

North Hertfordshire Local
Plan Examination in Public
Statement in Respect of
Matter 11: The Housing
Allocations and Settlement
Boundaries – the Category A
Villages

On behalf of
Hertfordshire County Council

January 2018

Prepared by
Vincent and Gorbings



STATEMENT IN RESPECT OF MATTER 11:

The housing allocations and the settlement boundaries – the Category A Villages

Ashwell, Barkway, Barley, Breachwood Green (Kings Walden Parish), Codicote, Graveley (including north of Stevenage), Hexton, Ickleford, Kimpton, Knebworth, Little Wymondley, Lower Stondon, Oaklands, Offley, Pirton, Preston, Reed, Sandon, St Ippolyts, Therfield, Weston and Whitwell (St Paul's Walden Parish)

1.0 STATEMENT IN RESPECT OF MATTER 11

- 1.1 This Hearing Statement has been prepared by Vincent and Gorbings on behalf of Hertfordshire County Council, owners of land at Bedford Road Ickleford (IC3). HCC is the sole freehold owner of the land.
- 1.2 Vincent and Gorbings have also been appointed to prepare and submit an outline planning application for residential development on this site. Technical and environmental investigations are being carried out and are referred to below in the context of the questions raised by the Inspector. Those investigations are nearing completion. It is estimated that the planning application could be ready for submission in the next 6-8 weeks.
- 1.3 The planning application will address the site specific criteria in the local plan allocation IC3 (estimated capacity 150 homes):
- Appropriate solution for primary education requirements having regard to up to date assessments of need
 - Appropriate junction access arrangements to Bedford Road
 - Sensitive incorporation of Footpaths Ickleford 013 and 014 as green routes around the edge of the site including appropriate measures to reinforce the new Green Belt boundary along their alignment
 - Integration of Bridleway Ickleford 015 as a green corridor through the site
 - Sensitive treatment of priority deciduous woodland habitat or where this cannot be fully retained compensatory provision elsewhere within or adjoining the site
 - Development proposals to be informed by site specific landscape assessment
 - Sensitive integration into the existing village particularly in terms of design building orientation and opportunities for cycle and pedestrian access
 - Archaeological survey to be completed prior to development
 - Consider and mitigate against potential adverse impacts of sites on Oughtonhead Lane SSSI
- 1.4 A development principles plan has been prepared (see below) which shows the disposition of the main land uses (residential development, education development, open space, green corridors, woodland, and the points of access). It shows that the residential development parcel can be accessed from Bedford Road and education development parcel (accommodating a 2fe primary school) can be accessed from Chambers Lane. A detailed masterplan is in preparation which will form part of the planning application. On the basis of work completed thus far it is estimated that the number of homes that could be accommodated on this site could be increased to approximately 190 dwellings.



- 1.5 This statement addresses only the questions raised by the Inspector in respect of deliverability under Matter 10 The Housing Allocations and the Settlement Boundaries – The Category A Villages. Other matters such as land supply, and the selection of sites and consequent changes to the Green Belt should be addressed by NHDC as noted in the responses to follow. This Statement is submitted further to the representations made in response to the Reg. 18 and 19 local plan consultations by HCC Property (Development Services).

Inspectors Question 11.28

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?

- 1.6 The County Council owns the freehold of this site. The County Council confirms that site can be released for residential development during the plan period.

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

- 1.7 The local plan acknowledges that site IC3 will require the creation of a new access on the A600 Bedford Road and that contributions will be required towards schemes in Hitchin. Highway Consultants (Stomor Ltd) have been appointed to prepare a transport assessment to be submitted with a planning application. This transport assessment is well advanced.
- 1.8 There are currently five points of vehicular access from the site onto the Bedford Road as well as the existing bridleway access for pedestrians, cyclists and horse riders. These access points will be rationalised into one single access for vehicles serving the residential development.
- 1.9 A secondary access from Chambers Lane could be brought forward to serve a new 2fe primary school as and when required.

- 1.10 In order to meet Hertfordshire County Council's Principal Road Policy the transport assessment contains a clear justification for the proposed access onto the A600:
- The access would replace four existing, informal accesses on the east side of Bedford Road which have varying design standards and may be capable of intensification of use without significant upgrade;
 - A fifth existing access would be reduced in use as the former Countryside Management Service used to share this access with a single house is included within the development site so the access would revert to a use by the house only;
 - It is considered unlikely that the whole site (i.e. residential and education zone) could be accessed from other roads to the south due to the limitations on available carriageway width and the need to retain the wooded part of the site adjacent to Greenfield Avenue;
 - The site is proposed for allocation for housing development in the emerging North Hertfordshire Local Plan. The highway consultants are unaware of any 'in principle' objection to the site and potential access from Bedford Road by the Highway Authority;
 - The proposed access will be designed to accord with standards and would enable the northbound extension of the existing 30mph speed limit;
 - The design of the access and amended speed limit would help manage traffic speeds at the approach to the site access and Ickleford where existing 85%ile speeds are shown to be in excess of the existing 30mph limit;
 - There is no current record of accidents on this section of Bedford Road and the design of the proposed site access in accordance with standards is unlikely to materially worsen this situation.
- 1.11 The design of the proposed access conforms to appropriate design standards and has been submitted for Stage One Safety Audit. It has not flagged any substantive concerns about the proposed access onto the A600 or the proposed access onto Chambers Lane.
- 1.12 The transport assessment proposes improvements to pedestrian facilities through an upgrading of the bridleway running through the site and links through to Chambers Lane.

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

- 1.13 A number of environmental and technical investigations have been carried out and will be submitted with the planning application:
- **Topographical survey (Sunshine Surveys Ltd)** – the completed topographical survey identifies the positions of all buildings, trees and any level variations in the land
 - **Tree Survey (Ian Keen Ltd)** – identifies all trees, woodland groups and hedgerows: this will inform the retention of woodland areas and individual trees in the development of an illustrative site layout. The survey concludes that there are few trees of merit on the site other than some English oak along the southern boundary
 - **Preliminary ecological assessment (ELMAW Consulting)** – has identified the potential for some protected species which required additional surveys which were subsequently completed

- **Breeding Bird surveys, Bat activity surveys and reptile surveys (ELMAW Consulting)** – these surveys were undertaken in summer 2017. There were no reptiles found, very low bat potential, there is a requirement to protect breeding birds (trees or shrubs to be removed during nesting season unless checked by an ecologist). Overall the site is of low biodiversity value. Biodiversity gains will be detailed in any outline planning application.
 - **Archaeology (CgMs Ltd)** – the desk-top assessment has confirmed that there are no relevant designated heritage assets within the vicinity of the site. The site is located immediately to the west of an Archaeological Alert Area. Non-designated late medieval ridge and furrow is documented as being located within the study site and there is an associated potential for contemporary agricultural features to be present. The site is considered to have a modest archaeological potential for remains associated with the prehistoric period and a limited potential for all other periods. The report concludes that a programme of archaeological evaluation would be required in advance of development and as the remains are not anticipated to be of national significance this mitigation can be secured through an appropriate planning condition.
 - **Geo-technical investigations (REC Ltd)** – a Phase I geo-environmental investigation has been undertaken which concludes that the risk classification is very low to moderate. It is recommended that a phase II investigation is undertaken to test for ground conditions and any potential contamination. This could be attached as a pre-commencement planning condition. Soakage testing has also been carried out to inform the preparation of the drainage strategy concluding that good drainage persists across a large area of the site and therefore large shallow soakaways could be used for surface water drainage.
 - **Utilities assessment (Stomor Ltd)** – A services investigation has been conducted to determine the location of existing services. All the main utilities (gas, electric, BT, Cable and water run along Bedford Road to the west of the site with the exception of foul and water sewers located in Chambers Lane. There are no services running across the site which could sterilise the development potential of the land. Upgrades may be required which will need to be established at the detailed planning application stage.
 - **Foul Water Drainage impact assessment (Anglia Water)** – has identified and specified the requirement for upsizing foul water sewers to accommodate flows from the development which is achievable.
 - **Surface water drainage impact assessment and strategy (Stomor)** – a flood risk assessment has been completed which concludes that the site is not at risk of flooding from fluvial sources, groundwater or artificial sources. There is a low risk of surface water flooding and AWS have confirmed historical incidents of sewer flooding within the vicinity of the proposed development. The development layout will be designed with consideration of flood routing to ensure new buildings and occupants of the site will not be subject to detrimental impacts in the event of flooding. The proposed surface water drainage strategy for the site will demonstrate a system of SuDs and attenuation features to provide sufficient storage to avoid flooding with the site during the 1 in 100 year storm plus 40% allowance for climate change.
- 1.14 The technical and environmental investigations which have been carried out to inform the preparation of an outline planning application confirm that there are no technical or environmental constraints to the deliverability of the site.
- 1.15 The outline planning application is being finalised and will be submitted following public consultation in the next 6-8 weeks.

Inspectors Question 11.29

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

- 1.16 A full suite of technical and environmental studies has been undertaken to assess the environmental effects of the development. These will be submitted with the outline planning application and have been outlined above. There are no abnormal or significant environmental issues that need to be addressed through mitigation. All matters of environmental effects can be dealt with through the planning application process.

Inspector's Question 11.30

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

- 1.17 The matter of spatial strategy, housing land supply and the allocation of suitable sites is a matter for NHDC to consider. The housing allocation IC3 represents a sustainable location for development being close to the village amenities of Ickleford and being located on a major public transport bus route into Hitchin which is nearby. The land is capable of being developed in a comprehensive manner being in the single ownership of Hertfordshire County Council.

Inspector's Question 11.31

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

- 1.18 It is for NHDC to respond on the case for the exceptional circumstances that pertain in respect of the release of this site for development.

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

- 1.19 It is for NHDC to respond on the nature and extent of harm to the Green Belt pertaining to the removal of this site.

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

- 1.20 It is for NHDC to respond to explain how the impacts of releasing land from the Green Belt have been ameliorated or reduced to their lowest 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 the Green Belt or would the Green Belt function be undermined by the sites allocation?

- 1.21 It is for NHDC to respond on the Green Belt function of adjoining land. The planning application will show how existing vegetation along the northern and eastern boundaries through the retention of the footpaths and what are green corridors can be retained to ensure the creation of an effective and defensible Green Belt boundary to the land beyond. This will serve to prevent any encroachment into the countryside and the unrestricted sprawl of Ickleford (the relevant purposes of the Green Belt in this location), thus creating strong and enduring Green Belt functions.

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?

1.22 It is for NHDC, in the context of housing land supply and spatial strategy requirements to explain whether they consider Green Belt boundaries in this location will endure past the end of the plan period.

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

1.23 It is for NHDC to explain how the Green Belt boundaries proposed for Ickleford accord with the plan's strategy for meeting sustainable development. The planning application will outline the sustainability credentials of the site through a sustainability statement and accompanying documentation.

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 open?

1.24 The Green Belt boundary has been clearly defined using public footpaths which run along the eastern and northern site boundaries. Both these boundaries are also delineated by existing hedgerows which reinforces the containment of the site. Existing vegetation (taken from the topographical survey) is illustrated on the plan below.



Inspector's Question 11.32**a) *Is the proposed settlement boundary consistent with the methodology for identifying settlement boundaries?***

1.25 It is for NHDC to justify how the proposed settlement boundary around Ickleford is consistent with the methodology adopted by the Council.

b) *Appropriate and justified?*

1.26 It is for NHDC to explain whether the proposed Green Belt boundary is appropriate and justified.

Vincent and Goring

Sterling Court, Norton Road
Stevenage, Hertfordshire SG1 2JY

T: +44 (0) 1438 316 331
vincent-goring.co.uk

Ruth Gray, Associate Director
ruth.gray@vincent-goring.co.uk

