



Stevenage Borough Local Plan 2011-2031

Revised Housing Targets consultation
June 2015

About this consultation

This document is a consultation on the new local plan for Stevenage.

You can comment on this document from Monday 22 June 2015. Please send your comments to the Planning Policy team at Stevenage Borough Council. The deadline is **Monday 27 July 2015**.

You can send us your comments using the addresses below.

On line

www.stevenage.gov.uk and click on "Have your say"

By email

planningpolicy@stevenage.gov.uk

By textphone

01438 242555

By mail

Planning Policy
Stevenage Borough Council
Daneshill House, Danestrete
Stevenage
SG1 1HN

We will read all comments that are sent to us by the deadline. Late comments will not be accepted.

Any comments that you send us will be public documents. They will be available for other people to see on request. We cannot accept confidential or anonymous responses. We will not reveal personal data such as signatures, email addresses or telephone numbers but we cannot keep your name or address secret.

If you have any questions, please contact the Planning Policy team using the details above or by telephone on 01438 242752. This number is for queries only. We cannot accept your response to the consultation over the phone.

We have to complete a number of stages before we can adopt and use the new local plan. The diagram on the next page shows how this consultation fits in to the overall preparation of the plan⁽¹⁾.

Government guidance says that our plans should look at least fifteen years into the future from the date they are adopted. The local plan will cover the period from 2011 to 2031.

1 The timetable for writing the plan is set out in a document called the [Local Development Scheme](#). Our LDS came into effect in August 2014.

About this consultation

Stage 1 Preparing the Evidence Base	This stage involves us collecting information on a range of social, economic and environmental matters. This informs the plan. The evidence base is kept up-to-date through each of the stages below.
Stage 2 Consultation on the preparation of the plan	This is the stage we are at now. This is the second consultation we have carried out. We use the results of Stage 1 to identify the main issues that the plan needs to deal with and the options that are available. An environmental assessment is also produced. We carried out a first consultation on the local plan in June and July 2013. This consultation will end in July 2015.
Stage 3 Writing a detailed draft plan	At this stage we continue to develop our plan. This includes considering your comments from Stage 2 and the findings of any new studies. We decide on the exact words and policies we want to use in the plan.
Stage 4 Publication of the draft plan	We publish what we think should be the final version of the plan. A consultation is held for six weeks. More detailed environmental assessments are also published. A draft proposals map shows sites that we want to develop or protect. We aim to reach this stage later in 2015.
Stage 5 Formal consideration of objections	We will consider the points raised by the consultation. If there are significant issues, we may withdraw the plan and start again. If smaller changes are required, we can make these and consult on them.
Stage 6 Submission to the Secretary of State	Once we are happy with the plan, and believe we can defend it against any remaining objections, we will send it to the Secretary of State to be examined. We aim to reach this stage by the spring of 2016.
Stage 7 Examination	An Inspector appointed by the Government will examine the plan. People who have objected to the plan may be allowed to appear in front of the Inspector in person. We aim to reach this stage in the summer of 2016.
Stage 8 Inspector's report	The Inspector writes a report of the examination and decides whether or not the plan can be adopted. If the Inspector decides the plan cannot be adopted, we may be able to ask him or her to suggest changes (or modifications) that would make the plan acceptable. We aim to reach this stage in autumn 2016.
Stage 9 Adoption	Once the Inspector says that our plan is acceptable (either with or without modifications) it can be adopted. We aim to reach this stage by the end of 2016.

Housing targets consultation

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Contents

1 Introduction

1.1 We carried out a first consultation on a new local plan for Stevenage in the summer of 2013⁽²⁾. This asked for your opinions on a wide range of topics. We published the results of the consultation in 2014⁽³⁾ and are continuing to address the issues raised.

1.2 Following the first consultation, it became clear that we would need to carry out more work before publishing a full draft of the plan. In particular, we need to consult again on the housing target for the Borough. The reasons for this include:

The last Census showed that previous estimates of Stevenage's population had been too low. This had influenced the figures used in our last consultation. New Government projections were released after the consultation in 2014 and earlier in 2015⁽⁴⁾. We have to take this new information into account;

A large number of local plans have failed at examination or in the courts since 2013. Others have required significant extra work. In a number of cases, it was because they did not properly consider what the housing target should be or how it related to the plans of other authorities; Government guidance on housing and the Green Belt has been updated. This has been used to review our understanding of future housing requirements in the Borough⁽⁵⁾; while We have been working to encourage more development in Stevenage. As a result, the number of homes that we think could be built in the Borough by 2031 has changed.

1.3 We cannot now rely on the housing target options that we consulted on in 2013 to write our draft plan. This document sets out an updated choice of two possible options for the Borough's new housing target that takes these matters into account.

1.4 Stevenage is a very small Borough. In places, the town is built right up to the Borough boundary. At Great Ashby, to the north-east, it spills over the boundary into North Hertfordshire (see map on following page). Much of the undeveloped land at the edges of the Borough is in the Green Belt.

1.5 The future of the Green Belt is therefore closely related to the housing target that we might choose. The new local plan will need to make an important choice:

Maintaining the current Green Belt boundary on the understanding that this will not provide enough homes to meet future needs within the Borough; versus

Meeting identified housing needs within the Borough on the understanding this will require the release of some land from the Green Belt.

1.6 The three options we have identified for the Green Belt in this consultation are broadly the same as in 2013. The information that explains what the different approaches might mean has been updated.

2 [Stevenage Borough Local Plan 2011-2031: First consultation](#)

3 [Stevenage Borough Local Plan 2011-2031: First consultation, Statement of Consultation](#)

4 2012-based subnational population projections (available from the [ONS](#) website); 2012-based household projections in England 2012-2037 (available from the DCLG website)

5 Planning Practice Guidance was published by the Government in March 2014 on the [Planning Portal](#) website.



Map of Stevenage Borough

1.7 The Borough Council has identified a preferred approach. We intend to follow these choices in our draft plan later in the year. However, due to the changes outlined above and the requirements of Government guidance, we are providing a further chance for you to comment before making a final decision.

Laws and guidance on local plans

1.8 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England. We have to take the NPPF into account when we prepare this plan or decide if we should grant planning permission for new developments.

1.9 The NPPF says that we should meet the development needs of our area where possible. We should identify future housing, business and other requirements and then use our plan to say where and when these will be met. However, the NPPF also says that protecting the Green Belt is very important.

1.10 National laws say that local authorities should work together when writing new local plans. This is known as the Duty to Co-operate. This is particularly important if a local authority does not think it will be able to meet its needs in its own area. However, each authority can only plan for its own area. It cannot identify sites or set targets for land that is not under its control.

1.11 National Planning Practice Guidance (NPPG) was launched in 2014. It provides more detailed information and says how we can meet the requirements of the NPPF. NPPG also sets out how we should calculate the amount of new development that is required and explains how the Duty to Co-operate works.

1.12 Throughout this document we have highlighted relevant guidance in the NPPF and NPPG and shown how this has been taken into account.

1.13 Our plans must also go through two different processes while they are being written that consider the likely effects of the plan on the environment, our society and the economy. These are required by national and European laws.

1.14 These processes are collectively known as Sustainability Appraisal (SA). The proposals in this consultation have been subject to SA. The SA is in a separate document but we tell you about its most important findings in this consultation. The full SA is available to view on our website, at our offices in Danestrete and at the libraries in the town centre and Old Town.

2 Borough housing target

2.1 Housing is one of the main issues that any local plan has to set policies for. Government projections show the number of people living in Stevenage continuing to increase. This, along with changes in the ways people choose to live, will continue to drive demand for new homes.

2.2 The new local plan will set a housing target that says how many homes need to be built within the Borough between 2011 and 2031. Until recently, the housing target for Stevenage was not set by the Borough Council. However, it is now up to us to decide how many homes should be built in the future.



The local plan will set a target for new homes and identify the sites where these will be built

2.3 The NPPF says local plans should normally meet the full requirements for market and affordable housing⁽⁶⁾. The price of homes in Stevenage is a significant issue while there is a continual demand from individuals, couples and families wanting to join our housing waiting list. There are areas of the town in need of regeneration. Allowing more development to happen can help address these issues and encourage investment and change.

2.4 On the other hand, Stevenage is a particularly small Borough. There is only so much development that we can fit within our boundaries. We are tightly surrounded by the Green Belt and two other authorities - North Hertfordshire and East Hertfordshire. The Green Belt can be a reason to restrict the amount of development we allow to happen in the future⁽⁷⁾. We have to be able to show there are "*exceptional circumstances*" in order to change the Green Belt boundary and release land for development.

2.5 Before finally choosing our housing target, we have to explore the reasonable options. Any target also has to be justified by the evidence - we can't just make a number up.

⁶ Paragraph 47 of the NPPF.

⁷ Paragraph 14 of the NPPF explains that exceptions [to meeting housing needs] should only be made where (i) the adverse impacts of doing so would significantly and demonstrably outweigh the benefits; or (ii) specific policies in the NPPF indicate development should be restricted. Examples include policies relating to Sites of Special Scientific Interest, Green Belt or Local Green Space.

Changes since the 2013 consultation

2.6 The 2013 consultation suggested three possible options for a housing target. A target of 5,300 homes was identified as the Council's preferred option. This was based upon the number of homes that, at the time, we felt could be built within the Borough. It also would have met the Government's household projections that were released shortly before the consultation⁽⁸⁾.

2.7 As explained in Section 1, these figures are no longer considered a reliable basis for the new local plan. The reasons for this can be split into two broad categories which are discussed below:

- New data, guidance and evidence on need ('housing demand'); and
- New sites that have been promoted for development in the Borough and Government advice relating to the Green Belt ('housing supply')

Housing demand

2.8 Since the last consultation in 2013, a large amount of new information has become available. This has provided up-to-date data on how the town is expected to grow and change in the future. We also have a much better understanding of how the Government expects us to take this into account as we write the local plan.

2.9 New Government population and household projections for Stevenage show a significant increase on the numbers previously used. These now suggest that, between 2011 and 2031:

The population of Stevenage would rise from 84,200 to 97,900. This is an increase of 13,700 people or 16% over twenty years;

Most of this growth is in older age groups. The number of people aged 60 or over in Stevenage would rise from 16,100 to 25,800. This is an increase of 9,700 or 60%;

This would result in an increase of 7,600 households in Stevenage over the plan period.

2.10 These figures are the "starting point" for our local plan⁽⁹⁾. However, these projections should be thoroughly tested. We should also take into account economic indicators, market signals and other factors to work out what the NPPF calls our 'Objectively Assessed Needs'. This includes estimates of future jobs, house prices and measures of affordability.

2.11 These issues are explored in detail in our new housing study⁽¹⁰⁾. This document should be referred to for more detail. It tells us that:

The Government's latest population and household projections for Stevenage are based on trends from the last five years;

Using trends from the last 10 years is a better way of calculating future needs. This prevents plans being based upon short-term trends that are too high or too low to realistically continue

8 2011-based household interim projections to 2021 for England, published in April 2013 and available from the [National Archives](#) website (accessed May 2015). More information is contained in the 2013 consultation document and accompanying Housing Targets Paper (Stevenage Borough Council, 2013)

9 Planning Practice Guidance: Housing and economic development needs assessments, [Paragraph: 015 Reference ID: 2a-015-20140306](#)

10 Stevenage and North Hertfordshire Strategic Housing Market Assessment Update 2015 (ORS, 2015). The NPPF says this is a key part of our evidence base

in the future. In Stevenage, this reduces the number of homes needed compared to the latest Government projections;

However, our Objectively Assessed Needs should also include a response to market signals. This increases the number again. This response takes account of 'concealed households', such as grown up couples living with parents, as well as those who will require affordable housing⁽¹¹⁾.

2.12 This approach is consistent with how nearby areas, including North Hertfordshire, East Hertfordshire, Central Bedfordshire, Bedford and Luton, have calculated the number of homes they need. It would also result in Stevenage taking a 'fair share' when looking at the number of homes that are said to be needed nationally. Overall, the study identifies an Objectively Assessed Need for Stevenage of **7,300 new homes over the period 2011-2031**.

Housing supply

2.13 We assess the number of homes that could be built in Stevenage every year⁽¹²⁾. Interest in Stevenage as a place to invest and build homes has increased in the last two years. There are several reasons for this:

We are moving further away from the recession and downturn that started in 2008. People and companies are more confident;

Stevenage is less than 20 minutes from the centre of London by the fastest train;

There is a significant demand for new homes, both from Stevenage itself and the wider area;

We have a number of vacant or underused sites, particularly in and around the town centre.

2.14 The regeneration of the town centre is a key priority for the Borough Council. The Stevenage First Town Centre taskforce has been set up to guide development and investment. A new regeneration plan will shortly be completed that will inform the full draft of the Local Plan.

2.15 These factors mean that more landowners are now willing to put forward their sites for development. Some owners are considering bigger schemes than in the past.

2.16 The Council is also at the early stages of developing a new housebuilding programme to help local people have their own low-cost home. The aim is to deliver 550 council homes over the next ten years. This is the first phase of a longer-term programme to deliver up to 1,900 new homes. This programme will need to identify a number of sites in the Borough.

2.17 However, we cannot simply assume that all sites which have been suggested for development, and are considered broadly suitable for housing, should be used to set the target. This is for a number of reasons including:

Not all sites which already have permission will necessarily be built;

Some sites have also been suggested, and may be needed for other other land uses, such as employment;

11 Inspector reports into other local plans are clear that it would be unrealistic for local plan housing targets to try and meet all affordable housing needs

12 This is done through a Strategic Land Availability Assessment (SLAA). Our most recent study is the Strategic Housing Land Availability Assessment: Housing, Update June 2014

Lots of the same sort of site have been promoted individually and could be suitable. However, it may not be appropriate or realistic to develop them all. Examples include sites in the town centre, our neighbourhood centres or small areas of open space;

Local Plans have to be flexible and show what will happen if some sites or schemes do not come forward. The plan will need to include a slightly higher number of sites than is actually needed to meet any target;

Landowners or developers may not be willing or able to bring sites forward at the rate of development suggested by this overall number; while

Some sites meet the SLAA tests but are less preferable locations for development. This might include sites (partly) in areas of flood risk or Conservation Areas or sites currently in the Green Belt.

2.18 An initial view on these issues has been taken to inform the two housing options in this consultation. A final decision on which sites should, or should not, be identified for development will be made at the next stage of the Plan.

Relationship with the wider area

2.19 All local authorities have to prepare local plans for their own areas.

2.20 Stevenage is surrounded by North Hertfordshire and East Hertfordshire districts. Their boundaries come right up to the edge of town. Any decisions they make could affect what happens in Stevenage in the future.

2.21 North Hertfordshire consulted on their local plan earlier in 2015. This suggested sites for development to the north and north-east of Stevenage. It also said land to the west of Stevenage in North Hertfordshire could be 'safeguarded' for long-term use. In total, their plan identified land for almost 5,000 new homes on the edge of Stevenage. These would be in addition to any target that we set for the Borough. North Hertfordshire say they will produce a full draft of their local plan by the end of the year.

2.22 East Hertfordshire consulted on their local plan in 2014. This said they did not intend to put any development around Stevenage.

2.23 North Hertfordshire and East Hertfordshire's current proposals are shown on the following page. Where relevant, we have discussed what North Hertfordshire and East Hertfordshire are planning to do in this document. This helps to show what will happen around the town as a whole in the future. However, **we cannot make plans or set targets for land outside of the Borough** in these areas.

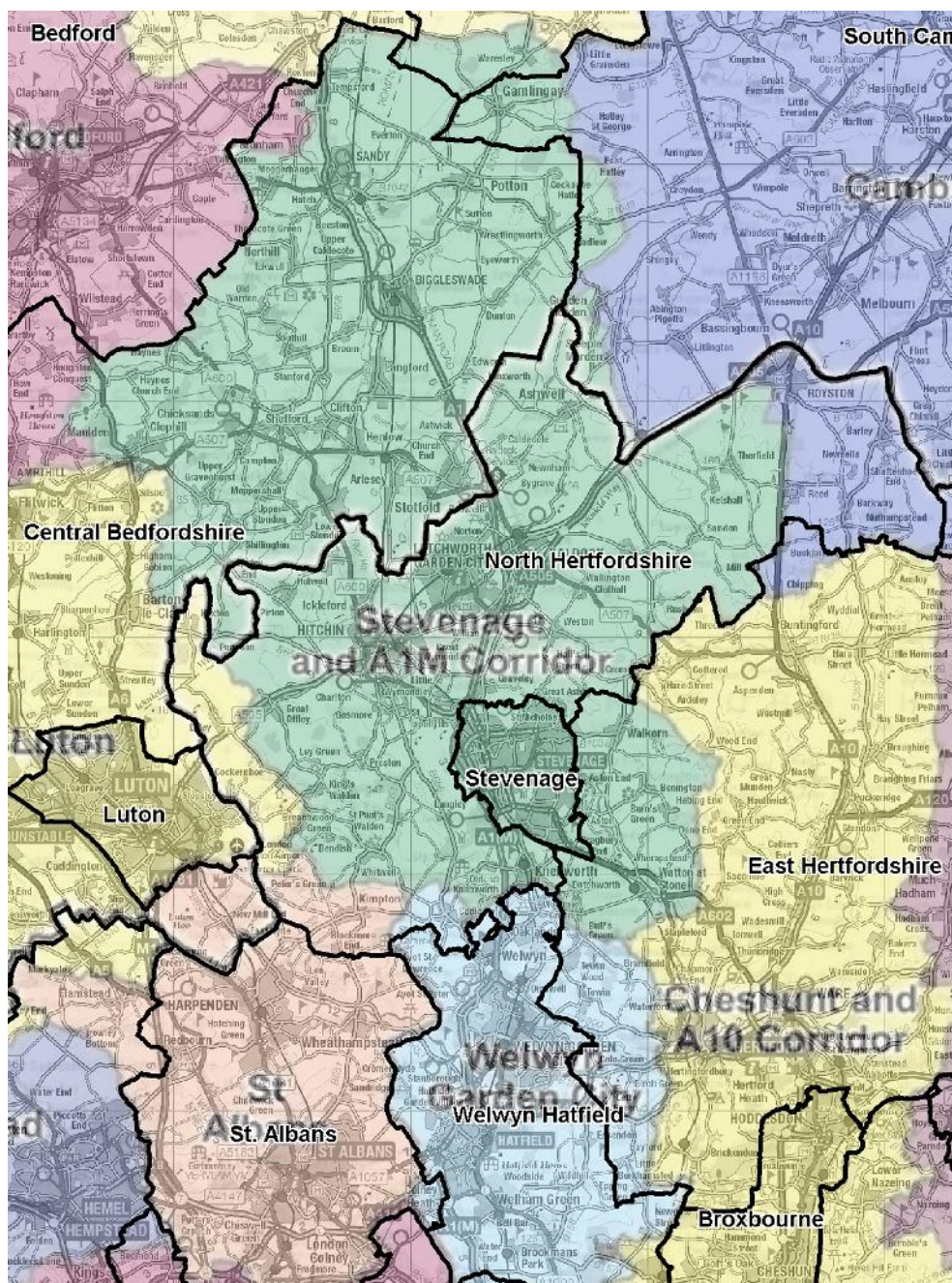
2.24 The Duty to Co-operate also requires us to work with other nearby authorities, as well as North Hertfordshire and East Hertfordshire. The NPPF says local authorities should work together to make sure enough homes are built across Housing Market Areas (HMA). These are larger areas that cross local authority boundaries.



8

2.26 This HMA is shown in the map below⁽¹³⁾. Local authority boundaries are shown by black lines. The HMAs are shown by the coloured areas. These HMA boundaries are currently being reviewed to make sure they take account of the most recent data.

2.27 Once this work is completed we will work with relevant authorities to compare our emerging housing targets and make sure Government requirements are being met. On current information, this could include North Hertfordshire, East Hertfordshire and Central Bedfordshire councils.



Stevenage's current Housing Market Area (shown green) extends well beyond the Borough boundary (black).

¹³ This HMA geography was developed by Opinion Research Services (ORS) and is available in a number of studies they have completed for local authorities which are publicly available. Administrative boundaries have been overlaid by the Borough Council.

Revised housing target options

Revised Borough housing target options

Option	Number of homes 2011 - 31	
	Total	Average per year
a. Maintain the Green Belt	5,300	265
b. Borough capacity	7,600	380

2.28 We are now consulting on two different housing options for the future. Based on current information, these would see either 5,300 or 7,600 homes being built over the period to 2031. Option b would require development on land outside the edge of the existing town that is currently in the Green Belt. This is because there is not enough space within the existing Green Belt boundary to build this number of homes. We have used the evidence and issues discussed above to help us develop these options:

Option a would build the maximum number of homes that we could accommodate within the existing Green Belt boundaries around the town. This would still use the undeveloped land to the west of the A1(M);

Option b is our preferred approach. We would build the number of homes we think we could now reasonably accommodate within the Borough boundary. This would include developing sites which are currently outside of the town in the Green Belt. It would broadly meet the Government's latest projections of population and household growth and also our own assessment of Stevenage's future needs.

2.29 Please read the more detailed information about each option before you respond to the question below. We would also suggest that you read the section on Green Belt (see Chapter 3) to understand how the two issues affect each other.

2.30 It is important to be clear that these options are for Stevenage Borough only. Any plans or proposals for development around the edge of Stevenage in North Hertfordshire and East Hertfordshire districts would be in addition. These decisions are beyond our control, but we have told you what the relationship might be based on the latest information.

Question 1

Which housing option (a or b) do you think we should work towards? What are your reasons for choosing this level of development?

Option a: Maintain the Green Belt - 5,300 homes

Possible advantages of this option	Possible disadvantages of this option
<p>No need to release land from the Green Belt sites for housing;</p> <p>Focuses most development within the existing urban area;</p> <p>Could allow for a better balance between housing and employment within the Borough.</p>	<p>Would not meet Objectively Assessed Needs;</p> <p>Would not provide enough affordable homes;</p> <p>Could send negative messages about the town, stopping investment and regeneration;</p> <p>Would not allow development around the town in North Hertfordshire</p>

2.31 This option would only build within the limits of the existing Green Belt boundary. This would include the land to the west of Stevenage that was taken out of the Green Belt when our current plan was adopted in 2004. We think this option could deliver around 5,300 homes⁽¹⁴⁾.

2.32 We would not alter the existing inner Green Belt boundary to release land. There would be no Green Belt development within Stevenage Borough until at least 2031.

Development outside the existing town

2.33 The NPPF says that the Government attaches great importance to Green Belts. They are one of the reasons we can use to restrict development if the evidence says this would be appropriate. This option would take that position. It would say that meeting our future housing needs and regenerating the town do not represent the 'exceptional circumstances' that we need to show if we are to adjust the Green Belt boundary⁽¹⁵⁾(see Issue 2).

2.34 This option would result in some development outside of the existing town. The land to the west of the A1(M) was taken out of the Green Belt in 2004. Our evidence says there is no justification to re-designate this area as Green Belt⁽¹⁶⁾. There are also smaller areas of land along North Road, near the Lister Hospital, that are outside the Green Belt and could be used for development.

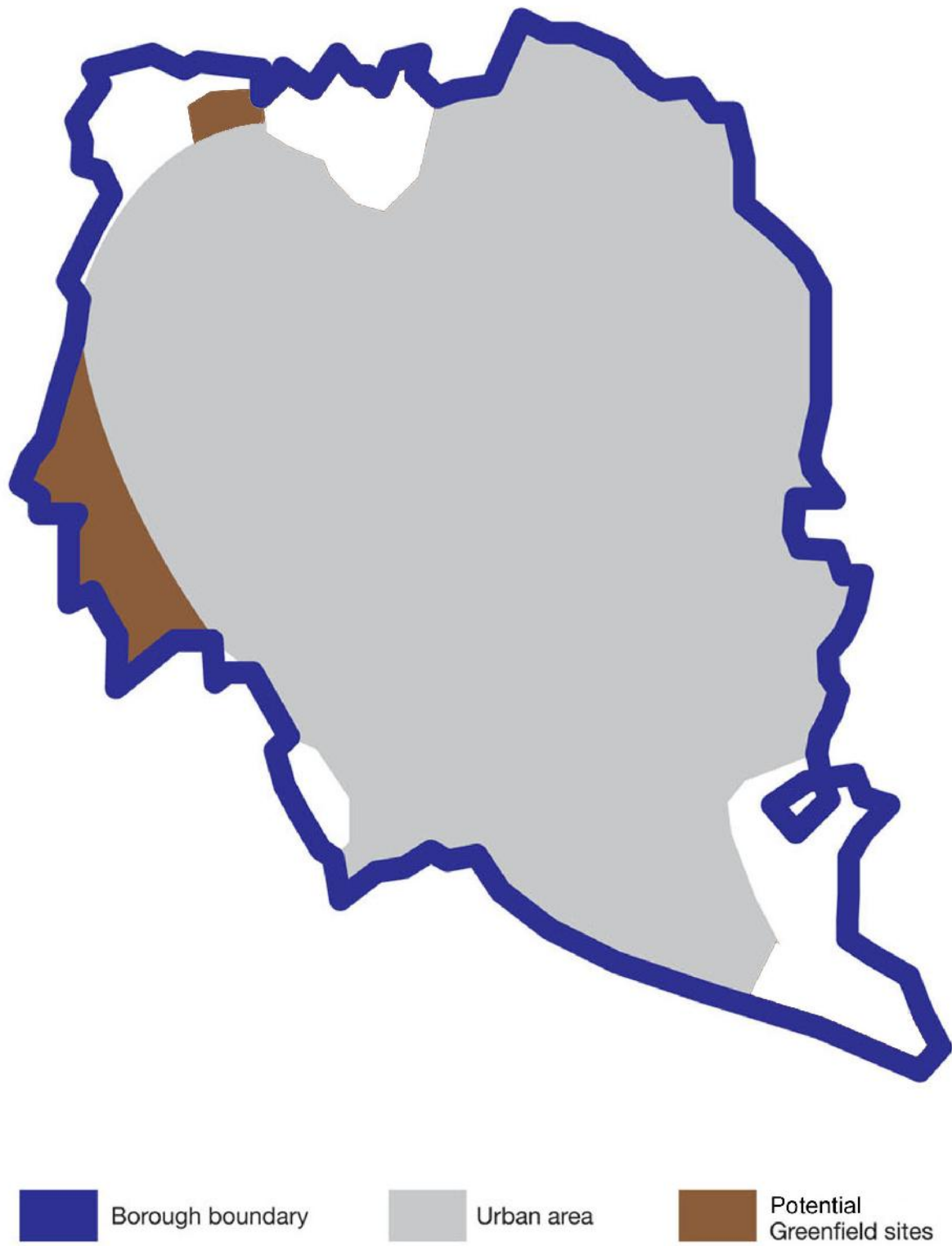
2.35 Following examination decisions into other local plans, we do not think an even lower target that excludes these areas from consideration is a realistic option. This is because the Government is encouraging all local authorities to plan for more homes. Option a would already fail to meet all of our future needs. It is extremely unlikely that an even lower number would be accepted when we sent our plan to be examined.

2.36 Based on current information, we think that this option would see around 1,500 homes built on undeveloped land around the town. The remaining 3,800 would be built on sites within the existing urban area. More than 1,000 of these homes have already been built or granted planning permission.

14 This is lower than the number of homes on non-Green Belt sites in the SLAA. This is because the SLAA considers individual sites on their own merits and does not look at cumulative impacts. It is not required to consider the best overall pattern of development. 5,300 homes is our best current estimate of the (types of) sites that might be used in a strategy that did not go into the Green Belt.

15 As per Policy 83 of the NPPF.

16 Review of the Green Belt around Stevenage: Part 1 - Survey against Green Belt purposes (AMEC, 2013)



NPPF housing requirements

2.37 This option would not provide enough homes to meet our Objectively Assessed Needs. It would deprive Stevenage people of the right to have their own home locally. A large number of new forming households would need to leave the Borough or remain within a shared home.

2.38 The NPPF says that, if we do not provide enough homes, we should work with other authorities to try and make up the shortfall. This option would result in a shortage of 2,000 homes that our evidence says are needed. We would need to try and find another authority within our Housing Market Area (HMA) who was willing to take this.



Option a would mainly rely on sites within the existing town to meet the target. Some of these have already been built at Hertford Road (l) and Martins Way (r).

2.39 This would cause particular difficulties. The other authorities in our HMA already need to try and meet their own needs. They also have large areas of land in the Green Belt. It would be very difficult to ask them to use their Green Belt land to meet our needs if we were saying that Stevenage's own Green Belt land should be protected.

2.40 The nearest areas that are inside our current HMA, but outside of the Green Belt are rural areas to the east and north-east of Stevenage. This includes villages such as Benington in East Hertfordshire and Ashwell in North Hertfordshire⁽¹⁷⁾. Further afield, most of Central Bedfordshire is outside of the Green Belt. But this could mean trying to provide homes to meet Stevenage's needs over 10 miles away.

2.41 At the moment, the plans of North Hertfordshire, East Hertfordshire and Central Bedfordshire do not make any allowance to build extra homes for Stevenage over the period to 2031.

Delivery

2.42 Taking into account completions since 2011, this option would now require an average of around 300 homes to be built each year in Stevenage. This is slightly higher than the average number of homes built over the last ten years but broadly in line with longer term trends.

¹⁷ Some villages to the west of Stevenage, including Preston and Whitwell are currently outside of the Green Belt. North Hertfordshire's draft plan suggests these areas should be added into the Green Belt in the future.

2.43 By providing a lower number of homes overall, we would also provide a lower number of affordable homes.

2.44 We might be able to deliver around 1,500 new affordable homes. This would meet some local needs. A lower housing target means we would be less able to secure new affordable homes through planning permissions. We would be heavily reliant on the Council's own house building programme to provide new affordable housing in the future.

2.45 It would not be possible for North Hertfordshire District Council to build new homes to the north of Stevenage. The scheme they have proposed here relies on development taking place within the Borough boundary first. Without a complementary scheme in Stevenage, the land in North Hertfordshire could not be connected to the rest of the town.

2.46 North Hertfordshire could physically provide the sites they have proposed to the north-east of Stevenage as these would be next to existing development at Great Ashby. But it would be inconsistent to say it was acceptable to build on the Green Belt around Stevenage in North Hertfordshire, but not in the Borough.

2.47 Similarly, it would still be possible for North Hertfordshire to 'safeguard' land to the west of Stevenage. However, this site is also currently in the Green Belt. It has been identified to meet Stevenage's long-term needs beyond 2031. It would be very difficult for us to continue asking for this land to be provided if we were not willing to make use of our own Green Belt land.

2.48 This approach could also have other effects. By limiting the amount of development that can take place within or around the town, it may become more difficult to deliver other schemes such as the regeneration of the town centre. People may be less willing to invest in the town if they do not believe Stevenage is a place that is growing and changing.

Sustainability appraisal

2.49 Our sustainability appraisal shows that this option would perform relatively well on environmental grounds. This is because it would not propose any large-scale releases of Green Belt land. However it would not meet local housing needs. This means the option performs very poorly against social indicators.

Conclusions

2.50 The Council does not support the approach set out in option a. We think that restricting housing supply and not doing our best to meet local needs, particularly for affordable housing, is not an appropriate strategy for the town.

2.51 We also think that it would be incredibly difficult to reach an agreement with other authorities to take this number of extra homes. This is because they are already facing significant pressure to meet their own housing needs. Large areas of our shared Housing Market Area are in the Green Belt.

Option b: Borough Capacity - 7,600 homes

Possible advantages of this option	Possible disadvantages of this option
Meets Objectively Assessed Needs Seeks to accommodate housing development to 2031 within the Borough boundary	Requires the release of Green Belt and greenfield sites outside of the urban area. Would not leave much land for other uses, including employment; Would need the number of homes being built in Stevenage to rise significantly, especially in and around the town centre.

2.52 This option would broadly meet identified housing requirements. It is a reasonable estimate of the number of homes that could now be accommodated within our boundary based upon:

Sites that have been promoted for development;
The need to ensure an appropriate balance of uses within the Borough; and
Our ability to deliver. This is in terms of both the overall number of homes and specific projects and programmes such as town centre regeneration.

2.53 Option b would still use sites within the urban area and the undeveloped land to the west of Stevenage (as option a). However, option b would also roll-back the Green Belt to the north and south-east of the town⁽¹⁸⁾.

2.54 This is our preferred approach.

Development outside the existing town

2.55 The land to the west of the A1(M) within the Borough boundary has already been taken out of the Green Belt. Our evidence says we could not justify putting this land back into the Green Belt as it does not fulfil the purposes identified in the NPPF⁽¹⁹⁾. Under Option b, we would identify this land for new homes and other supporting land uses.

2.56 We would also review the Green Belt boundary around the town and release land for development. We consider that the future development and regeneration needs of the Borough do provide the 'exceptional circumstances' that are required to alter Green Belt boundaries⁽²⁰⁾. Sites to the north and south-east of the town would be needed to meet the target.

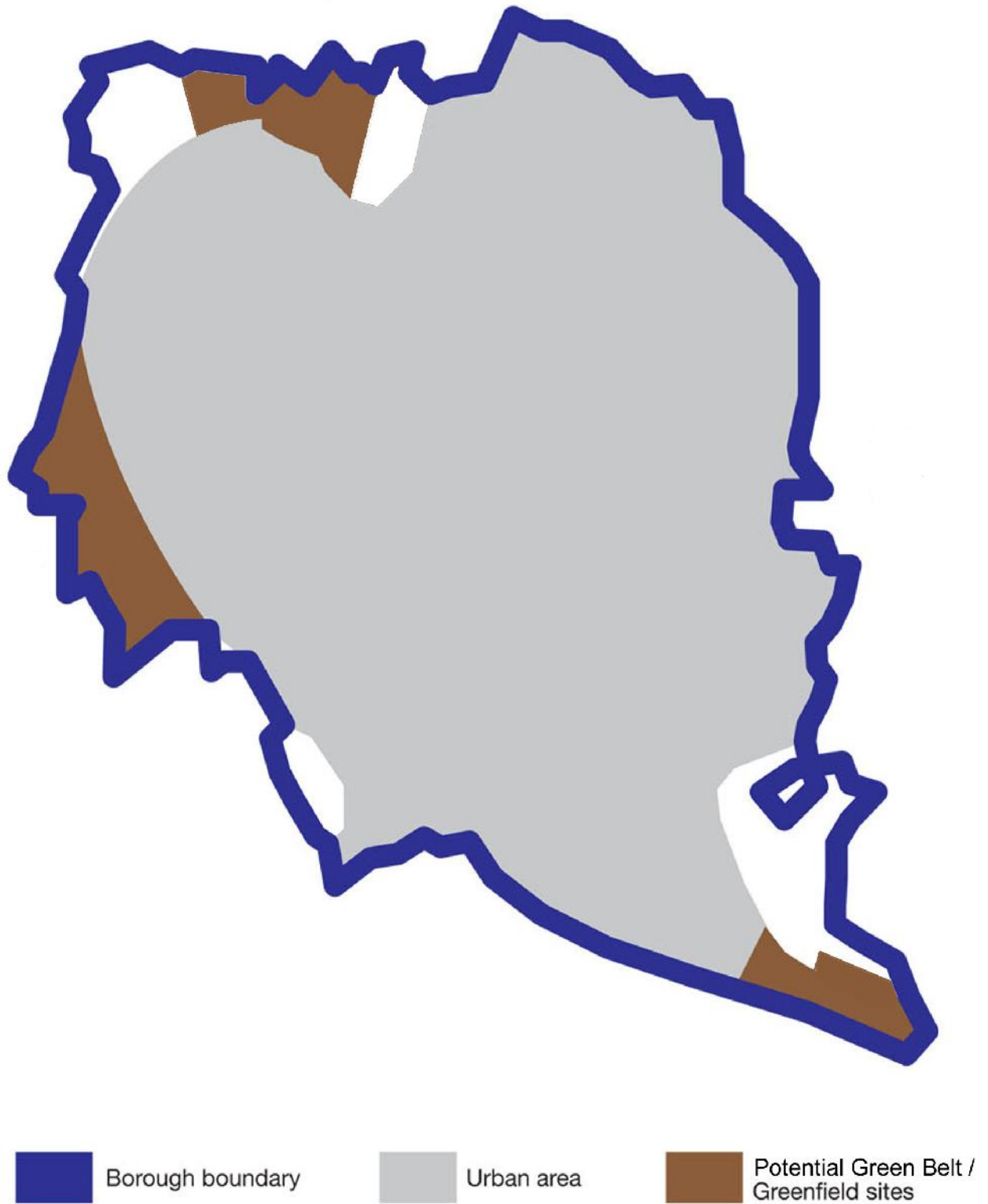
2.57 Our evidence says that these areas make a contribution to Green Belt purposes. However, there may also be scope for some change in these areas without compromising the overall function of the Green Belt. There is capacity for development to the west, north and south-east of the town on landscape grounds⁽²¹⁾.

18 This option of 7,600 homes is lower than the numbers in the SLAA. This is because the SLAA considers individual sites and does not look at cumulative impacts. It is not required to consider the best overall pattern of development. 7,600 homes is our best current estimate of the (types of) sites that could be used for this strategy.

19 Review of the Green Belt around Stevenage: Part 1 - Survey against Green Belt Purposes (AMEC, 2013)

20 As per Policy 83 of the NPPF.

21 Review of the Green Belt around Stevenage: Part 1 - Survey against Green Belt Purposes (AMEC, 2013); Stevenage Landscape Sensitivity and Capacity Study, (Halcrow, 2006)



2.58 Based on current information, we think that this option would see around 1,500 homes built on land currently in the Green Belt and 1,500 homes on other undeveloped land around the town.

2.59 Any new development in these areas would still need to preserve important open spaces. Our Open Space Strategy says that, to the north of Stevenage, we will seek to protect the openness of the countryside closest to St Nicholas Church and within the Rectory Lane Conservation Area. The protection will recognise the literary connection of the land to E.M. Forster and Rooks Nest House⁽²²⁾.

2.60 The remaining 4,700 homes would be built on sites within the existing urban area⁽²³⁾. More than 1,000 of these homes have already been built or granted planning permission.

NPPF housing requirements

2.61 This option would provide enough homes to meet our identified needs. It would provide a small surplus of additional homes. There are a number of ways in which we could justify these additional homes:

The Government's latest household projections for the Borough suggest 7,700 homes will be required. Although our evidence suggests our housing requirement should be calculated in a slightly different way, we think it is important to also aim towards this slightly higher number; There is an acute need for affordable housing in the town. A modest increase in the target will allow more homes in response to this pressure, while remaining broadly consistent with the approach being taken by other nearby authorities⁽²⁴⁾;

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 stock⁽²⁵⁾;

A number of the potential schemes we are considering require a certain number of homes in order to be viable. If we try and reduce the number of homes on these sites, they may not come forward at all⁽²⁶⁾; while

Setting a challenging target provides a clear signal that we are serious about delivering regeneration and change in the Borough. This may help encourage investment and growth.

Delivery

2.62 A plan based on this target would explain the factors above to show that our housing needs could be met in full. We would not need to make any arrangements to deliver homes in another area.

22 Open Space Strategy (Stevenage Borough Council, 2015)

23 This is higher than the figure for the urban area in option a. This is because we think that a decision to support a higher number of homes, and enable further development around the town beyond the Borough boundary, will stimulate confidence in Stevenage and deliver sites and schemes that might otherwise yield less homes or not come forward at all.

24 Our previous SHMA (DCA, 2013) said 575 affordable homes were required each year. 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.

25 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.

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

2.63 Option b would let North Hertfordshire use the sites to the west, north and north-east of Stevenage identified in their consultation earlier this year. The schemes we would need to build in the Borough boundary would provide infrastructure that they could connect to.

2.64 Taking into account completions since 2001, this option would now require between 400 and 450 new homes to be built each year in Stevenage. This is higher than development rates over the last ten or twenty years. However, we are confident that the market could deliver this amount of housing over the plan period. Housebuilders have told us that they think this can be achieved.

2.65 We might be able to deliver more than 2,000 new affordable homes. This would meet some local needs but would not meet the requirements of everyone on our housing waiting list. However, Government guidance and recent examination decisions have made clear that it is not realistic to expect local plans to meet all affordable housing needs in the future. This is because many affordable homes are delivered by private landowners as part of a planning agreement to develop their sites. We would have to build a substantial number of additional market homes to deliver more affordable housing. We would like to do more, but we think this approach is a reasonable compromise. It shows we will do the best we can without requiring an unrealistic number of homes to be built.

2.66 This approach may not leave as much land for other uses, such as employment, as we might like. However, as with housing, Government guidance encourages local plans to consider development across wider areas⁽²⁷⁾. North Hertfordshire's latest draft plan includes a new employment site at Baldock to help to meet any requirements that can't be met in Stevenage.

Sustainability appraisal

2.67 Our sustainability appraisal recognises that this approach performs better in social and economic terms than option a. This reflects the larger amount of development. However, it performs less well against environmental indicators. This is because we would need to identify a large amount of greenfield land outside of the existing town to be developed on.

Conclusions

2.68 Option b is our preferred option. It would lead to a local plan that provides enough homes to meet the Government's expectations. We would say the future needs of the town give us reason to release land from the Green Belt. We would use reasonable and available capacity within the Borough.

2.69 Option b follows broadly the same principles as our preferred option in 2013, even though the number has risen. It would make use of available sites and lands to meet our future needs within the Borough. We said this was our preferred approach two years ago and this is still the case.

27 Planning Practice Guidance: Housing and economic development needs assessments, Paragraph: 008 Reference ID: 2a-008-20140306 makes reference to "Functional Economic Areas"

Other housing target options we have considered

2.70 This consultation sets out two options for a future housing target. We also thought about whether we should include other possible targets. We did this to meet the requirements of national and European laws.

2.71 This included considering whether it was appropriate to have:

An 'urban capacity' option that did not go into the Green Belt or use undeveloped land to the west of Stevenage. This would have allowed an option of around 3,500 - 4,000 homes;
A partial Green Belt release to allow a target between the two options outlined above. This would have allowed for an option of around 6,400 homes; and
Using more of the sites that have been promoted to us by 2031. This could have allowed an option of around 9,000 homes.

2.72 More information about these, and how we came to choose the options in this consultation, can be found in the SA.

3 The Green Belt

3.1 Green Belts are one of the best known and oldest planning policies. The Government attaches great importance to the Green Belt. Any threat to the Green Belt can be a highly controversial issue for local people.

3.2 The term 'Green Belt' does not apply to all undeveloped land or open countryside. There are 14 different Green Belts in England covering around 13% of all the land in the country. Much of the land around Stevenage forms part of the Metropolitan Green Belt that surrounds London. The Green Belt was extended to Stevenage in 1979.

3.3 The NPPF says that Green Belts serve five purposes:

Stopping urban sprawl;
Preventing towns from joining together;
Protecting the countryside;
Preserving historic towns; and
Encouraging regeneration and the use of brownfield land⁽²⁸⁾.



Land at the north and east of the Borough is currently in the Green Belt.

3.4 The current inner Green Belt boundary around Stevenage is, for the most part, drawn very tightly around edge of the town. In the past, land has been released from the Green Belt for development. This allowed Great Ashby to be built at the north-east of the town. Land to the west of the A1(M) was released in 2004 but, to date, no development has taken place here.

3.5 National guidance prevents many forms of development in the Green Belt unless there are very special circumstances. This includes housing. This means that planning applications to develop land that is currently in the Green Belt for new homes are often refused⁽²⁹⁾.

28 The purposes are set out in full in Paragraph 80 of the NPPF

29 Government advice has made clear that the need for more housing is unlikely to be a good enough reason to grant planning permission for housing on current Green Belt land, Planning Practice Guidance: Housing and economic land availability assessment, [Paragraph: 034 Reference ID: 3-034-20141006](#)

3.6 However, it is possible to change the Green Belt when a new Local Plan is being prepared. Government guidance says that, if there are “exceptional circumstances”, the boundaries can be altered and land can be removed for development. There is no strict definition of what does, and what doesn’t, represent “exceptional circumstances”. This means that we have to come to a view on whether these circumstances exist around Stevenage.

3.7 Stevenage cannot meet its future housing needs within the Borough by only using land outside of the Green Belt (see Issue 1). This means that the balancing act between our future housing and development needs and the future of the Green Belt is crucial to the local plan.

3.8 An initial assessment of the Green Belt around Stevenage was completed in 2013⁽³⁰⁾. This considered how important larger parcels of land around Stevenage are to the Green Belt. Some areas make a significant contribution. These findings are shown in the map on the following page. In terms of land within the Borough, the study concluded that:

Land at the north-west of the Borough, around Junction 8 of the A1(M), makes a significant contribution to Green Belt purposes;

Land to the north of Stevenage, including the designation Conservation Area, makes a contribution to the purposes of the Green Belt;

Stevenage golf course is in a parcel of land that makes a limited contribution to Green Belt purposes;

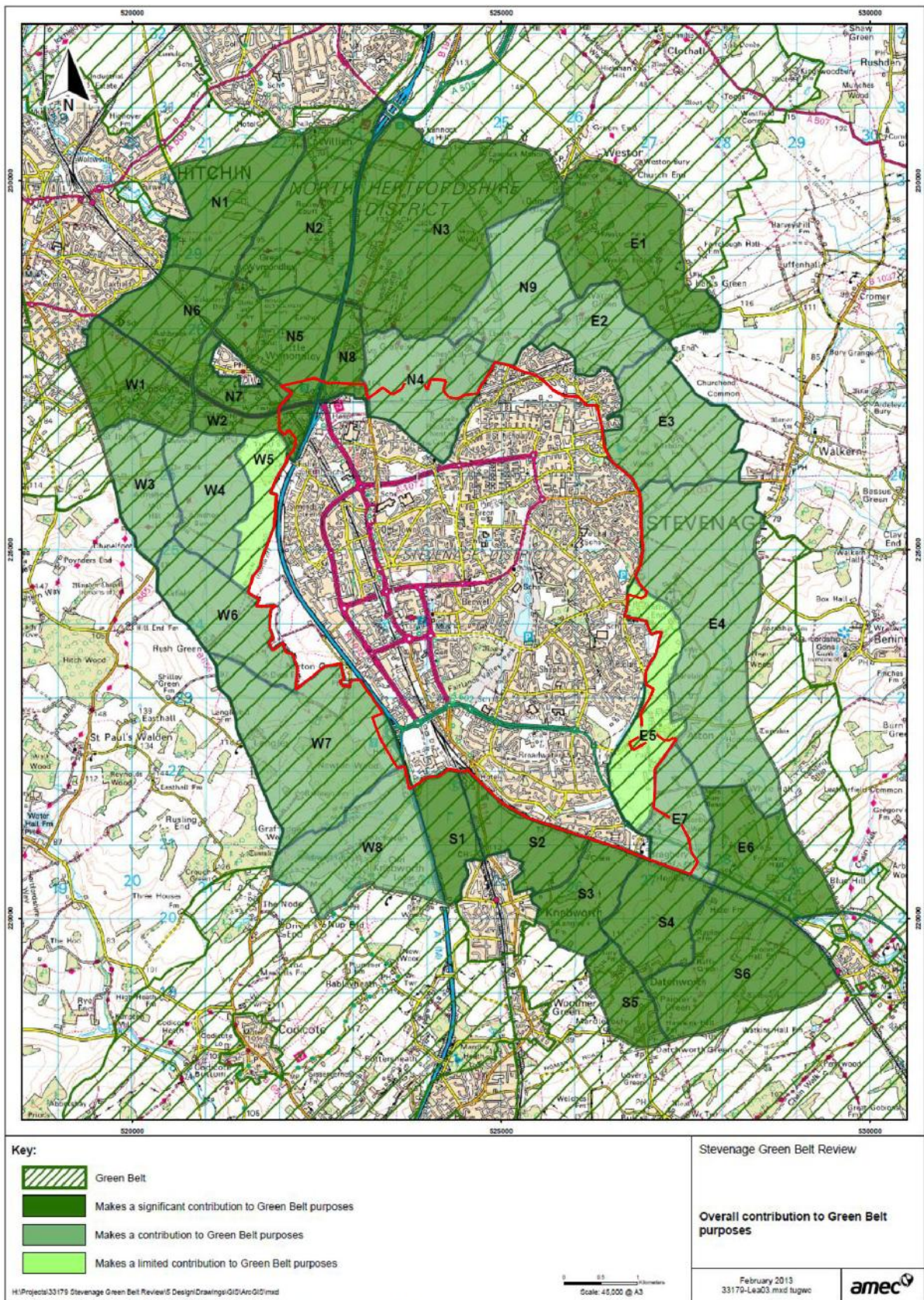
Lane at the south-east of the Borough makes a contribution to Green Belt purposes; while There would be no justification for putting the land west of Stevenage back into the Green Belt.

3.9 The inclusion of land in the ‘limited contribution’ category does not necessarily mean that all, or part, of it should be released from the Green Belt. Similarly, the inclusion of land in the ‘significant contribution’ category does not mean that there are no smaller areas of land within it which could still be considered for release.

3.10 Much of the land that was looked at in the Green Belt review is outside of the Borough in neighbouring East Hertfordshire and North Hertfordshire districts. This was necessary because the administrative boundary and inner boundary of the Green Belt are both drawn very tightly on the urban edge of the town. However, it is crucial to understand that **Stevenage cannot make plans for land outside of the Borough boundary**. North Hertfordshire and East Hertfordshire will make their own decisions about the land around the town, although they are free to use the findings of our work if they choose.

3.11 A second part of the study will provide further advice on how Green Belts have been changed in other areas. It will show how new boundaries could be created. This will be completed in time to inform our final decision and will be reflected in the draft plan later in 2015.

30 Review of the Green Belt around Stevenage: Part 1 - Survey against Green Belt Purposes (AMEC, 2013)



Findings of the 'Part 1' Green Belt Review

Green Belt options

Issue 2: The Green Belt

- a. Maintain the Green Belt
- b. Release land within the Borough for the period to 2031 only;
- c. **Release land within the Borough for the period to 2031 and work with neighbouring councils to identify land that might be needed after this time.**

3.12 We are consulting on three different options for the future of the Green Belt. These follow the same principles as the options we presented in 2013 and are closely linked to the housing options considered in Section 2:

Option a would maintain the existing Green Belt within the Borough. It would say there are no *exceptional circumstances* that justify removing the current protection. Under option a, we could only set a housing target to build 5,300 homes within the Borough⁽³¹⁾.

Option b would take the opposite view. It would say that *exceptional circumstances* did exist and we would commit to reviewing the Green Belt within the Borough for the period to 2031. This would allow us to set our preferred housing target of 7,600 homes. However, we would take no further steps to plan for the period after 2031.

Option c is our preferred approach. It is similar to option b. We would commit to reviewing the Green Belt within the Borough for the period to 2031. However, we would also work with North Hertfordshire and East Hertfordshire Councils to consider the best ways of meeting Stevenage's likely needs beyond this time.

3.13 Please read the more detailed information about each option before you respond. We would also suggest that you read the section on the Borough Housing Target (see Chapter 2) to understand how the two issues affect each other.

Question 2

Should we maintain the existing Green Belt within Stevenage Borough? Or should we roll back the inner boundary to meet our future needs? Should we work with North Hertfordshire and East Hertfordshire Districts to make sure we don't need to change the Green Belt boundary again by 2031?

31 The SA explains that this is considered to be the lowest reasonable option for a housing target that can now be considered.

Option a: Maintain the Green Belt

3.14 This option would give absolute priority to maintaining the current Green Belt within the Borough. The Green Belt boundary would not be altered in any location. Land would not be released from the Green Belt for new development.

3.15 This option would recognise the importance that national guidance puts upon the permanence of the Green Belt. It would acknowledge that the Green Belt around Stevenage plays a significant role in the relationship between the town, its residents, the rural area surrounding it and nearby towns such as Hitchin and Letchworth Garden City.

3.16 Option a would mean that we could not meet all of Stevenage's future requirements within the Borough (see Issue 1, option a). However, the local plan would say there were no "*exceptional circumstances*". It would say the release of Green Belt land was not justified.

3.17 The plan would rely upon advice in the NPPF which says that Green Belt is one of the specific policies that indicates the scale of development should be restricted.

3.18 A Government planning inspector would need to be convinced that this was the most appropriate approach. We would have to argue that the impacts of meeting Stevenage's development needs within the Borough would be significantly worse than the benefits of meeting them.

3.19 As set out under Issue 1, this approach would result in a shortfall of around 2,400 new homes. The local plan would need to demonstrate that appropriate, alternate locations in other areas that could meet the shortfall. This would have to be formally agreed with those local authorities where the homes would be built. Alternately, we would have to show that we had tried our best to do this and been unsuccessful, but still did not think this was a good enough reason to change the Green Belt.

3.20 Under this option, North Hertfordshire District Council would not be able to put development to the north of Stevenage. This could cause them problems in meeting their own housing needs. We could be criticised of not meeting the Duty to Co-operate. This is a vital legal test which could cause our plan to fail.

3.21 Our Sustainability Appraisal shows that this option performs well against certain environmental objectives. This is because it safeguards a large proportion of the undeveloped land around Stevenage until at least 2031. However, this comes at the expense of an inevitable shortfall of development.

3.22 We recognise the value and importance of the Green Belt. However, on balance, we currently consider that the benefits of meeting our future housing needs and co-operating with our neighbours to ensure the town can continue to grow and change outweigh the loss of Green Belt within the Borough. We do not support option a as our preferred approach.

Option b: Release land within the Borough for the period to 2031 only

3.23 Option b would commit us to reviewing the Green Belt. The local plan would release land from the Green Belt to allow development to happen. It would argue that “exceptional circumstances” were demonstrated by (an appropriate combination of):

- The scale of our identified development needs;
- The shortage of developable land outside of the Green Belt;
- A persistent shortage of affordable housing;
- The need to create a positive message to stimulate the regeneration of the town centre and other parts of the Borough; and / or;
- The reliance of other authorities on Green Belt releases (around Stevenage and elsewhere) to meet their own needs.

3.24 This approach would allow for our preferred housing target of 7,600 homes⁽³²⁾. However, any review would try to minimise harm. We would still seek to protect the openness of the countryside in important areas. This includes areas close to St Nicholas Church and within the Rectory Lane Conservation Area (see Paragraph 2.59).

3.25 It would also allow North Hertfordshire District Council to plan for further housing on the edge of the town to meet their own housing requirement if they choose.

3.26 Once they have been altered, Green Belt boundaries should not be changed again at the end of the plan period. This means that we should also look at the period after 2031 and try to work out what land or sites might be required. The NPPF calls this safeguarded land⁽³³⁾.

3.27 Option b would say that looking at this longer period was a step too far. It would support a review of the Green Belt for the period to 2031 but not for the period after. We would not safeguard any land within the Borough. We would not ask North Hertfordshire or East Hertfordshire to safeguard any land on our behalf in their own plans.

3.28 A lot could change over the next 15 years. Under option b, the local plan could say

- It was too early to be considering what might happen beyond 2031 and that these decisions should be saved for another day; and / or
- That this release of land from the Green Belt was a 'one-off' and that alternate ways would need to be found for the period after 2031.

3.29 Our sustainability appraisal of this option shows a significant amount of uncertainty. Although option b opens the possibility for greater housing and employment provision, it is difficult to identify the precise impacts without answering the ‘second-stage’ questions identified above (see paragraph

32 Although any decisions on how much Green Belt land should be released, where and what it should be used for would technically be distinct from the 'in principle' decision to review the Green Belt that would be made under this option

33 Paragraph 85 of the NPPF. This says that, where necessary, local planning authorities should identify 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. This land should not be allocated for development at the present time and permission should only be granted following a local plan review. Authorities should be satisfied that Green Belt boundaries will not need to be altered at the end of the development period.

3.29). The long-term impacts would depend on any future decisions on the period after 2031. However, Government guidance implies that no further Green Belt releases should be made at this point. This would potentially restrict the amount of development that could take place.

3.30 We recognise that suggesting land be taken out of the Green Belt will be controversial. However, the counter argument is that it gives us a much better chance to meet future needs locally. There would still be a significant area of Green Belt surrounding Stevenage. The town would still remain distinct and separated from other nearby towns.

3.31 The Borough Council supports the idea of reviewing the Green Belt within the Borough for the current plan period. However, we also think that we should take account of what the NPPF says about the longer-term. For this reason, option b is not our preferred approach.

Option c: Release land within the Borough for the period to 2031 and work with neighbouring Councils to identify land that might be needed after this time

3.32 This option would be the same as option b for the current plan period. We would commit to releasing Green Belt land within the Borough to contribute towards our future needs.

3.33 However, whilst option b would be a good choice for the Borough over the current plan period, it would fail to plan for the longer-term. Stevenage is a small authority. It is likely that almost all sensible sites within the Borough will be required by 2031 if we are to meet our anticipated needs in full.

3.34 This means that, beyond 2031, there may only be limited opportunities for further development within the town. We think it is best to consider these issues and make these long-term decisions now so that any further changes to the Green Belt around Stevenage in this current round of local plans is genuinely a 'once in a generation' decision. This would be preferable to the piecemeal changes that have been seen over the last 25 years.

3.35 It is important to remember that we cannot directly plan for land outside of the Borough boundary. Beyond any small parcels of Green Belt that may remain within the Borough, decisions to safeguard land around Stevenage will need to be taken by one or both of East Hertfordshire and North Hertfordshire.

3.36 We cannot require them to make this decision. We can work closely together to try and make sure they consider Stevenage's future requirements, and the findings of each of our Green Belt reviews, in their plans.

3.37 North Hertfordshire's draft plan already identifies land to the west of Stevenage as an area they will take out of the Green Belt and safeguard for the long-term needs of Stevenage. This area could provide around 3,000 new homes. It could make a substantial contribution towards the housing needs of today's children. Under option c, we would continue to strongly support this proposal as North Hertfordshire developed their own plan.

3.38 The latest version of East Hertfordshire's plan did not contain any sites on the edge of Stevenage. It did not propose to release any land for the current plan period or safeguard any land for the period after 2031. We have asked East Hertfordshire to reconsider this decision. Under option c, we would continue to pursue this approach. We would try to work with both North Hertfordshire and East Hertfordshire to agree a new Green Belt boundary around Stevenage that we could confidently say would not need to be changed until well after 2031.

3.39 Option c could result in land around Stevenage being safeguarded. However, in the future, any developers would still need to prove that the land was needed before they were allowed to build on it.

3.40 Option c remains our preferred option because it enables us to plan for our development needs to 2031 and beyond. It recognises that further release of Green Belt will probably be necessary to meet the Borough's needs after 2031. The first stage of our Green Belt review, and North Hertfordshire's most recent consultation, suggest there is further capacity for development beyond this time. This approach would allow us to seek the co-operation of our neighbouring councils to plan for that post-2031 period.

3.41 We thought that this was the best option when we consulted on the plan two years ago. We still think this is the case.

3.42 Our sustainability appraisal shows that, over the period to 2031, the effects would be the same as option b. Option c would be more likely to lead to further development in the period after 2031. However, there can be no guarantee of this as the relevant decisions would still need to be made by North Hertfordshire and / or East Hertfordshire Districts.

