

**Examination of the North Hertfordshire Local Plan (2011-2031)**  
**Examination hearing sessions**  
**Statement of North Hertfordshire District Council**

**Matter 11 – The housing allocations and the settlement boundaries**  
**The Category A Villages – St Ippolyts and Gosmore**

**11.66 Are all of the proposed housing allocations deliverable? In particular, are they: a) confirmed by all of the landowners involved as being available for the use proposed?**

1. Yes. The landowners of both sites confirm that they support the allocations and their deliverability for housing in their representations to the Regulation 18/19 consultation on the plan (ED3, p.15 – also supported in 2016 SHLAA).

**b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**

2. Yes. No site specific objections to the allocations have been received from the highway authority. All sites provide opportunities to connect into the existing highway and pedestrian footpath networks.

**c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

3. Yes. Both sites have been considered through the SHLAA and are considered suitable locations for development having regard to potential constraints (HOU9, site refs 221N [SI1] and SI/r3 [SI2]. See Appendix 3, p.26 and Appendix 4, pp.46). This is expanded upon in answer to question 11.67 below.

4. The sites have been subject to consultation with a range of statutory providers. The Infrastructure Delivery Plan (TI1) and Local Plan Viability Assessment Update (TI2) show that these developments are deliverable in infrastructure planning terms and that the development would be profitable such as to support a package of infrastructure measures. The likely significant environmental affects of allocating the sites have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.139-142).

5. No fundamental constraints to development have been identified. Site-specific infrastructure and / or mitigation measures for these sites are identified as policy measures in the plan (LP1, Policy SI1 and SI2, pp.207-208).

6. These measures will be supplemented by the generic development management policy requirements that apply to all sites in relation to issues including (but not limited to) affordable housing, housing mix, transport, design and heritage.

7. Specifically HOU9 26 for SI1 notes the land is grade 3 agriculture, within the vicinity of a listed building and has a low flood risk in part of the site. For SI2 it notes the land is grade 3 agriculture, adjacent to wildlife and archaeology.

**11.67 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?**

8. Yes. The proposed housing allocations at St Ippolyts and Gosmore are justified and appropriate. The appropriateness of the individual allocations are discussed below.
9. In broad terms, each allocation in the plan is justified by (see the Council's Statements on Matters 5, 7 and 9):
  - The need to seek to meet the Objectively Assessed Needs (OAN) for housing as far as is consistent with the policies set out in the NPPF in a district that is currently highly constrained by Green Belt and other considerations;
  - In the Council's view, being able to mitigate or ameliorate identified harms to an extent that the restrictions in Paragraph 14 of the NPPF (and other policies of the framework) would not apply when making a balanced planning judgement on the individual site(s);
  - The significant majority of the deliverable and developable sites identified in the SHLAA (HOU9) being required for allocation if the District is to be able to meet the OAN;
  - No preferable, deliverable alternative sites existing which would allow OAN to be met over the plan period in a substantively different way;
  - There being no reasonable prospect of other authorities in shared housing market areas being in a position to assist under the Duty to Co-operate should North Hertfordshire have resolved not to meet its OAN in full.
10. The proposed allocations at St Ippolyts and Gosmore would extend the village and represent green field development opportunities that can be achieved over the plan period minimising impacts on the Green Belt. Sites SI1 and SIC2 are currently designated as Green Belt. The justification and impacts in relation to Green Belt are discussed under question 11.69 below. The likely impacts of development for each of the sites are shown in Table A [from HOU9, Appendix 4, p.46].

**Table A: Impacts of development of allocations at St Ippolyts and Gosmore**

<b>Site</b>	<b>Name</b>	<b>Impact of Development</b>
SI1	Land south of Waterdell Lane (north) - 40 homes	Broadly 'L' shaped site wrapped around southern edge of Gosmore. Site largely well defined, with exception of that part of boundary adjoining Site 152. Land adjoining Half Hankerchief Lane to rear of properties on Waterdell Lane relatively contained. South-western area of site beyond footpath more exposed in longer views to south-west and reservations over suitability of this area. Potential access points from Waterdell Lane, London Road and Half Hankerchief Lane though improvements may be required to realise some of these. Dwelling estimate reduced in light of constraints*.  <i>*Note (from 72 to 40 homes).</i>
SI2	Land south of Stevenage Road - 12 homes	Irregular shaped area of undeveloped scrub land bounded by existing residential development, Stevenage Road - which provides opportunity for access - and Sperberry Hill. Sensitive design required to take account of surrounding dwellings. Estimate reduced to 10dph gross* to take account of this. Requires release from the Green Belt. This part of St Ippolyts currently 'washed over' so site will need to be considered in broader context of whether inseting is appropriate.  <i>*Note from 24 to 12 homes)</i>

11. The Housing and Green Belt Background Paper summarises the reasons for the selection of sites SI1 and SI2 (HOU1, Appendix 2, p.61). The allocation of these sites provide the opportunity to make a contribution to the overall housing requirements identified and provide land for infrastructure with wider community benefits. The policy site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address a number of issues raised through consultation on the Plan. On balance, the positive opportunities afforded by these sites are considered to outweigh the harms.

**11.68 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?**

11. Additional sites were put forward through the iterations of the SHLAA process, the majority of which were rejected due to their remoteness from the main settlements within the Green Belt. The 2016 SHLAA assessed four sites, the two that are proposed policies SI1 and SI2 and SHLAA references 347 and 221S. 347 was rejected due to its remoteness and 221S was rejected because it can not be accessed unless / until SI1 has commenced in 2030/31 [HOU3, Appendix 2, p.20].

**11.69 Sites SI1 and SI2 both comprise of land in the Green Belt. For each:**

**a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

12. Yes. Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at SI1 and SI2. The sites provide the only reasonable alternatives for the expansion of St Ippolyts and Gosmore beyond their current built limits.
13. Under the saved policies of the current District Plan, St Ippolyts and Gosmore are tightly surrounded by the Green Belt. The Council's general case for the existence of exceptional circumstances is set out in its response to Matter 7. The objectively assessed need for housing significantly exceeds the level of development which can be met on development opportunities on brownfield land or contained within existing urban areas or in rural areas beyond the Green Belt.
14. The District is highly constrained by Green Belt and many of the most sustainable locations for new development are within or adjacent to existing higher order settlements as set out in Policy SP2 and supported by Section 4 of the Sustainability Appraisal in (LP4, Technical summary, p. 58-59 pp 4.3 and LP4, Appendix 3, 275-280).
15. The harms to the Green Belt of the potential allocations have been assessed and weighed against the benefits of development in these locations. Measures to ameliorate or reduce the consequent impacts to the lowest reasonably practicable extent have been identified.

Site SI1

16. On edge of Category A village on land currently within the Green Belt. Contribution to overall housing numbers and supports vitality of the village. Site-specific criteria and dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised through the consultation

Site SI2

17. On edge of Category A village on land currently designated as Rural Area beyond the Green Belt. Proposal to designate additional Green Belt in this area provides

opportunity to establish clear boundary whilst site previously supported in this village not under consideration for this iteration of the plan.

**b) What is the nature and extent of the harm to the Green Belt of removing the site from it?**

18. The strategic land parcel 10 covers SI1 and strategic land parcel covers SI2. These parcels were assessed as making a significant contribution to the purposes of the Green Belt by the 2016 Green Belt Review (CG1, Figure 2.4, p.21). However the Green Belt Review also took a fine grained approach to the assessment, further dividing the parcels into sub-parcels and also assessing individual sites.
19. The assessment found that the contribution of site SI1 was significant for one of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.120 assessed as site reference 221).
20. The assessment found that the contribution of site SI2 was significant for one of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.121, assessed as site reference SI/r3).
21. These results are summarised in Table B below.

**Table B: Contribution of proposed allocations in St Ippolyts to the purposes of Green Belt**

Site	Green Belt purpose				Overall contribution
	Sprawl	Merge	Countryside	Historic	
Site SI1	Significant	Limited	Significant	Limited	Moderate
Site SI2	Moderate	Limited	Significant	Limited	Moderate

**c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?**

22. The sites proposed for allocation at St Ippolyts and Gosmore consist of well defined discrete parcels of land which already benefit from defensible Green Belt boundaries in the form of physical features and structural planting which will help to reduce the impacts on the Green Belt to the lowest reasonable practicable extent.

**d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?**

23. It is considered that the adjacent Green Belt to SI1 and SI2 South will continue to contribute to the purposes of Green Belt.

24. The assessment of the strategic land parcels and sub-parcels in CG1 shows that land beyond the proposed allocation boundaries already serve Green Belt purposes (CG1, Figure 2.8, p.31 and Figure 3.6, p.66).
25. The adjacent Green Belt land would continue to play an important role in, in particular, preventing sprawl from Hitchin to the south and maintaining the separation of Hitchin from St Ippolyts and Gosmore.

**e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?**

26. The extent to which existing settlements might be further expanded in order to meet future need is finite particularly given the dense settlement pattern in existence at the more sustainable locations in the west and central areas of the District.
27. The Plan recognises that, in the longer-term, continual incremental additions to existing settlements may not be the best solution (LP1, paragraph 4.100, p.50). Notwithstanding this point, each settlement within and adjoining the District will need to be properly assessed for further expansion capacity to inform any future local plan review process.
28. However, it is the intention of the plan that the Green Belt boundaries amended by the plan to accommodate growth of settlements will endure beyond the plan period in order to continue to ensure the Green Belt continues to perform its key strategic functions.

**f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?**

29. Green Belt boundaries have been determined with a view to achieving the most sustainable pattern of development. The new Green Belt boundaries have been established in order to accommodate the reasonable maximum of development that can be accommodated within the District at the present time in accordance with the settlement hierarchy.
30. The settlement hierarchy seeks to allocate development to higher order settlements in the first instance in accordance with Policy SP2 (as amended) and supported by the Sustainability Appraisal in (LP4, Section 3). This approach to the distribution of development and the establishment of enduring Green Belt boundaries is supported as the most sustainable approach to achieving the development needs over the plan period.

**g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?**

31. Every effort has been made to clearly define the Green Belt boundaries around allocated sites using physical features such as roads and watercourses that are readily recognisable and likely to be permanent. Or by the creation of physical boundaries through rounding off development boundary lines with existing built form.
32. Where no such permanent features exist, or where use of such features would necessitate release of substantial additional land beyond the proposed allocation boundary from the Green Belt, it has been necessary to use semi-permanent existing features such as field boundaries, hedgerows, public rights of way and / or tree belts.
33. SI1 follows the existing built form south-eastwards to Half Hankerchief Lane. This lane forms the southern boundary, the B656 forms the eastern boundary and the existing built form is the northern boundary.
34. SI2 is bounded by Spurberry Hill and Stevenage Road.

**11.70 Is the proposed settlement boundary:**

**a) consistent with the methodology for identifying the settlement boundaries?**

**b) appropriate and justified?**

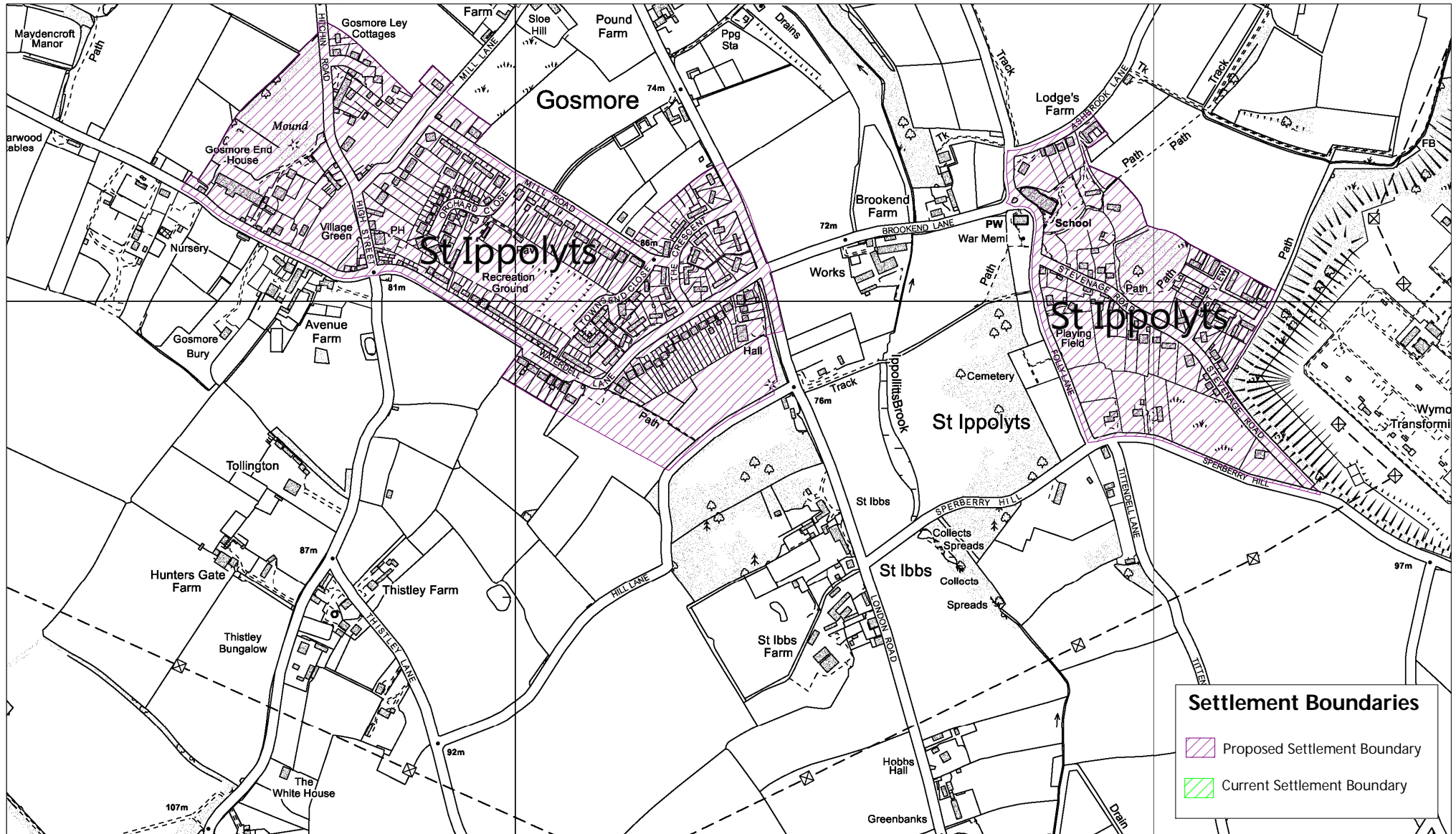
35. The Council's proposed amendment to the supporting text of Policy SP2 (LP3, amendment to paragraph 4.13, p.2) makes clear that the settlements are those areas excluded from the prevailing policy designation of the surrounding rural area.
36. The approach to establishing Green Belt boundaries and therefore the settlement boundary is discussed in the Council's answer to question 11.69 above. Beyond the proposed site allocations, no further alterations are proposed to the Green Belt boundary in this area.
37. A map showing the existing and proposed settlement boundaries for St Ippolyts and Gosmore are attached to this Statement as Appendix 1 to aid interpretation.

**Appendix 1 Existing and proposed settlement boundaries for St Ippolyts and Gosmore**





St. Ippolyts



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