

Regional Planning Guidance for the EAST OF England

District Level Housing Figures

Report on behalf of the Hertfordshire Authorities

Technical Paper

1. Methodology for the production of District level housing figures for the growth 'what-ifs'

1.1 The following sections set out the methodology followed by the Hertfordshire County Grouping in producing District level housing figures for the five Hertfordshire growth 'what-ifs'. The process can be broadly summarised under the following topics:

- 'Baseline Capacity' (completions, commitments and additional urban capacity)
- spatial strategy influences
- spatial strategies for the growth 'what-ifs'
- District level housing figures

2. Baseline Capacity

2.1 The baseline capacity for this technical exercise is made up of the following components:

Completions between April 2001 and March 2003 – by District and County.

Commitments at 31 March 2003. EERA Guidance states that commitments should include 'planning permissions, structure plan policy commitments and proposals in adopted local plans at 31st March 2003 and the contribution they can make to meeting housing needs in each county to 2021'. At the time Hertfordshire submitted its Interim Report to EERA, the County Grouping proposed to include only post-PPG3 greenfield allocations which had been subject to scrutiny by a local plan Inspector. The position has now changed and, consistent with EERA Guidance, most greenfield allocations are now included within commitments¹.

Additional capacity within urban areas - technical work undertaken in the preparation of the Deposit Version Hertfordshire Structure Plan Alterations to 2016 identified a difference in view between Hertfordshire's local authorities on the scope of Hertfordshire's urban

¹ A range of Areas of Special Restraint have been excluded from the figures.

areas to accommodate additional development. Differences in view were also evident in responses from wider consultees responding to the Deposit Structure Plan. There is also significant disagreement between local authorities on the ability of urban areas to accommodate further development in the period to 2021.

- 2.2 Because of the difference in view there are two baseline capacity figures from which to assess the implications of the growth 'what-ifs'. The County Council's 2003 baseline capacity assessment stands at 60,000 dwellings, whereas that for the Districts' combined assessments of capacity is 49,500 dwellings. Figures at County and District level are reproduced within Appendices 1 and 2, the contents of which are explained in section 5.

3. Development/spatial strategy influences

- 3.1 There are a number of existing and emerging key influences on the development/spatial strategy in Hertfordshire. The Development Plan in the County – the Structure Plan, District/Borough Local Plans, Minerals and Waste Local Plans are the main mechanisms through which Hertfordshire manages and plans the needs and pressures upon it. In addition, there are a range of national and regional initiatives which have potentially significant implications on the development/spatial strategy for the County – amongst others, these include:
- Revision of RPG
 - Step change in housing provision
 - The identification of growth areas to accommodate significant development
 - Regional Economic Strategy
 - Population and household projections
- 3.2 EERA Guidance suggests that these emerging national and regional influences may have a major role to play in both the scale and spatial distribution of housing development that should take place in Hertfordshire in the period to 2021.

The existing Hertfordshire Development Strategy – adopted Structure Plan to 2011

- 3.3 The settlement pattern of Hertfordshire is characterised by a number of small to medium sized towns, each with a range of facilities and surrounded by accessible open countryside. None of the County's towns are completely self-sufficient in terms of providing a full range of employment, social, leisure and shopping facilities for its residents and there are high levels of interaction, and therefore movement, between the towns. The Hertfordshire development strategy seeks to broadly maintain the general settlement pattern, concentrating development

within the main existing areas². It is for local plans to decide whether there are local circumstances which dictate which of these settlements should be the subject of different scales and types of development depending on local need and circumstances.

- 3.4 The main exception to this broad approach are strategic greenfield housing sites to meet countywide needs – these are located west of the A1(M) at Stevenage (commonly known as Stevenage West) and at various sites around Hemel Hempstead. The former proposes 5,000 dwellings (3,600 by 2011) with a possible second phase of another 5,000 whilst the Hemel allocation is limited to 1,000 dwellings. The Hemel strategic allocation is being brought forward through an emerging Local Plan.

The emerging Hertfordshire Development Strategy – Structure Plan Alterations to 2016

- 3.5 The emerging Structure Plan Alterations maintains a development strategy seeking to concentrate development in Hertfordshire's main settlements. However, in relation to meeting strategic housing needs it proposes to delete the previously identified strategic housing development at Stevenage West on the basis that development needs can be met within Hertfordshire's main urban areas to at least 2011 without the need for strategic greenfield development. The Structure Plan has been subject to both pre-deposit consultation and statutory deposit consultation. The Examination in Public into the Structure Plan has been postponed, following advice from GO-East.
- 3.6 Stevenage Borough Council seeks to secure a role for the future of Stevenage within RPG14 as the major growth point for Hertfordshire. It believes that up to 15,000 dwellings could be provided at Stevenage in the period to 2021, largely through sustainable urban extensions. This 15,000 would include Stevenage's own limited previously developed land (pdl). supply and the Stevenage West allocation made in the adopted Structure Plan. This scale of development could only be accommodated beyond Stevenage's administrative boundaries.
- 3.7 The emerging North Hertfordshire Local Plan contained proposals for development West of Stevenage. Following the publication of PPG3, and the requirement within it to prepare urban capacity studies, in December 2000 North Hertfordshire District Council withdrew its emerging Local Plan.

² Abbots Langley, Baldock, Berkhamsted, Bishop's Stortford, Borehamwood, Bushey, Cheshunt, Chorleywood, Croxley Green, Harpenden, Hatfield, Hemel Hempstead, Hertford, Hitchin, Hoddesdon, Letchworth, Potters Bar (including Little Heath), Radlett, Rickmansworth, Royston, Sawbridgeworth, South Oxhey/Carpenders Park/Eastbury, St Albans, Stevenage, Tring, Waltham Cross, Ware, Watford, Welwyn Garden City.

- 3.8 Responses to the consultation on the Structure Plan Alterations have proposed that certain areas/towns/sites within the County should be subject to either additional or restricted additional growth. Such proposals have not been subject to rigorous testing through sustainability appraisal processes and an Examination in Public or public consultation.

Sustainable Communities Plan

- 3.9 In 2003 the Government published 'Sustainable Communities: building for the future' containing a 'programme of action to tackle pressing problems in our communities in England: homes are unaffordable in some areas, but are being abandoned in others. We need decent homes and a good quality local environment in all regions.....marks a step-change in our approach; a strengthened determination by government to reverse, over the next 15-20 years, some damaging, deep-seated trends'. The document contains a range of issues which have a direct bearing on the district level housing technical work, particularly the step change in housing supply and proposals for increased housing provision in Growth Areas.

Step Change in housing provision

- 3.10 A step change in housing supply is envisaged, especially in London and the wider South East, by:
- Creating conditions in which private house builders will build more homes of the right type in the right places;
 - Addressing immediate and urgent needs for affordable housing, both for key workers and those who would otherwise be homeless;
 - Making the best use of the existing housing stock.
- 3.11 The Government states that it will work with local authorities to ensure that the new homes already planned are built in London and the wider South East and that additional new housing will be concentrated in four growth areas. It is not proposing a blanket rise in housing supply across the whole of the South East – only that existing planned development comes forward. The proposals for growth in housing are confined to the four growth areas.

Growth Area/Sub-Regional Studies

- 3.12 The Communities Plan confirms four growth areas for which major growth should be planned:
- Thames Gateway
 - Milton Keynes/South Midlands
 - Ashford
 - London-Stansted-Cambridge.

Two growth areas have potential implications for Hertfordshire – Milton Keynes/South Midlands and London-Stansted-Cambridge.

- 3.13 The Communities Plan states that London and the growth areas 'have the potential to accommodate an additional 200,000 homes above levels currently planned in regional planning guidance'. In launching the Communities Plan, the Deputy Prime Minister's statement to the House of Commons indicated that this scope for additional housing would be in the next 15-20 years – i.e. the period up to 2021. The Panel report into the London Plan (see below) recommends an annual housing target of 30,000 dwellings, some 7,000 above rates in RPG9, or 140,000 dwellings over RPG rates for the 20 year period to 2021. This would leave only 60,000 of the 200,000 dwellings to be provided in the growth areas to 2021.
- 3.14 There have been a number of studies undertaken within the growth areas affecting Hertfordshire to explore what the potential for growth might be, both in overall terms and spatially. The outputs of these studies, where they are relevant to Hertfordshire, are outlined below. Within the context of producing District level housing figures none of these studies have any statutory standing, nor have they been subject to a full public consultation exercise or, in many cases, sustainability appraisal process. EERA Guidance on the production of District level housing figures assumes that the most up to date outputs from studies within the growth areas should be inputted into this technical exercise. Whilst sections 4 and 5 include spatial strategies which include outputs from growth area studies, this should in no way be treated as the acceptance of relevant local authorities in Hertfordshire to the study findings.

London-Stansted-Cambridge Growth Area

- 3.15 A ***London Stansted Cambridge Study*** in 2002 on the whole of the growth area considered some of the implications of varying levels of growth. One of the findings was that Harlow, as a key town in the area between London and Cambridge and in need of regeneration, should play a major role in any development options for the area. The subsequent ***Harlow Options Study*** concludes that housing growth of between 29,000 and 38,000 dwellings would offer flexibility in planning for future growth in the Harlow area up to 2021. This range of growth is assessed as also requiring 213 and 276 hectares of additional employment land. Currently identified sites for development in the area could accommodate 10,000 dwellings and 95 hectares of employment land. The Study therefore examines sites for locating the additional requirement – that is, 19,000 to 28,000 dwellings and 125 to 181 hectares of employment land.
- 3.16 The Study found that two spatial development patterns better meet agreed sustainable development criteria. One pattern (Sub-Regional Urban Focus) recognises Harlow as a major urban centre and

concentrates development in and around the town. The other pattern (Transport and Regeneration Led Corridors) locates development around improvements to the transport network and creates links to key development drivers outside the study area. Under the Sub-Regional Urban Focus pattern the vision for the study area is of the substantial expansion of Harlow to meet the future growth needs of the area. This could include up to 9,000 houses to the north of Harlow in East Hertfordshire under a higher growth level option. The Transport and Regeneration Led Corridors pattern also envisages the substantial expansion of Harlow to meet the future growth needs of the area and the inclusion of a new transport based development corridor between Epping and Harlow and development in the Lea Valley and at Waltham Abbey. This option includes up to 10,000 houses on a variety of sites alongside the A10 between Waltham Cross and Ware, having implications on potential levels of future housing in Broxbourne and East Hertfordshire districts (broadly, 5,000 in Broxbourne, 5,000 in East Herts).

- 3.17 Both development patterns would necessitate the release of a substantial area of Green Belt land. The Study concludes that the Transport and Regeneration Led Corridors option better meets regeneration options. This is because the new public transport facilities will improve accessibility and the attractiveness of the area for inward investment. It also spreads the benefits around the area rather than focusing them chiefly on Harlow itself. The report concludes that these benefits warrant the higher level of investment needed to implement this option.
- 3.18 The **Stansted M11 Corridor Study** takes forward the London Stansted Cambridge Study and the Harlow Options Study to provide the basis for a sub regional spatial strategy to feed into the future regional plan for the East Region (RPG14). The main implication of the study for Hertfordshire is that it proposes 2,000 dwellings be provided on land at Bishop's Stortford currently identified in the East Herts Local Plan as an Area of Special Restraint. This is considered to be the latest most up to date guidance on the growth area as it affects Hertfordshire. There is no economic case for greater growth within the study area in Hertfordshire. It is still not entirely clear, however, whether the 2,000 proposed at Bishop's Stortford represents growth over and above RPG rates and therefore contributes to the growth area aspirations of the Communities Plan. For the purposes of this exercise this has been assumed to be the case. It is hoped that further work on the study, which it is understood is currently in progress, will clarify this position. When clarified, the figures produced in this report may need to be revisited.
- 3.19 The current most up to date output from the studies in this growth area as they affect Hertfordshire are proposals for 2,000 dwellings on greenfield land at Bishops Stortford in East Hertfordshire District. This

growth area proposal is included within the spatial strategies and District level housing figures exercise in sections 4 and 5.

Milton Keynes/South Midlands Growth Area

- 3.20 The ***Milton Keynes and South Midlands Study*** outlined potential growth levels and a preferred strategy for the distribution of that growth to 2031. It identified Luton and South Bedfordshire as an area of high growth and triggered the ***Luton/Dunstable/Houghton Regis Growth Area Study***, which provides a more detailed analysis to:
- test the feasibility and timing of growth that would be appropriate for future strategic planning to 2021
 - provide confirmation of the broad pattern, timing and phasing of development
 - provide guidance on how the area could be developed in the most sustainable way
- 3.21 The preferred spatial strategy for Luton, Dunstable and Houghton Regis is one which seeks to direct growth northwards, but also brings into play a reserve site of 95 hectares to the east of Luton in North Hertfordshire District. The reserve site is considered necessary by the study due to a number of fundamental uncertainties relating to:
- the real and appropriate levels of surplus employment land available for development in Luton, Dunstable and Houghton Regis – this may be an important additional source of land supply ‘which must, if it does exist, be factored into any Urban Renaissance strategy for Luton, Dunstable and Houghton Regis’.
 - there are possible limitations of the 27% apportionment of housing in the Milton Keynes/South Midlands Growth Area to Dunstable and Houghton Regis as part of the overall South Bedfordshire total. This has implications for the ultimate size of the Growth Area and therefore the final quantum of land required to deliver it.
 - there are difficulties regarding the timing of new road infrastructure works necessary to serve three key sites to the north of the Growth Area.
- 3.22 Should the reserve site prove necessary the Study anticipates that it might come forward before 2016. Assumptions on potential housing contributions at other sites in the Study assume densities of approximately 28.5 dwellings per hectare. Applying this density to the reserve site in Hertfordshire equates to 2,700 dwellings, rounded to 3,000 dwellings. This reserve site has implications for potential future levels of housing provision in North Hertfordshire District. North Hertfordshire District Council and Hertfordshire County Council have raised serious concerns regarding the identification of the reserve site in Hertfordshire. These concerns include the following:
- a spatial strategy which relies heavily on urban extensions will undermine efforts to regenerate the existing built up areas of the sub region, including Luton. In relation to Luton/Dunstable/

Houghton Regis, the phasing strategy brings forward the first tranche of greenfield urban extensions (west Dunstable) in the period 2006-2011. It is debatable whether this would allow enough time for a comprehensive regeneration strategy and implementation plan to be established for this growth location.

- the principle of identifying land within north Hertfordshire, outside of the sub regional boundary is inappropriate. The spatial strategy makes no direct reference to Hertfordshire.
- there has been no re-evaluation of the assumptions behind the preferred spatial strategy in the original MKSM study in the light of the separate growth assessments.
- the site is not favourable in both sustainability and accessibility terms, nor when compared to the other and more suitable sites identified in the study, including the employment sites in Luton.
- the site has not been justified in terms of need. Its inclusion as a reserve site is based solely on meeting any possible shortfall in the growth strategy arising from phasing and infrastructure constraints throughout the 20 year period. The major uncertainty inherent in the growth strategy surrounds the three northern sites, which are dependent on the widening of the M1 and the completion of the northern bypasses. The inclusion of the north Hertfordshire site as a safety net to the spatial strategy is inappropriate and reflects instead the need for further technical work to refine and strengthen the growth strategy.
- it is crucial that future growth in the sub region does not adversely compromise the benefits sought by widening the M1 and other key infrastructure schemes, many of which are designed to address existing capacity. There is concern that the preferred spatial strategy shows the indicative line of the eastern airport bypass as proposed in SERAS. This proposal has no status as it would only be required in the event of significant increases in capacity at Luton Airport, and that beyond the scale envisaged in the growth strategy. As such the eastern airport bypass has no value in improving the accessibility of the north Hertfordshire site.
- there is concern over the environmental implications of implementing the northern bypasses, particularly the visual impact on the Chilterns AONB and the traffic implications for Hitchin from improving east west links. The justification for the proposed highway improvement to the A1081 and the Translink extension to the south east of Luton is not clear. These infrastructure improvements appear unrelated to the growth strategy, which seeks to capture opportunities for employment development in Luton town centre and near the airport.

3.23 The current most up to date output from the studies in this growth area as they affect Hertfordshire are proposals for 3,000 dwellings on greenfield land to the East of Luton in North Hertfordshire District. This growth area proposal is included within the spatial strategies and District level housing figures exercise in sections 4 and 5.

The London Plan

- 3.24 The Examination in Public (EIP) on the draft spatial strategy for London (the draft London Plan) was held in March 2003. The Panel Report published in July contains a large number of recommendations but does not seek to change the basic elements of the Plan - to provide sufficient employment and housing, including affordable housing, on sites within London with good public transport accessibility to meet the needs of the growing population in the city.
- 3.25 The main concerns expressed at the EIP relate to the implementation of the strategy, particularly the provision of housing and affordable housing, the location of and accessibility of employment and the provision of adequate transport. Failure to achieve the objectives, particularly the provision of sufficient housing, would have serious implications for the East of England Region, particularly southern Hertfordshire and Essex, as pressures for out migration from London would increase.
- 3.26 The draft strategy anticipates a demand for nearly 32,000 new homes a year, made up from the 20,000 additional households related to population growth plus an allowance for the backlog of existing housing needs. London's contribution to the planned wider South East (RPG9) housing provision is 23,000 dwellings per annum which the Mayor has put forward as a minimum target. The Panel notes that were the target to be met but not exceeded the shortfall between that and the demand level (nearly 9,000 dwellings) would either be met by exporting demand to the neighbouring regions or in increasing the housing backlog in London. It recommends increasing the target to an aspirational 30,000 dwellings per annum. This new target might help limit out-migration from London. However whether it can be feasibly implemented will depend on the results of a new London Housing Capacity Study and the potential for increasing supply in certain areas.
- 3.27 EERA will consider advice on the implications for the Eastern Region of London not meeting its own needs in preparation of RPG. It is assumed that the implications of taking various potential judgements on these matters are broadly covered within the growth 'what-ifs' considered in section 5.

Population and Household Projections

- 3.28 To give an improved understanding of migration and the relationship between population and households, EERA has produced the following District-level population and household projections based on recent information available from the 2001 Census:
- a short run migration projection – this assumes that District level shares of migration during the last 5 years will continue but with the

total level of net in-migration adjusted to reflect changed Government assumptions about future international migration;

- Long run migration – which projects forward the pattern of migration over the last 10 years;
- Nil net migration – which provides a measure of ‘natural change’ and thus a measure of overall change that can be attributed to migration in the first two projections;
- Current structure plan dwelling provision – assumes provision continues at the average annual rates set in current structure plans³ to enable comparison of currently planned rates of provision with demographically driven projections of need.

3.29 EERA has also produced projections of what the District level of housing provision would be under the five growth ‘what-ifs’ based on proportions of dwellings within Districts in most recent Structure Plans. In addition, the Hertfordshire County Grouping commissioned, through EERA, further projections for the growth ‘what-ifs’ based on the proportion of households in each district at 2001 Census, rather than Structure Plan rates. The reason for this is that the distribution of dwelling figures in the deposit Structure Plan are based heavily upon the County Council’s view of varying capacity of Districts to accommodate development within urban areas. It would not be appropriate to apply a capacity based distribution to levels of growth above RPG rates that could clearly not be accommodated in urban areas. This further set of projections is used in the process of deriving District level figures for the growth ‘what-ifs’ considered in section 5 below.

3.30 EERA will consider advice on the various Chelmer projections and, amongst other matters, their underlying assumptions, in arriving at dwelling figures for Districts. It is assumed that the implications of taking various potential judgements on these matters are broadly covered within the growth ‘what-ifs’ considered in section 5.

The Regional Economic Strategy

3.31 In June 2001 the East of England Development Agency published ‘East of England 2010 prosperity and opportunity for all – the regional economic strategy’. The goal set in the Strategy is to make the East of England a world-class economy, in the top wealthiest European regions by 2010. In order to enable sister and sub regional strategies to complement and assist the implementation of the RES it was considered critical that there is collective and common understanding of its implications, particularly for land use and transport. EEDA, EERA, Go-East and the region’s strategic planning authorities jointly agreed a project brief to examine two principal questions:

³ Current structure plan = structure plan reviews at deposit or later stage where these have been undertaken in line with RPG6/9 and older structure plans elsewhere.

- how the levels of per capita GVA growth projected in the RES's high productivity enhanced growth scenario could be achieved
 - the implications of achieving this level of growth
- 3.32 The Regional Economic Strategy Sub-Regional Study Stage 1 Final Report July 2002 and Regional Economic Strategy Sub-Regional Study Stage 2 Final Report July 2002 were subsequently published. The reports considered two approaches – Business as Usual and Enhanced Growth. The Enhanced Growth projections were considered to be those which would be required to deliver the RES target. Meeting the RES GVA per head 2010 target date would result in an additional 105,000 jobs in Hertfordshire by 2021.
- 3.33 In 2003 Bone Wells Associates, Experian Business Strategies and Colin Buchanan and Partners were commissioned by EERA to update the modelling work undertaken in the 2002 studies to:
- Reflect the changes in the baseline and outlook implied by new information since the original work was done in November 2001, particularly the first results from the 2001 Census and revisions to local workplace employment estimates and regional GVA
 - Investigate the implications of relaxing the RES target to be among the top 20 regions in Europe measured by GVA per capita by 2010, by considering alternative achievement dates of 2015 and 2021.
 - Develop a number of new social and environmental indicators, not provided in the RES Sub-Regional Study.
- 3.34 Since the original forecasts were compiled in November 2001 for Business as Usual (BAU) and Enhanced Growth (EG) scenarios key new data has become available which affect both the baseline situation and projections of the future. The 2001 Census results indicate the regional population is over 100,000 (1.9%) less than was previously thought, and revised forecasts over the next twenty years indicate the disparity is expected to widen further. The working age population is revised down more than the total population, so the projected growth of full-time equivalent employment (BAU) has been revised down, although the projected levels are actually higher due to upwards revisions to the historical data.
- 3.35 The revised estimate for GVA per capita is 3.1% higher than before, due to the lower current population estimate, as well as higher regional GVA, revised upward by 1.2%. The new estimates and forecast of total employment are higher than before.
- 3.36 The 2002 Bone Wells study implied that enhanced growth to meet the RES 2010 target would result in an additional 105,000 jobs by 2021. The 2003 update to take into account new more up to date information demonstrates that meeting the 2010 RES target would result in an additional 88,000 jobs by 2021 – a significant fall of 21,000 jobs, or 19%. The alternative 2015 RES target date (EG15) reduces job growth by 2021 to 79,000. The alternative EERA 2021 RES target date

(EG21) reduces this still further to 60,000 additional jobs – a difference of 45,000 jobs, or 57%, from the 2002-based Bone Wells projections to meet the RES 2010 target.

- 3.37 EERA is currently undertaking technical work to establish to implications of the RES, Chelmer projections and the results of the growth area studies. Amongst other matters this work includes an EG21-Plus analysis, which represents EG21 on to which additional jobs are added to take account of economic aspirations emanating from growth area studies. This work is still in progress and has not yet been endorsed by EERA. It is assumed that the implications of taking various potential judgements on these matters are broadly covered within the growth 'what-ifs' considered in section 5.

SERAS

- 3.38 The Department for Transport (DfT) published its first consultation paper on aviation policy and airport development in July 2002. The Government wish to determine a 30 year sustainable aviation policy including providing further capacity at UK airports. The forecasts of air passenger demand in the south east and east show that if demand is not constrained either by a lack of capacity or by demand management measures, such as a tax on fuel, there will be a need for 3 to 4 new runways in the region. The July consultation put forward options for a new runway at Heathrow, up to three new runways at Stansted, a new four runway airport at Cliffe in Kent and a replacement runway (on one of two alignments) at Luton.
- 3.39 The second consultation exercise was almost identical to the first except that the options for 1 or 2 new runways at Gatwick are included. These are either a close parallel runway or a wide spaced runway to the south of the existing runway or two wide spaced runways south and north. The legal agreement between BAA and West Sussex by which no new runway can be built before 2019 remains so these options could only be built in the near future if it were to be overturned.
- 3.40 There is also some clarification as regards Luton. The options remain the same, a replacement full length runway to the south or a replacement realigned runway, but it is now made clear that these are options for comment and made less clear that an extension of the existing runway would be considered if it were proposed.
- 3.41 Planning applications are likely to be brought forward to increase capacity at Stansted and Luton to the maximum the existing runways can accommodate. If the applications are found to be acceptable in planning and environmental terms (an important proviso) the total available capacity in the south east will be almost sufficient to meet forecast demand for 2015.

3.42 The Government decisions on its airport strategy will not be made within the timeframe of this consultation. However, these decisions are likely to have an important role to play in informing decision-making on where development in Hertfordshire should be concentrated/restricted. There are currently no requirements for airport-related dwelling growth in Hertfordshire to inform this technical exercise.

4. Spatial Strategies for the Growth 'What-ifs'

4.1 Section 3 presents some of the main influences which could shape a development/spatial strategy for each of the growth 'what-ifs' in Hertfordshire. However, at this stage EERA has not made preliminary decisions on what the overall scale of housing development Hertfordshire should provide through RPG, whether and what scale of this development should take place in growth areas, what assumptions should be made about the RES, and so on. In the absence of these decisions there are potentially a huge number of different theoretical spatial strategies for each of the Hertfordshire growth 'what-ifs'.

4.2 Since submission of the Interim Report, technical work in Hertfordshire has been subject to scrutiny by joint political arrangements involving all local authorities in Hertfordshire. As discussed in the main report, this process has expressed considerable concern about attempting to explore detailed strategies to accommodate the scale of greenfield development that would be required to achieve the growth 'what-ifs'. Under the timescale available the technical work itself could not be anywhere near as robust as it should be for such a significant piece of work; there would be limited, if any, opportunities for meaningful public consultation; and the joint political processes that would be required simply could not take place.

4.3 Notwithstanding the fact that the majority of the Hertfordshire local authorities do not support the outputs from the growth area studies, the spatial strategies below include ones that reflect the current most up to date outputs from these studies in so far as they affect Hertfordshire, as outlined in section 3.

4.4 As also indicated in section 3 (paragraphs 3.3 - 3.7) the principle of development at West of Stevenage is currently under review. With the EIP into the Structure Plan Alterations currently on hold, the preparation of RPG14 is widely considered to be the only mechanism for a strategic review of West of Stevenage. A spatial strategy based on development at West of Stevenage of 5,000 dwellings is therefore included in addition to the outputs from the growth area studies.

4.5 There are therefore five spatial strategies based on the following:

- without any new growth or strategic area proposals;
- with growth area proposal of 3,000 dwellings to the east of Luton in North Hertfordshire;

- with growth area proposal of 2,000 dwellings at Bishop's Stortford in East Hertfordshire District;
- with strategic proposal of 5,000 dwellings at Stevenage West in North Hertfordshire District and Stevenage Borough;
- a combination of all the growth area/strategic proposals.

Section 5 sets out how District level housing figures have been produced for each of these strategies for the growth 'what-ifs'.

- 4.6 Stevenage Borough Council has sought the inclusion of the strategic allocation west of the A1(M) at Stevenage (partly in Stevenage Borough and partly in North Herts District) within this submission. This is supported by some Districts. This site is allocated in the adopted Structure Plan (1998) and the emerging Stevenage District Plan 2nd Review but not in an up to date North Herts plan. Stevenage believes that the site should be accorded a high level of weight given its development plan status and its potentially significant role in meeting the development needs of the County. The County Council and North Herts do not support this view.
- 4.7 The recent report (July) of the Stevenage Local Plan inspector allocates the site, but states that no planning permission should be granted prior to the justification of the need for the scheme being reassessed and accepted in a context of at least county-wide proportions. With the EiP of the Hertfordshire Structure Plan Review (which deletes the site) being in indefinite abeyance, Stevenage BC have asked that EERA conduct that reassessment. The County Grouping has concluded that it is appropriate that this 5,000 dwelling option be included here so that EERA may make that judgement.
- 4.8 More broadly, Stevenage BC is seeking a role for Stevenage within RPG as the major growth point for Hertfordshire. It has set out the case for a major expansion of 15,000 dwellings to 2021, together with an associated package of new employment opportunities and other social and community infrastructure. The Council has widely circulated a 'bid' document that sets out the case more fully than is possible here. This larger expansion would encompass Stevenage's limited previously developed land (pdl) capacity, greenfield sites within the Borough and Stevenage West at 5,000 dwellings plus additional sites. The latter element may include a further extension to Stevenage West in recognition of the adopted Structure Plan's allocation of "a possible second phase of a further 5,000 dwellings."
- 4.9 Whilst a major strategic greenfield option may be required within Hertfordshire, particularly at the upper level of the Growth what ifs, the County Grouping does not consider that it is appropriate to assess the major Stevenage expansion option within the context of this submission. This is because it is not included within a published Growth Area Study, or an adopted Plan, and is not supported by all the

relevant local authorities. There may be other options within the County which a full sustainability appraisal would assist to identify and assess.

5. District Level Housing Figures

5.1 Appendices 1 and 2 attached to this report contain tables which present baseline statistics for each of the spatial strategies for each of the growth 'what-ifs'. In each table:

- Column 1 presents total figures for completions 2001-2003, previously developed allocations at 2003 and estimates of additional capacity to 2021 as at 2003. There are two sets of figures; the County Council's assessment and the District's assessment.
- Column 2 presents figures for greenfield allocations as at 2003⁴.
- Column 3 presents total baseline capacity – columns 1 and 2 combined.

Columns 1-3 are exactly the same in all of the tables in Appendices 1 and 2.

5.2 Columns 4, 5, 6, 7 and 8 in all of the tables represent the five spatial strategies being used to derive District level housing figures. The methodology for establishing District figures is the same in all the tables, however Appendices 1 and 2 use different bases from which to calculate the distribution between Districts.

- No growth areas/strategic proposals (Column 4 in all the tables in Appendices 1 and 2) – Appendix 1 uses Deposit Structure Plan distribution to split growth 'what-if' figures between Districts. Appendix 2 uses household proportions at Census 2001.
- Growth area/strategic proposals (Columns 5, 6, 7 and 8 in all the tables in Appendices 1 and 2) - the growth area/strategic proposal figure is removed from the 'what-if' total and allocated to the 'target' of the relevant District. The remaining 'what-if' figure is then split between Districts based on Structure Plan distribution in Appendix 1 and by proportions of household in each District at 2001 Census in Appendix 2. Beneath the target figure for each District two 'additional greenfield requirement' figures are identified – one based on the difference between the County Council baseline capacity figure and the target, the other based on the District Council's baseline capacity assessment.

5.3 Amongst other matters, what this exercise demonstrates is, that by using two legitimate approaches, one Structure Plan based in line with

⁴ A range of Areas of Special Restraint have been excluded from the greenfield.

EERA guidance and one Census 2001 based to take account of circumstances in Hertfordshire (see paragraph 3.29), radically different figures for District distributions arise. There are a multitude of other ways in which figures can be derived using a similar process, including taking total baseline capacity and growth area/strategic proposals as a starting point and then apportioning the remainder based on either Structure Plan or Census 2001. However, such other approaches simply serve to produce yet more potentially radically different District distributions. The Structure Plan and Census 2001 based figures are those to which the Hertfordshire County Grouping have reached agreement, though it should be stressed that, growth area/strategic proposals aside, this is a simple desk top pro-rata exercise. As stressed elsewhere in this report, within the time available it has not been possible to undertake a thorough, robust and meaningful technical exercise to identify, and appraise, potential spatial strategies to replace the pro-rata approach.

5.4 A number of other issues consistent to many of the strategies considered for the growth 'what-ifs' have arisen from this work. Highlighted below are two key issues:

- Stevenage and Watford – tightly constrained administrative boundaries

Stevenage and Watford are both small, urbanised Boroughs with tightly constrained administrative boundaries. Under almost all the growth what-ifs, both authorities would need to look outside their own administrative boundaries to accommodate their future housing needs. Based on 5-year net migration rates Watford will need to accommodate over 4,800 new households by 2021. But not only is Watford itself small and heavily developed, it is surrounded by neighbouring authorities with similar heavily developed characteristics, and the Metropolitan Green Belt. Watford would need to look further afield to accommodate its needs. Stevenage will have over 8,000 new households to accommodate by 2021. It can only provide 2,200 dwellings within its own area (on brown and green sites) without Stevenage West. Accommodating Stevenage's housing needs raises different planning issues than those facing Watford. The majority view within the Group is that the timescale of this current technical exercise is insufficient to enable the necessary work to be completed to address and resolve these complicated issues.

- Under-utilisation of estimated baseline capacity

There are occasions in the tables where negative figures are registered under 'other greenfield requirement'. This indicates that, under the methodology set out in paragraph 5.2 the distribution of development is such that, either under the County Council's or the Districts' assessment of baseline capacity, the growth 'what-if' would involve

under-utilisation of estimated baseline capacity for development within a particular District.

6. Additional greenfield development required to meet the growth 'what-ifs' for the five spatial strategies

66,000 Growth 'what-if'

- 6.1 Using both the Structure Plan as a basis for distribution (Appendix 1), and the Census 2001 as the basis for distribution (Appendix 2), the total greenfield requirement under the 5 spatial strategies using the District Councils' combined assessment of baseline capacity would be at least 16,500 dwellings (550 hectares). The equivalent figures using the County Council's assessment of baseline capacity is 6,200 dwellings (207 hectares). This assumes a minimum PPG3 density figure of 30 dwellings per hectare taking no account of major physical and social infrastructure and other development requirements that would be necessary. If existing pdl capacity in some Districts were not fully utilised then the greenfield requirement would increase in the County as a whole.
- 6.2 The introduction of the various strategic greenfield releases under the spatial options reduces the residual requirement. If all the strategic releases are included there would in theory be excess capacity if the County baseline capacity figure is used and this is fully utilised.

71,000 Growth 'what-if'

- 6.3 Using both the Structure Plan as a basis for distribution (Appendix 1), and the Census 2001 as the basis for distribution (Appendix 2) the total greenfield requirement under the 5 spatial strategies using the District Councils' combined assessment of baseline capacity would be a minimum of 21,500 dwellings (720 hectares). The equivalent figures using the County Council's assessment of baseline capacity is a minimum 11,200 dwellings (373 hectares). This assumes again that all identified pdl capacity is utilised.
- 6.4 The introduction of the various strategic greenfield releases under the spatial options reduces the residual requirement.

⁵ Applying minimum PPG3 density figure of 30 dwellings per hectare, taking no account of the likely major physical and social infrastructure and other development requirements that would be necessary.

76,000 Growth 'what-if'

- 6.5 Using both the Structure Plan as a basis for distribution (Appendix 1), and the Census 2001 as the basis for distribution (Appendix 2) the total greenfield requirement under the 5 spatial strategies using the District Councils' combined assessment of baseline capacity would be a minimum of 26,500 dwellings (883 hectares). The equivalent figures using the County Council's assessment of baseline capacity is a minimum of 16,200 dwellings (540 hectares).
- 6.6 This assumes that all identified pdl capacity is utilised. The introduction of the various strategic greenfield releases under the spatial options reduces the residual requirement.

81,000 Growth 'what-if'

- 6.7 Using both the Structure Plan as a basis for distribution (Appendix 1), and the Census 2001 as the basis for distribution (Appendix 2) the total greenfield requirement under the 5 spatial strategies using the District Councils' combined assessment of baseline capacity is a minimum of 31,500 dwellings (1,050 hectares). The equivalent figures using the County Council's assessment of baseline capacity is a minimum of 21,200 dwellings (706 hectares). This assumes that all identified pdl capacity is utilised.
- 6.8 The introduction of the various strategic greenfield releases under the spatial options reduces the residual requirement

86,000 Growth 'what-if'

- 6.9 Using both the Structure Plan as a basis for distribution (Appendix 1), and the Census 2001 as the basis for distribution (Appendix 2) the total greenfield requirement under the 5 spatial strategies using the District Councils' combined assessment of baseline capacity is a minimum of 36,500 dwellings (1,217 hectares). The equivalent figures using the County Council's assessment of baseline capacity is a minimum of 26,200 dwellings (873 hectares). This assumes that all identified pdl capacity is utilised.
- 6.10 The introduction of the various strategic greenfield releases under the spatial options reduces the residual requirement).

APPENDIX 1

DISTRICT LEVEL HOUSING FIGURES BASED ON DISTRICT DISTRIBUTION IN HERTFORDSHIRE STRUCTURE PLAN ALTERATIONS

APPENDIX 2

DISTRICT LEVEL HOUSING FIGURES BASED ON PROPORTION OF TOTAL HOUSEHOLDS IN EACH DISTRICT AT CENSUS 2001