

# **HUTCHINSONS**

Planning & Development Consultants

**Objections to**

**North Hertfordshire District Council**

**Local Plan 2011-2031**

**Proposed Submission**

**October 2016**

**On Behalf of**

**Mr and Mrs M Holford, Mrs D Parker, Mrs S Bancroft  
Livingstone, Mr and Mrs N Dodds, Mr and Mrs D Bunker,  
Mr and Mrs L Maguire, Mr A Wallace, Mr and Mrs A  
Saunders and Mr and Mrs N Richardson**

**HUTCHINSONS**

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## 1 INTRODUCTION

1.1 We act on behalf of the following residents and enclose our objections on his behalf to policies of the Proposed Submission Local Plan 2011-2031 published for Consultation by North Hertfordshire District Council in October 2016.

Mrs Dorothy Parker                      The Round House, Westmill Lane, Ickleford

Mrs Stella Bancroft Livingstone    The White House, Westmill Lane, Ickleford

Mr & Mrs Nick Dodds                      Gable House, Westmill Lane, Ickleford

Mr & Mrs Michael Holford              Icknield House, Westmill Lane, Ickleford

Mr & Mrs David Bunker                Tudor House, Westmill Lane, Ickleford

Mr & Mrs Lee Maguire                  Kingston House, Westmill Lane, Ickleford

Mr Andrew Wallace                      Spinney Lodge, Westmill Lane, Ickleford

Mr and Mrs Antony Saunders        The Paddocks, Bedford Road, Ickleford

Mr and Mrs Nick Richardson        Top Park, Westmill Lane, Ickleford

1.2 The objections relate to the following policies and areas:

- The proposed Housing Requirement for the District (Policy SP8)
- Other Policies of the Local Plan – SP5 and HS1
- The proposed allocation for housing at Ickleford in the Proposed Submission Document IC2.

1.3 Finally the reasons are set out why the Draft Local Plan is considered to be unsound and fails to accord with Paragraph 182 of the NPPF.

## 2 POLICY SP8- HOUSING

### Objection

On behalf of our clients we object to the overall housing requirement for the District and its application in relation to the provision of housing across the district and in particular the inclusion of the allocation at Ickleford (IC2).

### Reasons

- 2.1 The Objectively Assessed Need (OAN) should result in a considered and appropriate response to the provision of housing in the district through the allocation of suitable and sustainable sites. However, the soundness of the OAN is questionable and there has been inconsistency between the way the housing requirement has emerged and how sites have been allocated.
- 2.2 North Hertfordshire had previously relied upon the housing requirement contained in the RSS but sought to identify a more up to date assessment of housing following the revocation of the RSS in early 2013.
- 2.3 The North Hertfordshire Strategic Housing Market Assessment (Part 1) (SHMA) prepared by ORS was produced in January 2013. This relied in part on the former RSS housing requirement for the district and its neighbours but with an assessment against more recent household projections and looked at scenarios based on trends in migration and employment. The SHMA provided a range of housing requirements based upon the different assumptions and trends of between 5,500 (zero migration) up to a maximum of 14,600 based upon the ONS/CLG 2008- based forecasts. A further figure of 15,800 was provided and showed how the figures compared if applying the East of England Plan assumptions of growth. (The RSS originally required 6200 dwellings over the period 2001 to 2021 equating to 310 dpa.)
- 2.4 Part 2 of the SHMA produced in May 2013 looked at the housing market and housing needs including affordability against the projections contained in Part 1 to derive a tenure mix for the various growth scenarios. It provided no definitive housing requirement for the district and the HMA but provided a range. It is not

clear from the subsequent publications which housing requirement if any, the Council had adopted.

2.5 In 2015, the Stevenage and North Hertfordshire Strategic Housing Market Assessment Update 2015 updated some of the key outputs of the 2013 North Hertfordshire SHMA together with other SHMA's that had been undertaken in the area (including the Stevenage SHMA). The SHMA was published in June 2015 and was intended to provide the Objectively Assessed Need (OAN) to inform the housing requirements of the North Hertfordshire Local Plan. The SHMA calculated a Full Objectively Assessed Need of 21,685 dwellings within the Housing Market Area of which **14,400 dwellings (720 per year)** were to be required in **North Hertfordshire** and 7,300 dwellings (365 per year) in Stevenage over the 20-year period.

2.6 The Council commissioned an update on the above in 2016 to take account of recently published ONS 2014-based Sub-National Population Projections (SNPP) and the CLG 2014-based household projections. The projections showed a lower rate of growth and as a consequence, the report - Updating the Overall Housing Need - which was published in August 2016, arrived at a lower FOAN of **13,800 (690 per year)** for North Hertfordshire but a slightly higher one for Stevenage of 7600 dwellings (690 per year) over the same plan period.

2.7 The numbers of dwellings required in North Hertfordshire as informed by the various SHMA updates are therefore as follows:

2013	14,600 (maximum) (730 dwellings per year)
2015	14400 (720 dwellings per year)
2016	13800 (690 dwellings per year)

Total reduction = 800 (6%)

2.8 The allocation of sites set out in the various consultation documents published by the Council have been inconsistent when considered against the emerging housing requirements set out in the Council's own commissioned evidence reports. As shown above at paragraph 2.7, these have shown a fall within the overall housing requirement of 800 dwellings or 40 per year but this has not been

met with commensurate reductions in the housing allocations. On the contrary, for example, the housing allocations in Ickleford have increased despite the fall in housing requirement.

- 2.9 It is recognised that the Government requires Local Planning Authorities to boost significantly the supply of housing, but it is considered that this increase in housing is not commensurate with the Council's own projections and that Ickleford is being targeted with an unacceptable increase in development which will place undue strain on the village and its facilities.

### 3 POLICY SP5: COUNTRYSIDE AND GREEN BELT

#### Objection

- 3.1 Our clients object to the change to the Green Belt boundary created to facilitate the proposed housing allocation at Burford Grange (IC2).

#### Reasons

- 3.2 The NPPF advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through preparation or review of the Local Plan. At that time Local Authorities should consider the Green Belt boundaries having regard to their permanence in the long term so that they should be capable of enduring beyond the plan period.

- 3.3 However, Paragraph 79 of the NPPF confirms "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*" and Paragraph 80 confirms the five purposes of the Green Belt, which include "*to check the unrestricted sprawl of large built-up areas*" and "*to prevent neighbouring towns merging into one another.*"

- 3.4 In our opinion it is essential that the land proposed as a housing allocation at Burford Grange, Ickleford (IC2) remains open and undeveloped in order to restrict urban sprawl extending Hitchin in a northerly direction and to safeguard the fragile gap between Hitchin and Ickleford.

- 3.5 We are concerned that the Green Belt Review of July 2016 provides an inconsistent approach to assessing the importance of the Green Belt in respect of the land between Hitchin and Ickleford. The assessment acknowledges that the Green Belt in this locality makes a "*significant contribution in preventing urban sprawl northward of Hitchin*" but then concludes in overall terms its contribution is only "*moderate.*"

- 3.6 The refined review of the Green Belt (Section 3) on a sector by sector basis indicates that the land to the west of the A600, including the proposed allocation IC2 (Sector 12a), makes a significant contribution to the Green Belt in overall terms, bearing in mind its importance in preventing expansion of Hitchin
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northwards and the need to safeguard the countryside for its own sake. The assessment indicates that this sector “*plays no role in preventing merger of neighbouring towns*” but the assessment of the adjoining Sector 13c to the east of the A600 indicates that it makes a significant contribution to the Green Belt as it “separates the settlements of Ickleford and Hitchin.”

- 3.7 We consider that the land to the east and west of the A600 makes a significant contribution to the Green Belt both in terms of its prevention of the urban sprawl of Hitchin in a northerly direction and the coalescence of Hitchin and Ickleford.

#### 4 POLICY HS1: LOCAL HOUSING ALLOCATIONS

##### Objection

- 4.1 On behalf of our clients we object to the local housing allocation at Burford Grange, Ickleford (IC2)

##### Reasons

- 4.2 We have made representations in the past on behalf of residents of Ickleford in respect of the possible allocation at Burford Grange, which resulted in it previously being discounted for allocation.
- 4.3 In 2011 representations were made to the Council pointing out that in addition to the significant contribution made by the site to the Green Belt, its identification at that time as “*brownfield*” was factually incorrect. This was an important consideration, because there was then, and still is now, a preference in favour of developing brownfield sites.
- 4.4 The Housing Options paper of February 2013 identified the site as one of many non-strategic sites, which the Council could choose to develop. However, it was evaluated as Priority 3 “*least likely to be acceptable*” and this was derived from the December 2012 Strategic Housing Land Availability Assessment (SHLAA), which confirmed that the site was in fact “*greenfield*” and that its possible development “*would erode the narrow gap between Ickleford and Hitchin and would need to be released from green belt first.*”
- 4.5 The SHLAA update of 2013 indicated that the site had failed one of the tests for inclusion as a potential development site and the later SHLAA update of 2014 also identified it as a “*greenfield*” site currently within the Green Belt (Category D).
- 4.6 However, the subsequent Draft Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) carried out by CAG Consultants incorrectly identified the site as “*brownfield*” and indicated there were “*benefits of developing a brownfield site and avoiding developing greenfield sites has benefits in the short term and is long lasting.*” We pointed out that this
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fundamental error in a document which informs the preparation and formulation of the Local Plan by providing a site by site assessment demonstrated that the sustainability and acceptability of the site had not been properly tested as part of the site selection process. Nevertheless, reference is still made to the brownfield nature of the site in the most up to date SA/SEA.

- 4.7 The Statement of Consultation of September 2016 relating to the proposed allocation at Burford Grange (IC2) contains no reference to our fundamental objections regarding urban sprawl and coalescence, although reference is made to a general acknowledgement of these issues at the beginning of the section dealing with Ickleford. The summary of comments specifically relating to the proposed allocation site refers only to “*traffic and access issues*” putting at risk pedestrian safety and a perception that “*the site could accommodate more housing than the allocated 48*” (now 40).
- 4.8 We do not consider that such anomalies and omissions make a sound and justifiable basis for the adoption of the Local Plan.

## **5 SOUNDNESS OF THE PLAN**

- 5.1 It is considered that the Local Plan 2011-2031 Proposed Submission dated October 2016 is unsound for the following reasons:
- 5.2 Not Positively prepared – the plan has not been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.
- 5.3 Not Justified – The plan does not provide the most appropriate strategy and places development in locations such as Burford Grange, Ickleford (IC2) which are unsuitable.
- 5.4 Not Consistent with national policy – The Local Plan does not comply with national Green Belt policy set out in the NPPF aimed at restricting urban sprawl and preventing the coalescence of settlements.