Policy / Paragraph	Modification	Reason / source
Foreword	<i>Replacement foreword</i>	Original foreword was written in 2016 and reflects the status of the Plan at that time. <i>To be added following Full Council decision and prior to final publication.</i>
About this consultation	<i>Delete</i>	Relates to consultation which took place in 2016. Previously consulted upon as potential modification MM001.
<b>SECTION ONE</b>	<b>INTRODUCTION AND CONTEXT</b>	
<b>CHAPTER 1</b>	<b>INTRODUCTION</b>	
Paragraph 1.5 and Footnote 1	<p>The National Planning Policy Framework (NPPF)<sup>1</sup> <b>was first</b> published in 2012 <b>and revised in 2018 and 2021. The NPPF</b> sets out the Government’s planning policies for England and must be taken into account along with other national planning policy in the preparation of local and neighbourhood plans and in determining planning applications. The NPPF is supplemented by detailed Planning Practice Guidance (PPG), <b>first</b> released in 2014, which provides additional detail on certain topics. Local plans must be consistent with national planning policy to pass examination. <b>This Local Plan has been prepared in accordance with the 2012 version of the NPPF.</b></p> <p><sup>1</sup> National Planning Policy Framework (DCLG) March 2012 – <a href="http://www.communities.gov.uk">http://www.communities.gov.uk</a>  <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a></p>	Factual update; An updated version of the NPPF was published in July 2021 after consultation on the Inspector’s Main Modifications had closed. Amendments to this paragraph and footnote previously consulted upon as potential modification FM010.
Paragraph 1.12	<p>The first step in preparing a neighbourhood plan is to define a neighbourhood area. There are currently <del>eleven</del> <b>thirteen</b> neighbourhood planning areas designated within the District with <del>one further community</del> <b>another two communities</b> considering preparing a neighbourhood plan. <b>Four neighbourhood plans have been “made” and form part of the Development Plan: Pirton, Wymondley, Preston and the joint neighbourhood plan for Bygrave, Baldock &amp; Clothall.</b> Those plans under preparation include the parishes of Ashwell, Barkway and Nuthampstead, Codicote, Ickleford, Kimpton, Knebworth, <del>Pirton, Preston,</del> St Ippolyts, St. Pauls Walden and <del>Wymondley</del> <b>Wallington. In addition, a neighbourhood planning forum and planning area has been designated for the unparished area of Charlton.</b></p>	Factual updates since submission of the Plan in 2017. Amendments to this paragraph and footnote previously consulted upon as potential modification MM004 and FM011.

Policy / Paragraph	Modification	Reason / source
Paragraph 1.16	The Local Plan must undergo a Sustainability Appraisal (SA) and a Strategic Environment Assessment (SEA) as part of its preparation. These are required under <del>both national and European</del> law. SEA takes into consideration the likely impacts of the Plan on the environment. The SA appraises the likely significant environmental, social and economic effects of the proposed policies in the Plan and how these can be mitigated and controlled. These assessments are normally carried out as a single process and this approach has been taken.	Factual update; The UK has left the European Union
1.19 (Footnote 3)	<a href="#">North Hertfordshire Statement of Community Involvement</a> updated <del>xxx</del> <b>2015 July 2020</b> .	Factual update; a revised SCI was adopted during the examination process. Previously consulted upon as potential modification FM012.
1.19 (Footnote 3)	NHDC Habitats Regulations Assessment (2018); <b>Habitats Regulations Assessment Addendum Note (2021)</b>	Factual update; To include reference to the further assessment published alongside the 2021 further Main Modifications
1.20 (Footnote 4)	The Local Plan has <del>also</del> been prepared in accordance with the Council's Local Development Scheme <sup>4</sup> which <del>shows provides information about the programme for preparing planning documents to be prepared as part of the this</del> Local Plan. <del>This includes documents that have been produced already and a the</del> timetable for the production of future documents <b>its review</b> .  <sup>4</sup> North Hertfordshire Local Development Scheme <del>April 2017</del> <b>November 2022</b>	Factual update; A new Local Development Scheme is presented alongside the new Plan showing the correct dates for the key stages in its preparation and incorporating the commitment to an early review contained in Policy IMR2.
After 1.27 (New paragraph)	<b>Further consultation was undertaken on the Inspector's Proposed Main Modifications in 2019 and 2021.</b>	Factual update. Previously consulted upon as potential modification FM014
<b>CHAPTER 2</b>	<b>A PICTURE OF NORTH HERTFORDSHIRE</b>	
Figure 1	<i>Replacement figure showing North Hertfordshire in context</i>	For legibility and accessibility; previous map is unclear. <i>Change to be made prior to final publication.</i>
Figure 2	<i>Replacement figure showing North Hertfordshire in detail</i>	For legibility and accessibility; previous map is unclear. <i>Change to be made prior to final publication.</i>

Policy / Paragraph	Modification	Reason / source
Paragraph 2.6 and Footnote 8	<p>North Hertfordshire is a diverse area. The total population figure for North Hertfordshire, from the <del>2015 Mid-Year Estimates</del>, was <del>131,696</del> (males = <del>64,621</del> and females = <del>67,075</del>) <b>2019 Mid-Year Estimates, was 133,570</b> (males = <b>65,382</b> and females = <b>68,188</b>)<sup>8</sup>. Over 70% of the population live in the four main settlements of Hitchin, Letchworth Garden City, Royston and Baldock.</p> <p><sup>8</sup> ONS (20169) Mid <del>2015</del> <b>2019</b> Population Estimates for UK, England and Wales, Scotland and Northern Ireland</p>	Factual update. Previously consulted upon as potential modification FM015.
Paragraph 2.7 / Footnote 9	<p>The District age profile <del>differs from the East of England profile as</del> <b>shows that</b> there is a lower proportion of 15-29 year olds <b>than in Hertfordshire</b> (North Hertfordshire <del>15.7%</del> <b>14.9%</b> compared to <del>East of England 17.8%</del> <b>16.6% in the county</b>). There are, however, more in the age groups from 30-54 (<del>North Hertfordshire 36%</del> compared to <del>East of England 33.6%</del>) <b>However, the proportion of people in the District in the 30 – 54 age group mirrors the proportion in the county as a whole (North Hertfordshire 35.1% compared to 34.9% for Hertfordshire)</b><sup>9</sup>.</p> <p><sup>9</sup> ONS (<del>2016</del><b>2019</b>) Population Estimates by single year of age</p>	Factual update. Previously consulted upon as potential modification FM016.
Paragraph 2.8 / Footnote 10	<p>Official statistics indicate that the population is likely to increase over the next <del>15</del> <b>10</b> years by <del>just over 24,000</del> <b>nearly 9,000</b> residents (population estimate at 2031 – <del>153,400</del><b>146,500</b>)<sup>10</sup>. This is due to a combination of factors, including people living longer, changes in social patterns, and the attractiveness of the District as a place to live. This will put considerable pressure not just on our housing numbers but on vital social support mechanisms such as schools and GP surgeries as well as our transport infrastructure.</p> <p><sup>10</sup> <del>Stevenage and North Hertfordshire SHMA Update 2015</del> <b>ONS 2016</b></p>	Factual update. Previously consulted upon as potential modification FM017.
Paragraph 2.10 and Footnotes 11-13	<p><b>More than 8 in 10</b> (<del>86.9%</del>) <b>(87.6%)</b> of North Hertfordshire's 16-64 year olds are economically active (in or seeking employment) compared to a national figure of <b>79%</b> <del>77.8%</del><sup>11</sup>. The unemployment rate in North Hertfordshire is <del>3.4%</del> <b>2.8%</b>; this is below the East of England figure (<del>3.8%</del>) <b>(3.6%)</b> and below the national rate (<b>4.2%</b>) (<del>5.1%</del>)<sup>12</sup>. Approximately 1 in 5 (<del>13.1%</del>) <b>(12.4%)</b> of North Hertfordshire's 16-64 year olds are economically inactive<sup>13</sup>.</p> <p><sup>11</sup> Nomis (<del>2016</del> <b>2020</b>) – Official Labour Market Statistics; Employment and unemployment (<del>Apr 2015 – Mar 2016</del>) <b>(Oct 2019 – Sept 2020)</b></p> <p><sup>12</sup> Nomis (<del>2016</del>) <b>(2020)</b> – Model based estimates of unemployment (<del>July 2016</del>) <b>(Sept 2020)</b></p>	Factual update. Previously consulted upon as potential modification FM018.

Policy / Paragraph	Modification	Reason / source
	<sup>13</sup> Nomis <del>(2016)</del> <b>(2020)</b> – Official Labour Market Statistics; Employment and unemployment <del>(Apr 2015 – Mar 2016)</del> <b>(Oct 2019 – Sept 2020)</b>	
Paragraph 2.11 and footnote 14	<p>According to the <del>2015</del> <b>2019</b> Index of Multiple Deprivation, North Hertfordshire is relatively affluent compared to other local authority areas. The District ranks <del>271<sup>st</sup></del> <b>269<sup>th</sup></b> out of <del>326</del> <b>317</b> local authority areas in England (1 being the most deprived)<sup>14</sup>. None of the District's population lives in areas within the bottom 10% of Super Output Areas (SOA) nationally, i.e. in the most deprived parts of the country. North Hertfordshire does however have <del>four</del> <b>five areas</b> in the next two cohorts, i.e. those which are in the top 30% are seen as being most deprived, this includes one area in Hitchin and <del>three</del> <b>four</b> in Letchworth Garden City.</p> <p><sup>14</sup> <del>Department for Communities and Local Government (2015) – English indices of deprivation-2015</del> <b>Ministry of Housing, Communities and Local Government English indices of deprivation 2019</b></p>	Factual update. Previously consulted upon as potential modification FM019.
Paragraph 2.12 and footnote 15	<p>On the whole the quality of life in North Hertfordshire is good. Life expectancy in North Hertfordshire is similar to the national figure; the male rate is currently <del>80.4</del> <b>81</b> years compared to <del>79.4</del> <b>79.8</b> years for England, and the female equivalent is <del>83.2</del> <b>84.3</b> years compared to <del>83.1</del> <b>83.7</b> years nationally. Life expectancy is <del>3.7</del> <b>4.7</b> years lower for men in the most deprived areas of North Hertfordshire than in the least deprived areas<sup>15</sup>.</p> <p><sup>15</sup> <del>Public Health England (2015)</del> <b>(2019 - 2020)</b> – North Hertfordshire Health Profile <del>2015</del></p>	Factual update. Previously consulted upon as potential modification FM020.
Paragraph 2.14 and footnote 16	<p>Adult and child obesity rates in North Hertfordshire are below the national and regional averages. <b>Adult obesity rates in the District at 2020 were 58.2% of all adults compared with a national rate of 62.3% which still presents a key challenge for the District</b> <del>19.1% v 23.0% for adults and 12.6% v 19.1% for children; however, these figures still present a key challenge for the District</del><sup>16</sup>.</p> <p><sup>16</sup> <del>Public Health England (2015)</del> <b>(2019 - 2020) – Obesity Profile</b> North Hertfordshire Health Profile <del>2015</del></p>	Factual update. Previously consulted upon as potential modification FM021.
Paragraph 2.15 and footnote 17	<p>Like most areas North Hertfordshire did not escape the detrimental affects of the economic downturn in 2009 and many variables including unemployment and job growth figures suffered as result. Figures have only recently returned to pre-2008 levels and the local employment environment is improving and the figures are moving in the right direction. It is estimated that there are around <del>48,800</del> <b>54,000</b> jobs<sup>17</sup> in North Hertfordshire.</p>	Factual update. Previously consulted upon as potential modification FM022.

Policy / Paragraph	Modification	Reason / source
	<sup>17</sup> <del>Nomis (2014)</del> <b>Nomis Local Authority Profile 2019</b>	
Paragraph 2.18	The District has a working age population of <del>81,700</del> <b>81,600</b> of which <del>71,800</del> <b>76,700</b> are economically active. The majority of these are employees and work full-time but a small proportion of the population are self employed ( <del>10.4%</del> ) <b>(10.5%)</b> .	Factual update. Previously consulted upon as potential modification FM023.
Paragraph 2.19	<del>In 2015 the median gross pay for full-time workers in the area (residence based) was £637.3 per week. This was considerably higher than the median earnings of those living in the East of England region (£551.0 per week) and the National Average (£529.6 per week), reflecting the high earnings associated with the proportion of the public that commute out of the District.</del> <b>In 2020, the median gross pay for full time employees was £644.10 per week which compares favourably with the national average of £586.70.</b>	Factual update. Previously consulted upon as potential modification FM024.
Paragraph 2.20	<del>15.7%</del> <b>16.65%</b> of the population do not have access to a car. This is much lower than the national figure ( <del>24.9%</del> ) <b>(25.8%)</b> and slightly lower than regionally ( <del>17.7%</del> ) <b>(16.93%)</b> .	Factual update. Previously consulted upon as potential modification FM025.
Paragraph 2.22 and footnote 20	House prices in the District are well above the regional and national averages, although slightly below the average for Hertfordshire which is skewed significantly upwards by prices in areas such as St Albans. The average cost of a home in the District is around <del>£350,000</del> <b>£355,000</b> , meaning prices are around <del>one-quarter</del> <b>44%</b> higher than the national average <sup>20</sup> .  <sup>20</sup> <del>Quarterly House Price Data for Hertfordshire (HertsLIS, 2016)</del> <b>ONS House Price Statistics for Small Areas 2019-2020</b>	Factual update. Previously consulted upon as potential modification FM026.
Paragraph 2.25 and footnote 22	There are currently more than <del>1,600</del> <b>2,100</b> households on the local authority housing register awaiting assistance with their housing needs <sup>22</sup>  <sup>22</sup> <del>Stevenage and North Hertfordshire Strategic Housing Market Assessment Update: Volume Two (ORS, 2016)</del> <b>NHDC Summary Statistics 2020</b>	Factual update. Previously consulted upon as potential modification FM027.
Figure 3	<b>HMA Housing Market Areas</b>	For ease of reading; avoid unnecessary use of acronym
Paragraph 2.41	Luton's plan and associated evidence base identifies a requirement for approximately 18,000 homes in the Borough but has capacity for just <del>7,000</del> <b>8,500</b> . <b>The most recent projections for Luton did not lead to a meaningful change in the housing situation presented in Luton's adopted Plan.</b> The issue of unmet needs from Luton is therefore a significant matter to be considered under the Duty to Co-operate.	Factual update. Previously consulted upon as potential modification FM029.
Paragraph 2.43	The Functional Economic Market Area (FEMA) covers a similar area to the Stevenage HMA. Our evidence shows that Stevenage, North Hertfordshire and the eastern half of Central Bedfordshire form a clearly defined FEMA that stretches along the A1 corridor . 70% of people	To reflect layout of adoption version of the Plan

Policy / Paragraph	Modification	Reason / source
	that work in this area, also live here. The economic profiles of the three areas are complementary while commercial property market data does not suggest that nearby commercial property markets, such as Luton, Bedford or Watford, extend this far). The FEMA is shown in figure 4 <del>on the following page</del> <b>below</b> .	
Paragraph 2.45	A number of key plans and strategies are produced at a county level to which the Council should have regard to in preparing the Local Plan. Key amongst these <del>is</del> <b>are</b> the: <ul style="list-style-type: none"> <li>• Strategic Economic Plan, <b>2017 - 2030</b> <del>and Growth Deal of both the Hertfordshire Local Enterprise Partnership (LEP) and the Greater Cambridge, Greater Peterborough LEP.</del></li> <li>• Hertfordshire Local Nature Partnership</li> <li>• Hertfordshire Waste and Minerals Local Plans</li> </ul> Hertfordshire Local Transport Plan	Factual update. Previously consulted upon as potential modification FM030.
Paragraph 2.46	In October 2013 the Hertfordshire LEP published their Strategic Economic Plan for the county <b>which was refreshed in July 2017</b> . This strategy sets out the LEPs vision, that by 2030, Hertfordshire will be the leading economy at the heart of the UKs Golden Triangle, which encompasses Cambridge, Oxford and London. To deliver the vision, the LEP has identified a number of priority areas, which represent major opportunities for Hertfordshire. These include: <ul style="list-style-type: none"> <li>• Maintaining Hertfordshire's global excellence in science and technology;</li> <li>• Harnessing Hertfordshire's relationship with London (and elsewhere); <del>and</del></li> <li>• Re-invigorating Hertfordshire's places for the 21st Century; <b>and</b></li> </ul> <b>Building the wider foundations for growth across both businesses and people.</b>	Factual update. Previously consulted upon as potential modification FM031.
After paragraph 2.47 (delete paragraph)	<del>Given that the northern part of the District is heavily influenced by the Cambridgeshire economy, the District is also part of Greater Cambridge, Greater Peterborough LEP. The goal of the Greater Cambridge, Greater Peterborough LEP is to create an economy with 100,000 major businesses and create 160,000 new jobs by 2025, in an internationally significant low carbon, knowledge-based economy, balanced wherever possible with advanced manufacturing and services.</del>	Factual update. Previously consulted upon as potential modification FM032.
Paragraph 2.48	The <del>Hertfordshire LEPs</del> <b>are</b> is responsible for bidding and prioritising infrastructure investment within <del>their areas</del> <b>the county</b> .	Factual update. Previously consulted upon as potential modification FM033.
After paragraph 2.54 [new paras. 2.55 & 2.56]	<b>The County Council's adopted Mineral Consultation Area Supplementary Planning Document identifies areas of the district where particular care is needed to prevent the unnecessary sterilisation of sand and gravel resources.</b>  <b>In order to prevent sterilisation of mineral resources the council and developers will consider the effect of future development on mineral resources in these areas at an early stage and</b>	Factual update. Previously consulted upon as potential modification MM005.

Policy / Paragraph	Modification	Reason / source
	<b>seek the advice of Hertfordshire County Council as the Mineral Planning Authority in accordance with the Minerals Consultation Area SPD (and any future revisions/successor).</b>	
Paragraph 2.58	It will therefore be necessary to both have regard to this strategy and work with the Highway Authority when taking forward the development sites set out in the Local Plan. <del>Work on the next iteration of the LTP—the 2050 Transport Vision—is well under way and is expected to be finalized by the end of 2016. This vision will set out proposals for accommodating growth in this Local Plan and other local plans in Hertfordshire.</del>	Factual update. Previously consulted upon as potential modification FM035.
Paragraph 2.59	The Local Plan is a key Council document. It is the spatial expression of the District’s priorities and development needs going forward. It provides the planning framework to support the priorities identified in other Council plans and programmes including the Council’s <del>Corporate Plan 2021—2026</del> <b>2022-2027</b> , and other Council strategies covering economic development, housing, leisure, climate change, environment and waste.	Factual update; a revised Council Plan was approved in September 2021 after consultation on the Inspector’s Main Modifications had closed.
Paragraph 2.60	<del>North Hertfordshire Corporate Council Plan</del>  The North Hertfordshire <del>Corporate Plan 2017-2021</del> recently reviewed in 2016 <b>Council Plan 2022 – 2027</b> sets out the Council’s vision and corporate objectives for the District. The council’s vision set out in the <del>Corporate Council Plan</del> is: <i>‘making North Hertfordshire a vibrant place to live, work and prosper’</i> <b>“We put people first and deliver sustainable services, to enable a brighter future together”</b>	Factual update; a revised Council Plan was approved in September 2021 after consultation on the Inspector’s Main Modifications had closed. Changes to this paragraph previously consulted upon as proposed modification FM036
Paragraph 2.61	<del>The Corporate Plan draws together the key elements of the Council’s proposals for how it will serve the District over the next few years. As well as looking at the current status of the authority, it considers the opportunities and risks facing the District, and also identifies the high-level projects which will ensure the Corporate Plan is being delivered.</del> <b>The Council plan sets out the priorities that the Council will address over the next five years. The plan also lays out how North Hertfordshire District Council will achieve its aims for the district.</b>	Factual update; a revised Council Plan was approved in September 2021 after consultation on the Inspector’s Main Modifications had closed. Changes to this paragraph previously consulted upon as proposed modification FM037
Paragraph 2.62	The <del>Corporate Plan</del> sets the following three objectives <b>Council Plan explains the Council’s cooperative values and sets out three priorities:</b> <i>1. To work with our partners to provide an attractive and safe environment for our residents, where diversity is welcomed and the disadvantaged are supported</i> <i>2. To promote sustainable growth within our District to ensure economic and social opportunities exist for our communities, whilst remaining mindful of our cultural and physical heritage</i> <i>3. To ensure that the Council delivers cost effective and necessary services to our residents that are responsive to developing need and financial constraints</i>	Factual update; a revised Council Plan was approved in September 2021 after consultation on the Inspector’s Main Modifications had closed. Changes to this paragraph previously consulted upon as proposed modification FM038.

Policy / Paragraph	Modification	Reason / source
	<ul style="list-style-type: none"> <li>• <b>People First: People make North Herts work. We value all our residents, businesses, staff, contractors, councillors, and other partners, and place them at the heart of everything we do.</b></li> <li>• <b>Sustainability: We recognise the challenges our towns and district as a whole face and are committed to delivering services which are relevant and sustainable. In doing so we will place our environmental responsibilities, as well as sound financial planning, at the centre of our policy making.</b></li> <li>• <b>A Brighter Future Together: We are far-sighted and plan for the long term to secure the best outcomes for our people, towns and villages, and the local economy, ensuring North Herts continues to thrive.</b></li> </ul>	
Footnote 31	North Hertfordshire Infrastructure Delivery Plan September 2016 ( <b>updated 2018</b> )	To include reference to further evidence produced for the examination
Paragraph 2.83	Changes to legislation and national planning policy in 2015 and 2016 mean that the CO2 and water performance of new dwellings is now governed by Building Regulations L, with changes to the Building Regulations in <del>2016</del> <b>2022</b> and <del>2019</del> <b>2025</b> expected to bring in tighter standards for CO2 emissions.	Factual update; Government response to the <i>Future Homes</i> standard was published in 2021
<b>SECTION TWO</b>	<b>SPATIAL STRATEGY AND STRATEGIC POLICIES</b>	
<b>CHAPTER 3</b>	<b>SPATIAL STRATEGY AND SPATIAL VISION</b>	
Vision (2 <sup>nd</sup> bullet)	A mixture of quality new homes including affordable houses with a choice of tenure catering for the needs of North Hertfordshire's residents <b>and, where appropriate, the wider housing market</b> , will be provided in appropriate sustainable locations.	To reflect the provision made towards unmet housing needs from Luton. Previously consulted upon as proposed modification MM006.
Vision (3 <sup>rd</sup> bullet)	New development will have contributed to the creation of sustainable communities. These are safe, attractive and inclusive; well-integrated into settlements; respect local distinctiveness; raise the standards of sustainable design and architectural quality; make a positive contribution to the local area; and ensure the protection, restoration and enhancement of valuable natural and historic resources. Strategic <b>and significant</b> sites will have been masterplanned in accordance with the guiding principles set out within this Plan.	Factual update; to reflect the revised requirements for masterplanning set out in Policy SP9 (MM045 & FM001)
<b>CHAPTER 4</b>	<b>STRATEGIC POLICIES</b>	
Policy SP1	<p><b>Policy SP1: Sustainable development in North Hertfordshire</b></p> <p>This Plan supports the principles of sustainable development within North Hertfordshire. We will:</p> <p>a. Maintain the role of key settlements within and adjoining the District as the main</p>	To more accurately reflect the content of other policies in the Plan. Previously consulted upon as proposed modification MM008.

Policy / Paragraph	Modification	Reason / source
	<p>focus for housing, employment and new development making use of previously developed land where possible;</p> <p>b. Ensure the long-term vitality of the District’s villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;</p> <p>c. Grant planning permission for proposals that, individually or cumulatively:</p> <ol style="list-style-type: none"> <li>i. Deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;</li> <li>ii. Create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;</li> <li>iii. Provide the necessary infrastructure required to support an increasing population;</li> <li>iv. Protect key elements of North Hertfordshire’s environment including <b>biodiversity</b>, important landscapes, heritage assets and green infrastructure (including the water environment); and</li> <li>v. Secure any necessary mitigation measures that reduce the impact of development, including on climate change; and</li> </ol> <p>d. Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan.</p>	
Paragraph 4.16	<p><b>The</b> Category A villages, normally <del>those</del> containing primary schools, <del>all</del><b>also</b> have defined boundaries within which development will be allowed and sites have been allocated to meet the District’s overall housing <del>totals</del><b>requirement</b>. <del>Category A villages have defined settlement boundaries and</del><b>These villages</b> are excluded from the policy designation (either Green Belt or Rural Area Beyond the Green Belt – see Policy SP5) which affects the surrounding countryside.</p>	To provide clarity in relation to neighbourhood planning. Previously consulted upon as potential modification MM013
Paragraph 4.23	<p>North Hertfordshire District Council is a member of <del>both</del> the Hertfordshire Local Enterprise Partnership (LEP). <del>and the Greater Cambridge Peterborough LEP. This reflects its location and the varying economic influences on the District’s settlements and rural area. Both LEPs</del> <b>The LEP</b> will be <b>an</b> important <b>stakeholder</b> <del>stakeholders</del> regarding how the North Hertfordshire economy grows and develops in the future. In particular the Hertfordshire LEP is seeking to regain the county’s competitive edge by encouraging increased employment growth and enterprise.</p>	Factual update; The Greater Cambridge & Peterborough LEP has been superseded by combined authority mayoral arrangements for Cambridgeshire that do not include North Hertfordshire.
Paragraph 4.25	<p>Our evidence shows that, compared to national averages there is a higher concentration of people <del>working in the District</del> employed in sectors such as manufacturing, construction, retail, motor trades, property, entertainment and recreation in North Hertfordshire...</p>	To avoid repetition of “in the District...in North Hertfordshire...”
Paragraph	Green Belt boundaries have been reviewed around all of the main towns within and adjoining	To accurately reflect the final

Policy / Paragraph	Modification	Reason / source
4.59	the District, with the exception of Royston which lies beyond the Green Belt. Boundaries have also been reviewed <b>around a number of villages</b> where they previously surrounded or covered ('washed over') <del>Category A and Category B villages within</del> <b>by</b> the Green Belt.	approach to the settlement hierarchy. Previously consulted upon as potential modification MM024.
Paragraph 4.63	The Rural Area Beyond the Green Belt covers the majority of the east of the District including most of the land between Baldock and Royston as well as the villages and countryside to the south of Royston. <b>It also covers the land to the north and west of Hitchin beyond the outer edge of the Green Belt.</b>	To ensure the extent of the Rural Area beyond the Green Belt is properly explained. Previously consulted upon as potential modification MM026.
Footnote 49	Infrastructure Delivery Plan (RS Regeneration, 2016; <b>RS Regeneration &amp; NHDC, 2018</b> )	To include reference to further evidence produced for the examination
Paragraph 4.105	This needs to be balanced against realistic expectations about when we can expect to see new homes being built. This is especially the case on the largest new sites which <b>require the certainty provided by this Plan in order to proceed and</b> can require significant up-front investment in infrastructure such as new roads. As a result, most of the planned new homes <del>are likely to</del> <b>will</b> be delivered after 2021.	To reflect the final approach to the anticipated delivery of new homes. Previously consulted upon as potential modification FM062.
Paragraph 4.104	These targets require housing completions within the District to accelerate well above those achieved historically. However, past rates have been constrained, in part, by tight village and Green Belt boundaries that have not been reviewed for <b>well over</b> twenty years whilst Government policy supports a 'significant boost' in the supply of housing.	Factual update; to reflect the further passage of time since this paragraph was drafted in 2016.
Paragraph 4.209	The masterplan will also be required to demonstrate an access solution which works in both highway and urban design terms. Previous work has shown that a new access from <del>Stotfold</del> <b>Norton</b> Road could be accommodated in landscape terms <sup>70</sup> . However, this needs to be balanced against a requirement to properly integrate this site with the existing Garden City. At the same time, any impacts upon the existing local highway network need to be managed within acceptable limits. <sup>70</sup> Land north of Letchworth: landscape sensitivity study (LUC, 2013)	Factual correction. Previously consulted upon as potential modification MM062.
Paragraph 4.195	Land to the north of Baldock is the largest, single development site allocated through this Plan. A total of 2,800 homes can be accommodated here, <del>2,500</del> <b>1,400</b> of which are anticipated to be built within the plan period to 2031.	Factual update; for consistency with the approved modifications to Policy SP8 (MM035 / FM057)
Paragraph 4.195	The area north of Stevenage is currently undeveloped farm land in the parish of Graveley. Adjoining land within Stevenage Borough to the south has been identified for development and this provides an opportunity for a coherent extension of the town to the north <sup>67</sup> . A masterplanning exercise for this site will need to consider the <b>collective</b> implications of these <del>cross boundary</del> allocations and demonstrate appropriate solutions. This may lead to some	For clarity. Previously consulted upon as potential modification MM406.

Policy / Paragraph	Modification	Reason / source
	facilities which will serve the whole development being located wholly within either North Hertfordshire's or Stevenage's administrative areas. <u>Footnote:</u> <sup>73</sup> Stevenage Borough Local Plan 2011-2031 (May 2019)	
Paragraph 4.232	A site at this scale will generate sufficient demand to support a new primary school on site. This will need to be at least 1FE in size. Further information on likely pupil yields, along with an understanding of any extent to which the nearby Highover JMI School may be able to meet future demands, will determine if it is necessary to <del>secure</del> <b>deliver</b> a 2FE school on- site.	For clarity. Previously consulted upon as potential modification MM073.
Paragraph 4.246	<del>Much of</del> the revised Green Belt boundary has been drawn along the routes of a public rights of way. Although a clearly defined features, parts of <del>its</del> <b>their</b> alignments cut across <del>more</del> open fields-land. Structural planting here will reinforce the <b>new</b> boundary as well as providing visual containment of the development.	For clarity. Previously consulted upon as potential modification MM080.
<b>SECTION 3</b>	<b>DEVELOPMENT MANAGEMENT POLICIES</b>	
<b>CHAPTER 5</b>	<b>ECONOMY AND TOWN CENTRES</b>	
Policy ETC3(b) (2 <sup>nd</sup> bullet)	<ul style="list-style-type: none"> <li>Letchworth Garden City: 1,000 gross sq.m <del>gross</del> and above;</li> </ul>	Delete repeated word
Paragraph 5.22	We monitor all retail units within the four main town centres on an annual basis, as well as those in the local centres. There is evidence in some centres that shop ( <del>A1 use class</del> ) units are being lost to non-shop uses in the core shopping areas.	Delete reference to defunct use class (replaced by Class E in 2020)
After paragraph 5.31	<del>The Council may consider other non-retail uses, such as surgeries or other community and leisure uses appropriate, if it can be demonstrated that they would meet a local community need.</del>	Previously consulted upon as potential modification FM091.
<b>CHAPTER 7</b>	<b>TRANSPORT</b>	
Paragraph 7.15	<del>Residential</del> Parking standards <b>for residential car and cycle parking</b> are set out in Appendix 4 of this Plan. Parking provision in accordance with these standards will generally meet the day to day needs of the occupiers but without over provision. Relevant applications will be required to meet these standards. Recommended standards for other uses, and other types of parking, <del>including cycle parking,</del> are set out in supplementary guidance <sup>86</sup> . This document also provides general guidance on issues such as design and layout.  <u>Footnote:</u> <sup>86</sup> Vehicle Parking at New Development Supplementary Planning Document (NHDC, 2011)	For clarity. Previously consulted upon as potential modification MM121
<b>CHAPTER 8</b>	<b>HOUSING STRATEGY</b>	

Policy / Paragraph	Modification	Reason / source
Policy HS1	<p><b>Policy HS1: Local Housing Allocations</b></p> <p>Local Housing Allocations are listed by parish and settlement in Chapter 13 and shown on the Policies Map. Planning permission for residential development and associated infrastructure on these sites will be granted <del>where</del> <b>provided that:</b></p> <ol style="list-style-type: none"> <li>Development broadly accords with the indicative number of homes shown;</li> <li>Proposals successfully address site specific <b>policy</b> considerations; and</li> <li>Unless site-specific <b>policy</b> considerations state otherwise, a variety of homes are provided in accordance with the general policy requirements of this Plan.</li> </ol> <p>Planning permission for other uses will be refused.</p>	For clarity and to ensure the Policies Map is correctly referenced. Previously consulted upon as potential modification MM123.
8.1	This Plan establishes targets to provide <del>15,950</del> <b>13,550</b> homes in North Hertfordshire over the period 2011-2031. Approximately 75% of this number is accounted for by the general allowances and Strategic Housing Sites set out in Chapter 3 (see Policies SP8 and SP14 to SP19)	Factual update; to reflect the revised housing requirements set out in Policy SP8 (MM035 / FM057)
8.2	The remainder will be delivered through Local Housing Allocations within and adjoining the District's towns and villages. These are individually set out in the <b>policies in the</b> Communities chapter of this Plan.	To reflect MM197 which gives policy status to the site-specific requirements. Previously consulted upon as potential modification MM124.
Footnote 101	Stevenage and North Hertfordshire Strategic Housing Market Assessment Update: Volume Two (ORS, 2016); <b>Review of the Official Projections for North Hertfordshire (ORS, 2020)</b>	To include reference to further evidence produced for the examination
8.17	The Council has <del>previously issued</del> <b>prepared</b> supplementary guidance <sup>103</sup> which provides further information on the provision of affordable homes in the District . This will be updated and / or replaced over the lifetime of this Plan. Development proposals should have regard to this information and any other relevant housing strategies.	Factual update; In September 2022, Cabinet approved consultation upon an updated Draft Developer Contributions SPD.
	[footnote] <sup>103</sup> <del>Planning Obligations SPD (NHDC, 2006)</del> <b>Draft Developer Contributions SPD (NHDC, 2022)</b>	
Policy HS5	<p><b>Policy HS5: Accessible and adaptable housing</b></p> <p>Planning permission for major residential development will be granted <del>where</del> <b>provided that:</b></p> <ol style="list-style-type: none"> <li>Applicants demonstrate that at least 50% of homes can be built to the M4(2) Accessible and Adaptable standard; and</li> </ol>	For clarity. Previously consulted upon as potential modification MM137

Policy / Paragraph	Modification	Reason / source
	b. On schemes where 10 or more affordable units will be delivered, 10% of these can additionally be built to the M4(3) wheelchair user standard <sup>96</sup> .	
Paragraph 9.26	The outcome of the air pollution impact assessment will be used to determine the nature and scale of the steps that should be taken to remove or reduce the scale of those concerns. Ideally this will occur at the design, planning and/or development stage, but may in certain circumstances rely on post development mitigation measures. <del>It is conceivable that in certain circumstances the outcome of an air quality impact assessment may demonstrate that a development is unsustainable from a local air quality perspective and may be refused.</del>	Previously consulted upon as potential modification MM151.
Paragraph 9.27	Two of the main roads that cross the District do so on a north – south axis: the A1(M) and A10. Another main road is the A505 that traverses the District on a southwest – northeast axis. It is the A505 that is currently directly associated with air quality concerns because it passes through the four main population centres of the District namely Hitchin, Letchworth Garden City, Baldock and Royston. Of particular concern is the area in the south of Hitchin. Notably Stevenage Road (A602) near the Hitchin Hill roundabout, which has been designated an Air Quality Management Area (AQMA) and the Payne’s Park roundabout at the A602 junction with the A505 which <del>is to be</del> <b>was</b> designated an AQMA in 2016.	Factual update. Previously consulted upon as potential modification MM152.
<b>CHAPTER 11</b>	<b>NATURAL ENVIRONMENT</b>	
Footnote 128	The DEFRA Biodiversity Metric is a tool used to quantify the value of biodiversity at any site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of require offsite compensation. The current Biodiversity Metric is available at : <a href="http://publications.naturalengland.org.uk/publication/5850908674228224">http://publications.naturalengland.org.uk/publication/5850908674228224</a> <a href="http://publications.naturalengland.org.uk/publication/6049804846366720">http://publications.naturalengland.org.uk/publication/6049804846366720</a>	Factual update; In July 2021, Natural England published the Biodiversity Metric 3.0 which updates and replaces the previous version referred to.
11.26	In 2009 the Council commissioned the Green Space Study to understand the existing quantity and accessibility of different types of open space. To ensure the evidence <del>is</del> <b>was</b> up-to-date in accordance with current national policy, the Council <del>has undertaken</del> <b>undertook</b> a review of open space provision across the District in 2016.	Factual update; to reflect the further passage of time since this paragraph was drafted in 2016.
11.54	<i>Delete footnote at end of first sentence</i>	Factual update; guidance no longer available with no obvious replacement or equivalent
11.65	The policy will allow the Council to achieve a consistent and transparent approach to the redevelopment of land where contamination of the ground may be a constraint. It will also help to meet the objectives of the Water Framework Directive. The policy also allows us to approve	Factual update; to reflect that the Policy does not specifically refer to receptors

Policy / Paragraph	Modification	Reason / source						
	higher value land uses on sites where serious contamination may make other types of development unviable. <del>In the policy below, the term 'receptors' includes</del> <b>Receptors to contamination include</b> human beings, the historic built environment and the natural environment, including controlled waters as defined in Section 4 of the Contaminated Land Statutory Guidance (DEFRA, 2012) .							
<b>SECTION 4</b>	<b>COMMUNITIES</b>							
<b>CHAPTER 13</b>	<b>COMMUNITIES</b>							
Paragraph 13.1	This chapter sets out the site allocations for development for each community in North Hertfordshire. It identifies the detailed site-specific <b>policy</b> criteria for each local housing allocation. Retail and employment allocations are also identified and site- specific <b>policy</b> criteria are provided where considered necessary.	To reflect MM197 which gives policy status to the site-specific requirements. Previously consulted upon as potential modification MM198.						
13.2 (bullet points) and relevant page headings	Cockernhoe, <b>Mangrove Green</b> and East of Luton St Ippolyts & <b>Gosmore</b>	To reflect the changes to Policy SP2 (MM010 / FM039)						
After 13.3 (Note)	Note: For the avoidance of confusion, sites <del>retained from the Preferred Options version of the plan</del> have kept the same reference number <b>throughout the preparation and examination of the Plan</b> . References for sites that were included in the Preferred Options <b>or submission versions of the Plan</b> but have not been carried forward <b>to this final version of the plan</b> have <u>not</u> been re-used. Any new sites have been given the next available reference number. This means that site allocation references for individual communities do not necessarily run sequentially.	Factual update; to reflect the fact that sites have been removed from the Plan as a consequence of the examination process.						
<b>ASHWELL</b>								
Paragraph 13.7	<del>One housing site is identified</del> <b>No sites are allocated for housing</b> in Ashwell for <del>33 new-</del> <b>62 117</b> further homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM201 / FM101.						
Table after Policy AS1 (delete)	<table border="1"> <tbody> <tr> <td>Total allocated sites</td> <td>33 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>62 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>95 homes</td> </tr> </tbody> </table>	Total allocated sites	33 homes	Completions and permissions	62 homes	Total allocated, completed and permitted	95 homes	Factual update. Previously consulted upon as potential modification MM203 / FM103.
Total allocated sites	33 homes							
Completions and permissions	62 homes							
Total allocated, completed and permitted	95 homes							
<b>BALDOCK</b>								
Paragraph 13.12	Baldock is classed as a town in Policy SP2: <del>Settlement Hierarchy</del> . A boundary for the town is shown on the Policies Map. Beyond this boundary is classed as Green Belt.	Consequential update to MM010 / FM039. Previously consulted upon as potential modification MM204.						

Policy / Paragraph	Modification	Reason / source						
Paragraph 13.15	<del>8</del> <b>Eight</b> housing sites are allocated in and around Baldock. These will deliver an estimated <del>3,436</del> <b>3,360</b> new homes ( <del>3,136</del> <b>1,960</b> during the plan period to 2031). A further <del>154</del> <b>238</b> new homes have been built or granted planning permission since the start of the plan period in 2011.	Factual update. Previously consulted upon as potential modification MM205 / FM105.						
Table After Policy BA11	<table border="1"> <tr> <td>Total allocated sites*</td> <td><del>3,386</del> <b>3,360</b> homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>204</del> <b>238</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted 2011-2031*</td> <td><del>3,290</del> <b>2,198</b> homes</td> </tr> </table> <p>* Land North of Baldock is allocated for 2,800 homes in total with <del>2,500</del> <b>1,400</b> of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031</p>	Total allocated sites*	<del>3,386</del> <b>3,360</b> homes	Completions and permissions	<del>204</del> <b>238</b> homes	Total allocated, completed and permitted 2011-2031*	<del>3,290</del> <b>2,198</b> homes	Factual update. Previously consulted upon as potential modification MM210 / FM107.
Total allocated sites*	<del>3,386</del> <b>3,360</b> homes							
Completions and permissions	<del>204</del> <b>238</b> homes							
Total allocated, completed and permitted 2011-2031*	<del>3,290</del> <b>2,198</b> homes							
<b>BARKWAY</b>								
Paragraph 13.32	Barkway is identified as a Category A <del>one of five</del> <b>one of five</b> villages where a greater amount of development has been allocated. in the settlement hierarchy and It is the largest in population terms of three villages located in the area to the east of the A10 and to the south of Royston. Despite this, facilities are limited and so residents would <b>presently</b> be likely to travel to either Royston to the north or Buntingford to the south for many day to day items. A development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to allow for Barkway's development needs during this Plan period.	Consequential to MM010 / FM039. Previously consulted upon as potential modification MM213 / FM108.						
Paragraph 13.34	<del>Three</del> <b>Two</b> sites are allocated in Barkway for an estimated <del>173</del> <b>160</b> new homes. A further <del>31</del> <b>57</b> homes have been built or granted planning permission <b>within the parish</b> since 2011.	Factual update. Previously consulted upon as potential modification MM214 / FM109.						
Table after Policy BK3	<table border="1"> <tr> <td>Total allocated sites</td> <td><del>173</del> <b>160</b> homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>31</del> <b>57</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>204</del> <b>217</b> homes</td> </tr> </table>	Total allocated sites	<del>173</del> <b>160</b> homes	Completions and permissions	<del>31</del> <b>57</b> homes	Total allocated, completed and permitted	<del>204</del> <b>217</b> homes	Factual update. Previously consulted upon as potential modification MM217 / FM113.
Total allocated sites	<del>173</del> <b>160</b> homes							
Completions and permissions	<del>31</del> <b>57</b> homes							
Total allocated, completed and permitted	<del>204</del> <b>217</b> homes							
Paragraph 13.35	The visible economic activity of the village is limited to a petrol filling station/garage, <del>soft furnishings business</del> and car repairs business. Barkway Park Golf Club is also located near to the edge of the village.	Factual update. Previously consulted upon as potential modification MM218.						
<b>BARLEY</b>								
Paragraph 13.44	There are no sites allocated for residential development in Barley. <del>Four</del> <b>17</b> homes have been granted planning permission or built since 2011.	Factual update. Previously consulted upon as potential modification FM116						
<b>BYGRAVE</b>								
Paragraph 13.49	Our Strategic Housing Site to the north of Baldock (see Policy SP14) is mostly within the parish of Bygrave. No other housing sites are allocated in Bygrave. There have been <del>no planning</del>	Factual update. Previously consulted upon as potential modification FM117						

Policy / Paragraph	Modification	Reason / source						
	<del>permissions granted or new</del> <b>two</b> homes built <b>or granted planning permission</b> in the parish since 2011.							
<b>CLOTHALL</b>								
13.60	Some of the <b>allocated housing</b> sites on the south-eastern edges of Baldock are in the parish of Clothall. For further discussion of these, see the Baldock page. No other housing sites are allocated in Clothall. There have been no planning permissions granted or new homes built within that part of Clothall parish outside of the Baldock urban area since 2011.	Factual update; for clarity						
<b>COCKERNHOE AND EAST OF LUTON</b>								
Paragraph 13.64	Cockernhoe <b>&amp; Mangrove Green</b> is identified as a Category A village. The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to include both the village <b>of Cockernhoe &amp; Mangrove Green</b> and the adjoining expansion of Luton. Outside this boundary the rest of the Cockernhoe ward is classed as Green Belt.	Consequential to MM010 / FM039. Previously consulted upon as potential modification MM221.						
<b>CODICOTE</b>								
Paragraph 13.72	Codicote is <del>identified as a Category A</del> <b>one of five villages where a greater amount of development has been allocated</b> . The development boundary is shown on the Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent but also allow for Codicote's future development needs.	Consequential to MM010 / FM039. Previously consulted upon as potential modification MM222.						
Paragraph 13.75	Four sites are allocated in and around Codicote village for an estimated 315 new homes. A further <del>49</del> <b>97</b> homes have been built or granted planning permission within the parish since 2011.	Factual update. Previously consulted upon as potential modification MM223 / FM119						
Table after Policy CD5	<table border="1"> <tbody> <tr> <td>Total allocated sites</td> <td>315 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>49 <del>97</del> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>364 <del>412</del> homes</td> </tr> </tbody> </table>	Total allocated sites	315 homes	Completions and permissions	49 <del>97</del> homes	Total allocated, completed and permitted	364 <del>412</del> homes	Factual update. Previously consulted upon as potential modification MM228 / FM124
Total allocated sites	315 homes							
Completions and permissions	49 <del>97</del> homes							
Total allocated, completed and permitted	364 <del>412</del> homes							
<b>GRAVELEY AND NORTH OF STEVENAGE</b>								
Paragraph 13.88	Our strategic site to the north of Stevenage is located in Graveley parish. One site is allocated within the village for an estimated 8 new homes. A further <del>8</del> <b>10</b> homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM235.						

Policy / Paragraph	Modification		Reason / source						
Table after Policy GR1	<table border="1"> <tr> <td>Completions and permissions</td> <td>8 10 homes</td> </tr> <tr> <td>Total allocated, completed and permitted 2011-2031*</td> <td>916 793 homes</td> </tr> </table>	Completions and permissions	8 10 homes	Total allocated, completed and permitted 2011-2031*	916 793 homes		Factual update. Previously consulted upon as potential modification MM236 / FM127.		
Completions and permissions	8 10 homes								
Total allocated, completed and permitted 2011-2031*	916 793 homes								
	* Land North of Stevenage is allocated for 900 homes in total with 775 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031								
<b>GREAT ASHBY AND NORTH-EAST STEVENAGE</b>									
Paragraph 13.103	It is recognised that a careful balance needs to be struck between facilitating new development, <b>encouraging sustainable travel choices</b> , ensuring safe vehicular access throughout Great Ashby, the provision of parking places and the need to ensure that any measures which might be implemented do not simply displace problems to other <b>less appropriate</b> locations.		Previously consulted upon as potential modification MM242.						
Paragraph 13.104	We will continue to work with the community council, <b>Stevenage Borough Council</b> and highway authority to determine the most appropriate solution(s). Sites in Great Ashby will need to ensure that any transport assessments appropriately take these matters into account and contribute reasonably to any necessary mitigation measures, or wider strategies which may seek to address these issues.		For clarity. Previously consulted upon as potential modification MM243.						
<b>HEXTON</b>									
Paragraph 13.113	There are no sites allocated for residential development in Hexton. Planning permission has been granted for <del>one</del> <b>four</b> new homes since 2011.		Factual update. Previously consulted upon as potential modification MM246 / FM128.						
<b>HITCHIN</b>									
Paragraph 13.128	Seven sites are allocated in and around Hitchin for an estimated <del>1,009</del> <b>971</b> new homes. The significant majority of these will be built at our Strategic Housing Site at Highover Farm. A further <del>638</del> <b>871</b> homes have been built or granted planning permission in Hitchin since 2011.		Factual update. Previously consulted upon as potential modification MM248 / FM129.						
Table after Policy HT10	<table border="1"> <tr> <td>Total allocated sites</td> <td>1,009 971 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>638 871 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>1,647 1,842 homes</td> </tr> </table>	Total allocated sites	1,009 971 homes	Completions and permissions	638 871 homes	Total allocated, completed and permitted	1,647 1,842 homes		Factual update. Previously consulted upon as potential modification MM254 / FM130.
Total allocated sites	1,009 971 homes								
Completions and permissions	638 871 homes								
Total allocated, completed and permitted	1,647 1,842 homes								
Ref to Policy	<del>Retail allocations and site-specific criteria</del> <b>Town Centre Uses allocations and site-specific criteria</b>		Previously consulted upon as MM261						

Policy / Paragraph	Modification	Reason / source				
<b>HOLWELL</b>						
Paragraph 13.158	There are no sites allocated for residential development in Holwell. <del>10</del> <b>30</b> homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM265 / FM133.				
<b>ICKLEFORD</b>						
Paragraph 13.161	The civil parish extends north to the District and county boundary with neighbouring Central Bedfordshire. <del>This Plan allocates land for development along the administrative boundary. This site</del> <b>The area at the north of Ickleford parish</b> is considered under a specific section of this chapter on Lower Stondon. This is the settlement within Central Bedfordshire that <del>the site will</del> <b>immediately adjoins North Hertfordshire.</b>	Consequential to FM158. Previously consulted upon as potential modification FM134				
Paragraph 13.162	Ickleford is identified as <del>a Category A</del> <b>one of five villages where a greater amount of development has been allocated.</b> The development boundary <b>of Ickleford</b> is shown on the Policies Map to indicate the area within which further development will be allowed. Most of the rest of the parish is classed as Green Belt, save a small area in the far north of the parish on the Bedfordshire border which is Rural Area Beyond the Green Belt.	Consequential to MM010 / FM0039. Previously consulted upon as potential modification MM266 / FM135				
Paragraph 13.164	Three sites are allocated around the edge of Ickleford village for an estimated 199 new homes. <del>10</del> <b>36</b> further new homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM267 / FM136.				
Table after Policy IC3	<table border="1"> <tr> <td>Completions and permissions</td> <td><del>10</del> <b>36</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>209</del> <b>235</b> homes</td> </tr> </table>	Completions and permissions	<del>10</del> <b>36</b> homes	Total allocated, completed and permitted	<del>209</del> <b>235</b> homes	Factual update. Previously consulted upon as potential modification MM271 / FM137.
Completions and permissions	<del>10</del> <b>36</b> homes					
Total allocated, completed and permitted	<del>209</del> <b>235</b> homes					
<b>KELSHALL</b>						
Paragraph 13.177	No sites are allocated in Kelshall for residential development. <del>One</del> <b>Four</b> new homes <del>has have</del> been built <b>or granted planning permission</b> in the parish since 2011.	Factual update. Previously consulted upon as potential modification MM278 / FM138.				
<b>KIMPTON</b>						
Paragraph 13.173	One site is allocated in Kimpton for an estimated 13 new homes. <del>32</del> <b>43</b> homes have been built or granted permission since 2011.	Factual update. Previously consulted upon as potential modification FM139.				
Table after Policy KM3	<table border="1"> <tr> <td>Completions and permissions</td> <td><del>32</del> <b>43</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>45</del> <b>56</b> homes</td> </tr> </table>	Completions and permissions	<del>32</del> <b>43</b> homes	Total allocated, completed and permitted	<del>45</del> <b>56</b> homes	Factual update. Previously consulted upon as potential modification FM140.
Completions and permissions	<del>32</del> <b>43</b> homes					
Total allocated, completed and permitted	<del>45</del> <b>56</b> homes					

Policy / Paragraph	Modification	Reason / source						
<b>KING'S WALDEN</b>								
Paragraph 13.189	One site is allocated in King's Walden parish, at Breachwood Green, for an estimated 16 new homes. <del>One additional new</del> <b>11</b> homes have been built or granted permission since 2011.	Factual update. Previously consulted upon as potential modification FM141.						
Table after Policy KW1	<table border="1"> <tr> <td>Completions and permissions</td> <td><del>1</del> <b>11</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>17</del> <b>27</b> homes</td> </tr> </table>	Completions and permissions	<del>1</del> <b>11</b> homes	Total allocated, completed and permitted	<del>17</del> <b>27</b> homes	Factual update. Previously consulted upon as potential modification FM142.		
Completions and permissions	<del>1</del> <b>11</b> homes							
Total allocated, completed and permitted	<del>17</del> <b>27</b> homes							
<b>KNEBWORTH</b>								
Paragraph 13.195	Knebworth is identified as a <del>Category A</del> <b>one of five villages where a greater amount of development has been allocated</b> . It is excluded from the Green Belt with a settlement boundary shown on the Policies Map. General development will be permitted in this area. The rest of the parish is designated Green Belt. Old Knebworth is identified as a Category B village within the Green Belt where limited infilling will be allowed.	Consequential to MM010 / FM039. Previously consulted upon as MM283 / FM143						
Paragraph 13.198	This Plan identifies <del>four</del> <b>three</b> local housing allocations within Knebworth for an estimated <del>598</del> <b>584</b> new homes. A further <del>65</del> <b>175</b> homes have already been built or granted planning permission <b>within the parish. This includes development adjoining the southern edge of Stevenage Borough.</b>	Factual update. Previously consulted upon as potential modification MM284 / FM144.						
Table after Policy KB4	<table border="1"> <tr> <td>Completions and permissions</td> <td><del>65</del> <b>175</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>663</del> <b>759</b> homes</td> </tr> </table>	Completions and permissions	<del>65</del> <b>175</b> homes	Total allocated, completed and permitted	<del>663</del> <b>759</b> homes	Factual update. Previously consulted upon as potential modification MM289 / FM148.		
Completions and permissions	<del>65</del> <b>175</b> homes							
Total allocated, completed and permitted	<del>663</del> <b>759</b> homes							
Paragraph 13.202	There is currently no secondary education provision in Knebworth. Pupils travel to a variety of schools in Hitchin, Stevenage and Welwyn Garden City. <del>Although some of these journeys can, and are, made by public transport, many are also made by car. This contributes to some of the known traffic issues in the town and across the wider road network</del>	Previously consulted upon as potential modification MM292.						
Paragraph 13.210	<del>A planning application</del> <b>Planning permission</b> has recently been submitted <del>granted</del> for a new library, doctors' surgery and pharmacy on the site of the current library within the identified village centre.	Factual update. Previously consulted upon as potential modification MM296						
<b>LETCHWORTH</b>								
Paragraph 13.215	<del>Fourteen</del> <b>Twelve</b> sites are allocated in Letchworth for an estimated <del>1,546</del> <b>1,485</b> additional dwellings. A further <del>594</del> <b>693</b> homes have been built or granted planning permission since 2011 and the town will see more than 2,000 new homes built over the plan period.	Factual update. Previously consulted upon as potential modification MM299 / FM149.						
Table after Policy LG10	<table border="1"> <tr> <td>Total allocated sites</td> <td><del>1,523</del> <b>1,485</b> homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>594</del> <b>693</b> homes</td> </tr> <tr> <td>Broad location – Letchworth Garden City town centre</td> <td>50 homes</td> </tr> </table>	Total allocated sites	<del>1,523</del> <b>1,485</b> homes	Completions and permissions	<del>594</del> <b>693</b> homes	Broad location – Letchworth Garden City town centre	50 homes	Factual update. Previously consulted upon as potential modification MM305 / FM152.
Total allocated sites	<del>1,523</del> <b>1,485</b> homes							
Completions and permissions	<del>594</del> <b>693</b> homes							
Broad location – Letchworth Garden City town centre	50 homes							

Policy / Paragraph	Modification	Reason / source
	<p>Total allocated, completed and permitted <b>2011-2031*</b> <b>2,167 1,928</b> homes</p> <p><b>* Land North of Letchworth is allocated for 900 homes in total with 600 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031.</b></p>	
Paragraph 13.230	<p><del>Additionally, in the longer term</del> Letchworth has the potential capacity to meet wider District needs, recapturing trade that is currently diverted to Hitchin. There are a number of opportunities within the town centre boundary that could accommodate this additional provision as detailed in the policies below.</p>	Previously consulted upon as potential modification MM308.
Ref to Policy	<p><del>Retail allocations and site-specific criteria</del> Town Centre Uses allocations and site-specific criteria</p>	Previously consulted upon as potential modification MM309.
Paragraph 13.241	<p><del>Schemes</del> <b>New development</b> in Letchworth will be required to make reasonable contributions towards these <del>schemes</del> <b>projects</b> and / or other schemes in nearby locations (see Baldock and Hitchin sections of this chapter in particular) where traffic generation arising from new development will have an impact. In addition, <del>schemes</del> <b>contributions</b> will be required <b>towards</b> <del>make contributions to</del> walking and cycling schemes in Letchworth which aim to influence mode share and free up capacity for new development.</p>	For clarity and to avoid confusing use of “schemes” to mean several different things
<b>LILLEY</b>		
Paragraph 13.249	<p>No sites are allocated in Lilley for residential development. <del>One new home has</del> <b>Nine new homes have been built or</b> granted planning permission since 2011.</p>	Factual update. Previously consulted upon as potential modification MM317 / FM156
<b>LOWER STONDON</b>		
Paragraph 13.250	<p>Lower Stondon lies outside of North Hertfordshire in neighbouring Central Bedfordshire. It consists of the original village core and more recent development which lies between the A600 Bedford Road and Henlow airfield <b>in Henlow parish</b>. This development extends to the administrative boundary between the two authorities.</p>	Factual update. Previously consulted upon as potential modification MM318.
Paragraph 13.255	<p><del>One new site is located</del> <b>Planning permission has been granted for 144 homes</b> adjoining Lower Stondon. Four further new homes have been completed adjacent to <del>the</del> <b>this</b> site since 2011.</p>	Factual update. Previously consulted upon as potential modification FM157.
<b>NEWNHAM</b>		
13.261	<p>No sites are allocated in Newnham for residential development. <del>No</del> <b>Three</b> new homes have been built or granted planning permission since 2011.</p>	Factual update. Previously consulted upon as potential modification FM160.
<b>OFFLEY</b>		
Paragraph 13.271	<p>Offley is a large parish in the western part of the District between Luton and Hitchin. The parish is split into two wards: Offley and Cockernhoe. At the 2011 census the population of the whole</p>	To reflect the changes to Policy SP2 (MM010 / FM039)

Policy / Paragraph	Modification	Reason / source	
	parish was 1,398 and there were 607 dwellings in the parish. Of these, 493 people and 205 dwellings were in the Cockernhoe ward (discussed on the Cockernhoe, <b>Mangrove Green</b> and East of Luton page of this chapter) and the remaining 905 people and 402 dwellings were in the Offley ward (the subject of this page).		
Paragraph 13.262	No sites are allocated in Offley. Since 2011, <del>73</del> <b>84</b> new homes have been built or granted planning permission in the Offley ward of the parish.	Factual update. Previously consulted upon as potential modification MM323 / FM161.	
<b>PIRTON</b>			
Paragraph 13.275	Pirton has a conservation area covering much of the older part of the village, including the site of the castle, Great Green and Little Green. The parish church of St Mary is a Grade I listed building. To the west of the village in the Chilterns, High Down House is also a Grade I listed building. <b>There are three Scheduled Ancient Monuments (SAM), a moated site at Rectory Farm, Toot Hill Motte and Bailey and an Anglo-Saxon settlement to the east of Priors Hill and north of Danefield Road.</b>	Factual update. Previously consulted upon as potential modification MM325.	
Paragraph 13.276	No sites are allocated in Pirton by this Plan. Around <del>94</del> <b>139</b> homes have been built or granted planning permission since 2011 <sup>447</sup> .  [Footnote] <sup>447</sup> Outline planning permission has been granted for up to 82 new homes at Holwell Turn. The precise number of homes to be built will be determined by a detailed, 'reserved-matters' application. An estimate of 70 homes has been used for the purposes of calculating overall housing numbers in this Plan. This figure is without prejudice to the determination of any future planning applications on this site.	Factual update. Previously consulted upon as potential modification MM326 / FM162.	
<b>PRESTON</b>			
Paragraph 13.277	Preston is a small village to the south of Hitchin. Historically it was part of the parish of Hitchin, becoming a separate civil parish in 1894. The parish covers the village and surrounding countryside. The village has a school, village hall, public house and a church. It is also home to a private school in the former manor house of Temple Dinsley.	Factual update; The Princess Helena College closed in 2021	
Paragraph 13.281	One site is allocated in Preston for an estimated 21 new homes. A further <del>17</del> <b>29</b> homes have been built or granted permission since 2011.	Factual update. Previously consulted upon as potential modification FM163.	
Table after Policy PR1	Completions and permissions	<del>17</del> <b>29</b> homes	Factual update. Previously consulted upon as potential modification FM164.
	Total allocated, completed and permitted	<del>38</del> <b>50</b> homes	
<b>RADWELL</b>			
Paragraph 13.286	No sites are allocated for residential development in Radwell. Since 2011, <del>six</del> <b>10</b> new homes have been either built or granted planning permission.	Factual update. Previously consulted upon as potential modification	

Policy / Paragraph	Modification	Reason / source						
		MM329.						
<b>REED</b>								
Paragraph 13.291	One site is allocated in Reed for an estimated 22 new homes. A further <del>12</del> <b>14</b> new homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM331 / FM165.						
Table after Policy RD1	<table border="1"> <tr> <td>Total allocated sites</td> <td>22 homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>12</del> <b>14</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>34</del> <b>36</b> homes</td> </tr> </table>	Total allocated sites	22 homes	Completions and permissions	<del>12</del> <b>14</b> homes	Total allocated, completed and permitted	<del>34</del> <b>36</b> homes	Factual update. Previously consulted upon as potential modification MM332 / FM166.
Total allocated sites	22 homes							
Completions and permissions	<del>12</del> <b>14</b> homes							
Total allocated, completed and permitted	<del>34</del> <b>36</b> homes							
<b>ROYSTON</b>								
Paragraph 13.2299	<del>Eight</del> <b>Four</b> sites are allocated in Royston providing a total of more than 1,000 <del>for almost</del> <b>500</b> new homes. <del>663</del> <b>1,421</b> further homes have been built or granted planning permission since 2011. <b>This includes two large sites of around 300 homes each at the eastern and western edges of the town.</b>	Factual update. Previously consulted upon as potential modification MM334 / FM167.						
Policy RY4 (final bullet)	To provide evidence to demonstrate that a suitable distance is provided from Royston City Water Recycling Centre and sensitive development (buildings that are regularly occupied) as part of the detailed planning of the site.	To delete word include in modifications in error						
Table after Policy RY11	<table border="1"> <tr> <td>Total allocated sites</td> <td><del>1,049</del> <b>478</b> homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>663</del> <b>1,421</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>1,712</del> <b>1,899</b> homes</td> </tr> </table>	Total allocated sites	<del>1,049</del> <b>478</b> homes	Completions and permissions	<del>663</del> <b>1,421</b> homes	Total allocated, completed and permitted	<del>1,712</del> <b>1,899</b> homes	Factual update. Previously consulted upon as potential modification MM342 / FM171.
Total allocated sites	<del>1,049</del> <b>478</b> homes							
Completions and permissions	<del>663</del> <b>1,421</b> homes							
Total allocated, completed and permitted	<del>1,712</del> <b>1,899</b> homes							
Table after 13.301	<table border="1"> <tr> <td><b>Policy RY9</b></td> <td>Land north of York Way</td> <td>10.9</td> </tr> </table>	<b>Policy RY9</b>	Land north of York Way	10.9	For consistency with labelling used for all other site allocations (as required by the Main Modifications)			
<b>Policy RY9</b>	Land north of York Way	10.9						
Paragraph 13.310	Hertfordshire County Council has recently provided additional First School capacity within the town. As a consequence, it is considered that existing <b>first</b> school sites have been developed to capacity.	Factual update. Previously consulted upon as potential modification MM343.						
Paragraph 13.311	<del>A further</del> <b>Land for a new 2FE first school has been secured within the new development currently being built</b> will be required over the plan period. This is the County Council's preferred school size and would normally require the provision of one new site. However, the majority of new development in Royston will be around the peripheries of the existing town. It may be more appropriate for the provision of two separate, smaller schools to the east and west of the town respectively to best accommodate future patterns of demand and increase the sustainability of new developments in these locations.	Factual update. Previously consulted upon as potential modification MM344 / FM173.						

Policy / Paragraph	Modification	Reason / source						
<b>RUSHDEN</b>								
Paragraph 13.320	There are no sites allocated for residential development in Rushden. <del>Two</del> <b>Six</b> new homes have been built <b>or granted planning permission</b> since 2011.	Factual update. Previously consulted upon as potential modification MM347 / FM174.						
<b>SANDON</b>								
Paragraph 13.325	There are no sites allocated for residential development in Sandon. <del>13</del> <b>17</b> new homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM349 / FM175.						
<b>ST IPPOLYTS</b>								
Paragraph 13.332	Two sites are allocated in St Ippolyts <b>&amp; Gosmore</b> for an estimated 52 new homes. A further <del>34</del> <b>55</b> homes have been built or granted planning permission in the parish since 2011.	Factual update. Previously consulted upon as potential modification MM351 / FM176.						
Table after Policy SI2	<table border="1"> <tr> <td>Completions and permissions</td> <td><del>34</del> <b>55</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>86</del> <b>107</b> homes</td> </tr> </table>	Completions and permissions	<del>34</del> <b>55</b> homes	Total allocated, completed and permitted	<del>86</del> <b>107</b> homes	Factual update. Previously consulted upon as potential modification FM177.		
Completions and permissions	<del>34</del> <b>55</b> homes							
Total allocated, completed and permitted	<del>86</del> <b>107</b> homes							
<b>ST PAULS WALDEN</b>								
Paragraph 13.339	<del>One</del> <b>No</b> sites <del>is</del> <b>are</b> allocated <b>for residential development</b> in St Paul's Walden at Whitwell for an estimated <del>41</del> new homes. A further <del>nine</del> <b>54</b> homes have been built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification FM178.						
<b>THERFIELD</b>								
Paragraph 13.334	One site is allocated in Therfield for an estimated 12 new homes. <del>10</del> <b>24</b> further homes have been either built or granted planning permission since 2011.	Factual update. Previously consulted upon as potential modification MM358 / FM180.						
Table after Policy TH1	<table border="1"> <tr> <td>Total allocated sites</td> <td>12 homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>10</del> <b>24</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>22</del> <b>36</b> homes</td> </tr> </table>	Total allocated sites	12 homes	Completions and permissions	<del>10</del> <b>24</b> homes	Total allocated, completed and permitted	<del>22</del> <b>36</b> homes	Factual update. Previously consulted upon as potential modification MM360 / FM181.
Total allocated sites	12 homes							
Completions and permissions	<del>10</del> <b>24</b> homes							
Total allocated, completed and permitted	<del>22</del> <b>36</b> homes							
<b>WALLINGTON</b>								
Paragraph 13.349	There are no sites allocated for residential development in Wallington. <del>One</del> <b>Two</b> new homes <del>has</del> <b>have</b> been built <b>or granted planning permission</b> since 2011.	Factual update. Previously consulted upon as potential modification FM182.						
<b>WESTON</b>								
Paragraph 13.353	Weston is classed as a Category A village, with a settlement boundary defined on the Policies Map within which additional development will be allowed. In the south of the parish site <del>GA1</del> <b>GA2</b> at Great Ashby is mostly in Weston parish. Most of the rest of the parish is classed as	Factual update. Previously consulted upon as potential modification MM361.						

Policy / Paragraph	Modification	Reason / source						
	Green Belt, apart from the eastern edges of the parish which are classed as rural area beyond the Green Belt.							
Paragraph 13.355	One site is allocated in Weston for an estimated 40 new homes. A further <del>seven</del> <b>eight</b> new homes have been built or granted planning permission.	Factual update. Previously consulted upon as potential modification MM362						
Table after Policy WE1	<table border="1"> <tr> <td>Total allocated sites</td> <td>40 homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>7</del> <b>8</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>47</del> <b>48</b> homes</td> </tr> </table>	Total allocated sites	40 homes	Completions and permissions	<del>7</del> <b>8</b> homes	Total allocated, completed and permitted	<del>47</del> <b>48</b> homes	Factual update. Previously consulted upon as potential modification MM368 / FM185.
Total allocated sites	40 homes							
Completions and permissions	<del>7</del> <b>8</b> homes							
Total allocated, completed and permitted	<del>47</del> <b>48</b> homes							
<b>WYMONDLEY</b>								
Paragraph 13.361	Little Wymondley is <del>classed as a Category A</del> <b>one of five villages where a greater amount of development has been allocated</b> , with a The settlement boundary is shown on the Policies Map within which additional development will be allowed.	Consequential to MM010 / FM0039. Previously consulted upon as potential modification MM365 / FM183.						
Paragraph 13.365	One site is allocated in Wymondley for an estimated 300 additional homes. <del>15</del> <b>31</b> further homes have been built or granted planning permission <b>in the parish</b> since 2011.	Factual update. Previously consulted upon as potential modification MM366 / FM184.						
Table after Policy WY1	<table border="1"> <tr> <td>Total allocated sites</td> <td>300 homes</td> </tr> <tr> <td>Completions and permissions</td> <td><del>16</del> <b>31</b> homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td><del>316</del> <b>331</b> homes</td> </tr> </table>	Total allocated sites	300 homes	Completions and permissions	<del>16</del> <b>31</b> homes	Total allocated, completed and permitted	<del>316</del> <b>331</b> homes	Factual update. Previously consulted upon as potential modification MM368 / FM185.
Total allocated sites	300 homes							
Completions and permissions	<del>16</del> <b>31</b> homes							
Total allocated, completed and permitted	<del>316</del> <b>331</b> homes							
<b>SECTION 5 IMPLEMENTATION, MONITORING AND REVIEW</b>								
<b>CHAPTER 14 DELIVERY</b>								
Footnote 162	North Hertfordshire Infrastructure Delivery Plan (RS Regeneration, 2016; <b>RS Regeneration &amp; NHDC, 2018</b> )	To include reference to further evidence produced for the examination						
Paragraph 14.9	Whilst these issues are not absolute constraints to the Local Plan, continued and proactive engagement with relevant parties, such as the developers, Highways Agency and Highways Authority, the Local Education Authority, the Environment Agency and Water companies, <b>the Hertfordshire Local Enterprise Partnership</b> and the Hertfordshire Local Nature Partnership is fundamental in achieving appropriate solutions.	For clarity. Previously consulted upon as potential modification MM371.						
Paragraph 14.12 (first inset)	LEPs are partnerships between businesses and local authorities set up by Government to support growth. North Hertfordshire is covered by <del>two separate LEPs – Hertfordshire and Greater Cambridge Peterborough</del> <b>the Hertfordshire LEP</b> .	Factual update; The Greater Cambridge & Peterborough LEP has been superceded by combined authority mayoral arrangements for Cambridgeshire that do not include North Hertfordshire.						
Paragraph	Grants and programmes – Where individual projects meet specific objectives, they can receive	Factual update; The UK has left the						

Policy / Paragraph	Modification		Reason / source
14.12 (third inset)	grant funding. Well known examples include lottery funding, particularly where there are heritage or health benefits, and programmes currently run by the European Union. North Hertfordshire, for example, benefits from access to the Eastern Plateau Fund which helps to support economic development in rural areas.		European Union
<b>APPENDICES</b>			
Appendix 1, Table [Only rows of the table with changes shown]	<b>District Local Plan No.2 with Alterations To be replaced</b>		Consequential to MM010, MM017, MM050, MM108, MM114, MM157, MM166, MM168, MM173 & MM175. Previously consulted upon as potential modification MM405.
	Policy 3 Settlements within the Green Belt	Replacement Policy contained in the North Hertfordshire Local Plan 2011 – 2031 Policy SP2 Settlement hierarchy and <b>Spatial Distribution</b>	
	Policy 5 Excluded villages	Policy SP2 Settlement hierarchy and <b>Spatial Distribution</b>	
	Policy 7 Selected villages beyond the Green Belt	Policy SP2 Settlement hierarchy and <b>Spatial Distribution</b> Policy D1 Sustainable design	
	Policy 8 Development in towns	Policy SP2 Settlement hierarchy and <b>Spatial Distribution</b>	
	Policy 9 Royston’s development Limits	Policy SP2 Settlement hierarchy and <b>Spatial Distribution</b> Policy CGB1 Rural areas beyond the Green Belt Policy CGB5 Urban Open Land	
	Policy 14 Nature conservation	Policy NE5 <del>New and improved public open space and biodiversity</del> Policy NE6 Designated biodiversity and geological sites <b>Policy SP12 Green Infrastructure, landscape and biodiversity</b> Policy NEx Strategic Green Infrastructure Policy NEx Biodiversity and geological sites	
	Policy 25 Re-use of rural buildings	Policy CGB4 Existing rural buildings in the <b>Rural Area Beyond the Green Belt</b>	
	Policy 29 Rural housing needs	Policy CGB2a Exception sites in rural areas	

Policy / Paragraph	Modification		Reason / source
		<p>for affordable housing in the Green Belt</p> <p><b>Policy CGB2b Community facilities, services and affordable housing in the Rural Area Beyond the Green Belt</b></p>	
	<p>Policy 30 Replacement or extension of dwellings in the countryside</p>	<p>Policy CGB4 Existing rural buildings in the Rural Area Beyond the Green Belt</p> <p>Policy D2 House extensions, replacement dwellings and outbuildings</p>	
	<p>Policy 42 Shopping</p>	<p>Policy SP4 Town Centres, and Local Centres and Community Shops</p> <p>Policy ETC3 New retail, leisure and other main town centre development</p>	
<p>Appendix 3</p>	<p><b>The star symbol on the adopted Policies Map denotes the general location of the Local Centres identified by Policy SP4. The buildings or areas shown edged and hatched on the following plans shows their extent and the areas to which relevant policies will be applied.</b></p>		<p>For clarity on the extent to which policies are applied. Note: The extents of the Local Centres shown on the following maps have not been altered.</p>

## Changes to the Policies Map

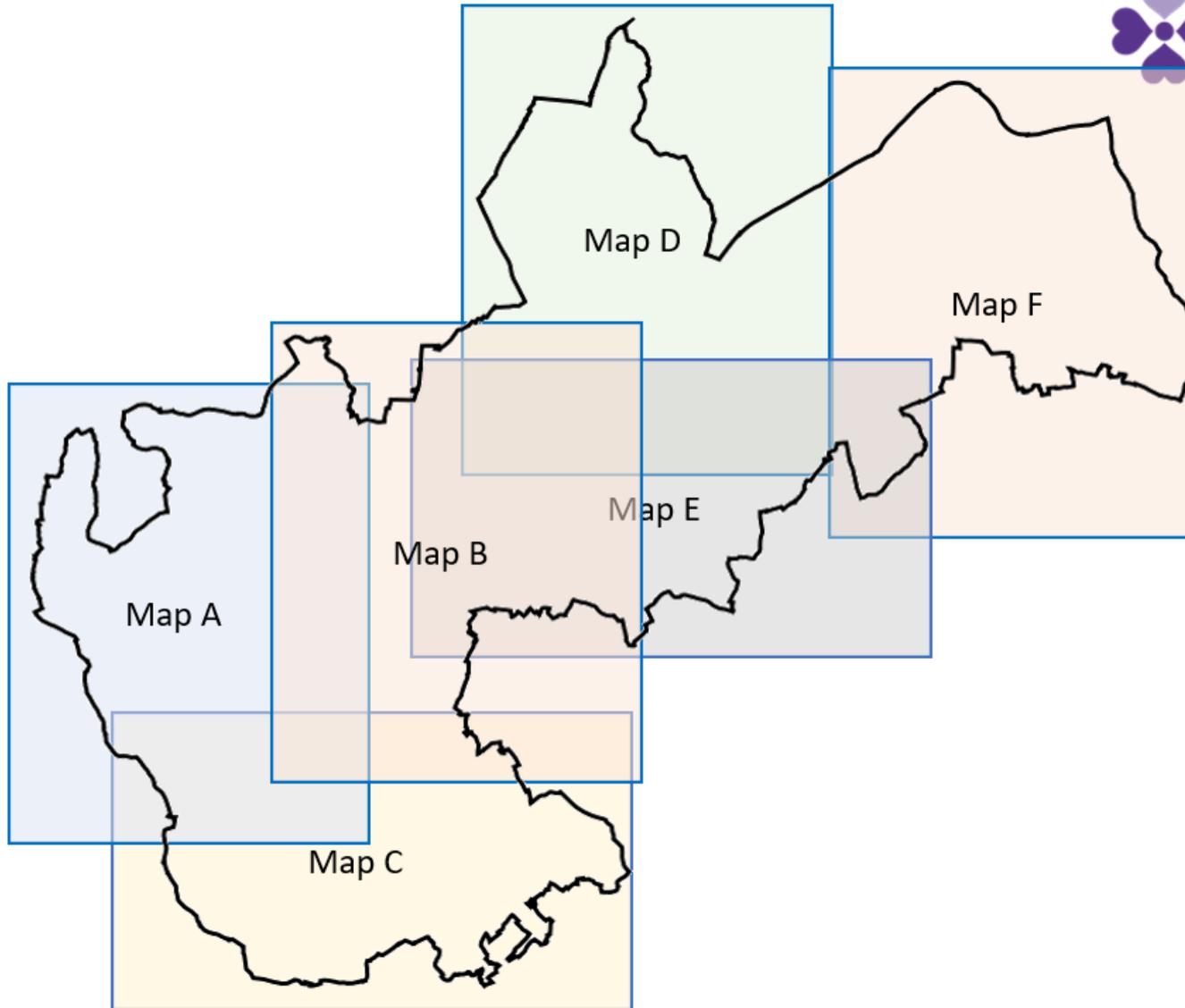
The Policies Map is not defined in statute as a Development Plan document and there are no powers for an Inspector to recommend Main Modifications to it. However, a number of the published Main Modifications to the Plan's policies require further corresponding changes to be made to the policies map compared to the version that was submitted for examination. In addition, there are some instances where changes to the policies map are needed to ensure that relevant policies are justified and effective. These changes are set out below for completeness.

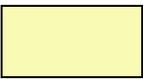
Policy / Paragraph	Modification
<b>POLICIES MAP</b>	
Policy SP3	Remove Letchworth Power Station as an Employment Site (SP3) and denote an Employment Area (ETC1). Previously consulted upon as potential modification MM380.
Policy SP8	Amend legend for Letchworth Garden City Town Centre Boundary to identify that this also represents the 'broad location' for housing identified under Policy SP8. Previously consulted upon as potential modification MM381.
Policy SP18	Include access route to allocation from Mendip Way. Previously consulted upon as potential modification MM382.
Policy ETC1	Remove Business Areas annotation but retain underlying Employment Area status. Previously consulted upon as potential modification MM383.
Policy HS7	Remove site CD4 and add new Gypsy & Traveller allocation at Danesbury Park Road (CD6). Previously consulted upon as potential modification MM385 / FM126.
Housing allocation AS1	Delete as allocation has been implemented. Previously consulted upon as potential modification FM102.
Housing allocation BA2 / Green Belt boundary, Baldock	Amend allocation boundary to reflect land-ownership and defensible features. Previously consulted upon as potential modification MM386.
Housing allocations BA3 & BA4	Amend boundaries between sites and extend BA3 to incorporate 'white land'. Previously consulted upon as potential modification MM387.
Housing allocation BK1	Delete as allocation has been implemented. Previously consulted upon as potential modification FM110.
Housing allocation BK2	Reduce housing allocation to exclude open space. Previously consulted upon as potential modification MM388.
Housing allocation BK3	Enlarge to housing allocation to include reserve school site. Previously consulted upon as potential modification MM389.
Housing allocation HT2	Changed to omit small area of neighbouring property. Previously consulted upon as potential modification MM411.
Housing allocation HT8	Reduce to reflect extent of land remaining for potential development. Previously consulted upon as potential modification MM390.
Settlement boundary - Hitchin	Remove land east of Bedford Road that is not part of The Priory School. Previously consulted upon as potential modification MM391.
Housing allocation KB3	Delete as allocation has been implemented. Previously consulted upon as potential modification FM146.
Housing allocation LG14	Delete as allocation has been implemented. Previously consulted upon as potential modification FM150.
Housing allocation LG17	Delete as allocation has been implemented. Previously consulted upon as potential modification FM151.

<b>Policy / Paragraph</b>	<b>Modification</b>
Housing allocation LS1	Delete as allocation has been implemented. Previously consulted upon as potential modification FM158.
Settlement boundary - Offley	Amend south east boundary of settlement to reflect curtilage boundary. Previously consulted upon as potential modification MM393.
Settlement boundary - Reed	Amend settlement boundary and Rural Area designation to reflect extent of new housing at The Kilns following completion of new development under planning permission 14/02573/1.
Housing allocation RY1	Delete as allocation has been implemented. Previously consulted upon as potential modification FM168.
Housing allocation RY2	Delete as allocation has been implemented. Previously consulted upon as potential modification FM169.
Housing allocation RY5	Delete as allocation has been implemented. Previously consulted upon as potential modification MM392.
Housing allocation RY8	Delete as allocation has been implemented. Previously consulted upon as potential modification FM170.
Settlement boundary – Whitwell	Amend the settlement boundary to exclude the recreation ground to the south of the settlement. Previously consulted upon as potential modification MM395.
Housing allocation SP2	Delete as allocation has been implemented. Previously consulted upon as potential modification FM179.
Housing allocation SI1	Extend the site boundary to abut London Road. Previously consulted upon as potential modification MM396.
Settlement boundary – Therfield	Amend the boundary around the southeast of the settlement (Hay Green) to more tightly follow the limit of existing development. Previously consulted upon as potential modification MM394.
Housing allocation WY1 / Urban Open Land	Amend alignment of housing allocation / urban open land boundary in line with Statement of Common Ground. Previously consulted upon as potential modification MM384.

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North Hertfordshire District Council Local Plan 2011-2031  
Policies Map: Coverage and Key

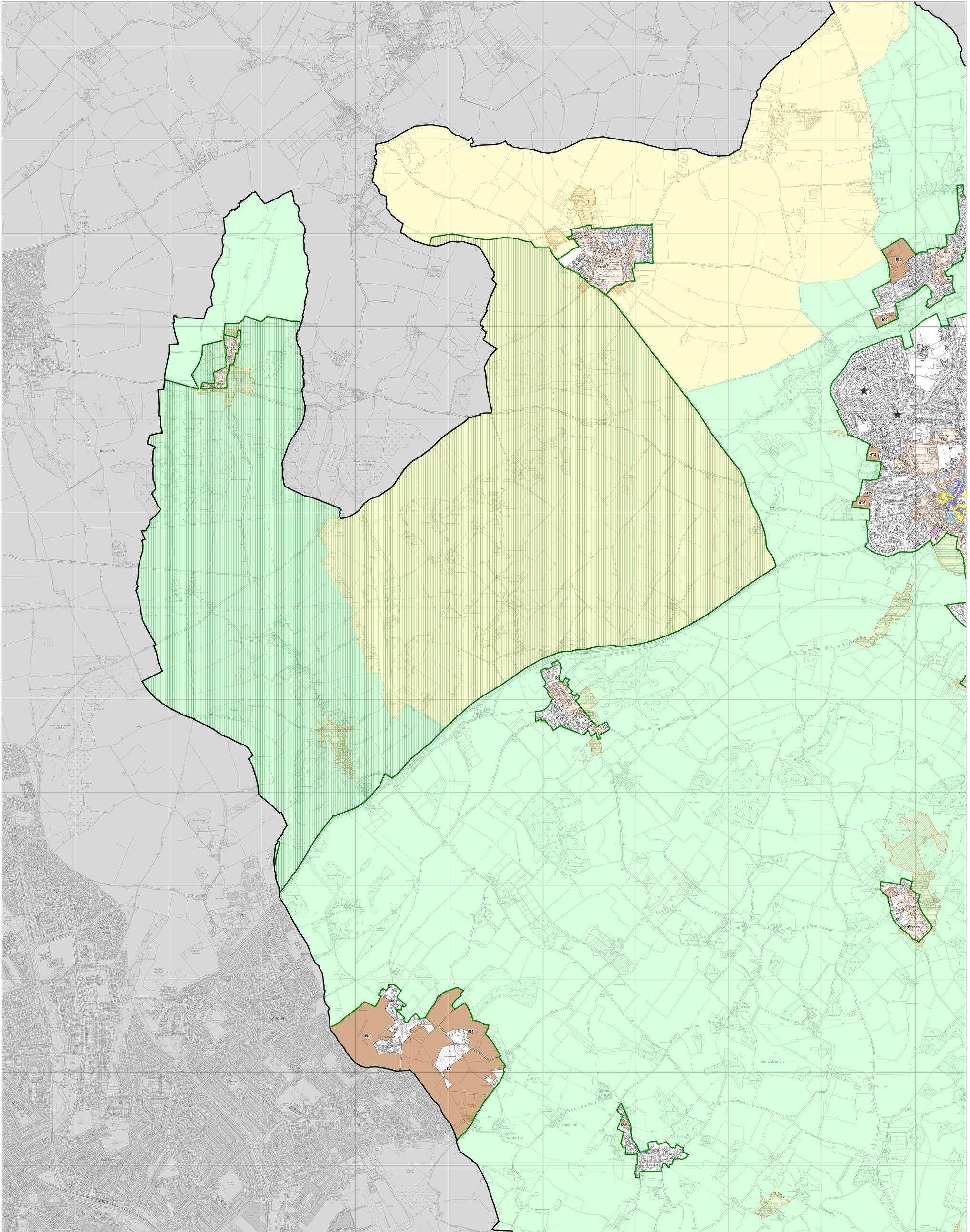


-  District boundary
-  Green Belt (SP5)
-  Rural Area beyond the Green Belt (SP5, CGB1)
-  Urban Open Land (CGB5)
-  Sites of Special Scientific Interest\* (NE4)
-  Area of Outstanding Natural Beauty\* (NE3)
-  Conservation Areas\* (HE1)
-  Employment Areas (SP3, ETC1)
-  Employment Sites (SP3, ETC1)
-  Housing Sites (SP8, SP14-SP19, HS1)
-  Local Centres (ETC6)
-  Settlement boundary (Policy SP2)
-  Town Centre Boundary (SP4, ETC3)
-  Primary Shopping Frontages (ETC4)
-  Secondary Shopping Frontages (ETC5)
-  Mixed Use Allocations (SP4, ETC3)
-  Safeguarded Land (SP8)
-  Gypsy & Traveller Site (SP8, HS7)

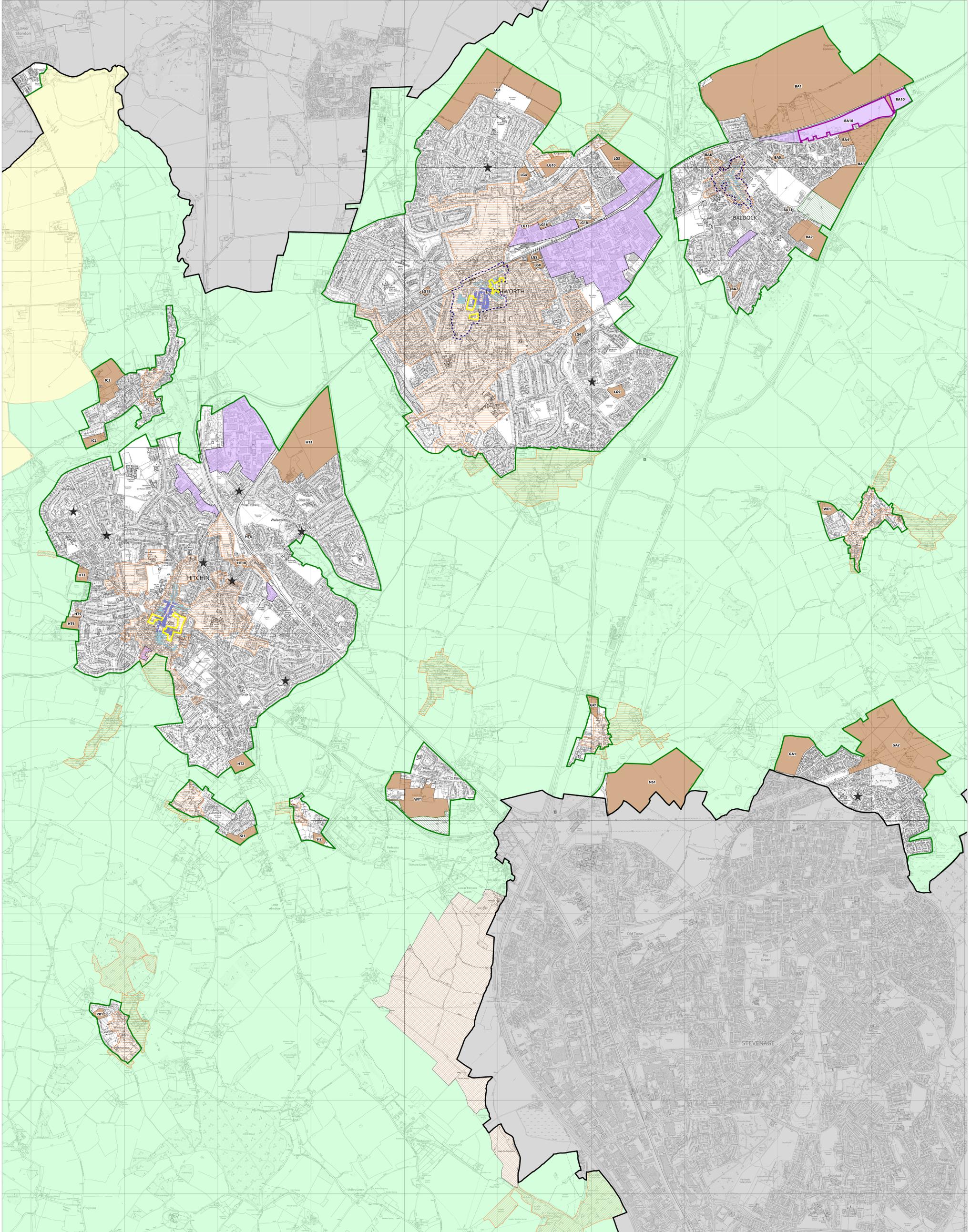


Scale 1:12,750

\*Designations set under different legislation, processes and / or by other bodies and may change outside of the Local Plan process



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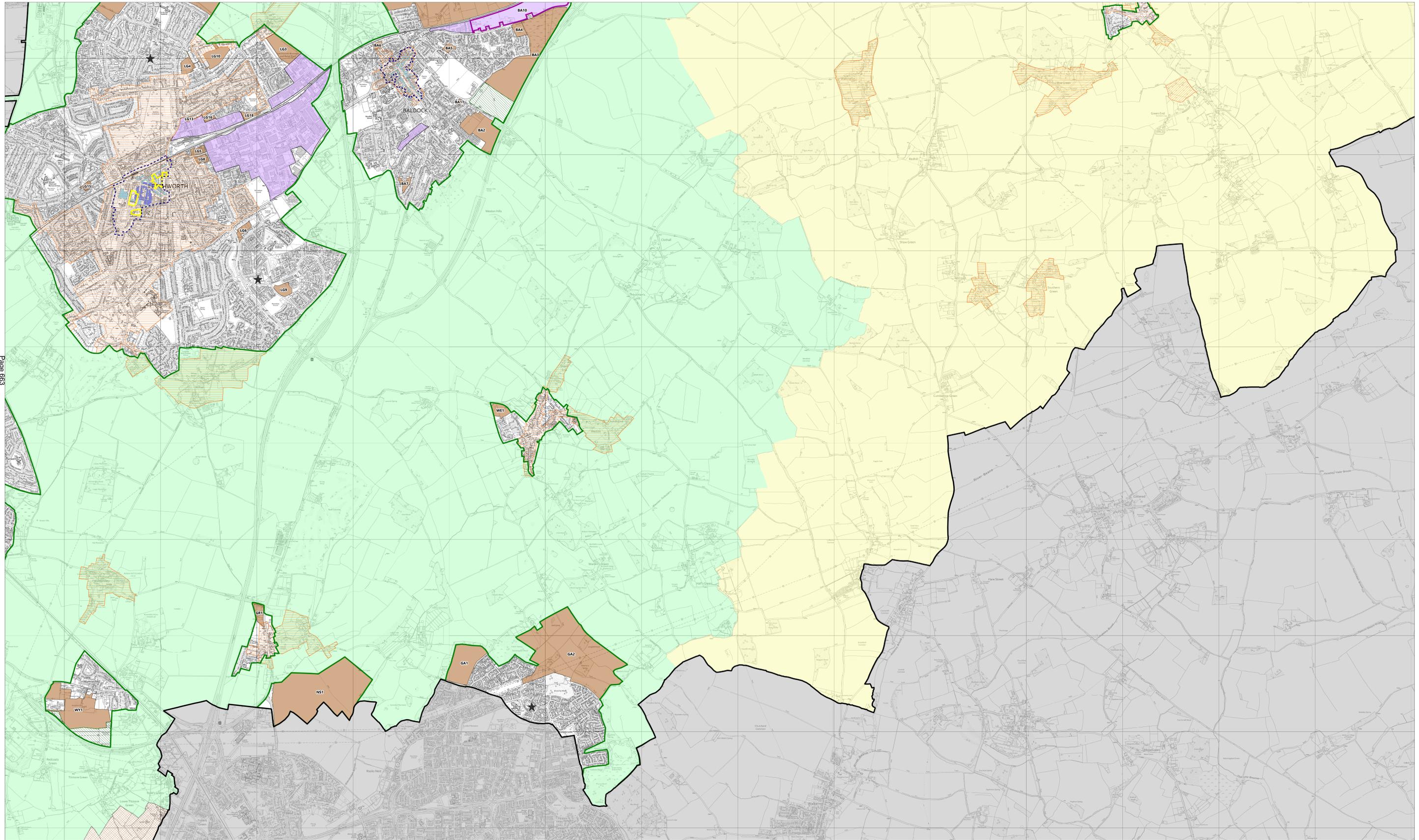
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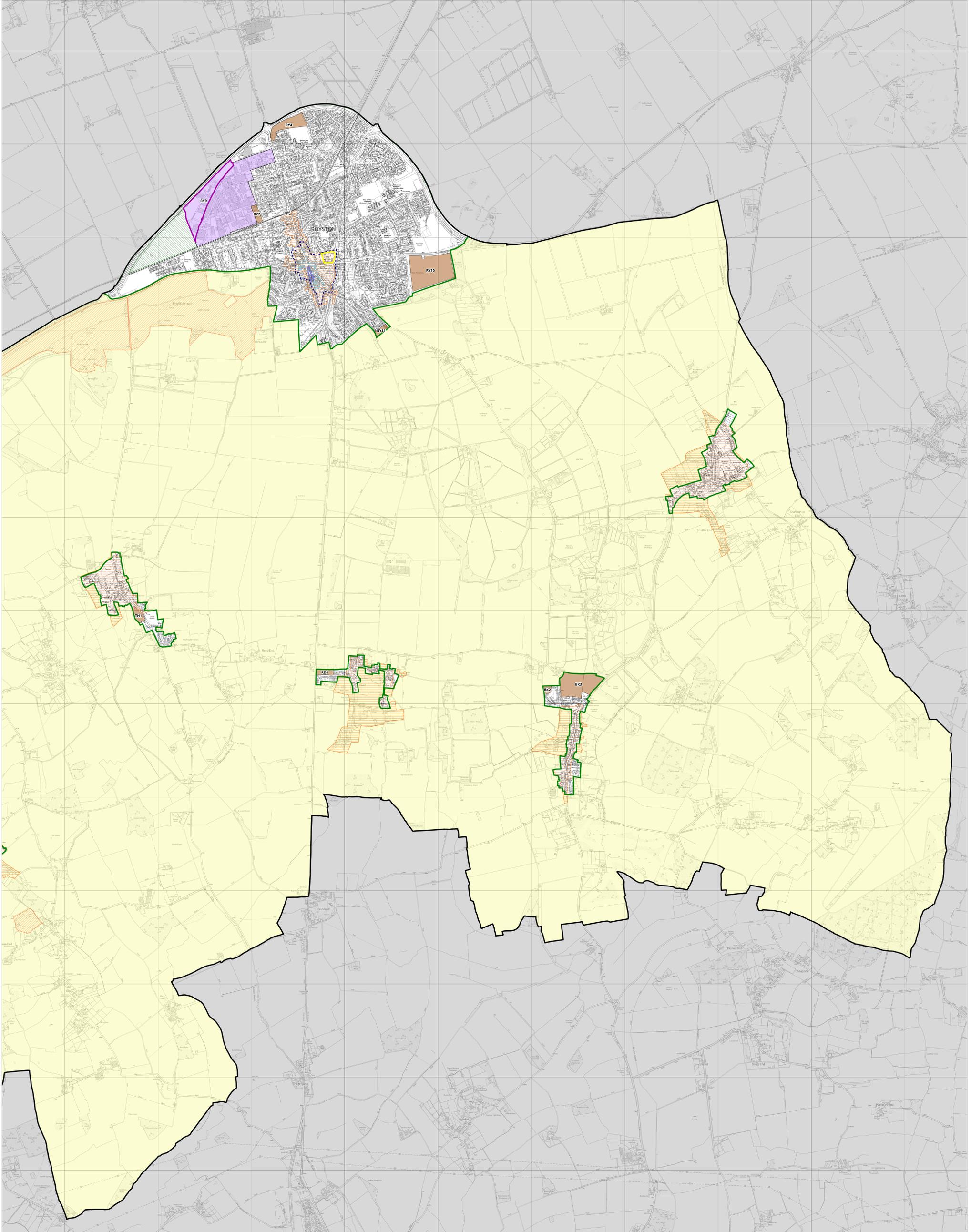
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# **Local Development Scheme**

Timetable for producing a new Local Plan for  
North Hertfordshire

November 2022

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## **1. Introduction**

- 1.1 As the Local Planning authority, North Hertfordshire District Council has to prepare a Local Plan and keep it under review. The Local Plan has to set out the Council's plans for the area, including allocating sites for development, identifying areas to be protected from development and setting the policies to be used when determining planning applications.
- 1.2 A new Local Plan must proceed through four key stages:
- Preparation of the new plan
  - Publication of a final draft
  - Examination; and
  - Adoption
- 1.3 The Local Development Scheme (LDS) sets out a timetable for the preparation of a local plan and other relevant documents.

## **2. Current position and the way forward for North Hertfordshire**

- 2.1 Planning applications have to be determined in accordance with the policies of the development plan, unless material considerations indicate otherwise. At present the statutory development plan for North Hertfordshire comprises:
- (i) North Hertfordshire Local Plan 2011-2031
  - (ii) Hertfordshire Minerals Local Plan adopted in 2007 (HCC)
  - (iii) Hertfordshire Waste Core Strategy and Development Management Policies Document, 2012 (HCC)
  - (iv) Hertfordshire Waste Site Allocations Document, 2014 (HCC)
- 2.2 The North Hertfordshire Local Plan replaces the saved policies from the North Hertfordshire District Local Plan No. 2 with Alterations (adopted 1996). The County Council is currently reviewing its Minerals and Waste Local Plan documents. A new Minerals and Waste Local Plan is being prepared and is expected to be adopted in 2024.
- 2.3 Figure 1 summarises the stages and timescales that have been undertaken for the production of the North Hertfordshire Local Plan.
- 2.4 In addition to the Local Plan, we have existing Supplementary Planning Documents (SPDs) providing greater detail on the policies contained in the plan. Supplementary Planning Guidance has been replaced by the new policies within the Local Plan or subject to review to ensure they are up-to-date and compliant with the NPPF and the new policies of the Local Plan.
- 2.5 It was agreed at Cabinet in March 2021 that three new or revised SPDs will be produced in addition to the Developer Contributions SPD which has already been subject to public consultation. These include a re-scoped Design SPD, a Sustainability SPD (incorporating the previously approved Parking and Transport SPD) and a Biodiversity SPD.
- 2.6 Cabinet resolved in March 2021 to not pursue a Community Infrastructure Levy (CIL) for North Hertfordshire at that time pending greater certainty on Government reforms.
- 2.7 Within NHDC, production of the plan is led by the Strategic Planning & Projects group, with input from the Local Plan Project Board and other internal departments as appropriate. The adopted Statement of Community Involvement (SCI) sets out how external parties and members of the public will be involved.
- 2.8 The Council produces annual monitoring reports which assess the effectiveness of the policies contained within the Local Plan. The Local Plan sets out a series of indicators and targets to assess the impact of the policies. Policy IMR1 sets out targets for housing delivery, and Policy IMR2 sets out that an early plan review will be undertaken by the end of 2023 to assess whether the Local Plan needs updating and to consider longer term requirements (See Figure 3). Notwithstanding this, the 2021 NPPF requires local plans to be reviewed every five years.

**Summary and Profile of the Local Plan**

**Figure 1: Local Plan**

<b>The Local Plan</b>	
Subject	This document includes the Council's spatial vision for North Hertfordshire, detailed planning policies against which planning applications will be assessed and land allocations (including housing, employment, retail, community and leisure facilities) for the District up to 2031. The Proposals Map shows the geographical application of relevant policies on an Ordnance Survey map base.
Geographical area	North Hertfordshire District
Status	Local Plan
Chain of conformity	Must conform with national planning policy.
<b>Timetable for production</b>	
Housing Options	February 2013 – March 2013 (Regulation 18)
Housing Additional Location Options	July 2013 – August 2013 (Regulation 18)
Preferred Options Consultation	December 2014 – January 2015 (Regulation 18)
Proposed Submission Consultation	October 2016 – November 2016 (Regulation 19)
Formal Submission to Secretary of State	June 2017 (Regulation 22)
Independent examination	June 2017– September 2022 (Regulation 24)
Consultation on Main Modifications arising from examination (if required)	Main Modifications and Additional Work Produced by the Council 2019: January- April 2019.  Further Proposed Main Modifications and Additional Work produced by the Council 2021: May - June 2021
Final Inspector's report	September 2022 (Regulation 25)
Adoption	November 2022 (Regulation 26)

**Figure 2: Statement of Community Involvement**

Statement of Community Involvement	
Subject	This document sets out the Council's policy on involving the community in the preparation of policies and the determination of planning applications.
Geographical area	North Hertfordshire District
Status	Local Development Document
Chain of conformity	Must meet minimum standards set in legislation. All other documents must be produced in accordance with this document.
Timetable for production	
<p>The current North Hertfordshire Statement of Community Involvement was formally adopted by the Council on 21 July 2020.</p> <p>The Statement of Community Involvement will be updated following adoption of the Local Plan.</p>	

**Figure 3: Local Plan Early Review**

<b>The Local Plan</b>	
Subject	<p>An early review will be undertaken by the end of 2023 in accordance with Local Plan Policy IMR2. The purpose of the initial review is to assess whether the Local Plan needs updating.</p> <p>Whilst all policies will be reviewed, there will be a specific focus on certain matters that were identified during the preparation and examination of the Local Plan.</p> <p>The review will be undertaken in line with Government policy and legislation, bringing together current information and cross boundary implications.</p>
Geographical area	North Hertfordshire District
Status	Early Review of the Local Plan
Chain of conformity	Must conform with national planning policy.
<b>Timetable for production</b>	
	<p>Detailed timetable to follow but will be undertaken by the end of 2023.</p> <p>Subject to the outcomes of that initial review to assess whether the Local Plan needs updating, a new plan or policies will be prepared to a new plan period to at least 2041.</p>

**Amendments to the Local Plan timetable from previous (2017) version of the Local Development Scheme:**

- Reg. 22 Submission to the Secretary of State changed to June 2017 (was May 2017)
- Reg. 24 Independent examination changed to June 2017– September 2022 (was September to December 2017)
- Consultation on main modifications added May-June 2021 (not previously included)
- Reg. 25 Receipt of Inspector's final report changed to September 2022 (was May 2018)
- Reg. 26 Adoption of the Local Plan changed to November 2022 (was June 2018)

**EXTRAORDINARY CABINET  
2 NOVEMBER 2022**

**\*PART 1 – PUBLIC DOCUMENT**

**TITLE OF REPORT: THERFIELD HEATH SSSI MITIGATION STRATEGY**

REPORT OF: IAN FULLSTONE, SERVICE DIRECTOR - REGULATORY

EXECUTIVE MEMBER: CLLR RUTH BROWN, EXECUTIVE MEMBER FOR PLANNING & TRANSPORT

COUNCIL PRIORITY: PEOPLE FIRST / SUSTAINABILITY / A BRIGHTER FUTURE TOGETHER

**1. EXECUTIVE SUMMARY**

To consider a Mitigation Strategy for the Site of Special Scientific Interest (SSSI) at Therfield Heath. To approve the strategy for use in planning decisions to mitigate against the additional recreational pressures on Therfield Heath SSSI.

**2. RECOMMENDATIONS**

- 2.1. That, subject to the approval of the Local Plan by Full Council, the Therfield Heath SSSI Mitigation Strategy is approved as a material consideration for the purposes of determining planning applications in Royston and the surrounding area.

**3. REASONS FOR RECOMMENDATIONS**

- 3.1. To provide a mechanism through which to negotiate mitigation measures to address recreational impact on the Therfield Heath Site of Scientific Interest (SSSI) and fulfil the Council's Statement of Common Ground with Natural England.

**4. ALTERNATIVE OPTIONS CONSIDERED**

- 4.1. None. The Council has signed a Statement of Common Ground with Natural England to prepare a mitigation strategy for Therfield Heath prior to the adoption of the Local Plan. Natural England are a prescribed body under the statutory Duty to Cooperate which the Council has a legal duty to demonstrate cooperation with as part of the plan-making duties.

**5. CONSULTATION WITH RELEVANT MEMBERS AND EXTERNAL ORGANISATIONS**

- 5.1. The Council hosted a workshop in July 2018 with key stakeholders to discuss the issues around Therfield Heath SSSI. The key stakeholders included local councillors, Natural England, the Therfield Heath and Greens Conservators, Hertfordshire County Council, Royston Town Council, landowners and Cambridgeshire County Council.

- 5.2. Subsequently, both Natural England and the Therfield Heath and Greens Conservators have been involved in the development of the final strategy.
- 5.3. The Executive Member for Planning and Transport and Deputy have been kept up to date with progress on the strategy at regular briefings. The Executive Member for Environment and Leisure has also been briefed.

## **6. FORWARD PLAN**

- 6.1 This report contains a recommendation on a key Executive decision, which has not been notified to the public in the Forward Plan. It is not possible to defer consideration of this decision for the reasons set out in the Notice of Reasons for Urgency – Key Decision, dated 10 October 2022, attached as Appendix A. The Chairman of the Overview and Scrutiny Committee has been informed and agreed, the notice of the recommendation has been available at the Council Offices in Gernon Road, Letchworth for three clear working days prior to the date of this meeting.

## **7. BACKGROUND**

- 7.1. Natural England identifies and designates Sites of Special Scientific Interest. Sites are designated for their biological, geological and / or physiographic interest.
- 7.2. Therfield Heath was first notified as a SSSI IN 1953 and last amended in 1984. The designation features include the chalk grassland habitat and the specific grasses, flowers and insects associated with it. The Heath also supports a wide range of other species although these are not specifically mentioned in the [citation](#).
- 7.3. As owners of the site, the Conservators of Therfield Heath and Greens must take [reasonable steps](#) to conserve and enhance the special features of the SSSI.
- 7.4. The submission version of the Local Plan proposed a number of allocations for residential development in and around Royston. In response, Natural England made a number of [representations](#) expressing concern about the proposed developments and the potential impact on Therfield Heath SSSI from the additional recreational pressures.
- 7.5. During the Local Plan Examination, the Council agreed with Natural England to prepare a mitigation strategy for the Therfield Heath SSSI prior to the adoption of the Local Plan and signed a [Statement of Common Ground](#) in which it was agreed that a mitigation strategy would be prepared and agreed prior to the adoption of the Local Plan.
- 7.6. The planning circumstances in Royston have changed throughout the Examination. Planning permission had been granted on a number of the proposed allocations and these have subsequently been removed from the Local Plan prior to receiving the Inspector's Report. During this time, it was unclear whether a mitigation strategy would be required as a direct consequence of the Local Plan, however, a mitigation strategy will provide a framework to secure S106 contributions from development and guide future expenditure to help maintain the SSSI.

## **8. RELEVANT CONSIDERATIONS**

- 8.1. The Council has been working with Natural England and the Conservators of Therfield Heath and Greens to produce a mitigation strategy for the Therfield Heath SSSI. An

initial workshop was held with key stakeholders in July 2018 to discuss the issues that might need to be addressed through the strategy.

- 8.2. A number of more detailed discussions have taken place with Natural England, the Conservators and the Council during the preparation of the strategy. However, work on the strategy has been protracted as there have been a number of delays in receiving comments and responses from the stakeholders to be included in the final strategy. There were also delays in the Local Plan Examination which resulted in planning permission being granted on a number of the allocated sites and subsequently being removed from the Local Plan. During this time it was unclear whether a mitigation strategy would be required as a direct consequence of the Local Plan.
- 8.3. The Therfield Heath SSSI Mitigation Strategy (attached as Appendix B) sets out the details of the recreational pressures that can impact on the SSSI and the measures that could be used to help change those pressures in the future. This is the version of the Strategy that has been sent to Natural England and we are anticipating final comments from Natural England, a verbal update will be provided.
- 8.4. The Mitigation Strategy takes a combined approach of measures to mitigate the effects of additional recreational impacts from further development in Royston. A number of themes have been identified which the proposed measures fall into:
  - Education and management projects;
  - Planning requirements on developments in Royston and the surrounding area;
  - Policy and strategy measures to inform longer term considerations; and
  - Wider measures which will provide alternative recreation opportunities.
- 8.5. The Conservators and Natural England identified that “soft” management and education measures have a significant role to play in raising awareness of the Heath’s ecological importance. A warden has been employed on a part time basis to fulfil that role and is currently being funded through the Section 106 contributions which have already been secured. The action plan includes the continued role of the warden until 2031 in parallel with the end of the Local Plan period.
- 8.6. The action plan also includes provision for visitor facilities to be provided on the site and £100k has been secured through S106 monies as a contribution towards this. There is some debate between the Conservators and Natural England as how this might be achieved.
- 8.7. In terms of planning requirements on future developments in Royston and the surrounding area, the Strategy outlines that the Council will use the Fields in Trust open space standards as an absolute minimum for new developments and will seek to increase those standards on a case by case basis. The introduction of new open space standards for developments can only be made through the Local Plan, as this is assessed as part of the viability testing.
- 8.8. The Council has committed to preparing a number of new Supplementary Planning Documents which will be relevant to the implementation of this Strategy and ensure that any development schemes will be suitably designed and any contributions are secured towards the funding of other suitable mitigation measures on the Heath or wider area.

- 8.9. The Council will also be undertaking a programme of work to prepare the evidence base for the review of the Local Plan. These studies will set out a strategic overview of the functions and pressures on green space across the District and will provide the opportunity to better understand the key pressures at a local level. The long term arrangements for sport, recreation and green infrastructure provision will be a key consideration in the next review of the Local Plan.
- 8.10. The final theme addressed in the strategy focus on wider measures which can provide alternative recreation opportunities which might help to re-direct some recreational use of the Heath to the wider area. In particular, there are a number of projects listed in the action plan which centre on the provision, improvement and linking of footpaths which could provide alternative recreational routes.
- 8.11. Through discussions with Natural England, it has become clear that normally, Natural England would expect S106 contributions to be secured in perpetuity, i.e between 80 and 120 years. However, it is recognised that any of the measures set out in the action plan cannot be funded from the relatively modest scale of development already permitted or still proposed for allocation in the Local Plan for Royston over this period. The Mitigation Strategy does provide however, a comprehensive list of potential projects that any future S106 monies could be used for where appropriate.
- 8.12. The Mitigation Strategy will not be a static and it will require periodic review and updating to reflect changing circumstances. This could include changes to any Management Plan for the Heath prepared by the Conservators and Natural England, updates to other relevant plans and strategies and if projects are funded and implemented.

## **9. LEGAL IMPLICATIONS**

- 9.1. The legal framework for the preparation, submission, examination and adoption of Development Plan Documents is set out in the Planning & Compulsory Purchase Act 2004 (as amended) (The Act). Detailed regulatory requirements are contained in the Town & Country Planning (Local Planning) (England) Regulations 2012.
- 9.2. The legal framework for designating Sites of Special Scientific Interest is provided by the [Wildlife and Countryside Act 1981](#) (as amended). The decision to notify a SSSI is made by Natural England as the relevant nature conservation body.
- 9.3. The Conservators of Therfield Heath and Greens were set up by an Act of Parliament in 1896 and are the owners and managers of the Common Land at Therfield Heath which substantially overlaps with the SSSI designation (see Section 2). In addition to being the owners and occupiers of the Heath, the Conservators are also defined as a Section 28G body with duties under the Countryside and Wildlife Act, 1981.
- 9.4. Under the Terms of Reference for Cabinet, the Constitution states that it may exercise the Council's functions as Local Planning Authority and receive reports on strategic planning matters, (except to the extent that those functions are by law the responsibility of the Council or delegated to the Service Director: Regulatory).

## **10. FINANCIAL IMPLICATIONS**

- 10.1. There are no new financial implications from this report. Approval of the Strategy will enable the Council to negotiate and guide the expenditure of S106 contributions from

development schemes in respect of the mitigation measures required to reduce the impact of recreational pressures.

- 10.2. The costs of updating wider studies referenced in the report will be funded from approved budgets. In March 2021, Cabinet approved the reallocation of funding of £167,000 to support the preparation of supporting supplementary documents and associated that will be required alongside the Local Plan. In February 2022, Full Council approved funding of £300,000 over a five-year period to support early-stage work on the next review of the Local Plan.

## **11. RISK IMPLICATIONS**

- 11.1. As part of the Local Plan Examination, the Council agreed with Natural England to prepare a Mitigation Strategy for the Therfield Heath SSSI prior to the adoption of the Local Plan. The adoption of the Local Plan is due to be considered by Full Council on 8 November 2022 and approval of the mitigation strategy will fulfil the Council's commitment in advance of this decision being taken.

## **12. EQUALITIES IMPLICATIONS**

- 12.1. In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.
- 12.2. There are no direct equality implications for this decision.

## **13. SOCIAL VALUE IMPLICATIONS**

- 13.1. The Social Value Act and "go local" requirements do not apply to this report.

## **14. ENVIRONMENTAL IMPLICATIONS**

- 14.1. The allocations for development in Royston included in the Local Plan have been assessed through the Sustainability Appraisal accompanying the Local Plan. The Mitigation Strategy has been prepared to ensure that the additional recreational impacts on the SSSI can be mitigated and maintain or improve the condition of the SSSI.

## **15. HUMAN RESOURCE IMPLICATIONS**

- 15.1 None arising from this report.

## **16. APPENDICES**

- 16.1 [Appendix A: Notice of Reasons for Urgency – Key Decision, 10 October 2022](#)
- 16.2 Appendix B: Therfield Heath Mitigation Strategy – October 2022

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## **18. BACKGROUND PAPERS**

- 18.1 [Therfield Heath SSSI Citation](#)
- 18.2 [Representations received from Natural England, 30 November 2016](#)
- 18.3 [Statement of Common Ground between North Hertfordshire District Council and Natural England, November 2017](#)

**NOTICE of reasons for Urgency – KEY DECISION**

NORTH HERTFORDSHIRE DISTRICT COUNCIL (“the Council”)

**The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (“the Regulations”)**

The Council intends to hold a public meeting of the Cabinet on 2 November 2022 at 7:30pm at which a part 1 urgent item will be considered in respect of a report linked to the Local Plan Inspector’s Report, The Therfield Heath SSSI Mitigation Strategy, which must be considered at the same time.

1. This meeting is deemed to be a relevant “decision-making body” under the Regulations.
2. In these Regulations a “key decision” means an executive decision, which is likely—
  - (a) to result in the relevant local authority incurring expenditure which is, or the making of savings which are, significant having regard to the relevant local authority’s budget for the service or function to which the decision relates; or
  - (b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the relevant local authority.
3. Under Regulation 9, the Council is required to give notice of its intention to make a Key Decision, at least 28 clear days before the date of this meeting and publish this on its website.
4. Where publication of the intention to make a Key Decision under Regulation 9 is impracticable, then under Regulation 10 that decision may only be made –
  - (a) where the proper officer has informed the Chairman of the Overview and Scrutiny Committee or, if there is no such person, each member of the relevant Overview and Scrutiny Committee by notice in writing, of the matter about which the decision is to be made;
  - (b) where the proper officer has made available at the offices of the relevant local authority for inspection by the public and published on the relevant local authority’s website, a copy of the notice given pursuant to sub-paragraph (a); and
  - (c) after five clear days have elapsed following the day on which the proper officer made available the notice referred to in sub-paragraph (b).
5. As soon as reasonably practicable after the agreement has been obtained, the Council must publish a notice setting out the reasons why compliance with Regulation 9 is impracticable.
6. The Council has obtained the agreement of The Chair of the Overview and Scrutiny Committee that the making of the decision was considered urgent and could not reasonably be deferred for the following reasons:

## STATEMENT OF REASONS

1. The Council is due to make a decision on adoption of its new Local Plan on November 8 2022. This will follow a recommendation to Cabinet on November 2 2022. This is a key decision first notified to the public in August 2021. The vote on the Local Plan follows the conclusion of the Examination by an independent Inspector carried out between June 2017 and September 2022.
2. During the course of the Examination, the Council agreed with Natural England to produce a mitigation strategy for the Therfield Heath Site of Special Scientific Interest (SSSI) prior to the Plan's adoption. This was in response to representations made by Natural England in relation to, in particular, the proposed developments around Royston.
3. Natural England are a prescribed body under the statutory Duty to Cooperate. This means the Council has a legal duty to demonstrate cooperation with them as part of its plan-making duties. Failing to meet the Duty to Cooperate means a Plan cannot pass Examination.
4. The planning circumstances in Royston have changed throughout the Examination. A number of planned sites (which gave rise to the need to produce the strategy), have been recommended for removal from the Local Plan and / or otherwise granted planning permission in the meantime. As such, the Council could not be certain whether the Strategy would be required as a direct consequence of the Local Plan until receipt of the Inspector's final report.
5. The Inspector's report, received in September 2022, does not make direct reference to either the mitigation strategy or the Therfield Heath SSSI. However, it does make reference to "the number, scope and content of the Memoranda of Understanding (MoU) the Council has entered into with prescribed bodies" in concluding the Duty to Cooperate has been met.
6. The Council have been working with Natural England, as well as the Conservators of Therfield Heath & Greens, to produce a mitigation strategy.
7. The strategy is a Key Decision by virtue of having effect in two or more wards; it will be recommended for Cabinet approval as a material consideration for all relevant planning applications in the District within the SSSI's Zone of Influence (to be defined in the strategy as an area of approximately 6km surrounding the SSSI).
8. The meetings to agree the Local Plan have been agreed and finalised at relatively short notice and a revised Forward Plan reflecting this additional Key Decision could not be published within 28 days of the proposed Cabinet meeting on 2 November 2022.
9. Without deferring this item, the Council would need to either (i) defer the decisions on the Local Plan or (ii) proceed with those decisions at risk.

Signed: Jeanette Thompson

Proper Officer of the Council

Date: 10/10/2022



**North  
Herts**  
Council

**Therfield Heath SSSI Mitigation Strategy  
October 2022 (Draft)**

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# 1 INTRODUCTION

## 1.1 Overview

- 1.1.1 Therfield Heath is a protected Site of Special Scientific Interest (SSSI) lying to the west of Royston in Hertfordshire in the parish of Therfield. As well as being a protected site, it is an important recreational facility for residents of the town and surrounding area and a registered Common. The site additionally contains a number of historic burial mounds (or barrows) which are protected as Scheduled Monuments (SMs). SMs are nationally recognised heritage assets.



- 1.1.2 Under the District Council's new Local Plan, more than 1,800 new homes are anticipated to be built in and around Royston over the twenty-year period from 2011 to 2031. It is inevitable that further development will take place in surrounding areas that lie within The Heath's catchment, including in neighbouring South Cambridgeshire in the future.
- 1.1.3 The Conservators of Therfield Heath and Greens, Natural England, North Hertfordshire District Council (NHDC) and other key stakeholders have long recognised the recreational pressures that people have on the SSSI<sup>1</sup>. These pressures have increased since the start of the Covid-19 pandemic in 2020.
- 1.1.4 Since the introduction of the Covid-19 lockdown in March 2020, the Conservators have reported a significant and continuing impact on The Heath as a result of

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<sup>1</sup> *Therfield Heath Visitor Access Study, Footprint Ecology 2019*

increasing numbers of people using The Heath for recreational purposes, particularly during the periods of lockdown and restricted travel.

- 1.1.5 This strategy sets out measures that will be used to manage the impact upon Therfield Heath SSSI as a result of the planned growth in the Local Plan. It is important to note that the extent of the Therfield Heath SSSI and the extent of the Common Land which is generally referred to as Therfield Heath do not directly correspond to one another. This relationship is explained further in Section 2 of this document.

## **1.2 Background, purpose and status of this document**

- 1.2.1 This document has been produced by NHDC to support their new Local Plan with the input of key stakeholders and interest groups. The requirement for a strategy was agreed by NHDC with Natural England as part of the Local Plan Examination<sup>2</sup>.
- 1.2.2 This document will be a material consideration in the determination of relevant planning applications. It provides additional information to support consideration of issues including, but not necessarily limited to:
- The design and layout of development schemes that come forward in the area covered by this strategy;
  - The requirements of policies in the Plan relating to open spaces, biodiversity and other relevant green infrastructure;
  - The contributions that developers might be asked to make towards measures to manage the impact of their scheme upon the SSSI including potential measures within and beyond the Heath;
  - Specific projects that any such contributions might be put towards.
- 1.2.3 This strategy is referenced in the Council's (forthcoming) Developer Contributions SPD as a document which should be referred to in securing the above. The SPD, in turn, supports Policy SP7 of the new Local Plan. This requires developers to provide, finance and / or contribute towards mitigation measures which are fairly and reasonably related to their proposed schemes.
- 1.2.4 This strategy is not a detailed management strategy for Therfield Heath itself. Although elements of this strategy relate to this subject, the management of much of Therfield Heath remains the responsibility of the Conservators of Therfield Heath and Greens with Natural England acting in an advisory role. The Conservators and / or Natural England will continue to produce such strategies and management measures as they consider necessary to protect the notified features of the SSSI and / or manage Therfield Heath generally.
- 1.2.5 Section 2 sets out the relationship between the SSSI and other designations in the area. Section 7 of this document sets out how this strategy will be reviewed and updated in the future to reflect any such measures identified in other documents.

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<sup>2</sup> [Statement of Common Ground between NHDC and Natural England, November 2017](#)

- 1.2.6 Other authorities within The Heath's Zones of Influence, as identified within this strategy, may wish to pursue some of the principles and / or projects identified in this document – either by adopting it for their own purposes or translating its findings and recommendations into any relevant strategies being produced for or within their area. It is beyond the scope of this strategy to specifically require this, however, there may be opportunities to explore this further in the future.

### **1.3 Legislative context**

- 1.3.1 The designations affecting Therfield Heath SSSI have their roots in a range of legislation.
- 1.3.2 SSSIs are sites designated at a national level for their biological, geological and / or physiographic interest. The legal framework for SSSIs is provided by the Wildlife and Countryside Act 1981 (as amended). The decision to notify a SSSI is made by Natural England as the relevant nature conservation body.
- 1.3.3 The Conservators of Therfield Heath and Greens were set up by an Act of Parliament in 1896 and are the owners and managers of the Common Land at Therfield Heath which substantially overlaps with the SSSI designation (see Section 2). In addition to being the owners and occupiers of the Heath, the Conservators are also defined as a Section 28G body with duties under the Countryside and Wildlife Act, 1981<sup>3</sup>.
- 1.3.4 The provisions in the Environment Act 2021 will help to restore natural habitats and increase biodiversity and will require new developments to improve or create habitats for nature.
- 1.3.5 Local Nature Reserves are a statutory designation made under the National Parks and Access to the Countryside Act 1949. The regime for Scheduled Monuments is set out in the Ancient Monuments and Archaeological Areas Act 1979.
- 1.3.6 Local Plans are prepared under the Planning and Compulsory Purchase Act 2004 (as amended). Local authorities have a statutory duty to set out policies for development in a Local Plan. Regulations set out detailed requirements as to their preparation and examination. Plans are examined to determine whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. In order to be sound, a Plan must be positively prepared, justified, effective and consistent with national policy. In preparing Plans, authorities must also prepare environmental assessments which set out the likely effects of their proposed policies.
- 1.3.7 Planning law requires that applications for development are determined in accordance with the adopted Local Plans unless material considerations indicate otherwise<sup>4</sup>. Case law establishes that the factors which might be a material consideration are wide-ranging.

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<sup>3</sup> [Section 28G - Countryside and Wildlife Act, 1981](#)

<sup>4</sup> [Section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)

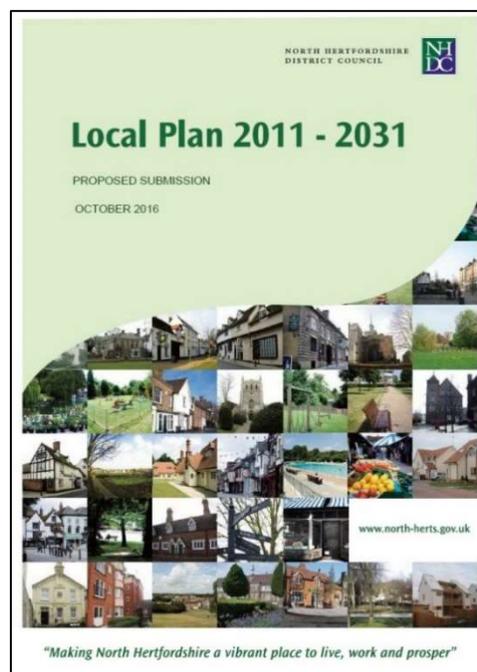
## 1.4 National planning policy context

- 1.4.1 The National Planning Policy Framework (NPPF) says that planning policies and decisions should contribute to and enhance the natural and local environment. This should be achieved by, among other matters, affording protection to sites of biodiversity value in a manner commensurate with their status<sup>5</sup>.
- 1.4.2 Development adversely affecting a SSSI (either individually or cumulatively) should not normally be permitted unless the benefits clearly outweigh the likely impacts<sup>6</sup>. National policy also sets out guidelines for consideration of schemes which might adversely impact upon designated heritage assets, including Scheduled Monuments<sup>7</sup>.
- 1.4.3 Balanced against this is a general expectation that local authorities should plan to meet their development needs and any needs which cannot be met in neighbouring areas unless there are strong reasons for restricting development or adverse impacts would significantly and demonstrably outweigh the benefits<sup>8</sup>.

## 1.5 The Local Planning context

### North Hertfordshire

- 1.5.1 The Local Plan for an area forms part of the statutory Development Plan. The proposed new NHDC Local Plan was submitted to the Secretary of State in June 2017 for Examination in Public. It covers the period from 2011 to 2031.
- 1.5.2 Following the examination process, the Plan contains four proposed housing allocations in Royston. These are expected to deliver approximately 500 new homes. Together with existing permissions and completions since 2011, 1,900 new homes are expected in and around the town over the Plan period.
- 1.5.3 Initial hearing sessions were held between November 2017 and March 2018. During this period, NHDC agreed with Natural England that a mitigation strategy for Therfield Heath SSSI would be produced.



<sup>5</sup> Paragraph 174 of the NPPF

<sup>6</sup> Paragraph 180 of the NPPF

<sup>7</sup> Paragraphs 189 to 208 (inclusive) of the NPPF

<sup>8</sup> Paragraph 11 of the NPPF

- 1.5.4 This would address the recreational impacts arising from the proposed allocations and developments within Royston and the surrounding areas within NHDC (both alone and in-combination). The strategy was to be developed in consultation with Natural England and agreed prior to the adoption of the Local Plan<sup>9</sup>.
- 1.5.5 Proposed Main Modifications (the changes required to the Plan arising from the examination) were consulted upon in 2019. Further hearing sessions were held between November 2020 and February 2021. Further Proposed Main Modifications were issued for consultation in May 2021.
- 1.5.6 The Council received the Inspector's report on 8<sup>th</sup> September 2022. Receipt of the report marks the end of the Local Plan Examination. The Council will consider whether to adopt the new Local Plan at a meeting of Full Council on 8 November 2022. Following any decision to adopt, the new Local Plan will be the starting point for considering planning applications for new development.

### **South Cambridgeshire**

- 1.5.7 Royston is located at the north-east of the District. Its outer limits are broadly demarcated by the A505 bypass around the north of the town, which also marks the administrative boundary between the counties of Hertfordshire and Cambridgeshire. South Cambridgeshire is the district local planning authority for the land to the north of the A505. As set out in subsequent sections of this strategy, the identified Zone of Influence for the Therfield Heath SSSI extends across the administrative boundaries.
- 1.5.8 South Cambridgeshire's Plan was adopted in September 2018 and covers the period to 2031. It includes sites for new development and sets out what types of development will be permitted in the villages and the south-west of the District closest to Therfield Heath.
- 1.5.9 There was no specific requirement arising from the examination of the South Cambridgeshire's Plan to expressly mitigate the likely impacts of its strategy on Therfield Heath SSSI. The Plan does, however, contain generic policies allowing potential impacts to be considered as individual sites are brought forward for development in the future.
- 1.5.10 South Cambridgeshire have commenced work on a joint plan review with Cambridge City Council; the [Emerging Greater Cambridge Local Plan](#). Consultation took place in November and December 2021 on the First Proposals for the Plan. Following consideration of the issues raised, a full draft local plan will be prepared for public consultation.
- 1.5.11 Further information on future development in both authorities is contained in Section 3.3.

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<sup>9</sup> [Examination Document ED52: Statement of Common Ground between NHDC and Natural England, November 2017](#)

## **1.6 Developer contributions, planning obligations and S106**

- 1.6.1 Under the present planning system, contributions from developers to mitigate the impact of development in the area are normally secured through planning obligation agreements under Section 106 of the Town and Country Planning Act 1990.
- 1.6.2 Agreements may be used to ensure that the impacts arising as a result of a new development can be addressed. They are also a valuable way of ensuring that a development complies with planning policies contained in the Local Plan and any Neighbourhood Plans. Planning obligations may be set out in an agreement between the Council and the developer (and any other relevant parties) or in a unilateral undertaking offered by the developer.
- 1.6.3 The terms 'developer contributions', 'planning obligations' and 'Section 106' (s106) are used interchangeably but generally refer to the same things.
- 1.6.4 There may be instances where the impacts of development that lie within other local authority areas may affect the Therfield Heath SSSI. This includes, but is not necessarily limited to, South Cambridgeshire District. It will be for Natural England, as the statutory consultee, to determine the likely severity of the impacts and the extent to which mitigation measures may be required. Natural England may request obligations from the developer accordingly. In these cases, the NHDC may expect a clause enabling money to be transferred for spending in the District if necessary and justified.

## 2 THERFIELD HEATH SSSI

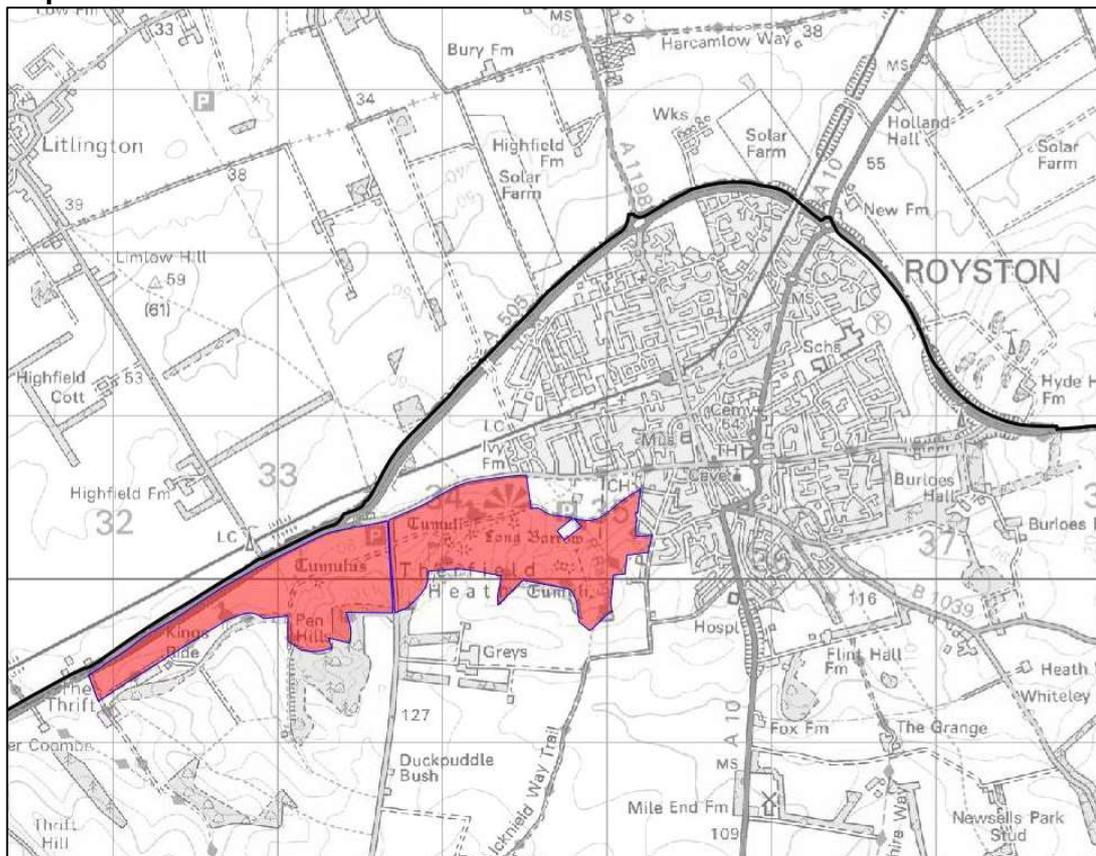
### 2.1 The SSSI designation

2.1.1 Therfield Heath SSSI lies to the west of Royston in the county of Hertfordshire in the parish of Therfield. It covers an area of more than 140 hectares (350 acres), extending almost 3.5km from the urban edge of Royston on its eastern boundary and running along the A505 dual carriageway to the west. At its widest, the SSSI measures over 750m from north to south.

2.1.2 The SSSI is an undulating site which, in broad terms, rises quite steeply to the south. There is a vertical gain of approximately 50m between the lowest and highest points of the designated site. It lies on the north side of a ridge known as the East Anglian Heights. This ridge is a continuation of the escarpment which forms the Chiltern Hills further to the west.

2.1.3 The location and extent of the SSSI in the context of the town of Royston are shown on the map below.

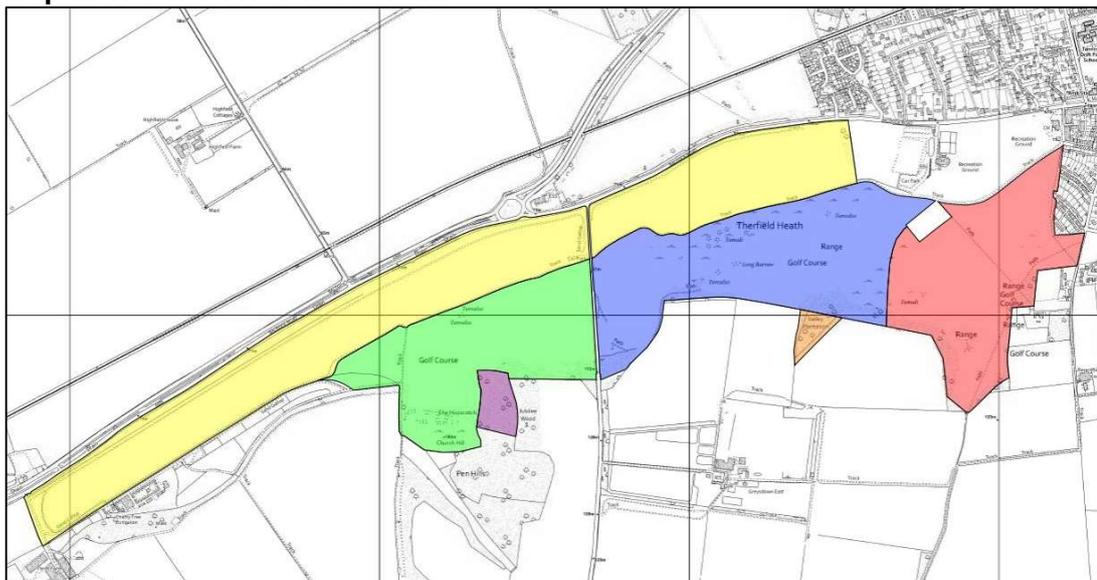
**Map 1: Location of Therfield Heath SSSI**



2.1.4 The site was first notified as a SSSI in 1953 under the National Parks and Countryside Act 1949. It was re-notified under the existing legal framework in 1984.

- 2.1.5 The SSSI Citation, which is reproduced in full at Appendix A, identifies that Therfield Heath is a very good example of East Anglian chalk grassland. The site contains some of the richest chalk grassland in England and is of high conservation value. The designated features of the SSSI are: lowland calcareous grassland, lowland mixed deciduous woodland, a vascular plant assemblage, an invertebrate assemblage and the Chalkhill blue butterfly. These species are identified as reasons for notifying Therfield Heath as a SSSI.
- 2.1.6 The SSSI also supports a wide range of other species. This includes ground-nesting skylarks and an array of finches, warblers, birds of prey and other species. However, these are not specifically identified in the SSSI citation as features underpinning the designation.
- 2.1.7 Therfield Heath SSSI is divided into six units. SSSI units are divisions of SSSIs used to record management details. Four of these units (001 to 004) contain calcareous grassland. These correspond to that part of the SSSI which is also Common Land (see Section 2.4 below). The remaining two units (005 and 006) contain areas of woodland. The six units are shown in the map below.

**Map 2: Therfield Heath SSSI units**



## 2.2 SSSI Zone of Influence

- 2.2.1 The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Natural England’s SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](https://data.gov.uk) website.
- 2.2.2 The IRZs are established on a case-by-case basis using intelligence relating to the relevant SSSI. Historically, the IRZ for the Therfield Heath SSSI had been drawn

relatively tightly around the designation. These have been expanded in recent years and, in early 2019, the requirement to consult Natural England on schemes of 25 or more homes was extended to approximately 3km from the SSSI boundary<sup>10</sup>.

2.2.3 In order to better understand visitor pressure on Therfield Heath SSSI, Natural England commissioned a detailed visitor survey in 2019. This survey provided evidence taken from direct and automated counts, face-to-face interviews and an online questionnaire.

2.2.4 The key findings of the [Therfield Heath Visitor Access Study](#) included:

- 70% of interviewees gave dog walking as their main activity;
- the median route length for visitors was 2.47km in the summer, 2.11km in winter and 1.59km in winter;
- other activities included walking, playing golf, jogging, power walking, family outings and meeting up with friends;
- dog walkers and golfers were the groups of visitors least likely to use the café or sports facilities;
- interviewees tended to visit the site frequently and many of these visits were short (an hour or less);
- relatively few other sites were mentioned as alternative destinations to The Heath; and
- suggested improvements mostly related to parking in the main car park, dog mess on site, the need for dog waste bins, signage on site, conflicts between users and the need for better surfaced paths.

2.2.5 The study concluded that, as a very approximate estimate, there are 215,000 person visits to the Therfield Heath per year, excluding visitors using the sports facilities and the café only. The median distance for interviewees was 1.9km and 75% of interviewees lived within 5.8km.<sup>11</sup> These areas are referred to in this report as Zones of Influence (ZOI).

2.2.6 The visitor survey identified that the Heath is a well-used and a popular site for recreation and that very little of the use relates to the nature conservation of the site with only a small proportion of visitors (10%) visiting the site because of the butterflies and the flora, albeit that half of respondents were aware of the SSSI designation. Paragraph 1.10 from the visitor study notes that: “*The whole of the common is subject to the Commons Regulation Provisional Order Act 1888 which gives the right to access on foot as well as for the purposes of other forms of recreation, including the playing of cricket and other games.*” With this in mind, it is not surprising that 90% of visits to the Heath are for the purposes under this enactment, rather than to view and study the designated SSSI. The survey concluded that the issues for nature conservation on the site relate to the volume of

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<sup>10</sup> As shown on the MAGIC mapping tool (<https://magic.defra.gov.uk/MagicMap.aspx>), accessed June 2022

<sup>11</sup> The Footprint Ecology report identifies the median and 75% percentile distances as 1.9km and 5.8km respectively. These have been rounded up to the nearest kilometre for simplicity for the purposes of this strategy.

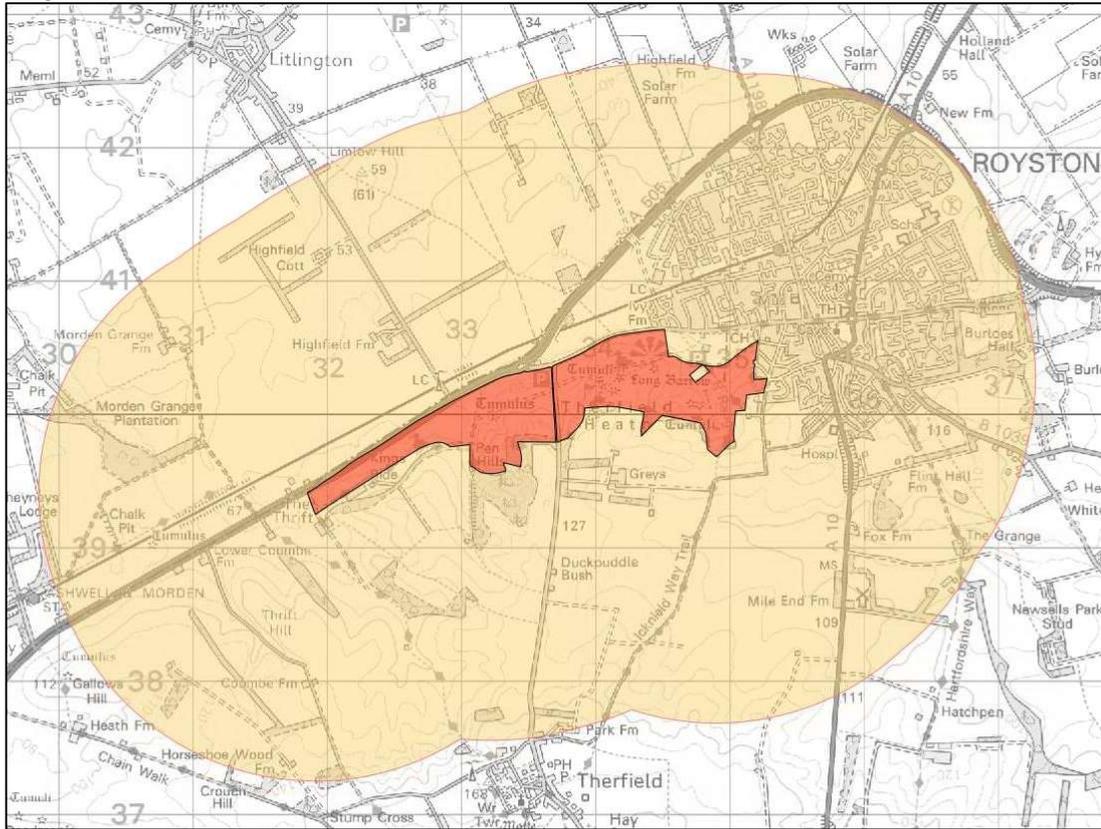
footfall on The Heath and the longer-term challenges delivering the management necessary for the nature conservation.

2.2.7 The study also considered a range of implications for recreational management in the context of the survey's findings which might be relevant to this strategy. In particular, the survey found that;

- much of the recreational use was local and that the creation of a visitor centre has the potential to result in drawing more visitors from a wider area but that such a centre would not necessarily be used by local residents;
- conversely, a visitor centre could help to raise awareness of the conservation interest of the site which could ensure that visitors recognise its value;
- the presence of a warden or ranger could be a positive way to engage with visitors;
- the site could be more robust if the recreational use could be shifted from being widespread and dispersed to being more concentrated along set routes;
- if there were parking improvements in key locations, people could be encouraged to use particular routes and the visitor facilities; and
- the provision of green space elsewhere in Royston could help to resolve the pressures on The Heath, for example with dedicated dog walking routes.

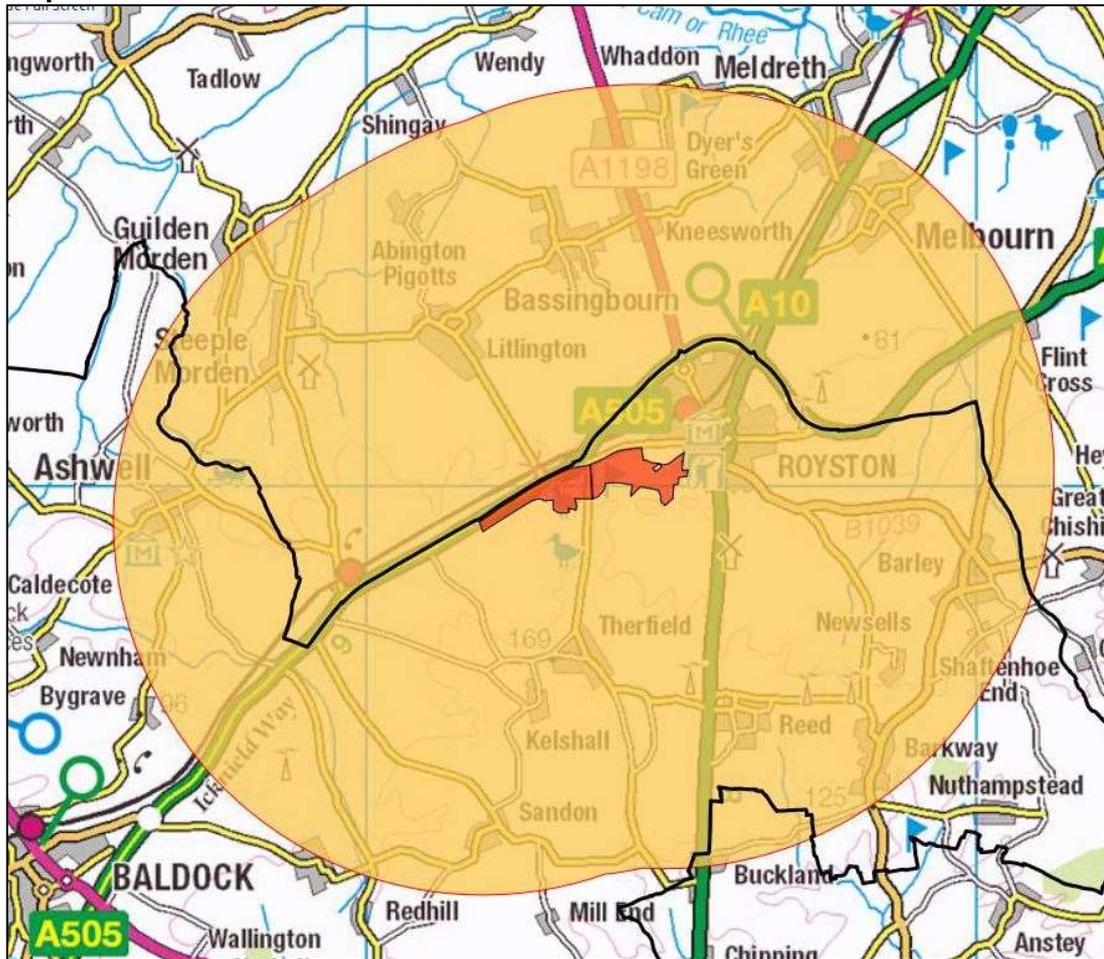
2.2.8 The inner 2km ZOI from which half of trips to The Heath are drawn is detailed in the map below. This encompasses the entirety of Royston as well as surrounding land in both North Hertfordshire and South Cambridgeshire. This surrounding land is largely rural with only scattered farms and buildings. There are no other settlements within this inner zone.

**Map 3: 2km inner Zone of Influence around Therfield Heath SSSI**



- 2.2.9 There are approximately 7,500 homes within this inner ZOI. Based upon the results of the Footprint Ecology visitor survey, this gives a very approximate estimate that, on average, each individual home in this area generates around 14 visits to The Heath per year.
- 2.2.10 The wider 6km buffer from which three-quarters of trips to The Heath are drawn, is detailed in the map below. As well as the whole of Royston this incorporates, in whole or in part, many surrounding villages in both North Hertfordshire and South Cambridgeshire. This includes (but is not limited to): Ashwell, Barley, Barkway, Bassingbourn, Litlington, Melbourn, the Mordens, Reed, Sandon and Therfield. This extends beyond the current limits of Natural England's Impact Risk Zones.
- 2.2.11 It is estimated that there are around 6,800 additional homes in this wider ZOI beyond the 2km inner zone. Based upon the results of the Footprint Ecology visitor survey, this gives a very approximate estimate that, on average, each individual home in this area generates around eight visits to The Heath per year.
- 2.2.12 The approaches set out in this Strategy (or other documents which reference this Strategy) should be applied within the 5.8km Zone of Influence insofar as it lies within North Hertfordshire.

**Map 4: 6km wider Zone of Influence around Therfield Heath SSSI**



2.2.13 The Conservators' view is that both the catchment radii and the overall volumes of visitor numbers calculated by the Footprint Ecology report may represent conservative estimates of The Heath's reach and popularity. The report acknowledges that it does not account for the extra 'draw' of special events. The Conservators have further concerns around the detailed nature of some of the survey timings and techniques which they consider may have underestimated traffic and usage. It is also acknowledged anecdotally that there has been a rise in the number of visitors to The Heath since the start of the COVID-19 pandemic in 2020.

2.2.14 Given the Conservator's view of the visitor survey, it may be appropriate in the future to consider applying some of the principles beyond the 6km Zone of Influence, particularly for strategic-scale development schemes which will generate a larger number of new residents or employees. The most appropriate approach to be taken will be determined on a case-by-case basis.

2.2.15 The approach to be taken in other authority areas will be for those Districts to determine in consultation with Natural England as required.

## **2.3 Other designations and activities**

2.3.1 There are a number of other designations and activities affecting the Therfield Heath SSSI.

## Common Land

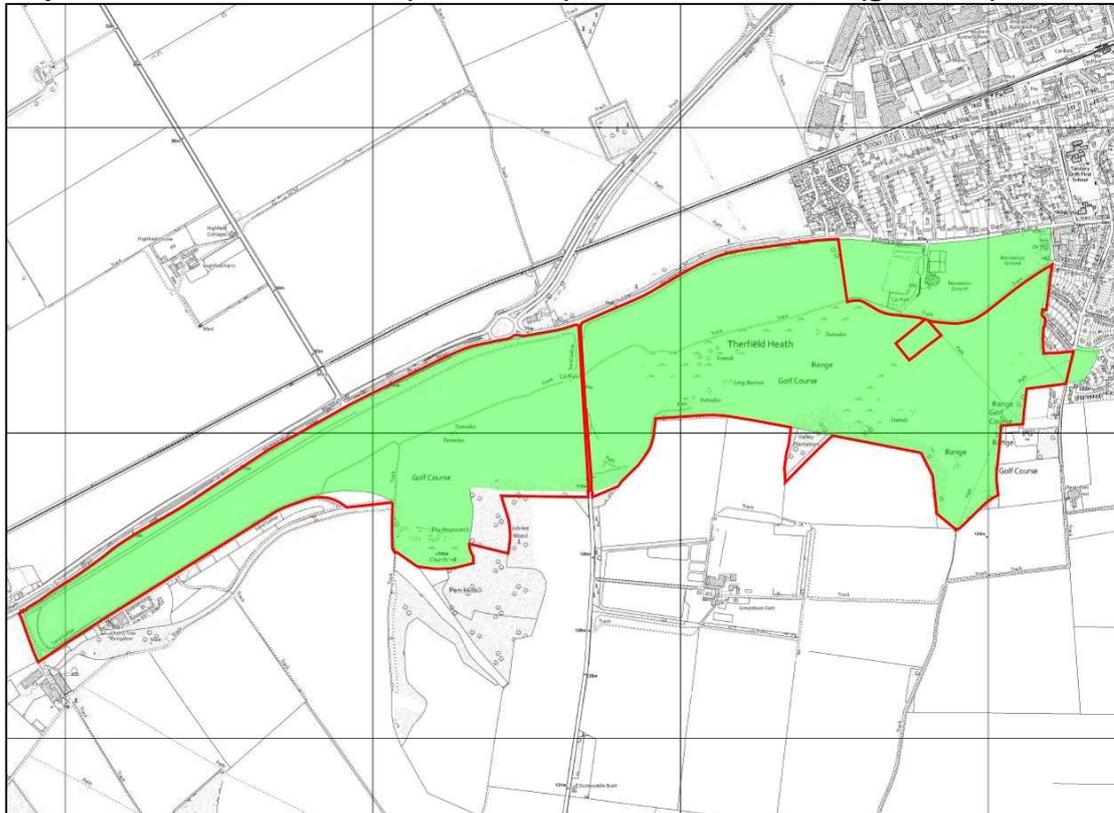


*The extent of the Common Land includes the sports facilities at the north-east of Therfield Heath as well as large areas of the SSSI designation*

- 2.3.2 As set out in Section 1, the extent of the SSSI does not correspond exactly to the extent of the Common Land which is also referred to as Therfield Heath. The Common Land is owned by the Therfield Regulation Trust and managed by the Conservators of Therfield Heath and Greens.
- 2.3.3 The relationship between the two is shown in the map below. The key differences between the designations are:
- An area of additional Common Land outside of the SSSI boundary at the north-east of the site, broadly corresponding to the areas covered by the Golf clubhouse, Royston Rugby Club, the Heath Sports Centre and associated sports pitches and facilities, Heath Café and the associated car parks;
  - A further, small area of Common Land to the east of the SSSI and Briary Lane and south of Sun Hill; and
  - Areas of the SSSI outside of the Common Land, broadly corresponding to the two areas of woodland in Units 005 and 006 discussed above.
- 2.3.4 The area which is both Common Land and within the Therfield SSSI broadly corresponds to SSSI Units 001 to 004 as shown in Section 2.2 above. The Common Land is open access land under Section 15(2) of the Countryside and Rights of Way Act 2000. It is important to note that this document is a mitigation strategy for the SSSI rather than for The Heath (as defined by the Common Land designation). However, there is significant overlap between the two.
- 2.3.5 The Conservators are the statutory managers of The Heath under a 19<sup>th</sup> Century Act of Parliament (see Section 1). Although this strategy identifies some broad measures for future consideration it is recognised that responsibility for day-to-day management

of The Heath and decisions about management regimes (or similar) within it remain the responsibility of the Conservators. The Conservators liaise with Natural England, as the responsible body for the statutory SSSI designation, in undertaking their management responsibilities.

**Map 5: Therfield Heath SSSI (red outline) and Common Land (green fill)**



### **Other biodiversity designations**

- 2.3.6 The area covered by the SSSI is also designated as a Local Nature Reserve (LNR). The LNR designation was declared in 1973. There are some minor differences between the geographical extent of the two designations. These are mainly around the edges of the sites and the differences are generally marginal. The principal difference is that the LNR designation also covers the rectangular rugby pitch which can be seen excluded from the SSSI designation in Map 5 above towards the east of the site.
- 2.3.7 The LNR Citation states Church Hill on Therfield Heath is renowned for its colony of rare pasque flowers which bloom in early spring. Full details are given on the [Herts and Middlesex Wildlife Trust website](#).
- 2.3.8 There are a number of designated Local Wildlife Sites in the area immediately surrounding the SSSI. The largest of these is Jubilee Wood to the south of Fox Covert Wood (SSSI Unit 005).
- 2.3.9 Fox Covert Wood itself is managed as a wildlife site by Herts and Middlesex Wildlife Site Trust but this does not bestow any additional status upon the land over and above the existing SSSI and LNR designations.

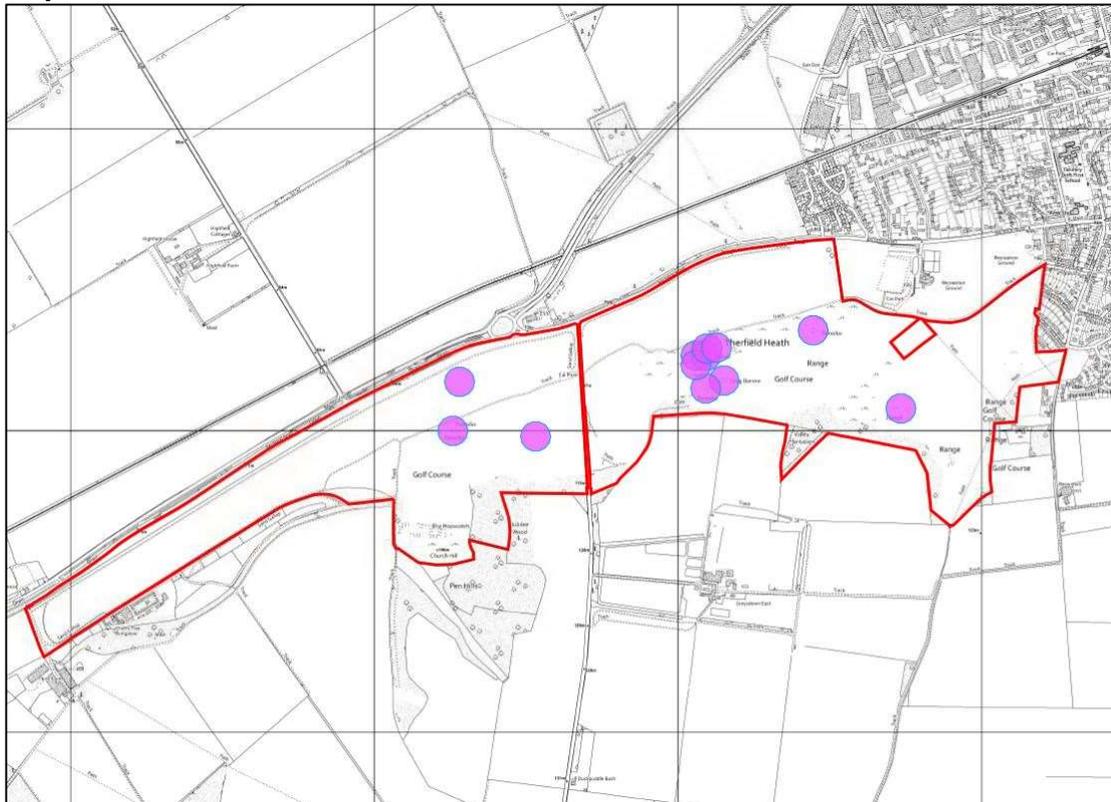
## Heritage



*The scheduled barrows are a distinctive feature on the Heath's skyline*

2.3.10 There are a number of ancient burial barrows and other features within Therfield Heath SSSI which are protected as [Scheduled Monuments](#). The location of these is shown on Map 5 below. Round barrow cemeteries date to the Bronze Age. The round barrow cemetery on Therfield Heath is the largest known example of its type in Hertfordshire.

**Map 6: Scheduled Monuments within Therfield Heath SSSI**



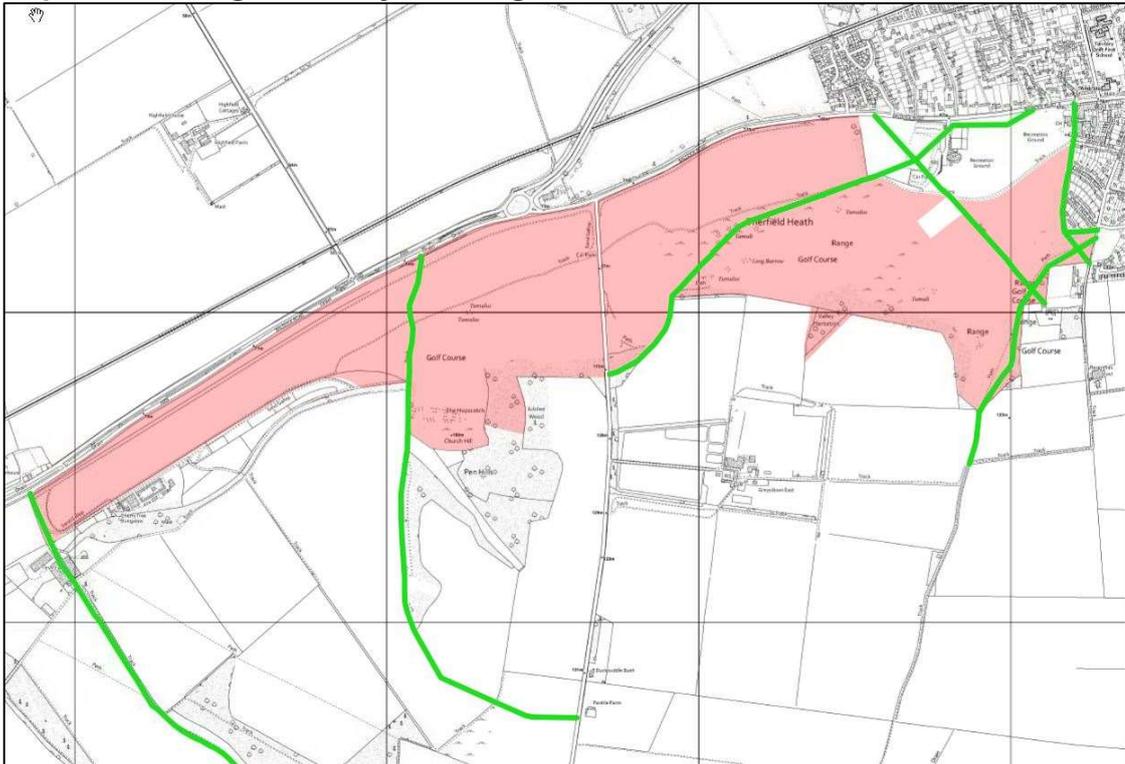
## Public Rights of Way

2.3.11 There are seven paths within the Therfield Heath SSSI which are recognised as Public Rights of Way. They provide routes within and / or across The Heath. A

number of these link to destinations outside of the Heath either directly or by connecting to the wider Rights of Way network. The table and map below show and summarise these routes.

Footpath	Description	Length
Therfield 002 (T002)	From A505 opposite Thrift Farmhouse, south-east across western edge of SSSI, continuing beyond to Therfield village.	2.6km
Therfield 005 (T005)	From A505 approximately 300m west of roundabout, south across SSSI continuing south and then east to unclassified road to Therfield.	1.9km
Therfield 006 (T006)	From Baldock Road, approximately 50m west of Downloads, generally west and south-west across recreation ground to unclassified road to Therfield.	1.7km
Therfield 007 (T007)	From Baldock Road, approximately 50m west of Ivy Lane, south-east across the recreation ground and SSSI.	0.8km
Therfield 009 (T009)	From Baldock Road, opposite Copperfields, generally south across the recreation ground and then south-east to Briary Lane approximately 120m south of Sun Hill	0.5km
Therfield 010 (T010)	Short spur from Briary Lane, approximately 10m south of Sun Hill west across the SSSI to join Footpath Therfield 009 at the rear of properties on Stake Piece Road.	0.1km
Therfield 011 (T011)	From Briary Lane, approximately 40m south of Sun Hill, generally south-west and south across the SSSI continuing beyond southern extents to join Bridleway Royston 013.	0.9km

## Map 7: Public Rights of Way crossing Therfield Heath SSSI



*Note: Only those PROWs lying partially or wholly within the SSSI are shown on this map*

### Long distance paths and other routes

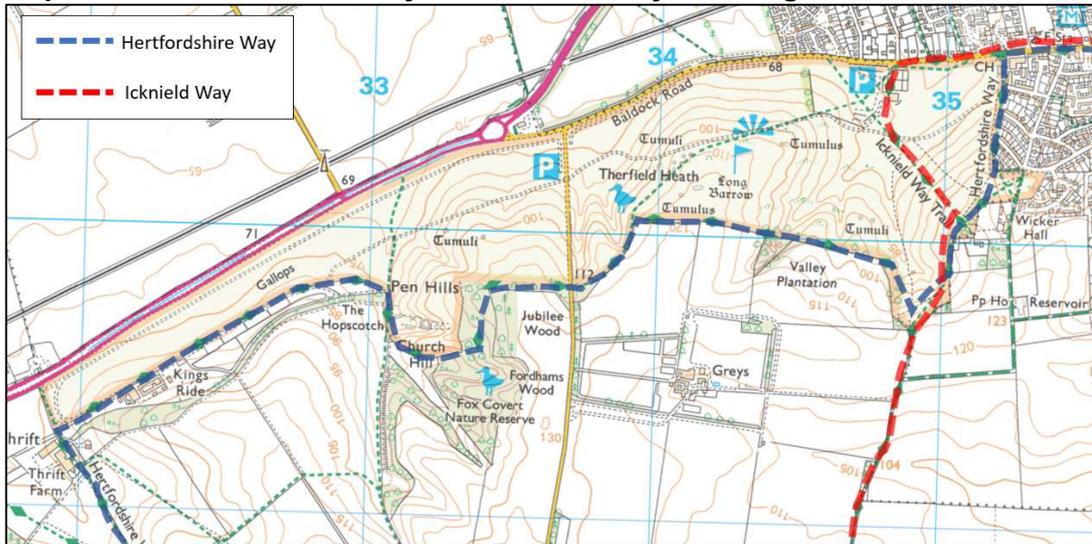
2.3.12 Two long-distance walking paths cross Therfield Heath SSSI. The Icknield Way Path broadly follows the ancient route of the same name (though in this area the historic Icknield Way itself is now the alignment of the A505 from Baldock). The Icknield Way Path is a 110-mile route connecting the end of the Ridgeway National Trail in the Chilterns to the start of the Peddars Way National Trail in Norfolk. It enters Therfield Heath at its south-east corner following Rights of Way through the eastern part of the SSSI to Baldock Road



2.3.13 The Hertfordshire Way is a route of more than 160 miles around the perimeter of the County. It enters the Heath along the route of footpath Therfield 002 and traces the southern perimeter of the site, most of which is not a formally recognised Right of Way. It rejoins the footpath network at the south-east corner of Therfield Heath –

where the route also intersects with the Icknield Way – and follows defined footpaths along the eastern boundary before exiting towards Royston town centre.

**Map 7: The Hertfordshire Way and Icknield Way crossing Therfield Heath SSSI**



2.3.14 In addition to the Public Rights of Way detailed above, there are a number of informal paths across the Heath. Some of these paths are more defined than others and some are managed with a surface. These paths can be linked to the open access status of the Common Land where ‘desire lines’ are created by preferred walking routes over the years. The eastern end of Therfield Heath in particular contains many informal paths and ‘desire lines’ as shown on the aerial photo below. This reflects the proximity of this part of the Heath to the built-up area of Royston and its ease of access.



*Source: Google Maps*

- 2.3.15 There are three car parking areas that provide free public access to The Heath; at Briary Lane, adjoining the Rugby Club / Heath Café complex and south of Baldock Road, west of the unclassified road which bisects the site. All of these are within the Common Land but only the latter falls within the SSSI.
- 2.3.16 The Conservators seek to regulate behaviour on The Heath through the use of byelaws. These generally seek to prevent anti-social activity (including dog fouling) and the removal of plants or soil.
- 2.3.17 Royston Golf Club provides an 18-hole golf course on a largely 'out and back' route across the upper levels of The Heath (Units 002 and 003 as described in Section 2.1 above). A grass gallops associated with the adjoining Kings Ride stables covers the perimeter of the lower, relatively flatter ground at the west of the SSSI (Unit 004).
- 2.3.18 Other sporting activities at The Heath lie within the common land but outside of the SSSI designation.



*The golf course extends across a large area of the SSSI designation*

### 3 THE ZONE OF INFLUENCE

#### 3.1 Introduction

3.1.1 As set out in Section 2.2 above, this strategy identifies a 2km inner Zone of Influence and 6km wider Zone of Influence around the SSSI based upon the findings of the Footprint Ecology visitor survey conducted for Natural England. This section sets out further information on other forms of recreational provision within the ZOI, along with details of planned and potential future development and other relevant strategies.

#### 3.2 Green Infrastructure Provision in the ZOI

##### Open Space provision

3.2.1 The Council has recently undertaken an audit of open space in the District's main settlements. In terms of formal open space provision within the ZOI, residents in Royston have access to about 148 hectares of open space around the town, including Therfield Heath. As illustrated in the table below, if Therfield Heath is excluded the amount of natural and semi-natural green space reduces significantly.

Type of Open Space	Including Therfield Heath (Ha)	Excluding Therfield Heath (Ha)
Parks and Gardens	2.2	2.2
Cemeteries and Churchyards	1.3	1.3
Allotments	1.75	1.75
Outdoor sports facilities	5.71	5.71*
Children's play areas	0.8	0.8
Amenity green space	8.16	8.16
Natural and semi-natural green space	125.55	14.33
Green corridors	2.32	2.32
Total	147.79	36.57

\* Sports facilities on Therfield Heath are not included in this figure as they are not publicly available, i.e they not free to use without joining the club

3.2.32 The Open Space Profile for Royston also provides an overview of open space provision in comparison with the Fields in Trust quantity standards. The profile concludes that there are some types of open space where there is a deficit when compared to the FiT standards, including parks and gardens, allotments, outdoor

sports facilities, provision for children and teenagers and amenity green space. The one typology where there is not a deficit in provision is natural and semi-natural green space. The full details are included in Appendix B.

3.2.33 In addition to green space, there are more formal opportunities for recreation in Royston. The Playing Pitch Strategy undertaken in 2015 considered the level of formal playing pitch provision across the district. The Study looked at all main pitch playing sports, football, rugby union, hockey, tennis, athletics, bowls and bmx and skate parks as well as golf. The Strategy concluded that there was no overall deficiency in playing pitch provision in the Royston area.

3.2.34 In addition to formal green spaces, access to natural green spaces has been recognised as an important contributory factor to the quality of the environment and to quality of life. English Nature<sup>12</sup> recommended that local authorities should consider the provision of natural areas to ensure that local communities have access to an appropriate mix of green spaces which provide for a range of recreational needs (Accessible Natural Greenspace Standards Model – AnGST). The recommended provision was for at least 2ha of accessible natural greenspace per 1000 population in a system of tiers:

- No person should live more than 300m from their nearest area of natural greenspace;
- There should be at least one accessible 20ha site within 2km from home;
- There should be one accessible 100ha site within 5km;
- There should be one accessible 500ha site within 10km.

3.2.35 Therfield Heath is 140ha in size and the 5km AnGST catchment area includes the whole of Royston and extends to Reed in the south and to Bassingbourn to the north. As previously noted, some parts of The Heath are used for formal recreation uses which reduces the amount of natural green space available to the community. However, even when taking this into account, the catchment of the Heath (in terms of the AnGST standards) still covers the whole of Royston, as illustrated in Map 4.

3.2.36 Further afield, there are recreational opportunities at Wimpole Hall Estate which is run by the National Trust and open to paying members of the public. The parkland is a Grade I Registered Park and Garden.

3.2.37 In 2020, Public Health England published a report “Improving access to greenspace: A new review for 2020” which recognises the importance of access to green spaces and the role they play in supporting health and wellbeing. The study acknowledges the importance of green and natural open spaces to people following the COVID-19 pandemic.

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<sup>12</sup> Providing Accessible Natural Greenspace in Towns and Cities, English Nature 2003

### **Other green infrastructure**

- 3.2.38 The North Hertfordshire Green Infrastructure Plan, 2009<sup>13</sup> identified Therfield Heath as an important open space within the District. One of the projects identified in the 2009 Action Plan was for grassland restoration to the west and south of Therfield Heath. The Plan also identified the proposed green infrastructure within Royston but these are limited to initiatives within the town rather than creating or improving links to the surrounding countryside.
- 3.2.39 The County Council prepared the [Hertfordshire Strategic Green Infrastructure Plan](#) in 2011. The Green Infrastructure Plan (GIP) identified work which would be needed to deliver green infrastructure in the future, including two projects in North Hertfordshire: Chalk Arc and “Reconnect”. The projects identified in the Green Infrastructure Plan focus on the restoration, enhancement and conservation of elements of green infrastructure and the restoration and reconnection of the rights of way. An updated County-wide GIP is currently being prepared.
- 3.2.40 As part of the new Local Plan for Greater Cambridgeshire, biodiversity and green spaces have been identified as one of the key themes that the new local plan will need to address to ensure environmental sustainability in the future. The evidence studies have evaluated existing green infrastructure assets and the key issues which might arise from development. As the spatial strategy for development evolves, it will become clearer whether proposed development in Cambridgeshire will have implications for increased recreational use of Therfield Heath.

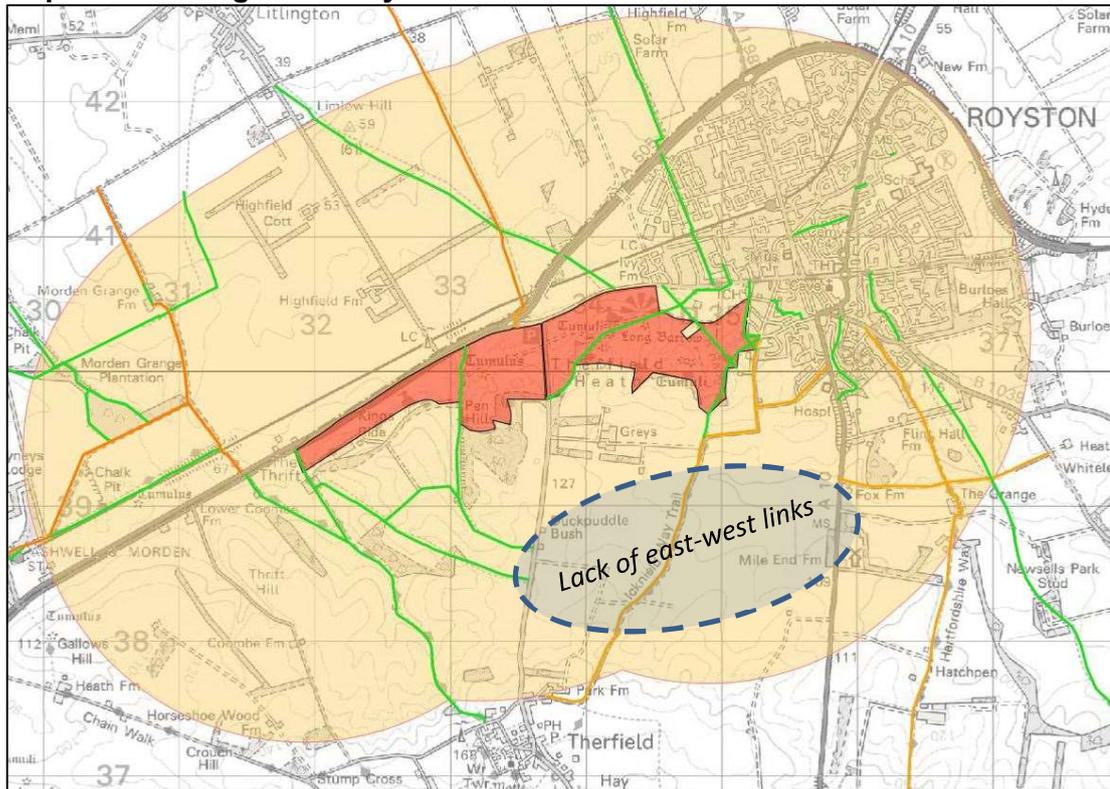
### **Public Rights of Way**

- 3.2.41 There is an extensive network of Public Rights of Way (PRoW) within the ZOI. Within Hertfordshire this includes elements of long-distance routes including the Hertfordshire Way and The Hertfordshire Chain Walk, a series of interconnecting walking loops stretching from the boundary with north London to Ashwell station. There is a similar network of routes within adjoining Cambridgeshire.
- 3.2.42 The PRoW network within the inner ZOI is detailed on the map below. It can be seen that there are a number of routes within this area. However, it is notable that many traverse the area in broadly north to south directions. There are areas where provision is more deficient. There is a lack of east-west connectivity, particularly to the west of the A10 and north of the A505 (although there is an extensive east-west byway just beyond the northern limits of the 2km zone as detailed below). These gaps in provision limit opportunities for circular walking or recreational routes.
- 3.2.43 The A505 itself is also a notable barrier to north-south movements. To the west of the A10 junction this is a 70mph dual carriageway and a number of rights of way cross this road at grade between Cambridgeshire and Hertfordshire. These are denoted by the red “x” marks on the map below.

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<sup>13</sup> North Hertfordshire District Green Infrastructure Plan, 2009 [Part 1](#) and [Part 2](#)

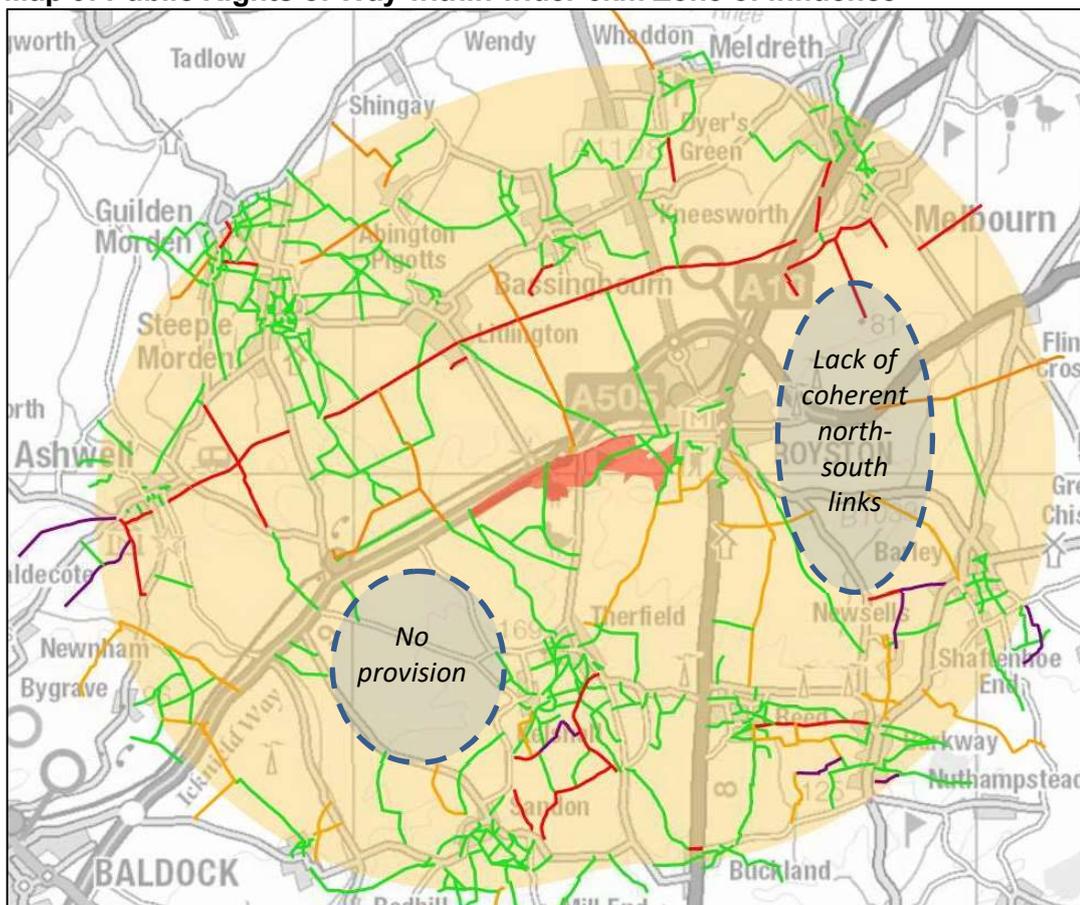
**Map 8: Public Rights of Way within 2km inner Zone of Influence**



*Note: Footpaths shown green, bridleways shown orange. Only those PROWs lying partially or wholly within the inner ZOI are shown on this map*

- 3.2.44 Provision within the wider ZOI is shown in the map below. Similarly to the inner ZOI, it is possible to identify areas with lower levels of provision. There is no interconnected provision from north to south from Melbourn around (or into / through) the eastern edges of Royston towards Barley, Barkway and Reed. There is a general absence of Right of Way routes to the west of Kelshall and south of the A505.
- 3.2.45 In addition to the PRoW network there are also some permissive footpaths in the ZOI where landowners allow recreational use to take place which could be used to extend provision in the future. This is explored further in Section 5.

**Map 9: Public Rights of Way within wider 6km Zone of Influence**



*Note: Footpaths shown green, bridleways shown orange, byways shown red or purple (restricted). Only PROWs lying partially or wholly within the wider ZOI are shown*

### **Other leisure provision**

3.2.46 Cycling has become an increasingly popular leisure activity. However, Royston and its surrounds are not connected to the National Cycle Network. In the Royston area, there is only one cycle route promoted by the Countryside Management Service, a circular route incorporating Royston and the surrounding villages of Therfield, Reed, Barkway and Barley. There are no current leisure routes promoted to the north of Royston by Cambridgeshire County Council.

3.2.47 Part of Therfield Heath is used by Royston Golf Club and within 10km, there are a further 4 golf clubs, all to the north or east of Royston. The Playing Pitch Strategy concluded that the level of supply was sufficient to meet the demand from residents.

## **3.3 Future development in the ZOI**

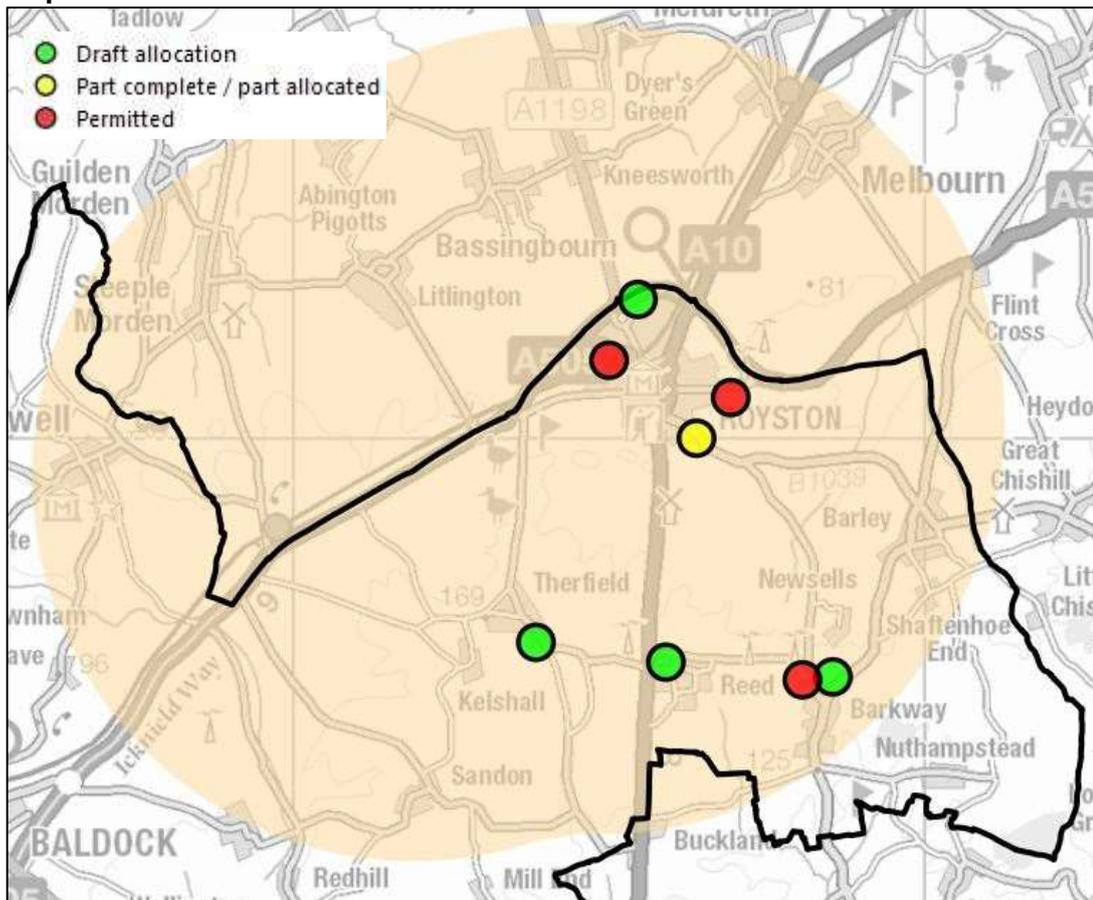
### **North Hertfordshire**

3.3.1 North Hertfordshire's current District Plan was adopted in 1996. A revised Local Plan for the period 2011-2031 was submitted for examination in June 2017. The District Council hopes to be in a position to adopt the new plan in 2022.

3.3.2 The new Plan sets out a proposed strategy that would provide almost 13,000 new homes across the whole District over the twenty-year plan period, along with associated employment growth.

3.3.3 Map 10 and the table below illustrate the location and status of the sites that are allocated for development in the new Local Plan within the identified Zone of Influence.

**Map 10: New Local Plan allocations within the wider ZOI**



Address	Local Plan Policy	Dwelling estimate	Status
Land off Windmill Close, Barkway	BK2	20	Draft allocation with planning permission granted, <a href="#">20/02779/FP</a>
Land between Cambridge Road and Royston Road, Barkway	BK3	140	Draft allocation with planning application under consideration, <a href="#">18/01502/OP</a>
Land at Blacksmiths Lane, Reed	RD1	22	Draft allocation with no permission or application

Land north of Lindsay Close, Royston	RY4	100	Draft allocation with no permission or application
Anglian Business Park, Orchard Road, Royston	RY7	60	Draft allocation with planning permission granted, <a href="#">19/01172/HYA</a>
Land south of Newmarket Road, Royston	RY10	300 (325)	Draft allocation with planning permission granted, <a href="#">17/00110/1</a> and <a href="#">20/01138/RM</a>
Land at Barkway Road	RY11	18	Draft allocation with application received <sup>14</sup> , <a href="#">21/02957/FP</a>

3.3.4 Outside the wider ZOI, the Local Plan allocates a strategic housing site for approximately 2,800 homes to the north of Baldock. This is approximately 10km from the SSSI. However, due to its size it could result in some impacts upon the Heath and it may be appropriate to consider applying some of the principles in this Strategy to any future scheme.

3.3.5 A number of further developments in Royston and the surrounding area have been completed since the start of the plan period in 2011. Others benefit from planning permission and are under construction. These include Redrow's Hedera Gardens scheme on land north of the Baldock road and Meridian Gate being built by Linden Homes to the east of town.

3.3.6 Several of these sites were included in the proposed new Local Plan at the time of the original agreement with Natural England. However, as development has now started (or been completed), these sites no longer form part of the Local Plan. Details of relevant sites are given in the table below.

Address	Former Local Plan Reference	No. of homes	Status of site
Land west of Claybush Road, Ashwell	AS1	33	Development completed
Land off Cambridge Road, Barkway	BK1	12	Development completed
Land west of Ivy Farm, Baldock Road	RY1	279	Under construction – partially complete
Land north of Newmarket	RY2	330	Under construction – partially complete

<sup>14</sup> Part of site has previously received permission and been built

Address	Former Local Plan Reference	No. of homes	Status of site
Agricultural Supplier, Garden Walk	RY5	19	Development completed
Land at Lumen Road	RY8	15	Development completed

3.3.7 As these sites have come forward in advance of the new Local Plan being adopted, the likely effect of these developments on Therfield Heath SSSI was considered on a case-by-case basis as necessary.

3.3.8 Relevant Section 106 contributions totalling up to £479,000 were secured from the two largest sites. These are set out in the table below. These contributions will be used to support the delivery of measures identified in this strategy where this would be consistent with the terms of the relevant agreement.

Address	Reasons for S106 contributions	Contributions secured (£)
Land west of Ivy Farm, Baldock Road	Contributions towards visitor facilities including the provision of public toilets and changing rooms near or around Therfield Heath	£100,000
	Contributions for Heath Management, including the provision of a Site Warden or other management measures agreed with Natural England.	£279,000
Land south of Newmarket Road	Contributions for habitat mitigation measures on Therfield Heath.	£100,000

3.3.9 It is likely that further proposals that do not (or did not) form part of the Local Plan will come forward for residential development within the Zone of Influence. This is known as windfall development. The location and scale of any windfall development is, by its nature, currently unknown.

3.3.10 Any windfall applications will be determined as they are made. The principles in this mitigation strategy will be applied to any relevant schemes within North Hertfordshire.

### South Cambridgeshire

3.3.11 Future developments to the north of Royston in South Cambridgeshire will be determined through the Greater Cambridge Local Plan and by South Cambridgeshire District Council in the consideration of any relevant planning applications. Work on the plan is at an early stage and the proposed spatial strategy for future development in Cambridgeshire has not yet been identified. It is anticipated that further consultation will take place later in 2022.

### **Future Local Plan reviews**

- 3.3.12 NHDC's emerging Local Plan is expected to include a commitment to an early review by the end of 2023 to determine whether its policies need to be updated either in whole or in part.
- 3.3.13 In general terms (and without prejudice to future considerations), it is recognised that the pattern of development is generally more dispersed in the north-east of the District. Land here is beyond the limits of the Metropolitan Green Belt surrounding London and much of the Home Counties. This might suggest that land within the ZOI may be a less constrained option when compared within other parts of the District.
- 3.3.14 Any further review of existing towns and villages and other locations for further development opportunities, will take place through reviews of the respective Local Plans. These reviews will be bound by relevant legislation and national policy guidance applicable at the time and supported by the necessary evidence.
- 3.3.15 Longer-term schemes or proposals for development lie outside the remit of this first version of the strategy. However, there will be a need to monitor emerging proposals on an ongoing basis. The impact of any relevant proposals upon the Therfield Heath SSSI will need to be given appropriate consideration. Further information on the approach to review and update of this strategy is set out in Section 7.

## **3.4 Other plans and strategies in the ZOI**

### **Rights of Way**

- 3.4.1 The County Council have prepared a Public Rights of Way Improvement Plan<sup>15</sup> for a ten-year period up to 2027/28 which provides recommendations for the future management and investment for the rights of way network. The Improvement Plan is also accompanied by a list of potential projects for each District. For North Hertfordshire there are a number of suggestions for improvement which have been identified and ranked in the Royston area which could help to provide more attractive routes for recreation in the future. The highest scoring suggestions in the Royston area include:
- Verge improvements to avoid walking in Barkway Road (PRoW ref. 12/31);
  - Safer crossing of the A505 between Bassingbourn and Royston (PRoW ref: 12/34); and
  - Improvements to the dangerous crossing at McDonalds roundabout, Royston (PRoW ref. 11/103).
- 3.4.2 There are a number of other lower priority projects included in the list which could contribute to improving the public rights of way for recreational purposes in the longer term:
- Signposting the links with the Cambridgeshire rights of way network in Ashwell and Royston (PRoW ref: 12/01);

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<sup>15</sup> [Rights of way Improvement Plan 2017/18 – 2027/28, Hertfordshire County Council](#)

- The identification of the area between Reed, Newsells, Barkway, Barley and Royston to make some circular connections (PRoW ref: 12/10);
- Verge improvements between Royston and Buntingford (PRoW ref: 12/05);
- upgrading of Royston FP2 to a bridleway as it is used for cycling (PRoW ref: 11/106);
- circular walk to include South Cambridgeshire (PRoW ref: 12/35);
- add pathway at Hawthorn Way (PRoW ref 12/36; and
- add footpath in Royston to address a dead end (ProW ref 12/15).

## **Transport**

- 3.4.3 The District Council and Hertfordshire County Council (HCC) are currently collaborating to produce an LCWIP, (Local Cycling and Walking Infrastructure Plan) as recommended by the Department for Transport (DfT), to demonstrate a commitment to promote active travel and be in an optimal position to bid for future funding opportunities for cycling and walking schemes periodically announced by Government.
- 3.4.4 Consultation on the LCWIP is due to take place in the autumn of 2022 and it is anticipated that the LCWIP will be adopted in early 2023. The LCWIP will initially focus on the five largest settlements in the District including Royston, and will identify and prioritise the main the cycling and walking routes that will have the greatest impact on encouraging local residents and visitors to take up and continue to use active travel modes for local journeys, particularly on the arterial routes into the town centres. In the longer term the LCWIP will need to address rural and recreational routes.
- 3.4.5 In addition, the District and HCC are assisting Royston Town Council in its application to become a Sustainable Travel Town. The Sustainable Travel Town Programme is an HCC initiative that features in the County Council's current Local Transport Plan. It invites towns across the county to submit applications to identify for delivery a package of schemes that promote sustainable travel modes, for local and inter-urban journeys instead of private vehicles.
- 3.4.6 The Royston Sustainable Travel Town Outline Plan is the first step in developing a programme of schemes which will help enable modal shift to more sustainable modes of travel in Royston.

## **Open space, ecology and green infrastructure**

- 3.4.7 The District Council is updating its open space, ecology and green infrastructure evidence base. This will form part of and inform a suite of documents to support implementation of the new Local Plan and, in time, the proposed early review of the Plan.
- 3.4.8 In addition to the open space review identified above, the 2018 Playing Pitch Strategy and Action Plan will be updated in 2022 prior to a full review, currently anticipated to be completed in 2023/4. This will provide the opportunity to review sports provision on the Heath, in the Royston area and across the wider district and

reflect changes since the last strategy that have affected access to formal sports provision such as the reorganisation of schools provision within the town.

- 3.4.9 A wilding audit of key Council assets has been completed. This will inform a broader review as part of an ecological network plan to inform the most appropriate approaches to biodiversity and identify opportunity areas for new and enhanced habitats. This will be linked to the Environment Act 2021 which sets a mandatory requirement for new development to deliver a 10% net gain in biodiversity.
- 3.4.10 In this area, provision could include chalk grassland which has been identified by the Herts and Middlesex Wildlife Trust<sup>16</sup> as a priority habitat for creation and restoration.
- 3.4.11 The above work will all inform an update to the 2009 Green Infrastructure Strategy to provide a holistic overview of the approach to green and blue infrastructure provision across the District and key networks and connections.

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<sup>16</sup> Herts and Middlesex Wildlife Trust: Hertfordshire's Ecological Networks, 2014

## 4 KEY PRESSURES ON THE HEATH

- 4.1.1 The six units and their condition are shown and summarised in the map and table below. The full SSSI condition report is reproduced in Appendix C. Natural England's views on management and operations likely to damage the special interest are reproduced in Appendix D.

Unit no.	Main Habitat	Condition
001	Calcareous grassland	Unfavourable – recovering
002	Calcareous grassland	Unfavourable – recovering
003	Calcareous grassland	Unfavourable – recovering
004	Calcareous grassland	Unfavourable – recovering
005	Broadleaved, mixed and yew woodland	Favourable
006	Broadleaved, mixed and yew woodland	Unfavourable - recovering

- 4.1.2 The condition survey recognises that five of the six units within the SSSI are in an unfavourable – recovering condition. The exception is the area of woodland at Fox Covert (Unit 005). The condition survey also identifies a number of activities that results in adverse impacts upon the (condition of) the interest features underpinning the SSSI designation.
- 4.1.3 Within Unit 001, the presence of a large rabbit population, along with un-grazed areas and invasive scrub are identified.
- 4.1.4 Much of Unit 002 is occupied by the golf course. The manicured fairways and the transition of these to the rough – where greater variety of grassland species can be found – are key issues. Unit 003 similarly forms part of the golf course with the same issues as identified for Unit 002 above. Within this unit, Church Hill is recognised as the most abundant area of the SSSI but is under threat from invasive scrub. There is also a recognised need to manage land outside of the SSSI boundary to the south to control the transition of scrub species into the SSSI.
- 4.1.5 The presence of the gallops within Unit 004, along with the less varied topography, means there is a less favourable structure for invertebrates. However, changes to the management regime through an agri-environment scheme have proven beneficial.
- 4.1.6 As outlined in the previous sections, the 2019 Visitor Study highlighted the number of visitors and the range of activities that they engaged in whilst on The Heath and noted that very few visits related to the site's nature conservation interest. The Conservators have also observed that since the start of the Covid-19 pandemic, visitor numbers to The Heath have increased significantly, although it is not clear whether these patterns will continue or stabilise in the future.
- 4.1.7 In summary a number of pressures on, and issues relating to, Therfield Heath have been identified. Positively and proactively addressing these could have a positive

beneficial impact upon the condition of the SSSI. In summary, these pressures and issues include:

- Additional development in and around Royston, resulting in increased use of the Heath for informal recreation activities, including dog walking, jogging and occasional recreation;
- The detrimental impact on the soil nutrient balance of the chalk grassland arising from dog littering;
- The low prevalence of visitors identifying the ecology of the Heath as a key attractor and only half of visitors being aware of its nature conservation importance, potentially indicating low value being placed upon this;
- Inconsistency between the extent of the Zones of the Influence identified by the Footprint Ecology visitor survey and the Impact Risk Zones identified by Natural England that inform the approach to consultation on planning applications;
- The conflict between the status of The Heath as common land where people are allowed to roam whilst at the same time a significant part of The Heath being designated as a SSSI;
- The relative ease of access for car-users with three, free car parks including a large parking area adjoining the cafe;
- The use of the Heath for formal recreation by a number of successful sports clubs, including rugby, cricket and golf which (i) impact upon the ecological value of the Heath where activities take place within or adjoining the defined boundaries of the SSSI and (ii) drive further recreational demand as friends and families of participants make use of the wider setting of the sports facilities;
- The previous absence of any formal strategy to co-ordinate mitigation measures or wider projects that might help alleviate recreational pressures;
- The relative lack of other natural and semi-natural open spaces, and open space more generally, for informal recreation in Royston;
- Gaps in the Public Rights of Way network limiting the potential for alternate circular walks or access points to the wider countryside, particularly around the east of Royston and across the barrier created by the A505; and
- The absence of safe, longer distance cycle routes and connections.

## 5 MITIGATION MEASURES

### 5.1 Introduction

- 5.1.1 The previous sections of this report have considered a range of key issues relevant to Therfield Heath SSSI. This includes the features of interest that have led to its designation, patterns of usage of the Heath and the presence of other forms of recreational provision both within the Heath and its wider zones of influence which inform how individuals choose to spend their leisure time in the area.
- 5.1.2 This section considers how to draw the findings of these sections together into a package of potential mitigation measures to be taken forward by the District Council, the Conservators, Natural England and other relevant parties.
- 5.1.3 It is recognised that Therfield Heath SSSI is a unique asset to the District in terms of its features, status and location. In addition to its ecological and biodiversity value it provides a substantial area of natural recreational space within a varied and interesting landscape, immediately adjoining one of the largest towns in North Hertfordshire.
- 5.1.4 As Common Land, the Heath will continue to be a major draw for residents of Royston and the surrounding area. It is not realistic to anticipate that an open space of this nature can be easily replicated elsewhere in order to draw a substantive proportion of existing and potential future users away.
- 5.1.5 More than 2,000 new homes are expected to be built over the period 2011-2031 within that part of the wider Zone of Influence that lies in North Hertfordshire. As described in Section 3.3, a number of significant sites already benefit from planning permission or development has already been completed with contributions secured. As these homes become occupied, residents will start to use the recreational spaces around the town, including the Heath. The amount of planned development that remains to be permitted and brought forward is relatively small.
- 5.1.6 Even if usage of the SSSI could be managed in such a way that the 'per household' visitor rates identified in Section 4 reduce, the planned increase in housing within the area means that, without intervention, absolute visitor numbers to the Heath over time would likely continue to rise due to the increased population.
- 5.1.7 It is therefore essential to manage future impacts in such a way that the Local Plan, and any currently unknown windfall development that is granted permission, can be implemented in a way which does not have an unacceptable adverse effect on the SSSI as required by national policy<sup>17</sup>.
- 5.1.8 This mitigation strategy takes a combined approach of measures to mitigate the effects of the proposed developments on the SSSI. A number of themes have been identified which the proposed measures fall into:
- Education and management projects on The Heath;

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<sup>17</sup> Paragraph 180 of the NPPF

- Planning requirements on development sites within the ZOI;
- Policy and strategy measures to inform longer-term considerations; and
- Wider measures which will provide alternative recreation opportunities.

5.1.9 Detailed measures are discussed in turn under these headings below. These have been informed by stakeholder engagement including:

- Ongoing dialogue with The Conservators and Natural England in preparation of the study; and
- An initial workshop with a range of individuals and groups with an interest in the future of the Heath held at Royston Golf Club in July 2019 when work on the mitigation strategy was launched.

5.1.10 The overall objective is to identify a package of potential measures and ensure that as the planned increase in the area's housing and population is delivered, the recreational pressures and levels of disturbance upon the SSSI's notified features of interest do not result in further degradation of the site's condition. The SSSI citation states that almost all of The Heath is classified as "unfavourable – recovering".

5.1.11 The measures identified in this strategy will enable the Council to request appropriate and proportionate contributions from development schemes within the Zones of Influence and, where clearly justified, beyond<sup>18</sup>. It also provides a means to influence the preparation of other relevant plans and strategies and to seek additional sources of funding where the benefits of the scheme coincide with other aims and ambitions (such as the provision of measures to support sustainable modes of transport).

5.1.12 A detailed action plan, containing the measures set out in this part of the Strategy, is set out in Section 6. This identifies the lead agencies for the individual measures and, as applicable in each case, target dates, potential costs and monitoring arrangements.

## **5.2 Education and management measures within the Heath**

5.2.1 'Soft' management and education measures have a significant role to play in raising awareness of the Heath's ecological importance and guiding responsible use of the SSSI. These will be complemented by appropriately-scaled visitor and education facilities and physical on-site management works as outlined in paragraph 2.2.7.

### **Wardens**

5.2.2 The provision of wardening on the Heath has been identified as a key measure by Natural England, the Conservators and workshop participants. Wardens are a feature of mitigation programmes in other areas of the country such as the [Thames Basin Heaths](#) and the protected [coastal environments of Suffolk](#). In these and other examples, wardens form a small mobile team who spend most of their time on site talking to visitors, influencing behaviour and helping to increase peoples'

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<sup>18</sup> As required by national guidance and regulations that govern how contributions can be collected.

understanding of local wildlife. Wardens can also assist with the delivery of site-specific projects and monitoring.

- 5.2.3 This version of the strategy identifies a requirement for at least two wardens. Wardens will be responsible for promoting positive visitor behaviours and, as such, will need excellent interpersonal skills as well as being knowledgeable on the key features and species of the SSSI as well as nature conservation more broadly.
- 5.2.4 The **lead warden** would be the main contact point for the implementation of the Strategy insofar as it relates to on-site measures. They would be responsible for developing further detailed management plans for the Heath with Natural England and executing habitat management measures. In consultation with Natural England, the Conservators and North Hertfordshire District Council they would guide the expenditure of developer contributions that have been collected for on-site mitigation and management. They would co-ordinate publicity, education and outreach measures and manage other warden staff and direct volunteer work.
- 5.2.5 An **assistant warden** would report to the lead warden and support them in delivering their duties. The assistant warden post would likely be part-time to begin with and could potentially be staffed on an internship or apprenticeship basis. This would potentially provide opportunities for students or local residents with an interest in ecology, conservation and the Heath.
- 5.2.6 These formal, paid positions should be supplemented by volunteers and / or the 'Friends of...' group who could assist on an ad-hoc basis during periods of peak demand (such as the kite festival) or when particular works need to be undertaken.
- 5.2.7 Consideration should be given to branding or clothing to ensure wardens are recognisable to users of the Heath. Small-scale, portable equipment (such as boards or similar that can be put up when the warden is at a particular location) would help give a presence and assist the wardens by ensuring users understand who they are.
- 5.2.8 The Conservators have already appointed a lead warden on a part-time basis to begin managing use of the Heath and implementing the aims of this Strategy as it has been developed. The post has, to date, been funded from the S106 contributions received from the development of Ivy Farm and identified in Section 3.

#### **Visitor education facility**

- 5.2.9 Notwithstanding the current café and golf clubhouse, there is currently no physical location on site where wardens can shelter, store equipment or welcome individuals or groups – such as local school children – to the Heath.
- 5.2.10 An appropriate balance needs to be struck between facilitating the above and providing a 'destination' visitor facility with a significant physical footprint that enhances the draw of the Heath and compromises the aims of the Strategy.
- 5.2.11 Many wildlife sites make use of a (semi-)portable cabin or similar. This can provide an appropriate scale of facility and a location from which information can be provided

(when the cabin is both staffed and unstaffed). This Strategy supports the provision of a modest visitor facility that is commensurate with the broader management aims for the Heath.

- 5.2.12 This will require further investigation to determine the most appropriate facility and location(s) within the Heath where it might be located.



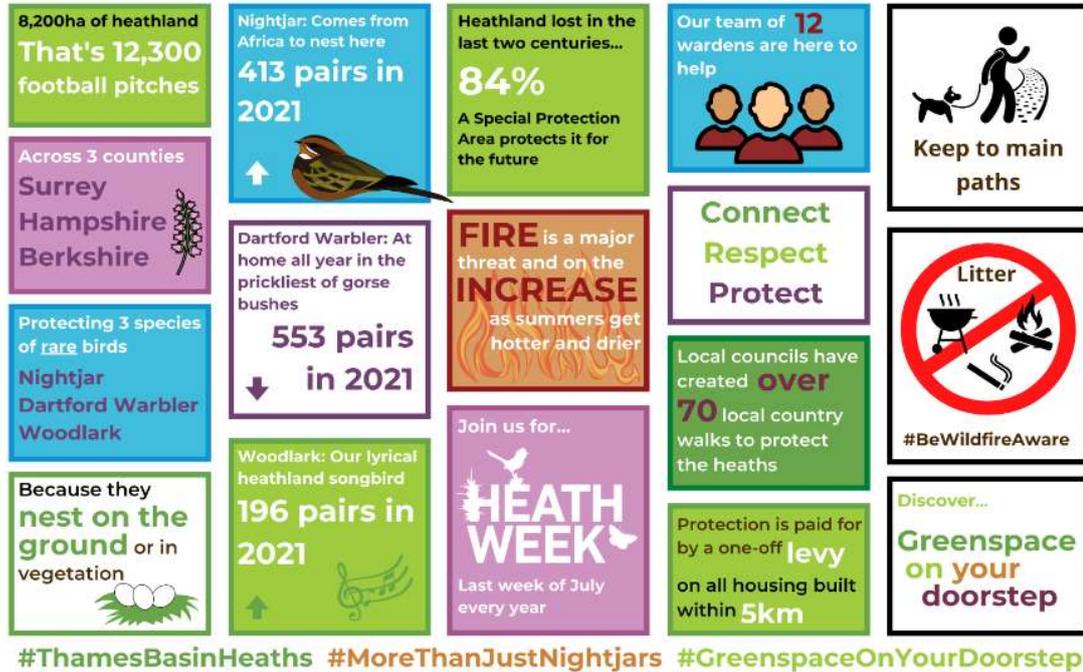
*Example of a small scale and semi-portable visitor facility (Source: Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire)*

### **Education and publicity material**

- 5.2.13 Ad-hoc, on-site interactions with users of the Heath will be a significant part of the wardens' roles and key to educating both frequent and occasional visitors on how they can enjoy the SSSI in a responsible manner.
- 5.2.14 However, this should be supplemented and supported by structured information and communications. The identity and work of the wardens, and key information about the Heath and its ecological value should be promoted through a well-maintained web presence and social media. Some mitigation projects develop branding, logos and leaflets which provide good examples of messages and public communication.
- 5.2.15 The Conservators and the Friends of Therfield Heath each maintain their own, separate web presence. Statutory information on the SSSI is maintained by Natural England. North Herts Council and Royston Town Council have their own websites. Information on long distance routes which cross the Heath or the wider ZOIs such as the Hertfordshire Way, Icknield Way Path and Icknield Way Tail is hosted elsewhere. A review should be carried out of relevant sites to determine whether information can be consolidated and / or to ensure that routes and opportunities which might divert recreational demand are consistently promoted across relevant platforms.

## THAMES BASIN HEATHS SPECIAL PROTECTION AREA

Protecting birds protects heaths!  
Protecting heaths protects birds!



Example of online infographic material (Source: Thames Basin Heaths Partnership)

5.2.16 Other measures which could be valuable in educating visitors and / or mitigating impact could include:

- Educational leaflets and information boards for residents explaining the importance of the Heath's natural and human history and setting out how the Heath can be used responsibly;
- Information being made available about alternative recreational footpath routes around Royston (including through the review suggested above); and
- Information on the location of alternative green spaces in the area.

5.2.17 The wardens should also develop a programme of community outreach with schools and local interest groups. This could incorporate visits to the Heath (making use of the proposed visitor facility) as well as off-site engagement at key meetings and events.

### Site management

5.2.18 Natural England and the Conservators have been working towards preparing a five year management strategy for The Heath which will help direct seasonal management activity. The SSSI management plan(s) will focus on describing how the grassland and notifiable features of the SSSI will be beneficially managed.

5.2.19 An **access management plan** should be developed to describe how human activity will be directed and controlled to alleviate recreational pressure and allow restoration of the habitat condition of the SSSI.

5.2.20 A key issue for the site is the loss of grazing.

- 5.2.21 Conservation grazing can play an important role in the management of grassland habitat. The use of animals for grazing – unlike manual cutting and management – naturally creates vegetation at different heights, and small areas of bare ground. This allows for different species of grass and wildflowers to grow, flower and set seed each year. This provides pollen and nectar for invertebrates and increases invertebrate food available for birds.
- 5.2.22 The Heath has historically been grazed, most recently by sheep, The Conservators have a grazier for the western part of the site and it was most recently grazed in 2021. An appropriate replacement grazing regime should be established for the longer term.
- 5.2.23 The Conservators have also expressed a desire to reconcile the statutory grazing rights on the Heath with the optimum grazing season for conservation purposes. These are currently ‘out of sync’ which technically limits the period for which the Heath can lawfully be beneficially grazed Further legal work will be required to review the grazing rights and regimes.
- 5.2.24 A number of matters which should be further considered in the access management plan have been highlighted by stakeholders in response to both the Footprint Ecology visitor survey and the development of this strategy. These measures might include (but are not necessarily limited to):
- Review of existing signage and interpretation and provision of new signage and interpretation as required; a number of stakeholders consider existing signage to be dated, complicated or confusing;
  - A review of (marked) routes as a possible solution to increased recreation pressure and to manage conflict and wear by less wandering across golf course;
  - Using renewed signage as a means of empowering people to take action against irresponsible users;
  - Consider identification of areas on the Heath (or times of the year) where ‘free roaming’ on an ‘on lead’ policy might be appropriate for dogs and dog owners / walkers;
  - A review of car parking provision; and
  - Further surveying of visitors to supplement the findings of the 2019 study, take account of post-Covid changes in usage and lifestyles, assess the effect of mitigation and management measures and inform future iterations of this strategy.

### **5.3 On-site planning mitigation measures for new development**

- 5.3.1 As set out in Section 1, the new NHDC Local Plan will provide the statutory policy ‘hooks’ allowing for mitigation measures to be secured from new developments. The following policies in the emerging Plan are of particular relevance:
- Policy SP7 provides general powers for the Council to secure mitigation measures from new development. This can take the form of physical or financial contributions;

- Policy SP9 requires developments of 100 or more homes to be masterplanned setting out, among other matters, the approach to green infrastructure;
- Policy SP12 reflects national guidance and states that designated biodiversity sites will be protected, enhanced and managed in accordance with their status;
- Policy D1 sets out detailed requirements for new development to achieve high quality and inclusive design;
- Policy NE1 requires new development to contain suitable mitigation measures to satisfactorily address adverse impacts on the strategic green infrastructure network;
- Policy NE4 sets out detailed requirements for development proposals affecting designated biodiversity and geological sites; while
- Policy NE6 establishes the requirements for provision of new and improved open space as a result of new development.

5.3.2 In 2021, the Council agreed to adopt the nationally recognised Fields in Trust standards to assess open space provision in new developments across the District. These standards are shown in the table below. The detailed approach to calculating the population of new developments and the consequential open space requirements is set out in the Council’s Developer Contributions SPD.

<b>Type</b>	<b>Standard (per 1,000 people)</b>
Playing pitches	1.2 hectares
Other outdoor sports	0.4 hectares
Equipped / designated play	0.25 hectares
MUGAs / skateboard etc	0.3 hectares
Parks and Gardens	0.8 hectares
Amenity Green Space	0.6 hectares
Natural and semi-natural	1.8 hectares
Allotments	0.3 hectares

5.3.3 The Council has recently reviewed the open space provision in Royston. This audit shows that there are 147.79ha of open space in Royston, which includes Therfield Heath. However, when those totals of open space are compared to the Fields in Trust standards in the table above, a number of deficiencies can be seen, as illustrated in the table below:

5.3.4 Using these figures it is possible to demonstrate that there are areas of deficiency in Royston.

5.3.5 This highlights that within the Zones of Influence (and the Inner Zone in particular) the Fields in Trust standards will normally be viewed as absolute minimums with a general expectation they will be exceeded. The Council’s policies and guidance make clear that it may be necessary to provide further open space and habitat in addition to standards-based recreational provision within developments. This might be to meet other requirements such as biodiversity net gain, sustainable drainage and good design. This approach also allows the Council to seek additional provision

in order to reduce impacts upon the SSSI. In doing so, it is recognised that many open spaces will perform multifunctional roles that meet several objectives simultaneously. A case study of a residential development is provided on the following pages.

Case study:	Land north of Baldock Road, Royston
Number of homes:	279
Application references:	16/00378/1 (outline permission, granted February 2019) 19/00386/RM (reserved matters, granted October 2019)

Royston is one of the main towns in North Hertfordshire. As the only town beyond the Green Belt, it has been the focus of (applications for) larger developments in recent years. An outline planning application was received following identification of the site in an early-stage consultation on the new Local Plan.

The site lies directly opposite Therfield Heath SSSI on its northern boundary extending from the previous western limit of the town towards the bypass. The initial consultation on the planning application led to objections from Natural England.

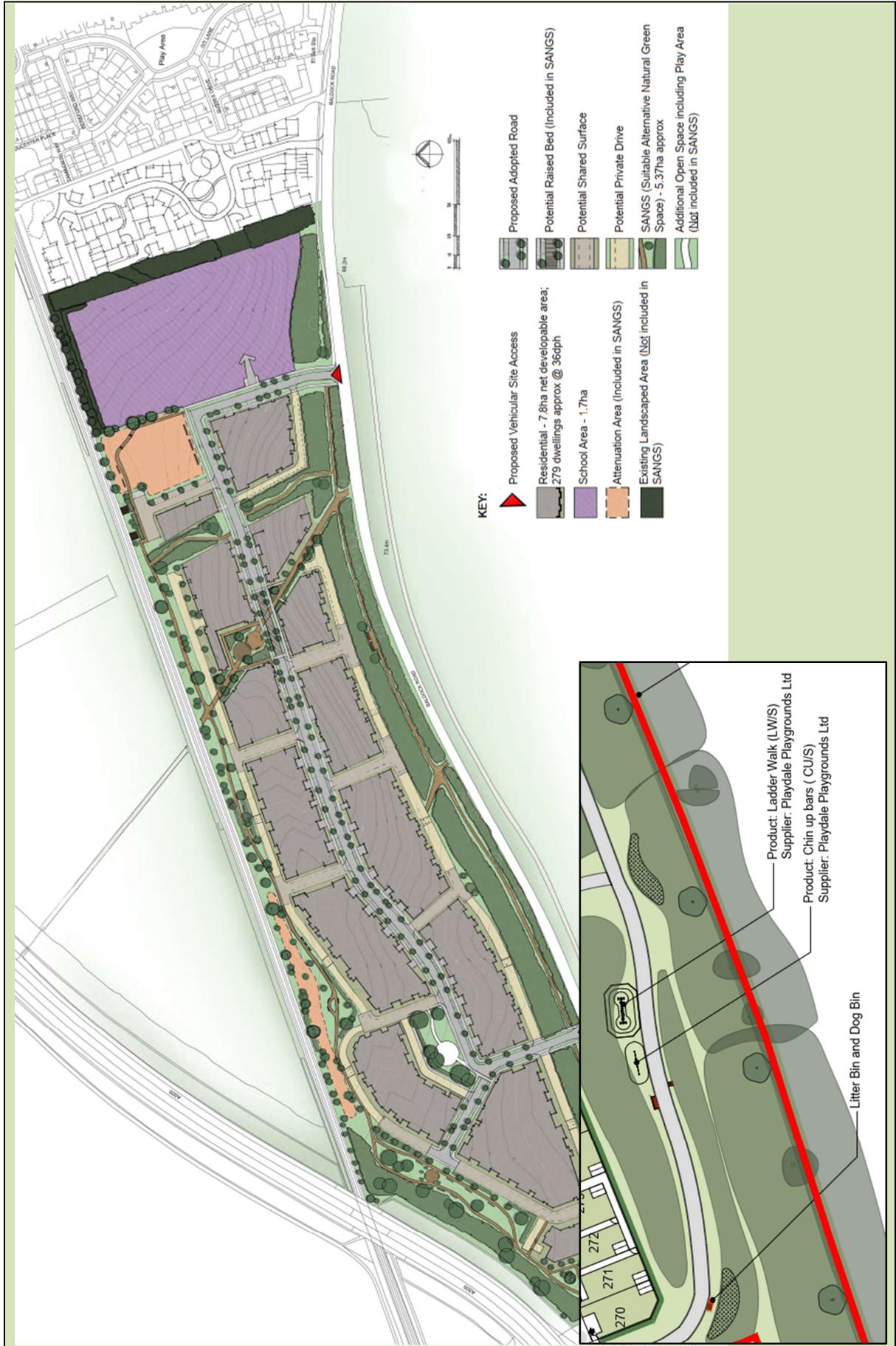
In order to address concerns raised it was necessary to carry out further assessment, including detailed survey work within the SSSI to determine the likely levels of impact that would arise from the scheme.

Following extensive negotiation and amendment to the scheme, the applicant agreed to incorporate a significant amount of green infrastructure at 8 hectares per 1,000 population (based on an assumed occupancy of 2.4 people per dwelling).

The open spaces are interconnected and will provide a series of circular routes for dog walking, running and cycling with children. This includes a perimeter walk of approximately one mile in length as well as shorter loops designed to intersect / overlap with the Public Right of Way that crosses the site. The routes are designed to encourage short distance recreation which can be undertaken on site to mitigate some of the pressures on the Heath from new residents. These can be seen on the plans reproduced on the following page. The scheme also made contributions of more than £300,000 towards management measures and facilities upon the Heath.

Outline planning permission was granted in February 2019 with the provision of on-site open space and off-site financial contributions secured through a site-specific legal agreement (Section 106).

The subsequent reserved matters application included further detail on the proposed landscaping and open space including the detailed positioning of litter and dog bins and 'trim trail'-style fitness activities to provide points of interest and interaction on the circular route. The scheme is now under construction. The first homes were completed in 2021 with 85 of the 279 homes complete as at April 2022.



- 5.3.6 Natural England advise that, where larger sites that support meaningful levels of on-site open space provision come forward for development, the recreational pressures arising from that development can be mitigated with the provision of appropriate levels of Suitable Alternative Natural Greenspace (SANG).
- 5.3.7 This is a particular form of green infrastructure provided within or close to a development that responds to recognised pressures on nearby designated sites. For development within the catchment of Therfield Heath SSSI, any SANG green infrastructure should be designed to absorb significant proportions of the day-to-day recreational needs of the new residents, including dog walking, jogging, children's play facilities and other informal recreation.
- 5.3.8 In some areas, SANG can be provided as a strategic off-site solution. Natural England advise that strategic SANGs to mitigate cumulative recreational impacts should normally be at least 30 hectares (ha) in size to reach an optimal size and in order to provide a route length of at least 2km within their boundary that might act as a sufficiently attractive alternative for recreational use.
- 5.3.9 Strategic SANG provision is not being pursued in this first iteration of the Mitigation Strategy as there is no evidence base, policy basis or allocated site(s) for this purpose in the new Local Plan<sup>19</sup>. However, this is a matter that the Council will explore as a potential approach in the longer-term.
- 5.3.10 The focus is therefore on securing enhanced levels of on-site provision and exploring opportunities to improve the green infrastructure networks from those sites which have been allocated in the Local Plan.
- 5.3.11 There is no nationally-set, or universally applied, SANG standard. However, a number of solutions have now been reached to mitigate recreational impacts on internationally and nationally designated sites which require provision of SANG at 8 ha per 1,000 population. This demonstrates that meaningful and substantive uplifts upon prevailing standards can and will be sought in order to meet national and local policy requirements.
- 5.3.12 Applicants and decision-makers should have regard to the 8-hectare SANG standard in developing and assessing proposals for development.
- 5.3.13 Application of the *Fields in Trust* standards across all typologies results in a standards-based requirement of 5.7 ha of open space per 1,000 population. SANG would normally be considered as natural and semi-natural greenspace, for the Fields in Trust requirement is 1.8 ha per 1,000 population. However, requirements for Parks and Gardens, amenity greenspace and even some equipped play could reasonably contribute to SANG requirements if (partially) managed in a naturalistic way and / or

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<sup>19</sup> Government guidance is clear that supporting documents to Local Plans cannot introduce new policies to the Development Plan and should not add unnecessarily to financial burdens on new development; viability should be tested primarily at the plan-making stage.

are (partially) 'traded' for further natural and semi-natural provision having regard to provision in the local area.

- 5.3.14 The remaining open space typologies relate to organised sports and other forms of provision and it will not normally be appropriate to count these towards SANG provision.
- 5.3.15 Based on anticipated future schemes, on-site provision will not be sufficient to demand an extensive heath-like open space environment within new developments. However, it should be possible to secure sizeable open spaces providing enhanced opportunities for some recreation needs that might otherwise resort to the Heath to be met within, or in very close proximity to, future development sites.
- 5.3.16 Open space provision should normally be made within the 'red line' of the planning application boundary. However, there may be instances where additional land closely adjoining the site, either in the ownership of the applicant or third parties, may be suitable for additional provision. Where this is the case, access rights to that land should be demonstrated and secured as part of the application.
- 5.3.17 Within the 2km inner ZOI within North Hertfordshire (see Section 2.2), schemes that are required to make meaningful on-site open space provision should seek all opportunities to accommodate the 8-hectare SANG standard in full. In practical terms, this requirement is most likely to apply to larger development within or adjoining the town of Royston where access to open space other than the Heath is more restricted. A case study is provided on the following pages.
- 5.3.18 The 6km wider ZOI within North Hertfordshire is characterised by small and medium-sized villages in a rural setting, often with good access to the wider countryside through the public rights of way network. The analysis of the visitor survey also suggests a substantively lower incidence of visits to Therfield Heath SSSI from this area compared with the inner ZOI<sup>20</sup>.
- 5.3.19 No specific requirement or benchmark is set for the provision of SANGs in this wider area. The level of on-site open space deemed appropriate will depend on a variety of factors including (but not necessarily limited to) the proximity of individual sites to the Heath, the characteristics of the individual site, the nature of the open spaces proposed and the ability to plug into existing green infrastructure and rights of way networks that provide access to the wider countryside.
- 5.3.20 In determining the distribution of publicly accessible open spaces within relevant schemes, it should be ensured that they are of high quality and will be attractive to future residents. To maximise their potential for recreational use, spaces should be laid out and incorporated within the development in a manner which encourages their functional use in line with national guidance and policy on good design. Disconnected, incidental spaces which fail to do this should generally be viewed as

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<sup>20</sup> The analysis in Section 2.2 suggests the number of visits per household could be 75% higher in the inner Zone of Influence than in the wider ZOI reflecting the day-to-day draw of the Heath for recreation..

an inappropriate approach to open space provision generally and within the ZOIs especially

5.3.21 In particular, applicants should aim to provide (as applicable to the size of the site):

- Coherent recreational and or dog-walking routes within the site; and / or
- Access to and / or sensitive incorporation of any Public Rights of Way, permissive routes or existing open spaces within or adjoining the site, particularly where these provide access to the wider countryside or might direct recreational activity away from the SSSI.

5.3.22 The approach taken should be set out in Masterplan documentation, Design & Access and / or Planning Statements and shown in site layout, parameter plans and / or landscape masterplans as applicable to the scale of the application. Schemes should provide a rationale which cross references their green infrastructure design with the mitigation requirements for the Therfield Heath SSSI. In line with any site-specific responses received from Natural England, applicants may be asked to produce further information relating to anticipated SSSI impacts and mitigation measures.

5.3.23 In order to deliver these policy requirements, it will be necessary for Natural England to review and update the Impact Risk Zones (IRZ) for the Therfield Heath SSSI for consistency with the approach set out above. As set out in Section 2.2, the current IRZ for residential developments extend approximately 3km from the Heath.

## **5.4 Planning policy measures**

5.4.1 In addition to the new Local Plan, NHDC has committed to producing a suite of supporting documents to help implement its requirements. These are known as Supplementary Planning Documents (SPDs). SPDs are formal planning documents which add further details to policies in a Local Plan. They can be used to provide further guidance on particular issues, but they cannot introduce new policies.

5.4.2 The Council has committed to producing four new SPDs in support of the new Local Plan:

- The Developer Contributions SPD will set out detailed guidance on the types of facilities and projects new developments will be expected to provide within their sites, or contribute to within the wider area;
- The Design SPD will provide further advice on how schemes should look and be laid out. This will include guidance on the provision of amenity and open spaces within development sites and will respond to the emerging revisions to NPPF on design requirements;
- A Sustainability SPD which will consider issues such as energy efficiency, climate change adaptation, parking provision and how more sustainable modes of transport, will be integrated into new developments; and

- A Biodiversity SPD to secure net gain on new sites and in anticipation of 10% biodiversity net gain becoming a mandatory requirement through the Environment Bill.
- 5.4.3 All of these documents will be relevant to the implementation of this strategy. NHDC will ensure that, as they are produced, each SPD contains appropriate references to this strategy and the mitigation measures, priorities and projects that have been identified. This will ensure that development schemes within the zones of influence are suitably designed and / or make appropriate contributions towards funding of mitigation measures within the Therfield Heath SSSI or wider area.
- 5.4.4 This strategy itself will be a material consideration in the determination of relevant planning applications within NHDC where it is appropriate.
- 5.4.5 As set out in Section 3, the Council will also be undertaking a programme of work to prepare and update an evidence base for these documents and for the review of the Local Plan. The district wide studies will include:
- An audit of publicly accessible open space;
  - An update to the Sports and Playing Pitch Strategy;
  - Underpinning requirements for biodiversity net gain and nature recovery;
  - Opportunities for ecological gains on spaces owned by the Council and other landowners; and
  - These studies will be drawn together in a revised Green Infrastructure Strategy for the District.
- 5.4.6 These studies will be undertaken at a District level to ensure that the Council takes a strategic view of the roles, functions and pressures for green spaces and green infrastructure when taken as a whole. However, they will provide an opportunity to understand key pressures at a local level within Royston and the ZOIs as well as reflecting changes since the relevant studies were last undertaken.
- 5.4.7 In the area covered by this mitigation strategy it is already known, for example, that reorganisation of schools within Royston has reduced access to and availability of pitches for formal sports provision, increasing demand use of those facilities in and around the Heath. The most appropriate long-term arrangements for sports provision (and green infrastructure more generally) in and around the town will be a key issue for consideration in the next review of the District Council's Local Plan.
- 5.4.8 Progressing these studies is a key element of the strategy as it will provide a clear evidence base to justify any future strategic interventions in the area for the long-term benefit of the Heath.
- 5.4.9 The role, function and condition of Therfield Heath SSSI will continue to be an important consideration in any future Local Plan or other strategy prepared by any of the authorities within the ZOI. The use of, and reference to, this strategy in adjoining authorities, notably South Cambridgeshire, and the upper-tier county authorities of Cambridgeshire and Hertfordshire, should be encouraged whilst recognising that Natural England have not presently placed the same obligations or agreements upon

those authorities to produce a mitigation strategy through the plan-making, or any other, process.

## **5.5 Off-site avoidance and mitigation measures**

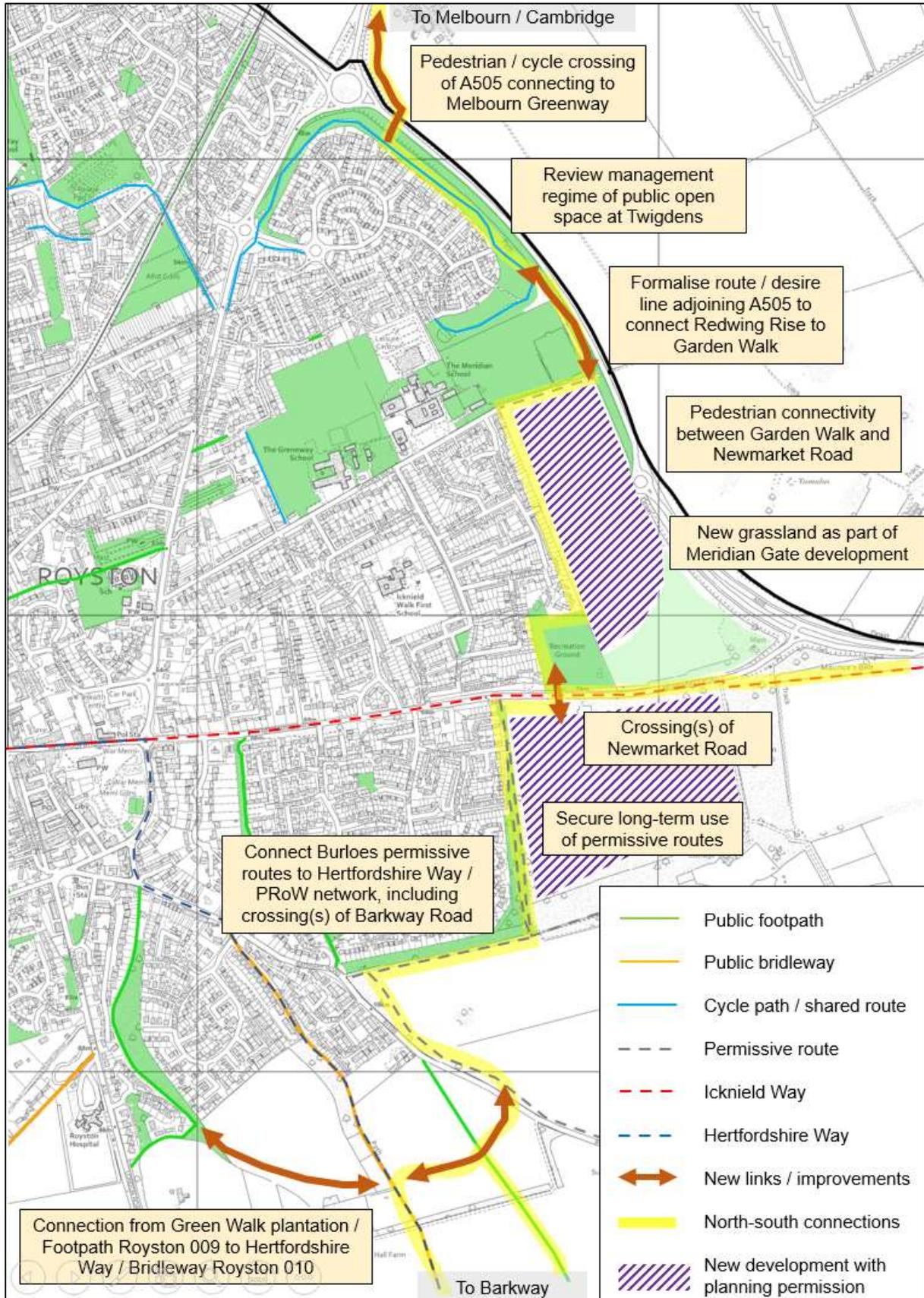
- 5.5.1 In addition to the measures identified above, pressures on the Heath might be further mitigated through the provision of alternative open space, leisure and recreational facilities elsewhere in the Zones of Influence and through the improvement of existing facilities to make them attractive places and routes for residents to use.
- 5.5.2 The analysis in the previous sections identifies a number of issues that serve to reinforce the current role of Therfield Heath as the key destination for outdoor leisure and recreation in the area. This includes the absence of alternate natural and semi-natural greenspaces providing a comparable environment to the Heath (on a smaller scale) as well as gaps in or barriers to the provision of attractive leisure routes for walking or cycling. This is for both day-to-day, incidental and / or circular routes in or close to Royston as well as access to the wider countryside in Hertfordshire and Cambridgeshire.
- 5.5.3 This strategy identifies a number of potential projects to help resolve these deficiencies. These should be pursued with relevant landowners and stakeholders. The projects are presented in broad areas below with a focus on Royston and its immediate surrounds as the key source of recreational pressure on the Heath.

### **Royston East**

- 5.5.4 The analysis in Section 3 identified a lack coherent north-south links in the rights of way network to the east of Royston as well as a general underprovision of alternate natural and semi-natural open space. A number of potential links, improvements and connections have been identified that would provide a more integrated green infrastructure network, enhanced north-south connectivity and improved (perceptions of) recreational opportunities in this area of the town. These are shown in the plan on the following page and described below.

#### **North of Newmarket Road**

- 5.5.5 To the north of Newmarket Road and within the ongoing Meridian Gate development a significant area of open space is to be retained / provided as chalk grassland on the high ground overlooking the town. This will incorporate existing, informal pathways to and around this area including those on the northern side of Newmarket Road and connections and connecting from the site through to the Newmans Recreation Ground.
- 5.5.6 There is no formal connection to the existing footpath network to the north of the site, but there is a well worn desire line alongside the A505 highway verge to join up with the open space to the south of Redwing Rise. Retaining and enhancing this connectivity would provide greater accessibility to and between the existing



Off-site mitigation projects in the east of Royston

residential areas supplementing existing routes such as the pedestrian and cycle link to the west of the schools linking Garden Walk and Cherry Drive.

- 5.5.7 Redwing Rise is surrounded by a significant area of public open space maintained by the District Council. Historically this has been largely maintained as an extensive area of mown grass amenity space. The Council is investigating the potential to alter the management regime to support natural / semi-natural habitat and provide a local-scale alternative open space. This would effectively be a retrospective SANG for this 1990s development.
- 5.5.8 There is an existing pedestrian / cycle network around the perimeter of this development which, in association with the measures above, would allow for continuous connections from Newmarket Road to the junction of the A505/A10.

South of Newmarket Road

- 5.5.9 To the south of Newmarket Road, outline permission has been granted for up to 325 dwellings. As part of the development a pedestrian crossing will be provided to the north of the site providing a link to the nearby Newmans Recreation Ground and the routes described above.
- 5.5.10 The Icknield Way runs east to west along Newmarket Road before deviating from the road along the route's historic alignment into Cambridgeshire. The possibility of providing a further crossing point close to the Meridian line and the Burloes estate access road to facilitate use of this route will be explored.
- 5.5.11 To the south and east of the site there is a network of unofficial footpaths on the Burloes Estate. These initially run south from Newmarket Road through a woodland strip to the east of the Valley Rise residential area before opening out into a perimeter route around the field to the north-east of Barkway Road which has permissive status. Through this strategy, the Council has held initial discussions with the landowner to secure the long-term use of these routes extending the options available to residents for recreational uses and allowing them to be publicised as alternatives.



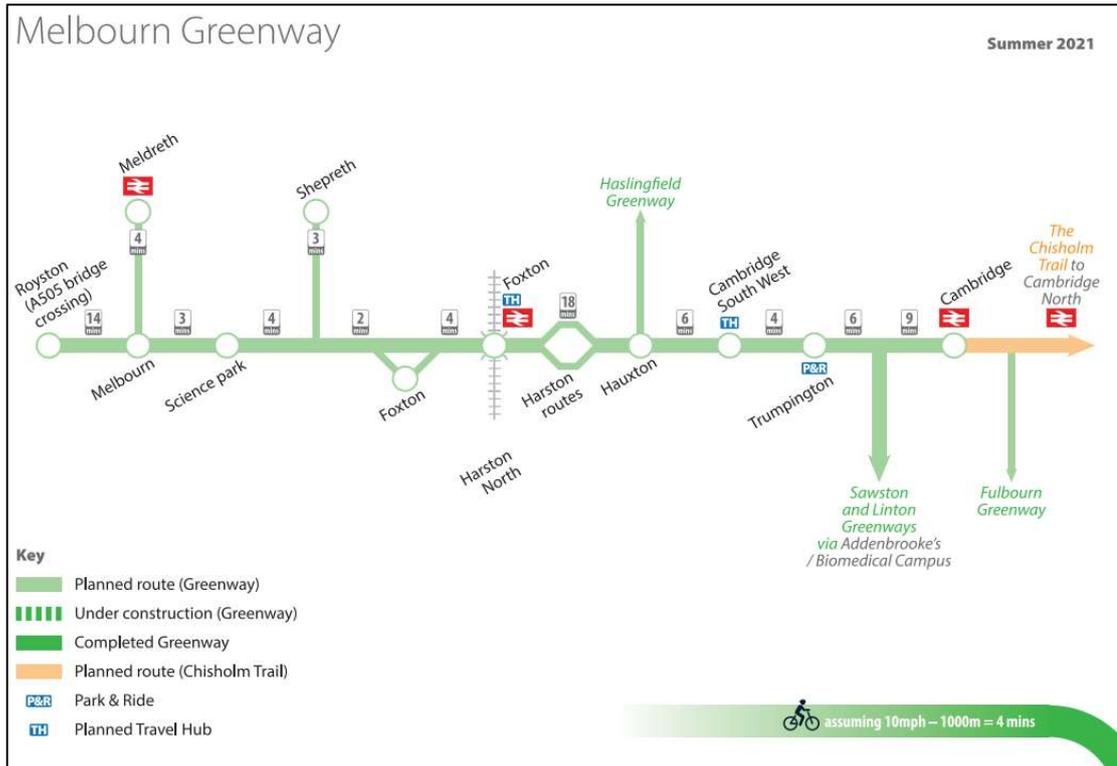
*Desire lines and routes heading south from Aintree Road. Source: Google Streetview*

5.5.12 To the west of Barkway Road, a bridleway (which also forms part of the Hertfordshire Way) and footpath run broadly north-west to south-east linking from the residential areas and providing access into the wider countryside towards Royston. To the east of this a further footpath, known locally as the plantation walk runs from close to the town centre south before awkwardly dog-legging west to the A10. However, there is an absence of east-west connectivity and new links should be investigated and provided connecting the permissive route around Burloes to these rights of way. This will provide a range of connections and opportunities for circular walks of different lengths around the urban fringe of the town connecting back into residential areas.

### **Royston North**

5.5.13 The A505 is a significant barrier to onward movement to and from Cambridgeshire. It is largely a national speed limited dual carriageway with a number of footpaths crossing the A505 at grade.

5.5.14 To the north east of Royston there are proposals for the development of the Melbourn Greenway, a link for pedestrians, cyclists and horse riders to travel from Melbourn to Cambridge. The project is being led by the Greater Cambridge Partnership in consultation with Hertfordshire County Council and the process of detailed design has started. The draft route starts in Royston and will include an improved path and bridge over the A505.



Melbourn Greenway schematic. Source: Greater Cambridge Partnership

- 5.5.15 The project is listed as a priority in the latest consultation on the North Herts LCWIP.
- 5.5.16 Further to the west, public rights of way 44, 17 and 2 extend into Cambridgeshire to the north across the A505. All of these rights of way cross the A505 at grade which does not make them attractive routes for leisure purposes. The 2017 Public Rights of Way Plan identifies that safer crossings are needed for these paths.
- 5.5.17 In the longer term, there are opportunities to improve these public rights of way and the links to the paths in Cambridgeshire to encourage greater use as leisure routes.
- 5.5.18 The [Royston Sustainable Travel Town Outline Plan](#) includes proposals a proposal for a Royston Greenway to meet the objectives of making Royston a town that is healthy, efficient to get around and helps to bring a shift away from the car to more active travel by improving the linkages of walking and cycling routes.

## **6 ACTION PLAN, FUNDING & DELIVERY**

### **6.1 Action Plan**

- 6.1.1 The Strategy has identified a number of projects which could help to address the recreational impacts on the SSSI arising from new development in Royston. The tables on the following pages sets out a series of actions plan for this strategy collating the measures and initiatives identified in the previous sections.
- 6.1.2 Alongside these actions, there are a number of wider range of measures outlined which in the longer term might help to provide wider recreational opportunities in the Royston area and help to reduce the pressures on The Heath. Many of these actions are not costed as they are initiatives taken from other plans and strategies which do not include detailed project costs. These would have to be established as projects are brought forward.

### **6.2 Funding**

#### **Developer contributions to on-site mitigation measures**

- 6.2.1 To date, developer contributions have been secured for on site measures from two development schemes in Royston: land west of Ivy Farm, Baldock Road and land south of Newmarket Road. These contributions have been secured for habitat mitigation measures, site management measures and visitor facilities, as outlined in paragraph 3.3.8.
- 6.2.2 The most significant measure for addressing recreational pressures on The Heath has been the appointment of a warden by the Conservators. To date, this has been funded by Section 106 contributions and the action plan includes the funding of this appointment for the lifetime of the Local Plan, up to 2031. The Council acknowledges that Natural England would normally expect a post like this to be funded in perpetuity, which could be between 80 and 120 years. However, given the scale of proposed development that remains to be built out, funding for the post for that length of time this is not achievable through this strategy.
- 6.2.3 To date, £379,000 has been secured from S106 contributions which is sufficient to fund the warden and their essential equipment for the period up to 2031, based on current costs, but not beyond. Taking these costs into consideration, this does leave approximately £35k from the secured contributions for further mitigation measures to alleviate recreational pressures on the Heath in addition to any further contributions secured on a case by case basis from any further development.

#### **Developer contributions to off-site mitigation measures**

- 6.2.4 In addition to on-site measures, contributions will be sought towards the wider suite of off-site mitigation measures which are detailed in the table of actions, wherever it is considered appropriate to do so.

- 6.2.5 NHC has resolved to continue using individual s106 legal agreements to secure mitigation measures from relevant sites at the present time. Contributions should always be proportionate and directed towards named projects.
- 6.2.6 The results of the visitor survey discussed in Section 2 suggest that there is a notably higher incidence of visits to Therfield Heath from homes within the inner Zone of Influence. Within the outer Zone, the average visit rates are lower but still make a notable contribution to overall use. In order to comply with national planning guidelines, any contributions sought must be proportionate to the likely impacts upon the SSSI of any given scheme.
- 6.2.7 The case study outlined in Section 5.3, land to the north of Baldock Road, within Royston (within the inner ZOI) secured contributions in excess of £1,000 per home towards management measures or the provision of additional facilities on Therfield Heath. These figures were negotiated with the agreement of Natural England and provide a useful benchmark to the scale of sums which might be sought where it would be proportionate and consistent with the relevant regulations to do so. It is equally recognised that these contributions were secured prior to the completion of a comprehensive strategy.
- 6.2.8 A number of measures in the wider area would likely still be required or encouraged in the absence of the Heath and / or this strategy given the emphasis of the wider planning system on good design, securing health and wellbeing and encouraging active travel through walking and cycling and contributions may be secured within requests for (e.g.) sustainable transport measures.
- 6.2.9 The Council has to prepare an annual infrastructure funding statement which sets out how developer contributions have been spent. This will be a key measure in monitoring the implementation of the measures in this strategy.
- 6.2.10 Many of the actions included in the tables below are not costed as they are measures which have been included in other strategies. These measures have not been costed in those strategies and therefore are projects to be considered in the longer term rather than immediate spending projects.

The following tables set out the measures discussed in the Mitigation Strategy:

Theme : On Site Education and Management							
Action	Description	Annual cost	One off costs	Total costs	Timescale	Organisation	Notes
Warden	Appointment of a lead warden to work on The Heath	£30,500		£305,000	2021 – 2031	THC NHC	Cost for one warden (part-time) based on an annual salary of £20,000 plus NI contributions (£2,500) and overheads (£8,000) giving a total of £30,500 per year.  10 year period used here as some S106 monies have been used for these costs
Warden Intern	Appointment of an intern warden to work on The Heath	£24,150		£193,200	2023 – 2031	THC NHC	Costs estimated from THC job description - July 2022  Assumption that the post would be filled for each year up to 2031
Warden equipment	Annual equipment purchases, e.g mobile phone contract, PPE and stationery	£4,640		£37,120	2023 - 2031	THC	Costs for equipment based on those provided by THC and split between annual and one-off costs
	One off small scale equipment purchases, e.g laptop, printer, laminator, uniform		£1,550	£1,550	2023 - 2031	THC	

Theme : On Site Education and Management							
Action	Description	Annual cost	One off costs	Total costs	Timescale	Organisation	Notes
Therfield Heath Management Plan	THC to develop a management plan for Therfield Heath in consultation with Natural England to assist in the continued management of the SSSI.		£1,000		2022	NE THC	Estimated cost – included to allow for a review of the Management Strategy in the period up to 2031 following agreement of a Management Strategy in 2022.
Therfield Heath Management Plan	Investigative review and update to regularize the grazing regimes for the Heath					THC NE	Included in the Mitigation Strategy as grazing can help to improve the condition of the SSSI.

Theme : Off Site Education and Management				
Action	Description	Timescale	Organisation	Notes
Review of websites and social media	Review of relevant sites and social media accounts to identify opportunities for consistent messaging and branding and provision of (e.g.) designed and branded material	Ongoing	THC RTC HCC NHC	
Promotion of alternate recreational routes	Investigate opportunities to work with Royston Town Council, landowners and local interest groups to provide appropriate publicity of alternate routes.	Ongoing	THC NHC Royston Town Council HCC Landowners Local interest groups	Production and distribution of leaflets for general public, local residents, new homeowner packs etc.

Theme : On Site Visitor Facilities							
Action	Description	Annual cost	One off costs	Total costs	Timescale	Organisation	Notes
Visitor education facility	Installation of a visitor education facility on The Heath to act as a starting point for visitors and provide a visible point of contact for the warden.	~£5,000	~£50,000		2023 – 2025	NE THC	The scope of this project has not been determined and therefore this is an estimate for a one off cost for the provision of a visitor facility and any on-going running costs.

Theme : Off Site Measures				
Action	Description	Timescale	Organisation	Notes
Off site open spaces	Deliver and secure long-term management regime for new chalk grassland and open space north of Newmarket Road	Ongoing	NHC	
	Review management regime of public open space around Redwing Rise and implement changes to deliver natural / semi-natural habitat		NHC	
	Investigate and secure opportunities for the creation of additional chalk grassland around Therfield Heath to increase the resilience of the SSSI and improve local biodiversity.		NHC HMWT THC NE Greater Cambridge Partnership	
East Royston connectivity	Investigate opportunities for new public rights of way, permissive routes and / or cyclepaths with landowners to provide connective routes from Meridian Gate to Ridgeways and Redwing Rise.	Ongoing	NHC	
	Provision of new pedestrian crossings on Newmarket Road.		HCC Developer Landowners	
	Work with the landowner to formalise and recognise the routes between Newmarket Road and Barkway Road by investigating the designation of a permissive route through the tree belt to the south of Newmarket Road and maintain the existing route to the east of Barkway Road.			
	Deliver enhanced pedestrian crossing facilities across the B1039, Barkway Road.			
	Provision of new east-west permissive route or Right of Way linking B1039 Barkway Road to Footpath Royston 16 / Bridleway Royston 10 (Hertfordshire Way) and Footpath Royston 009 (plantation walk)			
Royston Greenway	Continue to pursue opportunities to progress the Royston Greenway	Ongoing	NHC NE THC HCC – PRow RTC	
North Royston Connectivity	Work in conjunction with the Greater Cambridgeshire Partnership to ensure that the preliminary design work for the Cambridgeshire Greenways route from Royston to Cambridge includes consideration of a walking and cycling route over the A505.	2022 - 2023	Greater Cambridge Partnership HCC & NHC	

	Investigate opportunities for new and improved PRow and cyclepaths to improve the pedestrian links across the A505 to the north of Royston into Cambridgeshire, in particular for PRow 2 and 17.	Ongoing	NHC HCC Greater Cambridge Partnership Landowners Network Rail RTC	
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**Theme : Planning Policy**

Action	Description	Timescale	Organisation	Notes
Supplementary Planning Documents	Prepare a number of SPDs that incorporate and reinforce key expectations to help in the implementation of planning permissions and to secure appropriate mitigation measures for Therfield Heath through the planning system: In particular:		NHDC NE THC	The production of SPDs in support of the Local Plan and new evidence studies for the Local Plan Review will be met from within existing Council revenue and staffing budgets and as such they have not been costed separately.
	<ul style="list-style-type: none"> <li>Developer Contributions – this will include details of contributions expected from development schemes in respect of formal and informal open spaces</li> </ul>	2022	Developers Landowners	
	<ul style="list-style-type: none"> <li>Sustainability – this SPD will include consideration of health and wellbeing issues in as far as measures can be addressed through the planning system</li> </ul>	2023 / 2024	Community Groups Individuals	
	<ul style="list-style-type: none"> <li>Biodiversity – the SPD will secure net gain on new sites, supported by an ecology network plan.</li> </ul>	2023 / 2024		
	<ul style="list-style-type: none"> <li>Design – the SPD will respond to the emerging revisions in the NPPF on design requirements for new development.</li> </ul>	2023 / 2024		
Evidence Studies for North Hertfordshire	Playing pitches and Open Space Audit – will establish the amount of open space in the district and demand for recreation spaces	2022 / 2023	NHC	
	Complete baseline open space audit	2023 / 2024	NHC	
	Commission and complete updated Sports and Playing Pitch Strategy	2022 / 2023	NHC	
	Commission and complete wilding audit and BNG capacity study for Council owned assets	2023 / 2024	NHC	
	Commission and complete second phase wilding audit / BNG capacity work with other key public and private landowners	2023 / 2024	NHC	
	Commission and complete district-wide Green Infrastructure Study	2023 / 2024	NHC	

Greater Cambridge Local Plan	Continue to monitor progress on the Greater Cambridge Local Plan and where appropriate make representations which will ensure that a green infrastructure network is provided in association with any proposed development in South Cambridgeshire which is within the ZOI.	2023 / 2025	NHC NE Greater Cambridge Shared Planning Service	Timescales are dependent on decisions made by Cambridge City Council and South Cambridgeshire District Council.
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## **7 REVIEW AND UPDATE**

- 7.1.1 The Strategy will be implemented alongside the Local Plan and through development management decisions and will be in place for the lifetime of the Local Plan 2011 – 2031. This Strategy is not static and will require periodic review and updates to reflect changing circumstances, updates are made to other relevant plans and strategies and initial projects are funded and implemented.
- 7.1.2 As the development schemes are progressed, there will be greater clarity about the contributions which have been secured from development schemes and the projects which have been started or completed. Similarly, other relevant plans and strategies identified in this document may be progressed or updated themselves providing greater certainty in terms of projects and / or funding. Together these will inform progress towards achieving the measures recommended in this report.
- 7.1.3 As set out in Section 5, the Conservators and Natural England are preparing an updated Management Plan for the SSSI. This will include the detailed on-site management measures which may build upon some of the broad ideas identified in this strategy but lie beyond the scope of this document to prescribe in further detail.
- 7.1.4 Completion and adoption of this Management Plan will provide the trigger for a first review of this SSSI Mitigation Strategy (either in whole or in part). The update will translate (as appropriate) some of the detailed on-Heath management measures it identifies into this document.
- 7.1.5 In turn, this will allow those measures to be taken into account by planning decision-makers when schemes for new development are brought forward within the Zone of Influence (or beyond where considered appropriate).
- 7.1.6 This Strategy will be adapted and updated as new information, new projects or measures are identified which are relevant to the long-term mitigation of recreational impacts on the SSSI. Beyond the first update, the District Council will, as a minimum, consider the need to review and update this Strategy in conjunction with a review of the Local Plan.
- 7.1.7 The Council has a commitment to start a review of the local plan in 2023 and as part of that, there are a number of studies which will also be updated. These studies will help to establish a base line of open space and recreation provision across the District and which in turn will assist in further understanding and addressing the recreation pressures on Therfield Heath SSSI.

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## **APPENDIX A**

Therfield Heath SSSI Citation

**County:** Hertfordshire **Site Name:** Therfield Heath

**District:** North Hertfordshire

**Status:** Site of Special Scientific Interest (SSSI) notified under Section 28 of the Wildlife and Countryside Act 1981

**Local Planning Authority:** North Hertfordshire District Council

**National Grid Reference:** TL 335400 **Area:** 143.33 (ha) 354.14 (ac)

**Ordnance Survey Sheet 1: 50 000:** 153, 154 **1: 10 000:** TL 33 NW, 33 NE, 34 SW, 34 SE.

**Date Notified (Under 1949 Act):** 1953 **Date of Last Revision:** 1969

**Date Notified (Under 1981 Act):** 1984 **Date of Last Revision:** -

#### **Other Information:**

The majority of the site is also a Local Nature Reserve declared under Section 21 of the National Parks and Access to the Countryside Act 1949.

#### **Reasons for Notification:**

Therfield Heath is a very good example of the East Anglian type of chalk grassland. This plant community has suffered severe losses throughout its range during the post-war period, mainly as a result of agricultural intensification or the cessation of sheep grazing, so the remaining examples are of high conservation value. The site contains some of the richest chalk grassland in England.

Since the turn of the century the traditional use of the Heath for sheep grazing has gradually given way to a variety of recreational uses, of which golfing has had the greatest impact. Parts of the site were ploughed during the Second World War but have since reverted to grassland.

The remaining unimproved pasture is dominated by upright brome *Bromus erectus* and red fescue *Festuca rubra*. There is a rich assemblage of herbs including such rarities as pasque flower *Pulsatilla vulgaris* which occurs in abundance at Church Hill, spotted cat's ear *Hypochoeris maculata*, wild candytuft *Iberis amara*, bastard toadflax *Thesium humifusum*, and lesser meadow-rue *Thalictrum minus*.

cont.....

**Therfield Heath (cont...)**

The plant communities of the partially improved areas have a lesser, though increasing, diversity of species, including purple milk-vetch *Astragalus danicus* and horseshoe vetch *Hippocrepis comosa*.

The site also includes mixed scrub communities at various stages of development, and two areas of mature beech woodland. The latter is best developed at Fox Covert, where the ground flora includes abundant white helleborine *Cephalanthera damasonium*.

The grassland supports a diverse insect fauna, including the chalk hill blue butterfly *Lysandra coridon*.

## **APPENDIX B**

Royston : Overall net provision of accessible open space in Royston (in Hectares)

	Open Space Typology								Total
	Parks and Gardens	Cemeteries and Churchyards	Allotments	Outdoor sports facilities	Provision for children and teenagers	Amenity green space	Natural and semi-natural green space	Green corridors	
No. of identified sites	1	2	1	21 in total 11 of which are publicly accessible	10	11	6	4	56
Fields in Trust standards Ha <sup>2</sup> per 1,000 population	0.80	No standard	0.3	1.20	0.25	0.60	1.80	No standard	
Provision required using estimated population figures (Ha <sup>2</sup> )	13.44	No standard	5.04	20.16	4.20	10.08	30.24	No standard	83.16
Royston's total provision – net area (Ha <sup>2</sup> )	1.89	1.07	1.56	92.88 total 4.58 – publicly accessible sites	0.51	5.25	119.17	1.21	135.24
Difference (Ha <sup>2</sup> )	-11.55	No standard	-3.48	-15.58	-3.69	-4.83	+88.93	No standard	+52.08
Standard met - / +	-		-	-			++		+

## **APPENDIX C**

Therfield Heath SSSI Condition

Main Habitat	Responsible Officer	Unit Number	Unit Id	Area (ha)	NNR Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
<b>Therfield Heath SSSI - HERTFORDSHIRE (NORTH HERTFORDSHIRE)</b>									
CALCAREOUS GRASSLAND - Lowland	SONJA KAUPE	001	1005022	26.4014	0.00	05/07/2012	Unfavourable - Recovering	Since 2005, the bulk of this unit has been grazed by sheep between late summer and early winter each year. The chalk grassland sward continues to improve under this management and favourable condition targets for sward composition and structure are met over large parts of the grazed area, though not yet across the whole unit. The SSSI's notified invertebrates require a relatively complex habitat structure with some patches of bare ground, grassland vegetation of different heights, a component of scrub in an otherwise open habitat, many nectar sources, and suitable niches for overwintering stages. These conditions are met across the unit as a whole but there is still some scope for improvement, mainly towards the north end. The main factors preventing all favourable condition targets for the unit being met are: (a) Large areas of bare ground and a reduction in sward quality around the large rabbit warren near the	

								<p>southwest edge. Though moderate levels of rabbit grazing can be beneficial for grassland plants and invertebrates the rabbit population in this area is too high and is causing damage. (b) Ungrazed grassland towards the northern and eastern edges of the unit beyond the current grazing compartment boundaries. This fails most targets for sward composition and structure and requires an annual hay-cut or grazing, though a strip of tall grass and scattered scrub should be left around the boundary to benefit invertebrates. (c) Invasive scrub (mainly sycamore and ash saplings) spreading onto the grassland from the southern woodland edge. Scrub has been cut back several times on this unit in the last few years but tree saplings in particular are encroaching again.</p>	
CALCAREOUS GRASSLAND - Lowland	SONJA KAUPE	002	1005023	33.8804	0.00	05/07/2012	Unfavourable - Recovering	<p>This unit mainly consists of areas of chalk grassland `rough? separated by golf course fairways. The larger areas are sheep grazed. Their sward continues to improve and favourable condition targets for sward quality are now met over much of the grazed area. Smaller areas of rough that can't be grazed are cut-and-cleared in spring and autumn but</p>	

left uncut in summer. Their sward quality is also improving, though not as rapidly as the grazed areas. Strips of `semi-rough? (between fairways and adjacent rough) are doing less well: sward quality attributes are well below target and barely improving. Unlike the rough, this semi-rough is cut during the summer. An increase in the height of the summer cuts is probably needed to allow recovery. Fairways are of limited botanical value due to the frequent summer cutting they require, so it is important they are not widened at the expense of the rough. Since 2009 (when the amount of summer cutting was excessive) some fairways have been narrowed, returning areas to semi-rough or rough. These improvements need to be maintained and built on to achieve favourable condition. There are patches of tor grass in the grazing compartment along the unit?s northern edge. Though tor grass cover is within the target range for the whole unit the species is spreading and probably needs herbicide spot-treatment. The habitat structure for invertebrates is adequate across the unit as a whole but poor in areas dominated by

								<p>fairways. On the south side, scallops recently cut into the woodland edge and rotational scrub management have improved the structure, creating patches of scrub and tall herbs. There is scope for more improvement along this edge. The rabbit population on this unit is quite low and benefits the conservation interest by improving the habitat structure and providing some bare ground for nationally scarce wild candytuft.</p>	
<p>CALCAREOUS GRASSLAND - Lowland</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 754</p>	SONJA KAUPE	003	1005024	26.1398	0.00	05/07/2012	Unfavourable - Recovering	<p>Like unit 2, this unit mainly consists of areas of chalk grassland `rough? separated by golf course fairways. Points made in assessment comments for unit 2 on the improving condition of both grazed and cut-&amp;-cleared rough, and on issues over the condition and extent of summer-cut semi-rough and fairways, apply to unit 3 also. Church Hill, in the southwest of the unit, holds the greatest concentration of interest features on the SSSI, including a nationally important population of pasque flower, the bulk of recent and historic records of other nationally scarce plant species, and the richest chalk grassland flora. Though the sward on Church Hill</p>	

still easily exceeds most favourable condition targets, the area is currently under threat from scrub encroachment and an increasing rabbit population. Both are now damaging the sward on the southern slope and need urgent action, namely scrub management, rabbit control and further improvements to rabbit fencing. The main scrub problem is invasive sycamore. Control of sycamore and rabbits needs to include the land beyond the SSSI boundary to the south. The SSSI's notified invertebrates require a relatively complex habitat structure with some patches of bare ground, grassland vegetation of different heights, a component of scrub in an otherwise open habitat, many nectar sources, and suitable niches for overwintering stages. These conditions are met across the unit as a whole and the southwest area around Church and Pen Hills is particularly good. Further east, between the northeast corner of Fox Covert and the Therfield road, there is scope for improving the structure of the woodland edge by thinning trees and dense overmature scrub, cutting scallops, and relaxing the grass-cutting regime

								near this edge.	
CALCAREOUS GRASSLAND - Lowland	SONJA KAUPE	004	1005019	56.5494	0.00	05/07/2012	Unfavourable - Recovering	Under a new HLS agreement, large parts of the central and eastern sections of this unit are now left undisturbed through the summer and are cut for hay in early autumn. The improved management has major advantages for the SSSI's interest features, in particular the chalk grassland flora and invertebrates. It allows herbs to flower and set seed during the summer, while the removal of hay prevents the build-up of nutrients and thatch. On the hay-cut areas increases in herb cover, the frequency of positive indicators and nectar sources for insects were already noticeable in summer 2012. The new management also benefits ground-nesting birds such as skylarks and meadow pipits, which appeared to have increased on this relatively undisturbed part of the SSSI. The SSSI's notified invertebrates require a reasonably complex habitat structure with some patches of bare ground, grassland vegetation of different heights, a component of scrub in an otherwise open habitat, many nectar sources, and suitable niches for overwintering stages. These are provided in units 1 to 3	

								but inevitably - because of its use for horse training and its less varied topography ? unit 4 has a less favourable structure for invertebrates. Nevertheless the change to a hay cut and the establishment of a hedge along the north boundary (which adds to the unit?s shrub component) are significant improvements.	
BROADLEAVED, MIXED AND YEW WOODLAND - Lowland	SONJA KAUPE	005	1005020	2.2575	0.00	11/07/2012	Favourable		
BROADLEAVED, MIXED AND YEW WOODLAND - Lowland	SONJA KAUPE	006	1005021	1.2927	0.00	11/07/2012	Unfavourable - Recovering		

## **APPENDIX D**

Therfield Heath SSSI Management and Operations

## Views About Management



### **A statement of English Nature's views about the management of Therfield Heath Site of Special Scientific Interest (SSSI).**

This statement represents English Nature's views about the management of the SSSI for nature conservation. This statement sets out, in principle, our views on how the site's special conservation interest can be conserved and enhanced. English Nature has a duty to notify the owners and occupiers of the SSSI of its views about the management of the land.

Not all of the management principles will be equally appropriate to all parts of the SSSI. Also, there may be other management activities, additional to our current views, which can be beneficial to the conservation and enhancement of the features of interest.

The management views set out below do not constitute consent for any operation. English Nature's written consent is still required before carrying out any operation likely to damage the features of special interest (see your SSSI notification papers for a list of these operations). English Nature welcomes consultation with owners, occupiers and users of the SSSI to ensure that the management of this site conserves and enhances the features of interest, and to ensure that all necessary prior consents are obtained.

## **Management Principles**

### **Calcareous grassland**

In order to maintain a species-rich sward and its associated insects and other invertebrates, calcareous grassland requires active management. Without management it rapidly becomes dominated by stands of rank grasses, such as Tor-grass. These grasses, together with the build up of dead plant matter, suppress less vigorous species and lower the diversity of the site. Eventually, the site will scrub over. Traditionally, management is achieved by grazing. The precise timing will vary both between and within sites, according to local conditions and requirements. These may include stock type or the needs of particular plants or animals; certain invertebrates, for example, can benefit from the presence of taller vegetation. However, grazing should generally aim to keep a relatively open sward without causing excessive poaching. Light trampling can be beneficial by breaking down leaf litter and providing bare patches for seed germination and some invertebrates. An element of managed scrub, both within and fringing calcareous grassland can be of great importance to certain birds and invertebrates, but excessive scrub should be controlled.

### **Scrub**

Scrub habitats are low-growing communities where the main woody components are bushes or small trees, such as hawthorn, rowan and juniper. Scrub supports a wide

variety of species and ecological communities. In particular, the transitional zone between scrub and other habitats can be important for wildlife, especially invertebrates.

Often, scrub is a transitional stage that will develop into woodland if unmanaged. Maintaining structural diversity and a mosaic of age classes within areas of scrub is important for maintaining the diversity of species the scrub is able to support. For example, hawthorn scrub supports the greatest variety of bird and insect species in the early and middle stages of growth.

Scrub can be managed using rotational cutting, which should aim to maintain a mosaic of patches at different stages of growth. Scrub can also be cut in small patches to create an intimate mixture of scrub and grass and/or heath.

Grazing is another method for managing scrub and on some sites may be a more suitable management tool than cutting. By its nature, grazing can help to create a patchy mosaic of scrub and other upland habitats. As with cutting, it can also help to maintain a range of age classes. However, stock levels do need to be carefully controlled. If grazing pressure is too high the structure of the scrub vegetation may become impoverished. Also, the scrub may not be able to regenerate naturally, leading to a loss of cover over time. Where the objective is to increase the area of scrub an initial period of fencing to control grazing may be required.

### **Broadleaved semi-natural woodland**

There are many different ways in which broadleaved woodland can be managed to conserve its value for wildlife. The following gives broad views on a range of regimes that may be appropriate on your site.

A diverse woodland structure, with open space, a dense understory, and a more mature overstory is important. A range of ages and species within and between stands is desirable. Some dead and decaying wood, such as fallen logs, can provide habitats for fungi and invertebrates. However, work may be needed to make safe dangerous trees in areas of high public access. Both temporary and permanent open spaces benefit groups of invertebrates such as butterflies. They may require cutting to keep them open, and should be of sufficient size to ensure that sunny conditions prevail for most of the day.

Felling, thinning or coppicing may be used to create or maintain variations in the structure of the wood, and non-native trees and shrubs can be removed at this time. To avoid disturbance to breeding birds the work is normally best done between the beginning of August and the end of February. Work should be avoided when the ground is soft, to prevent disturbing the soil and ground flora. Normally successive felling, thinning or coppicing operations should be spread through the wood to promote diversity, but where there is open space adjacent plots should be worked to encourage the spread of species that are only weakly mobile. Natural regeneration from seed or stump regrowth is preferred to planting because it helps maintain the local patterns of species and the inherent genetic character of the site.

Deer management and protection from rabbits or livestock are often necessary. Whilst light or intermittent grazing may increase woodland diversity, heavy browsing can damage the ground flora and prevent successful regeneration. Invasive species, such as *Rhododendron* or Himalayan balsam, should be controlled.

Parts of a wood may need to be left unmanaged to benefit species that do best under low disturbance or in response to natural processes. Within these areas some trees will eventually die naturally and dead wood accumulate.

### **All habitats**

The habitats within this site are highly sensitive to inorganic fertilisers and pesticides, applications of which should be avoided both within the site itself and in adjacent surrounding areas. Herbicides may be useful in targeting certain invasive species, but should be used with extreme care. Access to this site, and any recreational activities within, may also need to be controlled.

## Operations likely to damage the special interest

Site name: Therfield Heath

OLD1001839

Ref. No.	Type of Operation
1	Cultivation, including ploughing, rotovating, harrowing, and re-seeding.
2	Grazing, (including type of stock or intensity or seasonal pattern of grazing and cessation of grazing).
3	Stock feeding.
4	Mowing or other methods of cutting vegetation, the introduction of, or changes in the mowing or cutting regime (including hay making to silage and cessation).
5	Application of manure, fertilisers and lime.
6	Application of pesticides, including herbicides (weedkillers).
7	Dumping, spreading or discharge of any materials.
8	Burning.
9	The release into the site of any wild, feral or domestic animal*, plant or seed.
10	The killing or removal of any wild animal*, including pest control.
11	The destruction, displacement, removal or cutting of any plant or plant remains, including any tree, shrub, herb, hedge, dead or decaying wood, moss, lichen, fungus, leaf-mould, turf etc.
12	Tree and/or woodland management+.
13a	Drainage (including the use of mole, tile, tunnel or other artificial drains).
14	The changing of water levels and tables and water utilisation (including irrigation, storage and abstraction from existing water bodies and through boreholes).
15	Infilling of ditches or pits.
20	Extraction of minerals, including topsoil, subsoil, chalk and lime.
21	Construction, removal or destruction of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks, or the laying, maintenance or removal of pipelines and cables, above or below ground.
22	Storage of materials.
23	Erection of permanent or temporary structures, or the undertaking of engineering works, including drilling.
26	Use of vehicles likely to damage or disturb features of interest.
27	Recreational or other activities likely to damage features of interest (eg vegetation).
28	Game and waterfowl management and hunting practices.

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\* 'animal' includes any mammal, reptile, amphibian, bird, fish or invertebrate.

+ including afforestation, planting, clear and selective felling, thinning, coppicing, modification of the stand or underwood, changes in species composition, cessation of management.