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For and on behalf of
**Linden Homes Strategic Land (Eastern)
New Road (Ashbrook) Ltd. and the Taylor family**

**Examination of North Hertfordshire Local Plan
Representations to Inspector's MIQs Hearings
Matter 10**

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1.0 MATTER 10 – HITCHIN

10.1 Our Reg19 Objections refer to the non-allocation of land at Hitchin Priory (South West Hitchin – SWH) which we identify as land comprising some 171 hectares in total, falling within an area to be defined by the provision of a perimeter road. This would form the first phase of an A602-A505 south west bypass for Hitchin. The land is therefore broadly analogous with Site 209 identified in OLP4 – Housing Additional Location Options Consultation Paper 2013. It has a net residential developable area in the order of 80ha with a capacity of approximately 2400 dwellings. It could be developed broadly in the form illustrated in our Reg19 submission at Figure 3 and Appendix 1 but it is expected that only approximately half the total development would be delivered within the current plan period.

10.2 With regard to our principal argument that the Submission Local Plan is unsound in relation to the level of distribution of housing provision and that Policy SP8 should be modified to include land south west of Hitchin in order to meet the requirements of an Objectively Assessed Need for Housing, comments are offered in respect of the specific questions relating to the delivery of sites at Hitchin to assist the understanding of the Examination concerning the duly made objection.

10.6 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?

10.6.1 The land required for the delivery of SWH is owned in the majority by the Taylor and Oliver families who have a long standing agreement with New Road (Ashbrook) Ltd to promote the development of the land and the provision of a relief road for Hitchin – which in turn would form the first phase on a full south west bypass for the town. Recently New Road (Ashbrook) Ltd and the Taylor family have entered into an agreement with Linden Homes Strategic Land, recognising that the ability to deliver development is of critical importance.

10.6.2 Linden Homes are a part of the Galliford Try PLC Galliford Try is a FTSE 250 business and one of the UK's leading housebuilding, regeneration and construction groups with revenues of £2.8 billion. They are by definition an experienced developer of large scale residential and infrastructure projects and are fully capable of bringing the site forward, including the infrastructure prerequisites.

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

10.6.3 There has been consistent acknowledgement by the public authorities of the need to address east-west traffic flows at Hitchin – in the form of a bypass between the A602 at Little Wymondley and the A505 west of Willow Lane, Charlton (see plan at Appendix 1) or as a deliverable alternative between the A602/B656 Gosmore Rd roundabout and the A505.

- 10.6.4 Three of the County Congestion Hotspots are associated with the A602 Park Way and the roundabouts at Gosmore Road (A602/A656) and at Upper Tilehouse St/Park Way (A602/A505) - T18 Fig 3.
- 10.6.5 LTP3 (still the most up to date LTP) Vol 2 s3.2 recognised in 2011 that the A505 was a key route to Luton Airport but stated that it opposed proposals for airport expansion – an apparent reason for doing nothing. Luton Airport is presently being expanded from 9.7m passengers per annum in 2013 to 18m ppa in 2020.
- 10.6.6 The current LTP sets out key priorities:
- Minimise the number of people killed or seriously injured on the county's roads through targeted activity including a mix of engineering, education and enforcement activity;
 - Reduce climate risk, including reducing congestion and pollution;
 - Manage congestion
- 10.6.7 LI8 is the consultation on a new LTP strategy, undertaken in late 2016. It was accompanied by a Technical Note (AECOM 60279140). This identified 101 future schemes (physical and network management) scoring between 5 and 24. An A505-A602 bypass (only between the A505 west of Hitchin and the Park Way roundabout (as deliverable by these proposals) scored 12 – the highest score available to any bypass scheme (only non-road projects and improvements to the Motorway network scored higher).
- 10.6.8 This was subsequently also considered as part of a wider east-west corridor between Luton and Stansted airports.
- 10.6.9 LP1 para 13.144 acknowledges that highway mitigation is needed in Hitchin even if no further development took place
- 10.6.10 TI3 states that "*existing pressures on the network have to be identified and then proposed mitigation outlined to address the growth related to car ownership and general development schemes as well as the additional impacts from Local Plan growth*" There is no clear evidence in the Examination Documents that this has been done.
- 10.6.11 TI3 para 3.6 notes that study work by AECOM tested (Scenario 4) SWH both at 4700 dwellings across a variety of sites and 6000 dwellings delivered by 2031. This Report identified that there would be 11 junctions/links with operational problems in the post 2031 period including both A505/B655 and A602/B656 junctions – both capable of relief by the proposed scheme
- 10.6.12 The 2014 Update (TI3 para 3.14) and 2016 Update continued to highlight the critical nature of the network through Hitchin at these junctions and links.
- 10.6.13 These assessments reflect long established consideration of the need for traffic relief in Hitchin which date back to key considerations of strategic transport planning in the 1980s. They have been consistently referenced in preparation of this plan – and have informed evidence base work such as that commissioned in 2012 regarding landscape sensitivity (GC7 Areas L1 and L2).

10.6.14 East-west connectivity remains a key issue. The Hertfordshire LEP's most recent Strategic Employment Plan (SEP) Perfectly Placed for Business 2017-2030) at pages 27 states that "*The A120, A602, A505 and A414 all need to feature in improved east-west connectivity*" and goes on to note at p30 that as a result the LEP will "*advance the development of an "east-west" conversation with a view to developing a forward-looking east-west economic plan for Hertfordshire*". This emphasis on east west links has been specifically added to this version of the SEP (it wasn't in the first draft) as restrictions on east west links – of which the A505-A602 is the principal link in the north of the County is seen as being a key limitation to economic growth across the county.

10.6.15 The omission of proposals to resolve traffic congestion for both local and cross county/airport access through this plan is not explained. The highway proposals forming part of the scheme would provide relief to critical junctions, positively benefit air quality and would provide appropriate access to the scale of development indicated in our Reg19 submission.

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

10.6.16 LP1 13.146 refers to the AQMA at Gosmore Rd (A602/B656). This is wholly in connection with traffic congestion (*Properties on the south side of Stevenage Road, Hitchin, fronting on to the road, between the Hitchin Hill Three Moorhens PH roundabout and 94-98 Stevenage Road – NO₂*). Relief of congestion will ameliorate this matter. A full bypass for Hitchin would remove the issue altogether.

10.6.17 We think consideration of air quality is potentially lacking in the plan. AQ has been identified as a historic issue in relation to the north of Baldock site (hence a paper was prepared post Reg19 consultation), although this may end up being a bit of a non-issue as HCC are looking into it as part of the Environmental Statement they are preparing. It has been considered as part of the SA/SEA in relation to traffic, however, not in any real detail, or with regards to trying to improve the existing situation.

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

10.7.1 Our statement in respect of Matter 3 refers.

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

10.8.1 LP4 provides Site Summaries. The Objection Site is noted as "*South West Hitchin (SWH) including SWHa and 209E and 209W, though part taken forward as HT10*". In this consideration the development "*would provide 6000-7400 dwellings*".

10.8.2 The site was scored in the Site Appraisal Matrices, against as a composite of all sites in SWH rather than as Site 209 which was a reduced site subject to further consultation in 2013 and broadly coincident with our clients' interest.

10.8.3 Key unknowns included transport impacts where the provision for a bypass was acknowledged as potentially able to alleviate transport issues through the town

(especially HGV), having a positive impact on noise and air pollution but that the potential impact associated with Luton Airport expansion, adding west to east movements, was unknown.

10.8.4 A number of 'negative effects and uncertainties' were listed in the schedule of Site Summaries, without drawing conclusion.

10.9 Sites HT1, HT2, HT3, HT5 and HT6 comprise of land in the Green Belt. For each:

Our comments relate to SWH in order that it may be tested in comparison with the evidence to this Examination in respect of the abovementioned sites

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

10.9.1 Our statement in respect of Matter 7 refers.

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

10.9.2 The Green Belt is considered to function in this area only to prevent urban sprawl – which must be balanced by the desirability of focusing growth needs on principal urban areas - and for the protection of the historic character of Hitchin, which is wholly without evidence – see q10.10 below.

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

10.9.3 The inner boundary of the Green Belt would be redefined by a permanent physical feature rather than following a series of disparate property boundaries. It would continue to extend beyond a new inner boundary and would therefore continue to function as a restraint on further growth, encroaching on the designated landscape area.

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

10.9.4 Arising from the above, the green belt function would not be diminished where it has limited or moderate function in preventing merger of settlements or safeguarding the countryside from encroachment (CG1 T3.1).

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?

10.9.5 No, it would be defined along the line of a bypass. No other boundary would better meet the guidance for boundary definition in the long term as a recognisable and permanent feature (Framework para 85).

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

10.9.6 Hitchin is acknowledged as the largest and most sustainable centre (LP1 Vision, SP2 paras 13.117, 13.129 et al.).

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

10.9.7 The provision of a bypass would form a permanent edge with long term defensibility – the application of Policy CGB5 would regulate the use of land excluded from the Green Belt and not forming part of development constituting the allocation of land at SWH – for example land which, through masterplanning, is considered to form the setting of Charlton village.

10.10 Is the proposed settlement boundary:

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

10.10.1 There is notable inconsistency in the assessment of settlement boundaries, especially in regard to landscape characteristics particularly between Hitchin, Baldock and North Stevenage.

b) appropriate and justified?

10.10.2 The proposed settlement boundary to the south west of Hitchin is not appropriate or justified.

10.10.3 With regard to our argument that the Plan fails to take account of the need to promote sustainable patterns of settlement and safeguard land to meet longer term development needs (Reg19 Submission paras 8.12 and 8.18-8.22), the enduring role and needs of Hitchin as the principal town have not been properly accounted for.

10.10.4 The strategic approach to review is consistent with a wider methodology used in other neighbouring authorities (CG1 s2.4). SWH falls in Area 11. At a more refined level the site falls within areas described as Sector 11a, 11b and part of 11c.

10.10.5 The value to the Green Belt is summarised as: "Making a significant contribution to the Green Belt purpose(s)" for the reason of "...helping to prevent the expansion of Hitchin south-westwards into open countryside and providing the setting for Hitchin".

- 10.10.6 There is no potential for coalescence with Luton – 7.5km – where both urban areas are enclosed by strips of Green Belt of between 1 and 2kms depth. This contrasts with Areas 14, 18 and 10 on the other flanks of Hitchin which separate major built up areas.
- 10.10.7 In terms of the five functions of green belt 'preventing expansion' realistically equates only to preserving the setting and special character of a historic town.
- 10.10.8 Reference is made to Hitchin Priory. The Priory is not listed and its parkland is not designated. It is largely located to the north east of the A602 Park Way – physically and visually separate
- 10.10.9 Charlton is an attractive village. It has a Conservation Area with a number of listed buildings. The Green Belt does not serve any function in protecting Charlton for its own sake where other policy designations prevail as a consideration
- 10.10.10The only heritage assessment is NHE4 which confines its consideration to Hitchin Churchgate and Surrounding Area.
- 10.10.11GC7 refers to landscape sensitivity. The more sensitive level refers to SWH as areas L1 and L2. – L1 covering a much greater area including the whole of St Ippolyts.
- 10.10.12The conclusions for these parcels is *moderate-high sensitivity* to development – the same conclusion reached for North Baldock (where landscape assessment was confined largely only to the land to be allocated – CG1 Unit B4). There is no clearly consistent assessment of proposed strategic growth areas north of Stevenage.
- 10.10.13Regarding SWH, GC7 concludes "*Landforms in particularly would be sensitive to the potential route for the bypass road being considered for the area*", and "*If the bypass road is considered in relation to this landscape unit, this should be designed to 'run with the contours' and respect landform as far as possible, avoiding the need for extensive re grading*".
- 10.10.14There is no substantiated reason why development should not be allocated in the SWH sector: the Green Belt has limited functionality and the principal purpose is not justified. The impact of a bypass has been considered and would form a clear defensible and therefore appropriate boundary which would be durable in the future whilst identifying land that would be either developable or subject to Policy CGB5

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