

**NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION
ON BEHALF OF MS L RICHARDSON (REP ID: 2302)**

WRITTEN STATEMENT

**MATTER 11 – HOUSING ALLOCATIONS AND THE SETTLEMENT BOUNDARIES:
CATEGORY A VILLAGES – LOWER STONDON**

Lower Stondon

- 11.47 Is the proposed housing allocation deliverable? In particular, is it:**
- a) confirmed by all of the landowners involved as being available for the use proposed?**
 - b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**
- 11.47.1 The proposed housing allocation is not supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided.
- 11.47.2 In response to a consultation on the current planning application (ref: 17/02175) for 185 dwellings at LS1, Hertfordshire County Council commented: *‘The viability of the proposed site access is dependent on the speed limit on Bedford Road being lowered to 30mph. However, the applicant has not provided adequate justification that lowering the speed limit would be consistent with the HCC Speed Management Strategy. If the speed limit on Bedford Road was to remain 60mph, then it is unlikely that the required visibility splays could be provided. Therefore the proposed vehicle access to the site is not considered to be acceptable.’*
- 11.47.3 Paragraph 13.243 of the Submission Local Plan notes that the Council’s transport modelling does not indicate that any specific mitigation measures are required in connection with LS1 but that development will contribute towards traffic in Hitchin, for which appropriate contributions would be sought. However, the cumulative impact of LS1 together with other nearby developments would have significant traffic implications.
- 11.47.4 A local residents’ group has produced figures which show that in total, housing developments within a 3-mile radius of LS1 would amount to over 2,800 new dwellings (or nearly 4,000 dwellings if RAF Henlow is redeveloped entirely for housing). See attached

Appendix A¹. The new developments would cumulatively result in increased traffic movements on the A600. As part of Central Beds Strategic Housing Land Availability Assessment (SHLAA), the Council assessed the potential redevelopment of RAF Henlow, which is due to become available for redevelopment in the near future. It notes that the MBDA site (developer and manufacturer of missiles) neighbours the potential development site and stores hazardous substances which would significantly affect developability of a large area of the site. It states that new development must not result in the total number of vehicular movements on Bedford Road (A600) to equal or exceed 10,000 movements in 24 hours, to ensure development would not negatively affect the ability of the MBDA to continue activities.

11.47.5 The cumulative impact of all nearby developments and the resulting increase in traffic on the A600 must be considered by both North Herts and Central Beds in relation to the storage of hazardous substances at the MBDA site.

11.47.6 In addition, it is noted that the Welbeck application CB/16/05229/OUT for 85 dwellings (recommended for approval subject to signing of s106 obligation) is situated on the western side of the A600 at Lower Stondon. The access for the proposed 85 dwellings is opposite LS1, both providing access on to the A600. The cumulative traffic implications of these two developments alone have not been considered in the proposed housing allocation, nor have the cumulative traffic implications of the many other developments (as detailed in Appendix A) within neighbouring villages been considered.

11.47.7 Paragraph 13.244 states that the most appropriate solution to creation of a new access on to A600, such as changes to speed limits, will be explored. However, amendments to speed limits can only be considered where they meet HCC Speed Management Strategy requirements and contribute towards the Local Transport Plan goals. No evidence is provided to demonstrate that it is feasible that the speed limit could be lowered thereby providing safe and appropriate access. The extent of driver compliance with the recently introduced 40 mph speed limit along the short stretch of the A600 in this vicinity has not been evaluated by transport studies, in order to determine whether any theoretical further speed reduction to 30 mph is viable and enforceable in practice.

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

¹ Note: Appendix A refers to 185 dwellings proposed under planning application 17/02175, not 120 dwellings as specified in LS1.

- 11.47.8 The proposed housing allocation is not deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints. The site is around 3 miles drive from Ickleford and the limited services and facilities available in Lower Stondon are not readily accessible by means other than the private car.
- 11.47.9 CUMULATIVE IMPACT OF NEARBY DEVELOPMENTS AND RESULTING TRAFFIC IMPLICATIONS. There are several developments either with planning permission, applications submitted or with proposed draft housing allocations within a 3-mile radius of the site. A local residents' group has calculated that they amount to between 2,800 new dwellings and nearly 4,000 dwellings (depending on the extent of development for dwellings at RAF Henlow). See Appendix A.
- 11.47.10 Cumulatively, these developments would impact on local services. For example, on lack of medical provision, in response to the current application 17/02175 for 185 dwellings at LS1, a partner from the local GP surgery in Lower Stondon objects to the planning application on the grounds that the developer assumes residents of the new development would use the Lower Stondon surgery yet the doctor points out that the application site is outside his practice area and the surgery would be under no obligation to register these residents. He advises that there is already serious pressure on the capacity of the surgery with other developments coming forward and that it is likely that the residents of LS1 would be advised to register with practices in Hitchin, 4 miles away.
- 11.47.11 Central Beds Council objects to the planning application on the grounds that there are several other sites within Lower Stondon/Henlow Camp which would be more sustainable than the proposed site and have fewer constraints. In addition, they object owing to the significant impact on the amenities and local infrastructure such as schools and healthcare at Lower Stondon/Henlow Camp and the resulting '*significant ramifications on CBC's ability to consider or allocate other sites within the immediate locality of those settlements.*'²
- 11.47.12 Robust objections to the proposed allocation in the submission draft have also been raised by the three neighbouring Parish Councils of Henlow, Ickleford and Stondon. All cite a failure to comply with the Duty to Co-operate. In addition, Henlow Parish Council objects to the breach of a defensible boundary (watercourse), loss of high quality agricultural land, unsustainable development, traffic implications and impact on facilities in Central Beds. It states that RAF Henlow is more suitable for development than LS1. Stondon Parish Council also notes that the allocation is not required to meet housing targets.

² Central Beds Council objection to 17/02175, dated 19 Oct 2017

11.48 Is the proposed housing allocation justified and appropriate in terms of the likely impacts of the development?

- 11.48.1 The proposed housing allocation is not justified and is inappropriate in terms of the likely impacts of the development.
- 11.48.2 **IMPACT ON CHARACTER AND APPEARANCE OF AREA.** The site is high quality grade 2 agricultural land with some trees and partial hedging to boundaries. It is rural in character, in contrast to the suburban character of the neighbouring existing dwellings in Lower Stondon. Owing to the largely open nature of the land to the south, east and west, gently undulating topography and lack of significant trees or hedges, the proposal would be prominent in the wider landscape setting and harmful to the rural character of the area.
- 11.48.3 LS1 requires 'sensitive integration into the existing settlement' yet the landscape and natural features militate against achieving such integration. The water course and flood plain along the northern boundary of LS1 provide a clear physical and visual break between existing development and new housing at LS1. The topography means that integration into the existing settlement in terms of building orientation and opportunities for cycle and pedestrian access, as required by LS1, can not be achieved.
- 11.48.4 **IMPACT ON HERITAGE ASSETS.** Old Ramerick Manor adjoins the site to the east. It is a grade II* listed building and is of considerable importance for its architectural and historic value.
- 11.48.5 Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 requires that special regard be paid to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. The setting of the grade II* listed building is open, rural, agricultural landscape. It is important because it reflects the historic use of the building as Manor House then farmhouse.
- 11.48.6 Even with the provision of a development-free buffer along the eastern edge of the site, as required by LS1, this character would be changed by the housing allocation to one of suburban development, totally at odds with the openness of the existing setting. The housing allocation does not demonstrate that 120 dwellings could be satisfactorily accommodated on the remaining land, having taken account of a development-free buffer to mitigate harm to the setting of heritage assets.
- 11.48.7 **IMPACT ON FLOODING.** LS1 requires that development be located beyond flood zones 2 and 3 and incorporate the watercourse, addressing existing surface water flood risk issues. These requirements significantly reduce land available for development. Additionally, any development would be required to maintain the required 7m buffer from the bank of the

watercourse (including any fencing, landscaping, planting), thereby further reducing the developable land available. It is not demonstrated that the allocation of 120 dwellings, nor the increase of 54% above this figure in the current planning application, could be satisfactorily accommodated on the developable land.

11.48.8 LOSS OF GOOD QUALITY AGRICULTURAL LAND. National planning policy seeks to preserve the 'best and most versatile agricultural land', defined as grades 1, 2 and 3a. In the section on Conserving and Enhancing the Natural Environment, the NPPF states that the economic and other benefits of the best and most versatile agricultural land should be taken into account and where significant development of agricultural land is demonstrated to be necessary, poorer quality land should be sought in preference to that of higher quality³.

11.48.9 According to the North Herts SHLAA, the site is agricultural land grade 2. This falls within the definition of 'best and most versatile agricultural land' and according to national planning policy, lower quality agricultural land should be used.

11.49 Is the proposed allocation the most appropriate option given the reasonable alternatives?

11.49.1 The proposed allocation is not the most appropriate option given the reasonable alternatives. The Council's updated monitoring information on Housing Land Supply (Sept 2017) demonstrates that the Council has 5.3 years' supply of housing land, taking into account the 20% buffer (and Central Beds has 5.94 years as at 1 Oct 2017). Both areas demonstrate an over-supply of housing land, including sites which are more sustainable and have fewer harmful impacts than LS1. There is therefore no justification, in terms of any demonstrable housing shortfall, for the inclusion of the LS1 site allocation within the draft North Herts Local Plan.

11.50 Is the proposed settlement boundary:

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

b) appropriate and justified?

11.50.1 The proposed settlement boundary is inappropriate and not justified. The existing boundary along the northern edge of LS1 forms the historic County boundary between Bedfordshire and Hertfordshire and follows the watercourse which is a tributary to the River Hiz.

³ Ibid – paragraph 112



County of Bedford. 1765. LS1 located to west of 'Ramerick'.

- 11.50.2 The existing boundary follows the natural feature of the watercourse, is clearly visible and provides a defensible boundary. The proposed boundary to the south of LS1 is marked by little more than a farm track and has no historic or logical reason for its location.
- 11.50.3 Similarly, the new boundary to the east does not follow any natural or permanent features.
- 11.50.4 Such weak boundaries are not robust and appear arbitrary. They are readily breached and can result in creeping development, to the detriment of the character and appearance both of nearby settlements and rural areas and can ultimately lead to coalescence of settlements.

Mrs G Davidson BA(Hons) MRTPI

January 2018

APPENDIX A
Data Representing New Dwellings
Approved, Submitted, Imminent and Proposed

Total new dwellings in developments approved, submitted, imminent and proposed within a 3 mile radius of LS1 are **2,888** based on mixed use at RAF Henlow (hi tech science park & residential option) and **3,989** if the 'all residential' option is adopted at RAF Henlow. These totals are broken down as follows:-

1. **Total Applications Approved: 603 Dwellings**
2. **Total Applications Submitted: 536 Dwellings**
3. **Total Applications Imminent: 531 Dwellings**
4. **Total Sites Proposed in Local Plans: 519 Dwellings**
5. **Plus RAF Henlow (700 Dwellings if mixed use/or 1,800 Dwellings if all residential)**
6. **Total Applications Approved & Recently Constructed: 183**

LOWER STONDON:

1. Land West of Bedford Rd , Lower Stondon (**WELBECK Development**) **85 Dwellings Approved 2017** With access road on the West side of the Bedford Rd
2. Land to rear of 104 to 168 Station Rd, Lower Stondon (**BOVIS Development - Stondon Park Phase 2**) **80 Dwellings Approved 2016**
3. Stondon Transport Museum, Lower Stondon **25 Dwellings Approved 2016**
4. Land East of Bedford Rd, Lower Stondon (**BARRATS Development LS1**) **185 Dwellings Application submitted Aug 2017** N Herts but extension to Lower Stondon
5. Rear Station Road behind Doctors surgery towards stadium 15.5 acres (**BLOOR Development - Phase 1**) **145 Dwellings Application imminent Oct/Nov 2017**
6. Hillside Rd, Lower Stondon **35 Dwellings Application imminent Nov/Dec 2017**
7. 186,188 and land to the Rear of Station Road Lower Stondon (**BOVIS - Stondon Park Phase 1**) **98 Dwellings Approved & Recently Constructed**

ICKLEFORD:

1. Ickleford Manor, Turnpike Lane, Ickleford **19 Dwellings Approved**
2. Bowmans Mill **71 Dwellings Application submitted and very likely to be approved as brownfield site**
3. IC 1 Land at Duncoats Close **9 Dwellings Proposed in Herts Local Plan**
4. IC 2 Land at Burford Grange, Bedford Rd **40 Dwellings Proposed in Herts Local Plan**
5. IC 3 Land at Bedford Rd, Ickleford **150 Dwellings Proposed in Herts Local Plan, (pages 169 - 171)** with the creation of a new access road onto the A600, the impact of which has also not been considered by Barratts. In terms of distance to local services for LS1 it is important to note in Point 13.160 of the Herts Local Plan that *"Ickleford Primary is a 1FE (One form Entry) school and regularly fills most of its available places from the local area..."* Point 13.161 further states *" The estimated number of homes on site 1C3 makes allowance for the provision of a new primary school of up to 2FE on this site."* However, the larger LS1 development of 185 dwellings makes no such allowance for any new primary school provision on that site. Instead, the developers Transport Assessment merely quotes walking distances to the Ickleford Primary School, which is already full according to the above statements from the Herts Local Plan.
6. Former site of Green Man Public House, Turnpike Lane, Ickleford **8 Dwellings Approved and Recently Constructed**

HENLOW:

1. Clifton Rd, Henlow **9 Dwellings Approved**
2. Hitchin Rd Henlow **12 Dwellings Approved**
3. High Street, Henlow (Old Parachute pub) **11 Dwellings Approved**
4. Millenium Meadow **59 Dwellings Application submitted**
5. Middlefield Lane **8 Dwellings Application submitted**
6. Stockbridge Road, Henlow **46 Dwellings Application imminent**
7. Land off Langford Rd, Henlow (CB /16/ 02721/OUT application) **(GLADMAN Development) 135 Dwellings Refused but Appeal in December**
8. The Dairy, Henlow (CREST NICHOLSON Development) **175 Dwellings Refused - no appeal date as yet**
9. Clifton Rd, Henlow **37 Dwellings Refused - no appeal date as yet**
10. 6 sites passed through to next stage in the CBC Draft Local Plan with **Proposed 320 Dwellings**
11. RAF Henlow is earmarked to close in 2020. Two options exist in draft CBC Local Plan; **Option 1 - Hi Tech Science Park with Proposed additional 700 dwellings. Option 2 - If site not partly used as science park , Proposed 1,800 Dwellings (based on CBC methodology). The MOD would like 5,000 - 6,000 Dwellings here!**

PIRTON:

1. South side of Holwell Rd (CALA HOMES Phase 1 GLADMAN Development) 78 Dwellings Approved May 2017
2. South Side of Holwell Rd (Phase 2 GLADMAN Development) 85 Dwellings submitted (Reduced from original 99 Submitted)

CLIFTON:

1. South Paddock, High St, Clifton (CB/16/04919/OUT) 22 Dwellings Approved
2. SWCC, Shefford Road, Clifton (CB/15/01657/OUT) 64 Dwellings Approved Oct 2017
3. New Road, Clifton (GLADMAN) (CB 15/02733/OUT) 97 Dwellings Approved (On Appeal) 2017
4. Hitchin Rd, Clifton (HALES) (CB/17/03538/OUT) 80 Dwellings Application Submitted
5. Stockbridge Road North, Clifton (WHEATLEY HOMES) 20 Dwellings Application Imminent
6. The Paddocks, New Road, Clifton (TAYLOR WIMPEY) (CB/13/01308/FULL) 70 Dwellings Approved recently and Under Construction

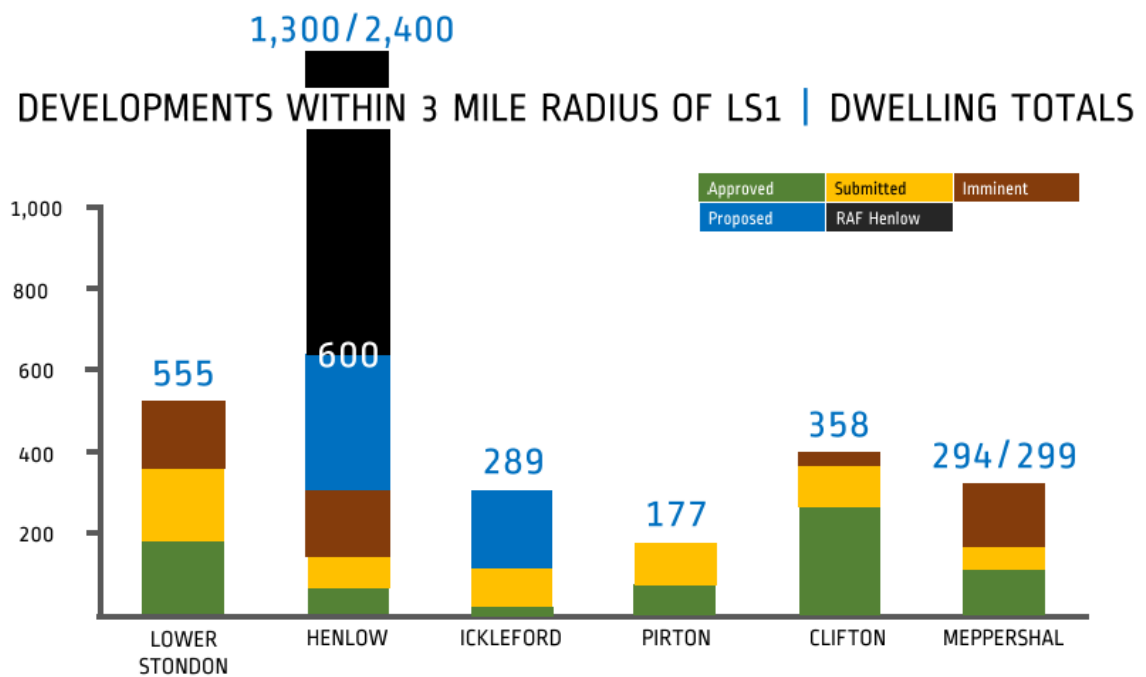
MEPPERSHALL:

1. Land behind Old Village Hall, Meppershall (CROUDACE) 86 Dwellings Approved Feb 2017
2. Land adjacent 23 Shefford Rd, Meppershall 6 Dwellings Approved
3. New Close Nurseries, Fildyke Rd, Meppershall 9 Dwellings Approved
4. New Close Nurseries, Fildyke Rd, Meppershall 10 Dwellings Application Submitted
5. 100 High St, Meppershall 38 Dwellings Application Submitted
6. Stocken House, 59 Shefford Rd, Meppershall (GLADMAN) 150 Dwellings Refused May 2017 but Appeal in Jan 2018
7. (Also Second Alternative Application submitted August 2017 for 145 Dwellings on same site)
8. Old Methodist Church, High Street, Meppershall 7 Dwellings Approved Dec 2016 and Under Construction

DEVELOPMENTS WITHIN 3 MILE RADIUS OF LS1 | DWELLING TOTALS




Figures as of November 2017



Figures as of November 2017

LOWER STONDON

	LOWER STONDON	Dwellings	Total per category
1	Land West of Bedford Rd , Lower Stondon, with access road on the west side of the Bedford Rd.	85 (WELBECK)	190
2	Land to rear of 104 to 168 Station Rd, Lower Stondon. Stondon Park Phase 2).	80 (BOVIS)	
3	Stondon Transport Museum, Lower Stondon.	25	
	Land East of Bedford Rd, Lower Stondon. In North Herts, but 'extension' to Lower Stondon	185 (BARRATTS)	185
5	Rear Station Road behind Doctors surgery towards stadium 15.5 acres (Phase 1).	145 (BLOOR)	180
6	Hillside Rd, Lower Stondon.	35	
			Total: 555

Approved	Submitted	Imminent	Proposed
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Figures as of November 2017

HENLOW

	HENLOW	Dwellings	Total per category
1	Clifton Road, Henlow.	9	32
2	Hitchin Road, Henlow.	12	
3	Old Parachute Pub, High Street, Henlow.	11	
4	Millennium Meadow, Henlow.	59	67
5	Middlefield Lane, Henlow.	8	
6	Stockbridge Road, Henlow.	46	181
7	Langford Road, Henlow. Refused, but on appeal.	135 (GLADMAN)	
10	X6 sites passed through to next stage in draft Central Beds Local Plan.	320	320
			Sub: 600
11	Plus RAF Henlow (700 Dwellings if mixed use/or 1,800 Dwellings if all residential)	700 / 1,800	700 / 1,800
			1300 / 2400

Approved	Submitted	Imminent	Proposed	RAF Henlow
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Figures as of November 2017

ICKLEFORD

ICKLEFORD		Dwellings	Total per category
1	Ickleford Manor, Turnpike Lane, Ickleford.	19	19
2	Bowmans Mill, Ickleford. Application submitted and likely to proceed	71	71
3	IC1 Duncots Close, Ickleford	9	199
4	IC2 Burford Grange, Bedford Road, Ickleford	40	
5	IC3 Bedford Road, Ickleford*	150	
			Total: 289

Approved	Submitted	Imminent	Proposed
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Figures as of November 2017

PIRTON

PIRTON		Dwellings	Total per category
1	Holwell Road, Pirton (Phase 1)	78 (GLADMAN (CALA))	78
2	Holwell Road, Pirton.	99 (GLADMAN)	99
			Total: 177

Approved	Submitted	Imminent	Proposed
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Figures as of November 2017

CLIFTON

CLIFTON		Dwellings	Total per category
1	South Paddock, High Street, Clifton.	22	258
2	SWCC, Shefford Road, Clifton.	64	
3	New Road, Clifton.	97	
4	Hitchin Road, Clifton.	80	80
5	Stockbridge Road North, Clifton.	20	20
			Total: 358

Approved	Submitted	Imminent	Proposed
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Figures as of November 2017

MEPPERSHALL

MEPPERSHALL		Dwellings	Total per category
1	Old Village Hall, Meppershall.	86	101
2	23 Shefford Road, Meppershall.	6	
3	New Close Nurseries, Fildyke Road, Meppershall	9	
4	New Close Nurseries, Fildyke Road, Meppershall	10	48
5	100 High Street, Meppershall	38	
6	Stockdon House, 59 Shefford Road, Meppershall. <small>150 refused May 2017 [Appeal 1/2018]. Alternative 145 dwellings on same site</small>	145 or 150*	145 or 150
			Total: 294 / 299

Approved	Submitted	Imminent	Proposed
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Figures as of November 2017

HENLOW
TOTAL: 600

MEPPERSHALL
TOTAL: 294 / 299

LOWER STONDON
TOTAL: 555

PIRTON
TOTAL: 177



CLIFTON
TOTAL: 358

RAF HENLOW
TOTAL: 700 / 1800

ICKLEFORD
TOTAL: 289

EXPANDED VIEW

A600 TO A507



A600 TO HITCHIN