

Housing Technical Paper



December 2015

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1 Introduction

What is a technical paper?

- 1.1 Technical papers provide additional information to help explain how policies in the draft local plan have been developed.
- 1.2 Our evidence base contains a number of studies. However, it is not always appropriate or possible to simply translate their recommendations directly into policy.
- 1.3 This might be for a number of (overlapping) reasons:
 - We need to consider evidence ‘in the round’. Our studies normally focus on particular issues or specialist areas. Once they are completed, we need to consider how they interact with the findings of other work we have carried out;
 - Government policy is set out in the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). These are clear that many of the analyses we have to carry out to support our plan should be objective and ‘unfettered’ by other considerations. Our Strategic Housing Market Assessment (SHMA), for example, should not have any regard to potential constraints ~ such as a lack of sites or the presence of Green Belt ~ when working out how many homes might be needed;
 - This means that we have to look across all of the evidence we have gathered, including public consultation responses, and come to a view on:
 - a. The most appropriate balance of land uses for the plan;
 - b. The most appropriate targets for these land uses (where relevant); and
 - c. The most appropriate sites where these requirements can be met;
 - Some potential sites will have been promoted for more than one use. A landowner might be willing, for example, to let their land be used for either housing or employment. We need to decide which, if any, of these uses is most appropriate;
 - Some potential sites identified in our evidence base will be in less preferable areas for development. This might include land that is not previously developed, in the Green Belt, in a Conservation Area or at greater risk of flooding than other options. We need to work out whether it is necessary or appropriate to use any of these sites;
 - We may receive objections to the findings of our studies, or use alternate sources of information that might suggest slightly different answers could be available;
 - New data may have been released since the relevant study was completed; while
 - We have to consider how our evidence and emerging proposals compare with those of other nearby authorities. It wouldn’t necessarily be appropriate, for example, for two neighbouring towns to both promote major retail development in their areas.
- 1.4 Technical papers help to explain how we have taken these matters into account and got ‘from A to B’, or from our initial study findings to the policies in our plan.

What does this technical paper cover?

- 1.5 This paper covers housing, in terms of both demand and supply.
- 1.6 It discusses the housing target we have identified for the Borough and how this need will be met through allocations within the Local Plan.

What are the key evidence studies?

- 1.7 The following studies should be read alongside this technical paper:
- Review of the Green Belt around Stevenage: Part 1 – Survey against Green Purposes (AMEC, 2013)
 - Review of the Green Belt around Stevenage: Part 2 – Site Assessment and Capacity Testing (AMEC, 2015)
 - Identifying Housing Market Areas in Bedfordshire and surrounding areas (Opinion Research Service (ORS), 2015)
 - Strategic Land Availability Assessment – Housing (Stevenage Borough Council (SBC), 2015)
 - Stevenage and North Hertfordshire Strategic Housing Market Assessment Update (ORS, 2015)
 - Stevenage Central Town Centre Framework (David Lock Associates (DLA), 2015)
 - Green Belt Technical Paper (SBC, 2015)
 - Gypsy and Traveller Site Search (SBC, 2014)
 - Stevenage Borough Council Gypsy and Traveller Accommodation Assessment (David Couttie Associates (DCA), 2013)
 - Stevenage Borough Council Strategic Housing Market Assessment (DCA, 2013)

What are the key issues for this paper?

- 1.8 This paper seeks to explain how the housing allocations contained within the Local Plan were made. It explains:
- How the housing target within the plan has been determined;
 - How we have moved from SLAA sites, to our list of sites to be allocated;
 - Our approach to finding a site to meet the needs of the Gypsy and Traveller community;
 - How our plan seeks to allow for a 5 year housing land supply; and
 - Our approach to the optional Housing Technical Standard for accessible homes.

2 Setting the housing target

- 2.1 The National Planning Policy Framework (NPPF) is clear that “local planning authorities should positively seek opportunities to meet the development needs of their area” (paragraph 14) In terms of housing, this means preparing a Strategic Housing Market Assessment to assess full housing needs (159). That evidence should be used to ensure plans meet full, objectively assessed needs as far as is consistent with the policies of the Framework (47).
- 2.2 Our evidence¹ concludes that the Objectively Assessed Need (OAN) for housing in Stevenage is 7,300 dwellings over the period 2011-2031. However, guidance (including relevant case law) makes clear that it may not be appropriate to simply translate OAN into the local plan’s housing target. Once independently established, OAN needs to be considered against relevant constraints². Planning Practice Guidance (PPG) explains that it may be appropriate to consider including an ‘uplift’ in translating OAN to a plan target.
- 2.3 The Local Plan sets a target of 7,600 homes to be developed within the Plan period. This maintains the preferred position of the Council, as set out in the previous consultation on the emerging Local Plan earlier in 2015³.
- 2.4 The decision to pursue a target of 7,600 homes has been reached having regard to the wider evidence base and the ‘audit trail’ set out through this technical paper. Although this is marginally higher than the OAN, we consider the target is justified on a number of grounds:
- NPPG states that an uplift in OAN should be considered where it could help deliver affordable housing requirements⁴. Stevenage has consistently recorded high levels of affordable housing need across a number of housing surveys⁵ conducted since the turn of the century:

Table 1: Historic affordable housing need in Stevenage

Year	Identified need (affordable units per year)
2003	435
2008	642
2010	581
2013	575

Although parts of the earlier assessment work have been superseded, a number of its findings remain valid⁶. In particular it calculates an affordable housing need of 575 units per year and identifies a requirement to redress structural imbalances in the housing stock.

In all instances, the annual affordable housing need identified within the Borough is higher than the total OAN for the Borough. A number of examination decisions have made clear that plans are not expected to meet affordable housing needs in full, but should make a reasonable adjustment⁷.

¹ Stevenage and North Hertfordshire Strategic Housing Market Assessment Update, 2015

² Including those set out in footnote 9 of the NPPF

³ Stevenage Borough Local Plan 2011-2031: Revised Housing Targets consultation - June 2015

⁴ Planning Practice Guidance, Paragraph: 029 Reference ID: 2a-029-20140306

⁵ Stevenage Borough Housing Needs Survey (David Couttie Associates (DCA), 2003); North Hertfordshire and Stevenage Strategic Housing Market Assessment (SHMA) (DCA, 2008); Stevenage SHMA Update (DCA, 2010); Stevenage Borough Council SHMA (DCA, 2013).

⁶ Stevenage Borough Council Strategic Housing Market Assessment, 2013

⁷ As seen in the Inspector’s reports into the local plans of Rushcliffe, Ribble Valley and Richmondshire.

Providing enough affordable homes for the people of Stevenage is a key priority for the council, and one which we are actively working towards resolving. A new team has been set up to progress the delivery of new council homes. A modest increase in the target will allow more homes in response to this pressure, whilst remaining broadly consistent with the approach being taken by other nearby authorities⁸;

- It takes into account the Government's latest household projections for the Borough, which suggest that just over 7,600 new homes will be required. Even though our OAN is calculated in a slightly different way, in accordance with the recommendations of our evidence, we think it is important to aim towards this slightly higher number. This ties in with our wider regeneration plans for the Borough and should help us to put forward a positive message, helping us to attract investment and achieve sustainable patterns of development;
- The housing numbers exclude requirements for care homes and other institutional style accommodation. As people live for longer, and live in their own homes for longer, it may be appropriate to assume some of this need will be met in the normal housing stock⁹;
- A number of the potential schemes we are considering require a certain number of homes in order to be viable. If we reduce the number of homes on these sites, they may not come forward at all¹⁰; while
- Setting a challenging target provides a clear signal that we are serious about delivering regeneration and change in the Borough. This is crucial if we are to encourage the investment and growth required to meet out our Local Plan objectives. Another key priority of the Borough Council is the redevelopment of the town centre. This will be residential-led and, although it is being actively led by the Borough Council (as majority landowner), other landowners will require a level of confidence in the market and in the Borough Council's commitment to this objective, if they are to consider further investment and growth.

2.5 At the same time, these 'upward' pressures need to be reasonably balanced. As subsequently set out, a target of 7,600 homes is one that is considered realistic, justifiable and achievable in the context of the sites submitted to be considered for future housing development and the capacity of the market to deliver: Reaching a target of 7,600 homes will require annual average delivery rates in Stevenage of 450 homes per annum to the end of the plan period. This represents an uplift of around 50% on long-term past performance¹¹.

⁸ The latest SHMA suggests that our Objectively Assessed Needs should contain a 10% uplift in response to market signals and affordable housing needs. These extra homes would equate to a 14% uplift.

⁹ Our latest SHMA suggests a requirement for almost 200 additional bedspaces over the period to 2031. These would normally be classified as a "C2" use, compared to dwellings which are "C3". It is standard statistical practise to assume that the proportion of older persons requiring this form of accommodation will remain constant.

¹⁰ Paragraph 173 of the NPPF is clear that plans should ensure that the viability of sites is not threatened.

¹¹ In the thirty years from the dissolution of the Development Corporation in 1981 to the start of the plan period in 2011, an average 300 homes per year were completed in Stevenage Borough.

3 Housing Supply

- 3.1 As a key part of the evidence base for the Local Plan, we regularly produce Strategic Land Availability Assessments (SLAAs). These assess the availability, suitability and achievability of sites within the Borough Boundary for housing and employment use.
- 3.2 The Strategic Land Availability Assessment: Housing (Update June 2015) provides us with an up-to-date long list of sites that have been positively assessed for residential use.
- 3.3 However, there are a number of issues with simply using the findings of this assessment to allocate housing sites within the Local Plan:
- The housing data in the SLAA covers the period to 31 March and at 1 April 2015 for completions and supply respectively. It is over six months old;
 - The SLAA is a discrete piece of work that does not take into account other evidence studies or other Local Plan objectives;
 - SLAA sites may be identified in other evidence studies as being suitable for, or requested by landowners or stakeholders to be considered for, alternate land uses. The SLAA cannot make judgements on competing land uses or the best overall distribution of land uses in the Borough. This is the role of the Local Plan; while
 - The SLAA does not take into account the housing mix required across the Borough. The estimated yield of sites within the SLAA may not include the most appropriate housing types/sizes;
 - The SLAA tests every site on an individual basis and does not consider cumulative effects or whether multiple sites of a similar nature might come forward for development (either in practical or policy terms);
 - The phasing assumptions in the SLAA are largely developer-led. As Local Planning Authority, we need to ensure that we can meet our housing targets, including the need to maintain a 5yr housing land supply; while
 - Not all SLAA sites may be required to meet the target set out within the Local Plan.
- 3.4 For these reasons, the SLAA has been used as a baseline, but the following steps have been carried out to enable Local Plan decisions to be made:
- An update of our housing monitoring data
 - A review of other Local Plan evidence studies / council objectives
 - The identification of sites that have been promoted / recommended for alternate land uses
 - Coming to a view on the best use for these sites
 - A review of the estimated housing numbers of sites
 - Determining more accurate phasing assumptions

Housing monitoring update

- 3.5 The 2015 SLAA takes into account residential completions and planning applications granted up to the end of March 2015. The SLAA identifies that since 2011, 593 homes have been completed and 1,188¹² are already in the planning process.

¹² Taking into account the non-implementation rate applied in the SLAA. See SLAA for further details.

- 3.6 This monitoring update takes into account additional applications permitted since 1 April 2015, and uses a cut-off date of 30 September 2015. The data is summarised below:

Table 2: New committed housing supply (permitted 1 April to 30 October 2015)

Reference	Site	No. of units	Net gain	Date approved
14/00425/FP	1 Aspen Close	1	1	20/04/2015
14/00559/OPM	Matalan	526	526	15/09/2015
15/00035/OP	Land Adj To 47 Breakspear	4	4	17/04/2015
15/00080/FP	3 and 4 Ditchmore Lane	6	6	24/04/2015
15/00099/FP	135 Sish Lane	1	1	02/04/2015
15/00115/FP	Voyage Care, 49 Fellowes Way	1	1	17/04/2015
15/00118/FP	142 Leaves Spring	1	1	17/04/2015
15/00120/FP	Southgate House	5	5	21/04/2015
15/00125/FP	40 Vinters Avenue	1	1	30/04/2015
15/00128/FP	14 Plash Drive	1	1	08/05/2015
15/00145/FP	28 Chester Road	2	1	22/05/2015
15/00176/FP	32 Jessop Road	2	1	21/05/2015
15/00225/CPA	Six Hills House	15	15	16/06/2015
15/00244/FP	15 Warwick Road	1	1	19/06/2015
15/00269/FP	The Mallard, 37 Julians Road	4	4	16/09/2015
15/00273/CPA	Brickdale House	1	1	06/07/2015
15/00326/FP	Southgate House	4	4	10/08/2015
15/00348/FP	1 Colestrete	2	1	14/08/2015
15/00395/RMM	Vincent Court	37	37	10/09/2015
15/00399/CPA	Crompton Joinery	4	4	10/08/2015
15/00406/FP	504 Canterbury Way	2	1	08/09/2015
15/00483/CPA	Six Hills House	128	128	05/10/2015
TOTAL			745	

Table 3: Sites to be removed from committed supply used in SLAA

Reference	Site	No. of units	Net gain	Reason
14/0001/REG3	Land Adj To 47 Breakspear	2	2	Superseded by 15/00035/OP
14/00178/OPM	Vincent Court	41	41	Superseded by 15/00395/RMM
14/00328/CPA	Six Hills House	132	132	Superseded by 15/00483/CPA
TOTAL			175	

- 3.7 In this period (1 April to 30 September 2015), 745 net additional homes were granted planning permission. Three of these applications superseded existing commitments. This leaves a total of 570 new homes to be added to the committed housing supply figures.
- 3.8 Overall, 2,351 new homes have been completed or have gained planning permission since the start of the plan period.

Reviewing the SLAA

- 3.9 The SLAA identifies sites which have the potential to provide 7,610 new homes.

- 3.10 The largest of the applications permitted since 1 April was Matalan (526 new homes), a site included in the 2015 SLAA. To avoid double-counting, 526 units are now added to the count of permitted schemes and must be removed from the SLAA sites estimate. The SLAA figure is therefore reduced to 7,084.
- 3.11 However, the SLAA assesses whether sites are suitable, available and achievable for housing in simplistic terms. It assesses them on a discrete basis, without considering:
- A. The need to reserve sites for other land uses, such as employment or retail;
 - B. The results of other evidence studies
 - 1) Green Belt Review
 - 2) Town Centre Framework;
 - C. Other policy considerations, such as environmental or social requirements;
 - D. The cumulative impact of development.
- 3.12 When these issues are taken into account, the number of sites and their yields are reduced. Sites in each of these broad categories are discussed in turn below.

A. Sites required for alternative land uses

- 3.13 The Local Plan is charged with delivering the best overall package of land uses for Stevenage. The table below identifies those SLAA sites that have been discounted from the housing trajectory, with our reasons.

Table 4: SLAA sites to be protected / allocated for alternate uses

Ref.	Address	Alternative use(s) (relevant evidence)	Comments
526	Primett Road car parks	Parking	Parking spaces in the Old Town are in high demand, particularly at peak times. No work has been undertaken to identify how the loss of these sites from parking to housing could be mitigated against. No development scheme has been identified and the site is not being actively promoted to the development industry at this point in time. The Primett Road car parks are required to maintain levels of parking provision in the Old Town.
610	Land North of Stevenage (part)	Open Space (St. Nicholas/Rectory Lane Conservation Area Appraisal, 2009; St. Nicholas/Rectory Lane Conservation Area Management Plan, 2012; Open Space Strategy, 2014)	The St. Nicholas/Rectory Lane Conservation Area designation covers the eastern half of the North Stevenage site, approximately half the entire site. These open fields were added to the conservation area in 2007, to protect the setting of the Listed Buildings and to ensure its open character is protected. The Open Space Strategy also recognises the importance of this area of open space, known as Forster Country. It proposes that a country park designation is considered for this site. For these reasons it has been decided to retain the eastern half of the promoted site as an open area within the Green Belt. The allocation area and dwelling numbers have

Ref.	Address	Alternative use(s) (relevant evidence)	Comments
			been reduced to reflect the area to be retained as open space.
615	Garden Centre	Retail/employment (Stevenage Retail Study, 2014; Stevenage Employment and Economy Baseline Study, 2013)	The Stevenage Retail Study identifies the need for a new convenience retail store towards the end of the plan period. The Garden Centre site provides the only available opportunity to meet this need. The site is already in Class A1 shop use.
629	Land West of Stevenage (north)	Access	This site is required to provide an access route to the wider, cross-boundary, Stevenage West scheme. Although residential development could also be accommodated alongside this use, it would need to form part of a wider scheme in order to create a new community. Without this, development would be unsustainable due to its separation from existing facilities within the urban area. As North Hertfordshire District Council is considering safeguarding the wider development site beyond the plan period, it is likely any residential development on this site within the Borough would come forward outside of the plan period. An allocation for residential development now could prejudice the larger scheme.

B. Sites where the results of other evidence studies need to be taken into account

1) Implementing the results of the Green Belt Review

- 3.14 The wider evidence base for the local plan includes a Green Belt Review to help us identify sites that might be suitable for release, if required. The Part 1 work evaluated strategic scale parcels of land against the purposes of the Green Belt, as defined within the NPPF. Once the contribution these parcels make to the Green Belt has been determined, the part 2 work then progressed this further, breaking down the sites into smaller potential development areas and considering them in more detail in terms of their potential release¹³.
- 3.15 The assessment did not identify the sites below as being suitable for release. They will, therefore, remain in the Green Belt. The assessment also recommended parcels of land to be added to the Green Belt area, to strengthen its current purpose.

Table 5: SLAA sites to remain in / be added to the Green Belt

Ref.	Address	Alternative use
613	Land at Norton Green	Site forms part of the area recommended to be put back into the Green Belt. This is a small parcel of land surrounding the hamlet of Norton Green. It is separated from the existing urban area by the A1(M). It does not have any physical boundary which separates it from the adjacent Green Belt

¹³ Review of the Green Belt around Stevenage: Part 1 – Survey against Green Belt purposes (AMEC, 2013); Review of the Green Belt around Stevenage: Part 2 – Site assessment and capacity testing (AMEC, 2015)

Ref.	Address	Alternative use
		land. Putting this site back in the Green Belt will address an anomaly relating to its previous removal.
616	Land at Todd's Green (1)	Sites to stay in the Green Belt. The Green Belt Review does not recommend the land parcel containing both of these sites for release. The Review states that although some development could be accommodated with a high degree of visual containment, the key issue remains the further erosion of the narrow gap between Stevenage and Hitchin. In addition it recognises that the land forms the easterly setting for Todd's Green.
623	Land at Todd's Green (2)	

2) Sites within the town centre

- 3.16 Sites within and around the town centre are treated slightly differently within the SLAA, mainly because, for the most part, these sites do not have specific schemes drawn up for them. As such, broad calculations were used, based on the average densities of town centre schemes over the last 10 years, to estimate the number of dwellings likely to be delivered within this area.
- 3.17 The Borough Council are committed to delivering significant growth and change within the town centre, as a key priority. Resources have been allocated to its delivery and Local Enterprise Partnership (LEP) money has been made available.
- 3.18 The Council recently commissioned work to produce a regeneration plan for the central area of the town. The Stevenage Central Town Centre Framework draws together a range of evidence and ideas to provide a strategic, but flexible, plan for the area. In July 2015, the Council's Executive resolved to adopt the Framework as a blueprint for the regeneration of the town centre and the wider central area as well as to form the basis for the development of planning policy.
- 3.19 The Framework aims to deliver large-scale housing growth. It estimates just over 3,000 new homes could be provided within the central area. This provides a much more accurate assessment of the town centre's potential than the SLAA findings.
- 3.20 However, it does include some sites that we have already taken into account as part of our committed supply (around 950 dwellings on 4 sites). In order to avoid double-counting, we have reduced the SLAA figure accordingly. An allocation of 2,050 homes in the Plan will, therefore, reflect the results of the Framework.

Table 6: Stevenage Central sites already in the planning process

Site	Dwellings
Matalan	526
Southgate House	74
Six Hills House	143
Brickdale House	204
Total	947

C. Sites where the effect of providing 'aspirational homes' needs to be considered

- 3.21 Re-balancing the housing stock is a key element of the future strategy for Stevenage. This includes providing more homes at the top end of the market ~ so-called 'aspirational housing'.

- 3.22 Separate evidence work¹⁴ has recommended a definition and set of criteria for aspirational housing, which is reflected in the Local Plan. It also identifies a number of sites that could be suitable locations to provide aspirational housing. Although some of the draft schemes submitted to us as part of the SLAA take this objective into account, some do not. In these cases it is not for the SLAA to amend the dwelling estimates submitted.
- 3.23 As such, the yields on those sites where it is considered aspirational homes might be appropriate have been reviewed.

Table 7: SLAA sites where the yield has been adjusted for aspirational housing

Ref.	Address	Dwelling estimate	Reduced figure	Explanation
610	Land North of Stevenage	1,136	800	Figure reduced to allow for aspirational homes around the edge of the conservation area, and for the conservation area to be retained.
Broad location	Stevenage Central	2,050*	2,000	Figure reduced to allow for aspirational flats to be provided.

*Following reductions made in section 3.3.

- 3.24 Provision for aspirational homes has already been accommodated within the draft schemes for Stevenage West, Bragbury End Sports Ground and the Land South of A602, which are also identified as suitable sites within the Aspirational Housing Research.

D. Sites where the cumulative impact of development must be considered – Neighbourhood centres

- 3.25 Although all of the neighbourhood centres within the SLAA have been assessed to be suitable, available and achievable within the plan period, the SLAA does not take into account the cumulative impact of delivering all of these sites within this timeframe.
- 3.26 It is unrealistic to assume that the council can bring forward the delivery of all of the neighbourhood centres before 2031. As such, following discussions with various teams within the council (Estates, as landowner; and the Housing and Regeneration teams, as key delivery partners), only the priority sites have been identified as allocations in the plan.
- 3.27 It is considered that seven neighbourhood centres could realistically be delivered between now and 2031. Those that will be promoted first are identified in Table 7. These will be included as housing allocations within the Local Plan.

Table 8: Priority neighbourhood centres – to be included in the Local Plan.

Ref.	Address	SLAA dwelling estimate
701	Kenilworth Close	65
703	The Hyde	50
704	The Oval	275
707	Burwell Road	20
709	The Glebe	35
710	Marymead	60
721	Bedwell Crescent	45

¹⁴ Aspirational Housing Research, 2010

Table 9: Neighbourhood centres to be developed after 2031.

Ref.	Address	SLAA dwelling estimate
702	Filey Close	20
705	Oaks Cross	13
708	Roebuck	30
712	Canterbury Way	40

Results of the SLAA review

- 3.28 As a result of the amendments outlined above, a revised list of potential housing allocation sites and yields has been created. Having regard to the wider evidence base, 14 sites or areas from the SLAA have been discounted, either in whole or in part.
- 3.29 This has led to a decrease in the potential yield from SLAA sites of 2,006 units. This is summarised in the table below.
- 3.30 Following the review process, 22 specific sites are identified as potential housing allocations, as well as the Stevenage Central development area. These offer a maximum yield of 5,604 units. These are shown in the table on the following page.
- 3.31 When added to the housing commitments and completions (since 2011), we have the potential to deliver a total of 7,955 new homes up to 2031.
- 3.32 Based on previous rates of delivery, we expect an additional 200 new homes to come forward as windfall sites.
- 3.33 This brings the overall total up to 8,155. The housing trajectory on the following pages identifies when these homes could be delivered.

Table 10: Summary of discounts applied to published SLAA following review

Category	Discount	Cumulative discount	Identified capacity
Published SLAA			7,610
Updated monitoring data	-526	-526	7,084
Sites required for alternate land uses*	-645*	-1,171*	6,439*
Green Belt Review findings	-78	-1,249	6,361
Town Centre Framework	-604	-1,853	5,757
Aspirational housing*	-50*	-1,903*	5,707*
Neighbourhood centres	-103	-2,006	5,604

* Land North of Stevenage has been discounted by 336 homes on the combined grounds of retaining open space, preservation of the Conservation Area and provision of aspirational homes. For ease of interpretation, this whole discount is included in the 'alternate land uses' for the purposes of this table.

Table 11: Revised list of potential housing allocation sites

Ref	Address	Land type*	Period	Deliverable / developable	Dwellings
1	Shephall View	UG	Now	Deliverable	25
107	Ken Brown Car showroom, Shephall Way	PDL	After 2021	Developable	36
201	Shephall Centre, Shephall Green	UG	2016-2021	Developable	34
209	Ex-Play Centre, Scarborough Avenue	UG	2016-2021	Developable	15
212	Scout Hut, Drakes Drive	UG	2016-2021	Developable	18
213	Land at Eliot Road	UG	Before 2016	Deliverable	16
214	Day Nursery, Fry Road	UG	2016-2021	Developable	6
511	Garage Court, Dunn Close	PDL	Now	Deliverable	5
604	Land south of A602, Bragbury End	GB	2016-2021	Developable	400
609	Sports Ground, Bragbury End	GB	2016-2021	Developable	150
609a	Car park - Bragbury End Sports Ground, Aston Lane	GB	Now	Developable	8
610	Land North of Stevenage	GB	Now	Developable	800
611	Land West of North Road	RG	Now	Developable	149
612, 627 & 628	Land West of Stevenage	RG	2016-2021	Developable	1,350
840	Former Pin Green School field, Lonsdale Road	UG	Now	Deliverable	42
701	Kenilworth Close Neighbourhood Centre, Hertford Road	PDL	2016-2021	Developable	65
703	The Hyde Neighbourhood Centre, Shephall Way	PDL	After 2021	Developable	50
704	The Oval Neighbourhood Centre, Vardon Road	PDL	After 2021	Developable	275
707	Burwell Road Neighbourhood Centre	PDL	2016-2021	Deliverable	20
709	The Glebe Neighbourhood Centre	PDL	After 2021	Developable	35
710	Marymead Neighbourhood Centre, Broadwater Crescent	PDL	2016-2021	Deliverable	60
721	Bedwell Crescent Neighbourhood Centre	PDL	2016-2021	Developable	45
Broad location	Stevenage Central	PDL	Various	Deliverable / developable	2,000
TOTAL					5,604

*PDL – Previously developed, UG – Greenfield sites within the urban area, RG – Greenfield sites outside the urban area, GB – Green Belt sites.

Table 12: Results of the SLAA review – Housing Trajectory

			2011-2016					2016-2021					2021-2026					2026-2031				
Monitoring year ending...	Site Total	Land types	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Sites under construction																						
Former Mastercare site	106	Previously developed					75	31														
The Water Tower	34	Greenfield sites within urban area					17	17														
Brickdale House (small)	54	Previously developed					54															
Six Hills House	143	Previously developed					50	50	43													
Southgate House	74	Previously developed					30	44														
Brickdale House (main)	150	Previously developed						100	50													
Medium sites (10-19 units)	11	Previously developed						6	5													
Small sites (<10)	24	Previously developed					10	7	7													
Small sites (<10)	13	Greenfield sites within urban area					6	4	3													
<i>Subtotal</i>	<i>609</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>242</i>	<i>259</i>	<i>108</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
Sites with detailed planning permission																						
BP Garage, Primett Road	43	Previously developed					10	15	18													
Rileys Snooker Club	38	Previously developed					10	28														
Archer Road NC	24	Previously developed						10	14													
Medium sites (10-19 units)	12	Previously developed																				
Small sites (<10)	39	Previously developed					5	5	5	5	5	1										
Small sites (<10)	18	Greenfield sites within urban area					2	2	2	2	3											
<i>Subtotal</i>	<i>174</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>27</i>	<i>60</i>	<i>39</i>	<i>7</i>	<i>8</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
Sites with prior notification																						
DuPont	73	Previously developed							25	25	23											
Bank House	44	Previously developed							22	22												
Stevenage Office Complex	91	Previously developed							45	46												
Small sites (<10)	7	Previously developed						7														
<i>Subtotal</i>	<i>215</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>7</i>	<i>92</i>	<i>93</i>	<i>23</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
Sites with outline permission / subject to s106																						
Park Place	181	Previously developed																				
Town centre scheme	120	Previously developed																				
Lonsdale school	67	Previously developed							30	37												
Longfield Fire and Rescue Centre	95	Previously developed						31	31	33												
Land rear of Ferrier Rd/Magellan Close	34	Greenfield sites within urban area					15	19														
Vincent Court	37	Previously developed						12	12	13												
Matalan	526	Previously developed							75	75	75	75	75	75	76							
Medium sites (10-19 units)	13	Previously developed						5	5	3												
Small sites (<10)	12	Previously developed						2	2	2	2	2	2									
Small sites (<10)	8	Greenfield sites within urban area					2	2	2	1	1											
<i>Subtotal</i>	<i>1,093</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>71</i>	<i>157</i>	<i>164</i>	<i>78</i>	<i>77</i>	<i>77</i>	<i>75</i>	<i>76</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
'Deliverable' housing sites																						
Shephall View	25	Greenfield sites within urban area							10	15												
The Plaza	150	Previously developed									50	50	50									
Burwell Road NC	20						10	10														
Kenilworth Close NC	65	Previously developed						20	30	15												
Former Pin Green School playing field	42	Greenfield sites within urban area							10	10	10	12										
Land West of North Road (Rugby Club)	149	Greenfield sites outside urban area								40	40	40	29									
Medium identified sites (10-19 units)	16	Greenfield sites within urban area						16														
Small identified sites (<10 units)	5	Previously developed							5													
<i>Subtotal</i>	<i>972</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>10</i>	<i>46</i>	<i>55</i>	<i>80</i>	<i>100</i>	<i>102</i>	<i>79</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>

(continued...)

(...continued)

			2011-2016					2016-2021					2021-2026					2026-2031				
Monitoring year ending...	Site Total	Land types	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
'Developable' housing sites																						
Town Centre	670	Previously developed											150	150	200	200	200	200	200	200	150	
Shephall Centre	34	Greenfield sites within urban area												10	10	14						
Ken Brown Car Motors	36	Previously developed											10	10	10	6						
Land south of A602	400	Green Belt									40	40	40	60	60	60	60	40				
Land West of Stevenage	1350	Greenfield sites outside urban area											150	150	150	150	150	150	150	100	100	100
Marymead NC	60	Previously developed													20	20	20					
The Hyde NC	50	Previously developed												10	10	10	10	10				
The Oval NC	275	Previously developed															50	50	50	50	50	25
The Glebe NC	35	Greenfield sites within urban area													5	5	10	10	5			
Bedwell Crescent NC	45	Greenfield sites within urban area															10	10	10	10	5	
Land North of Stevenage	800	Green Belt						150	150	150	150	150	50									
Bragbury End Sports Ground	150	Green Belt							30	40	40	40										
Medium identified sites (10-19 units)	33	Greenfield sites within urban area								3	3	3	3	3	3	3	3	3	3	3		
Small identified sites (<10 units)	6	Greenfield sites within urban area											1	1	1	1	1	1				
Small identified sites (<10 units)	8	Green Belt								4	4											
<i>Subtotal</i>	4632		0	0	0	0	0	150	180	197	237	333	404	394	469	469	514	424	368	363	355	275
Windfalls	200		0	0	0	0	0	0	0	0	0	0	20	20	20	20	20	20	20	20	20	20
Net completions (projected beyond 2015) at 31st March			190	85	172	146	296	593	631	541	446	513	580	489	565	489	534	444	388	383	375	295
Cumulative completions (projected beyond 2015) at 31st March			190	275	447	593	889	1,482	2,113	2,654	3,100	3,613	4,193	4,682	5,247	5,736	6,270	6,714	7,102	7,485	7,860	8,155
Annualised dwelling requirement since start of plan period			380	760	1,140	1,520	1,900	2,280	2,660	3,040	3,420	3,800	4,180	4,560	4,940	5,320	5,700	6,080	6,460	6,840	7,220	7,600
Surplus/deficit			-190	-485	-693	-927	-1,011	-798	-547	-386	-320	-187	13	122	307	416	570	634	642	645	640	555
Five year supply (committed and deliverable)																						

4 Determining the most appropriate approach

- 4.1 As discussed in Section 2 of this paper, the Local Plan sets a housing target of 7,600 homes over the plan period.
- 4.2 Since 2011, we have completed 593 new homes. We have granted planning permissions for a further 1,758 new homes. Our completions and committed supply, therefore, totals 2,351 new homes. This leaves a residual requirement of 5,249 new homes to plan for.
- 4.3 In seeking to meet these requirements, in order to achieve sustainable development, we have followed the sequential test and considered sites in the order below:

- I. Previously developed sites (PDL)
- II. Greenfield sites within the urban area
- III. Greenfield sites outside of the urban area
- IV. Green Belt sites, as a last resort

- 4.4 This sequential approach is not completely rigid. Ultimately it may be considered preferable to allocate a site from a lower / 'less-preferred' category in the hierarchy before a site from a higher / 'more-preferred' category. The NPPF (Paragraph 52), for example, recognises potential advantages in larger-scale forms of development:

"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development."

- 4.5 It will also be necessary to determine whether other constraints on otherwise 'more preferable' sites, such as flood risk or other restrictive policy designations, might justify a departure from a strictly sequential approach.
- 4.6 The potential housing sites are broken down as follows:

Table 13: Site breakdown by land type following SLAA review

Land type	Total dwellings	Cumulative total dwellings
Previously developed	2,591	2,591
Greenfield sites within urban area	156	2,747
Greenfield sites outside urban area	1,499	4,246
Green Belt	1,358	5,604
Total	5,604	5,604

- 4.7 It is clear that we cannot meet our needs by using only previously developed sites. This would only allow us to develop around an additional 2,600 new homes. Adding in the Greenfield sites would allow for around 4,250 new homes. Including an allowance for windfall sites, this would take us to a maximum of 4,450 new homes. This leaves us around 800 homes short of the target.

Table 14: Assessing the need for Green Belt sites

Green Belt sites	Scenario 1: North Stevenage only	Scenario 2: South Stevenage only	Scenario 3: North and car park	Scenario 4: North and Sports Ground	Scenario 5: North and Land South of A602	Scenario 6: All Green Belt sites
Committed and completions	2,351					
Previously developed, Greenfield and Windfalls	4,446					
North Stevenage (800 homes)	800		800	800	800	1,358
Bragbury End Sports Ground (150 homes)		558		158		
Bragbury End – car park (8 homes)			8			
Land South of A602 (400 homes)					400	
TOTAL	7,597	7,355	7,605	7,755	7,997	8,155
Surplus/deficit	-3	-245	+5	+155	+397	+555
Level of buffer	0	0	0	2%	5%	7%

4.8 Scenario testing has been carried out to determine how we could meet our target most effectively by releasing sites from the Green Belt.

4.9 It is clear that without the allocation of the North Stevenage site, we cannot meet our needs (Scenario 2). Using the North Stevenage site alone would leave us just short of our target (Scenario 1). At least one of the sites to the South of Stevenage is required to meet our needs. The target is just about met using Scenario 3, however, this would not allow for any level of contingency.

4.10 An allowance above the housing target, in the form of a buffer, is important to allow for the possibility that circumstances may change beyond our control, and that some sites may not be delivered as we thought. There is no set 'standard' for this buffer.

4.11 Due to the nature of the town, we are heavily reliant on a small number of large sites. This creates a risk in that if just one of these sites is not delivered, we will not be able to meet our housing target. A buffer reduces this risk and allows for some level of contingency.

4.12 Although a 2 - 5% buffer could be provided by only using one of the two larger sites to the south, a larger buffer provides for more flexibility. The sites to the south of Stevenage are also intrinsically linked, as they require a new roundabout to be delivered on the A602 – the development of which would likely be too costly for one site to bear independently.

- 4.13 The allocation of all four Green Belt sites, therefore, provides the best option in terms of ensuring the housing target is delivered. This provides a 7% buffer. Retaining the existing Green Belt boundary would significantly limit our opportunities to build new homes.
- 4.14 Our Green Belt Review recommends that these sites could be released, without damage to the overall purposes of the Green Belt. They were shown to have minimal impact on the Green Belt purposes:
- Land at North Stevenage - This parcel's south facing topography means there is relatively limited connection with the open countryside to the north. Mature planting along Stevenage's boundary makes the visual containment stronger. The revised boundary will follow the western edge of the St. Nicholas and Rectory Lane Conservation Area boundary. North Hertfordshire are proposing to release the parcel of land to the north of this site from the Green Belt as well, to enable an extended scheme.
 - Land to the South of Stevenage (north and south of A602) - Both sites are well contained by strong boundaries, meaning that sprawl can be restricted and the sites have limited connections with the wider countryside. The revised boundary will follow Aston Lane to the edge of the Borough boundary.
- 4.15 Because much of Hertfordshire is covered by the Green Belt, many local authorities within the surrounding area are also likely to be relying on Green Belt release in order to meet their own needs, making reliance on neighbouring authorities via the Duty to Cooperate an unrealistic and very uncertain option for us.
- 4.16 This is borne out by analysis of capacity across the wider housing market area (HMA). Our evidence shows that Stevenage is located within a single functional HMA. This stretches from Welwyn Garden City in the south to Sandy in the north and broadly follows the A1(M) / A1 corridor. It ranges from the edges of Luton in the west to Royston in the east. The HMA covers the significant majority of North Hertfordshire's administrative area and smaller parts of Welwyn Hatfield, Central Bedfordshire and East Hertfordshire¹⁵.

Table 15: Indicative capacity within functional Housing Market Area (HMA)

	OAN 2011-2031	% of population in HMA	Indicative OAN in HMA	Capacity in HMA (ex - GB)	Capacity in HMA (total)
Stevenage	7,300	100%	7,300	6,800	8,200
North Hertfordshire	14,400	99%	14,200	4,600	18,500
Central Bedfordshire	29,500	29%	8,400	5,900	5,900
East Hertfordshire	16,400	6%	1,000	0	500
Welwyn Hatfield	13,200	52%	6,900	2,700	4,900
Total	80,800		37,800	20,000	38,000

Source: Authority websites / ORS / SBC analysis. Figures rounded to nearest 100.

- 4.17 A review of published capacity across the HMA demonstrates there would be a substantial shortfall against identified needs if all authorities were to restrict themselves to consideration of sites outside of the Green Belt¹⁶. Based on current information, none of the authorities in

¹⁵ Housing Market Areas in Bedfordshire and surrounding areas (ORS, 2015)

¹⁶ Figures for other authorities based upon SLAAs or other published sources and may not include additional sites that have been submitted in response to any subsequent consultation exercise or 'call for sites'. Figures for other authorities do not take account of any alterations to SLAA results that might arise following consideration of the wider evidence base or other relevant factors.

the HMA could meet their share of OAN on non-Green Belt sites alone. It would be inappropriate for Stevenage to ask other authorities to use their Green Belt land to meet our needs whilst simultaneously asserting that Stevenage's own Green Belt should be protected.

- 4.18 The Green Belt Review also included land outside of the Borough Boundary in neighbouring Districts to ensure that a strategic view was taken. The latest iteration of North Hertfordshire's emerging local plan suggests that sites outside the Borough to the west and north will be allocated or safeguarded for future development¹⁷. The site to the north, in particular, could not be sustainably developed without the release of our North Stevenage site. Accordingly, if this site were to remain in the Green Belt, not only would we be incapable of meeting our housing needs, but it could limit the scope of North Hertfordshire to meet their target, should NHDC decide that this is the most appropriate course of action. The North Hertfordshire extension to this site has the potential to yield around 1,000 homes.
- 4.19 Provision across the wider market area will be subject of continued discussions under the Duty to Co-operate as the draft local plan moves towards submission.
- 4.20 It is clear that it is necessary to release Green Belt sites if we were to meet our housing target. However, the NPPF is clear that housing need alone does not constitute the 'exceptional circumstances' required to justify rolling back the Green Belt boundary. Further work¹⁸ has been carried out to demonstrate that 'exceptional circumstances' exist for Stevenage. The Green Belt Technical Paper should be read alongside this report.

Five-year land supply / Phasing

- 4.21 As well as meeting our overall housing needs, Government guidance requires us to identify **deliverable** sites for the first five years of the plan (2016 to 2021). A deliverable site is a viable site that is available for development now, in a suitable location for housing, with a reasonable prospect of housing delivery on site within five years.
- 4.22 We also have to identify **developable** sites or broad locations for years 6-10 and, where possible, years 11-15 of the plan. A developable site is a site that is in a suitable location for housing with a reasonable prospect of it becoming available, and being developed, for housing within the period specified.
- 4.23 We intend to adopt the Local Plan in December 2016. Our total **deliverable** housing requirement is calculated as follows:
- Annualised requirement – Our 7,600 target equates to 380 homes per year over the 20 year plan period (2011-2031). For the first five years this equates to 1,900 homes (380 x 5).
 - Buffer – A 5% buffer on top of the five years supply is required to ensure choice and competition in the market for land. However, where there has been persistent under delivery, the NPPF requires this buffer to be increased to 20%. This should be moved forward from later in the plan period. Our completions so far have been significantly below the annualised requirement; as such a 20% buffer is required.
 - 1,900 + 20% buffer = 2,280.

¹⁷ North Hertfordshire District Plan 2011-2031 Preferred Options (NHDC, 2014)

¹⁸ Green Belt Technical Paper, SBC, 2015

4.24 The five year requirement also needs to take into account previous shortfalls in delivery. Since 2011, 593 new homes have been completed. This leaves a deficit of 927 homes against the annualised housing target.

Liverpool vs. Sedgefield

4.25 There are two commonly used methods of addressing previous shortfalls in delivery:

V. The 'Sedgefield' method, which makes good deficiencies as soon as possible (i.e. within the five-year period); or

VI. The 'Liverpool' method, which spreads any deficit over the remainder of the plan period.

4.26 The courts have accepted that 'there is no indication in the NPPF that one method is preferable to the other'¹⁹.

4.27 Using the Sedgefield method would require us to deliver nearly 650 new homes every year for the first five years. This is than significantly above anything that we have delivered since the start of the plan period and much higher delivery rates over the last 10 years (with the highest completion rate being 386 and the lowest just 37 new homes). There is no guarantee that the market would be capable of supporting such a large 'uplift' in completions.

4.28 Our heavy reliance on a small number of large sites, in the form of urban extensions and the large-scale redevelopment of the town centre, also reduces the likelihood of meeting such a high housing number within the first 5 years. Most of these sites are subject to longer timescales than smaller Brownfield sites would be. Many of the smaller sites are owned by the Borough Council, as such, it would be unrealistic to assume that any more of these can be brought forward early on in the plan period. The constraints to the delivery of housing are primarily due to market considerations rather than the result of there being insufficient land allocated within the local plan.

4.29 As such, the deficit has been spread across the remainder of the plan period. This allows for a more realistic approach, and provides us with an achievable target in the first five years.

4.30 The deficit of 927 equates to an additional 58 new homes per year for the remaining 16 years. So a total of 290 additional homes has been added to the five year requirement.

4.31 Our deliverable housing requirement, for 2016 to 2021 (monitoring years ending 2017 to 2021) is 2,570.

4.32 The housing trajectory (p14-15) shows that we do not have sufficient **deliverable** sites to meet this requirement. Our committed supply and deliverable housing sites, those which we believe will come forwards within the first five years of the plan period, equate to just 1,627 new homes within this period.

4.33 However, by referring back to the SLAA, we identified that some of the **developable** sites in Table 11 were only constrained (and not considered deliverable) by their Green Belt designation(s). They would otherwise be available for development now (or would be so at the point of adoption). These sites are:

- 609 Bragbury End sports ground

¹⁹ Bloor Homes v Secretary of State for Communities & Local Government [2014] EWHC 754

- 610 Land north of Stevenage
- 604 Land south of A602

- 4.34 The first two listed have interested and active developers, and could otherwise be progressed within the first five years. The Land South of the A602 does not have any physical constraints and, although it is not being actively pursued by a developer, it is owned by the Borough Council, so we have the opportunity to push this site forward earlier if required.
- 4.35 All of the other developable sites have significant constraints which we do not believe can be overcome prior to the five year period.
- 4.36 Releasing these sites from the Green Belt and allowing them to become deliverable housing sites adds a further 980 homes to the first five years supply, bringing the total to 2,607. This enables us to just meet our five year housing land requirement.

Table 16: Five year land supply – showing Green Belt potential

		Five year period (2016-2021)
Five year supply	Committed supply	1,244
	'Deliverable' housing sites	383
	TOTAL 5yr supply	1,627
Five year supply with Green Belt sites	Bragbury End Sports Ground	150
	Land North of Stevenage	750
	Land south of A602	80
	TOTAL Green Belt	980
	OVERALL TOTAL	2,607

- 4.37 The release of Green Belt sites provides us with viable sites, which are available for development straight away and can help us to meet the more immediate shorter-term needs. This will be particularly important in meeting our affordable housing needs and achieving social sustainability. Stevenage has a severe shortage of affordable homes. Addressing this need is a key priority of the council. Meeting our housing target within the Borough boundary and increasing the short term housing supply will enable local people to gain access to the resulting affordable housing that is developed.
- 4.38 Although our aim has always been to bring forward previously developed sites and those within the urban area before Green Belt sites, in line with the NPPF, phasing sites in this way would not allow us to meet our five year housing land supply. Recent Local Plan examination reports illustrate cases where phasing has been removed / altered to allow for Green Belt sites to be brought forward and made available for immediate development following the adoption of the plan²⁰.
- 4.39 Accordingly, sites have not been phased within the Local Plan. This reflects recent Examination decisions, the fact that the council has previously under-delivered on its housing target.

Conclusions

- 4.40 The Objectively Assessed Need (OAN) for housing in Stevenage is 7,300 dwellings over the period 2011-2031. However, guidance (including relevant case law) makes clear that it may not be appropriate to simply translate OAN into the local plan's housing target.

²⁰ Planning Inspectorate: Report to Knowsley Metropolitan Borough Council, November 2015

- 4.41 We consider a small uplift in the housing target is justified. Amongst other things, Stevenage has consistently recorded high levels of affordable housing need. Providing enough affordable homes for the people of Stevenage is a key priority for the council. A modest increase in the target allows for more homes in response to this pressure, whilst remaining broadly consistent with the approach being taken by other nearby authorities. The Local Plan sets a housing target of 7,600 new homes.
- 4.42 Taking into account an update to the monitoring data and a review of the SLAA, we have a total deliverable housing supply over the plan period of 8,155 units. On face value, this is sufficient to ensure that our target is met. However, this finding still needs to be balanced against other relevant considerations.
- 4.43 It is clear that we cannot meet our target by using only previously developed or Greenfield sites. This leaves us around 800 homes short. It is necessary to include some or all of the Green Belt sites identified in the SLAA (as reviewed in this document) if our target is to be met or exceeded within the Borough.
- 4.44 Scenario testing has been carried out to determine how we could meet our target by releasing sites from the Green Belt. This also explores the level of additional provision, in the form of a buffer, that could be incorporated. A buffer is important to allow for the possibility that circumstances may change beyond our control, and that some sites may not be delivered as we thought.
- 4.45 This shows that without the allocation of the North Stevenage site, and at least one other, we cannot meet our target. The sites to the south of Stevenage are intrinsically linked, as they require a new roundabout to be delivered on the A602. As such, the allocation of all four Green Belt sites, provides the best option in terms of ensuring the housing target is delivered and ensuring a reasonable buffer.
- 4.46 Our Green Belt Review identifies that these four sites can be released without significant harm to the overall purposes of the Green Belt in this area.
- 4.47 A review of published capacity across the wider Housing Market Area (HMA) identifies significantly restricted capacity outside of Green Belt. Based on current information, none of the authorities in the HMA could meet their share of OAN on non-Green Belt sites alone. It would be perverse to not support Green Belt release in Stevenage but to request it of others in order to meet our needs.
- 4.48 Our approach is, therefore, to allocate all of the sites included in the post-review SLAA, which have the potential to provide a total of 8,155 new homes.
- 4.49 Our Green Belt Technical Paper identifies that 'exceptional circumstances' exist to justify the roll back of the Green Belt and the use of these sites for development. It should be read alongside this paper, as it considers this issue in more depth.

5 Other issues

Gypsies and Travellers

- 5.1 The plan's approach to Gypsies and Travellers has been informed by an accommodation study and site search exercise. These form part of the evidence base²¹.
- 5.2 The accommodation study identifies a requirement for three additional pitches over the period to 2018, with a further 3-5 pitches required in each five-year period thereafter. It is recognised that, due to the small numbers identified, this requirement will be susceptible to relatively minor variations in, or deviations from, the projected rates of household vacancies or formations. The draft local plan therefore includes a requirement that any applications are supported by up-to-date assessments of need.
- 5.3 The site search recognised two potential sites that met the broad tests of suitability and availability for Gypsy and Traveller use. However, it also recognised that both sites had been promoted for alternate land-uses through the plan process.
- 5.4 The site search identified a series of 'next steps' (c.f. paragraph 6.10 of that document). A number of these steps have been pursued as the plan progressed towards publication.
- 5.5 One of the key requirements arising from the site search was the consideration of the identified sites in the context of the wider evidence base for the plan in order to come to a view on the broader balance of uses that would need to be delivered.
- 5.6 This consideration for the two potential sites is summarised in the table below and should be read in conjunction with comments made against these sites in other relevant studies.

Table 17: Review of sites identified in Gypsy and Traveller site search

Site / area	Commentary	Minded to include in local plan?
Land west of North Road	This site was also identified as a prospective Employment site in the SLAA. Although the site was considered suitable and available for Gypsy and Traveller use, the site search recognised that a number of constraints existed on the site. Most notably the presence of the pylon lines which traverse this site from east to west. The location of these lines – towards the north and south of the site respectively – and the need to ensure appropriate clearances from these, meant that any Gypsy and Traveller site could be seen as something of an 'island' separated from neighbouring land parcels and uses. This would not provide a good quality of life for the Gypsy and Traveller community. The prospective Gypsy and Traveller use needs to be set against the potential alternate employment use. As set out in the employment evidence base, there is a significantly constrained supply of employment land within the Borough. Failure to make use of potential sites could result in an imbalanced strategy. Employment would be a more intensive use that made better and more sustainable use of the site. Employment units could be accommodated across the significant majority of the site as i.) the quantum of land required exceeds the size of this site, while ii.)	No

²¹ Stevenage Borough Council Gypsy and Traveller Accommodation Study (DCA, 2013); Gypsy and Traveller Site Search (SBC, 2014)

Site / area	Commentary	Minded to include in local plan?
	guidance produced for the National Grid identifies that low-intensity uses or ancillary requirements such as car parking areas and storage yards can be accommodated beneath overhead lines with sensitive design ²² . An employment scheme is considered more likely to be able to present a holistic solution for the site that could be designed around the identified constraints. On balance, the Council was minded to consider this site as more appropriate for future employment use.	
Land west of Stevenage	This site is also promoted as part of a significant housing development. The promoters of this scheme previously objected to the extension of the existing site at Dyes Lane on the basis it could prejudice the realisation of the wider development. There are uncertainties surrounding the current site owner's willingness to take on management responsibility for any extension. Based on the maximum potential yield from this area and the findings of the accommodation study, a further extension to the Dyes Lane site would still necessitate the identification of a new site where the remaining pitches needed over the plan period could be accommodated. If any new site was capable of accommodating the whole pitch requirement, it may be preferable to do so in a single location. On balance, the Council was therefore minded to not pursue any further extensions to the existing site at Dyes Lane.	No

- 5.7 Although provisionally minded to use both sites identified in the site search for alternate uses, no final decision was taken at this point. Utilising both potential sites for alternate uses would plainly result in a shortfall in Gypsy and Traveller provision. It was therefore necessary to consider additional recommendations set out in the site search and come to a rounded view.
- 5.8 In June 2015, nearby authorities were contacted under the Duty to Co-operate to ascertain whether they had sites or areas which might be able to contribute towards the unmet needs from Stevenage if the approach above was pursued. No additional sites beyond the Borough boundary were put forward as a result of this exercise.
- 5.9 As such, the findings of the site search were revisited to determine if it might be appropriate to reconsider them for allocation in the plan. In doing so, regard was had to the initial findings of the site search and consideration of any alternate proposals on those land parcels.
- 5.10 The sites search rated the suitability of prospective sites using a traffic-light 'RAG' rating. It also identified whether or not they were located within the Green Belt.

Table 18: Status of other 'suitable' sites in Gypsy and Traveller site search

	Outside Green Belt	Within Green Belt
'Moderate' prospect	0	1
'Difficult' prospect	1	5

- 5.11 Following the principles of a sequential approach, the one site outside of the Green Belt was reconsidered first. However, a review of the site search's conclusions identified that this site presented similar issues to the land west of Stevenage considered above: it forms part of a wider scheme being promoted in this area and would likely still necessitate the identification of a further site. This opportunity was not pursued.

²² <http://www2.nationalgrid.com/UK/Services/Land-and-Development/A-sense-of-place> provides advice.

- 5.12 Consideration was then given to the one ‘moderate’ prospect identified within the Green Belt. A review of the site search’s conclusions identified that this site was identified as a ‘good’ opportunity in physical terms: It is a level site with direct access and a reasonable level of screening and containment. The Green Belt policy constraint was the significant factor preventing a more favourable assessment of suitability.
- 5.13 Further consideration was given to the contribution of this site to the purposes of Green Belt. Although within a wider land parcel judged to make a significant contribution to the purposes of Green Belt, this prospective site is well separated from the land to the north by a well-established, mature treeline as well as a change in levels to the adjacent field.
- 5.14 A more detailed assessment of a smaller land parcel was undertaken in the ‘Part 2’ Green Belt review. This recognises that it is physically and perceptually distinct from the wider segment, due to its heavily wooded nature. It recommends that this land could be released, in whole or in part, without significant harm to the strategic role of the Green Belt²³.
- 5.15 Further site investigations have been conducted, including liaison with Hertfordshire County Council’s Gypsy and Traveller, Education and Highway teams. No significant constraints to development have been identified.
- 5.16 In light of the wider local plan evidence base, the conclusions reached regards potential alternate sites and the absence of alternate potential locations beyond the Borough boundary, it is considered that allocation of this land for a Gypsy and Traveller site is justified.
- 5.17 Re-issued Government guidance²⁴ retains the advice that:
- If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific identified need for a traveller site, it should do so only through the plan making process and not in response to a planning applications. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.*
- 5.18 These principles have been followed in the draft plan. The Green Belt Technical Paper contains further explanation.

Optional housing technical standards

- 5.19 The Government has created a new approach for the setting of technical standards for new housing²⁵. Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard.
- 5.20 Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.

²³ These issues are considered further in the Green Belt Technical Paper (SBC, 2015).

²⁴ Planning Policy for Traveller Sites (DCLG, 2015)

²⁵ Written statement to Parliament: Planning update March 2015

National guidance²⁶ states that where Local Planning Authorities are to include these additional standards, they need to provide evidence to justify why this is considered to be necessary.

Accessibility and wheelchair housing standards

- 5.21 We have considered the need for the additional accessibility standards that Local Authorities can choose to include in their local plans:
- M4 (2): Accessible and adaptable dwellings; and
 - M4 (3): Wheelchair user dwellings – can only be applied to Affordable Homes and homes where the local authority designates the owner.
- 5.22 Our evidence²⁷ provides an assessment of currently adapted dwellings as well as likely future need.
- 5.23 Responses to the consultation carried out as part of this work suggest that around 13% of households in Stevenage have at least some form of wheelchair adaptation in their homes (around 4,500 households). This means that around 30,300 households are not wheelchair accessible.
- 5.24 The evidence also identifies that around 12% of current households require new wheelchair adaptation.
- 5.25 Applying the 12% requirement to those existing households that do not include adaptations currently, means that 3,600 homes built to M4(2) standards will be required. The Local Plan cannot require existing properties to be adapted, but it can make allowance for this need by ensuring it is met through the new building stock. We also need to ensure adaptable and accessible properties are provided to meet the needs of the new population.
- 5.26 Our housing target is 7,600 new homes. Allowing for at least half of these new homes to be wheelchair accessible should ensure these needs are met.
- 5.27 The Local Plan, therefore, sets a target of **50%** of all new dwellings to be wheelchair accessible and adaptable. This figure will however vary on a site by site basis, as there will be some dwellings that cannot be adapted to accessible and adaptable standards (such as high rise flat developments).
- 5.28 In terms of viability, our evidence²⁸ has taken into account the Standards Review and its implications.
- 5.29 Whilst the study acknowledges the Code for Sustainable Homes standards are no longer being applied, as there is not yet any data on the build costs for applying the optional standards contained in the standards review, it applies the Code for Sustainable Homes costs²⁹. This equates to 1.5% of build costs to reflect 'the increase in environmental standards contained in the building regulations.

²⁶ NPPG: Housing- Optional Technical Standards

²⁷ Strategic Housing Market Assessment (SHMA), 2013

²⁸ Whole Plan Viability Study (HDH, 2015)

²⁹ The study refers to *Cost of building to the Code for Sustainable Homes, Updated Cost Review (DCLG, August 2011)*".

- 5.30 This 'increase in standards' reflects the introduction of Part M of the Building Regulations above.

Internal Space Standards

- 5.31 The government has introduced an optional nationally described space standard. This aims to ensure properties have a minimum internal floorspace area (as identified below). We have considered whether there is a case for requiring these standards for new homes within the Borough.

Table 19: Nationally described space standard. Minimum gross internal floor areas and storage (m2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

- 5.32 The majority of residential schemes granted planning permission in Stevenage in recent years have met the minimum internal space standards above.
- 5.33 However, there have been some residential schemes which have fallen below these thresholds. This can have a significant negative impact on residents' overall quality of life. Although this represents only a small proportion of the new homes built at present, the Local Plan is set to increase the total number of new homes built each year significantly. As such, even a small proportion of this overall growth could equate to a large number of homes being built to lower size standards.
- 5.34 The Borough Council places great importance on the quality of life of its residents. Implementation of these internal floorspace standards ensures that all new residential development contributes towards this better quality of
- 5.35 life, and does not create poorly designed and overcrowded properties.

- 5.36 Our evidence on viability³⁰ states that “The Council have no current plans to introduce these standards, we have however reflected these in our modelling”. The viability of future housing growth proposed in the Local Plan has, therefore, been assessed based on this standard being introduced.

Water efficiency

- 5.37 National policies³¹ expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations.
- 5.38 All new homes are required to meet the national standard on water usage set out in Building Regulations of 125 litres per person per day. We have considered whether there is clear local need for a more demanding standard to be set.
- 5.39 The Environment Agency have identified that Stevenage lies within an area of 'Water Stress'³².
- 5.40 As such, the more stringent optional target of 110 litres per person per day has been adopted for all new developments in Stevenage in line with National Planning Policy Guidance.

³⁰ Whole Plan Viability Study (HDH, 2015)

³¹ NPPF, 2012

³² As identified in the Rye Meads Water Cycle Study Review Adopted September 2015