



## NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION

### MATTER 10 – THE HOUSING ALLOCATIONS AND THE SETTLEMENT BOUNDARIES: THE TOWNS BALDOCK, HITCHIN, LETCHWORTH, ROYSTON, STEVENAGE (GREAT ASHBY) AND LUTON (COCKERNHOE)

#### STATEMENT ON BEHALF OF HERTFORDSHIRE COUNTY COUNCIL (PROPERTY) IN RELATION TO BALDOCK SITE ALLOCATIONS BA1/BA2/BA3/BA4 (part) and BA10

#### 1. Introduction

- 1.1 WYG represents Hertfordshire County Council (HCC) Property and has been appointed to prepare master plans and outline planning applications for the County Council's land holdings around Baldock. These sites are the subject of draft local plan allocations BA1, 2, 3, 4 (part) and 10.
- 1.2 In December 2017 WYG submitted two outline planning applications on behalf of HCC for the principle of development for these sites and means of access. One application covers land north of Baldock (allocation BA1). The other covers land south east of Baldock (allocations BA2, BA3, BA4 (part) and BA10). It is not anticipated that these applications will be determined before the formal adoption of the Local Plan. It is further intended that throughout the course of the application and beyond, WYG will work with the Baldock, Bygrave and Clothall Neighbourhood Planning Group, North Hertfordshire District Council (NHDC), local residents and other stakeholders, including the County Council and Network Rail, to develop the detail of the proposals.
- 1.3 This statement deals only with matters relating to delivery. We leave other matters such as land supply, and the selection of sites and consequent changes to the Green Belt to NHDC. The Statement is submitted further to the representations made in response to the Reg. 18 and 19 local plan consultations by HCC Property (Development Services).
- 1.4 This Statement responds to the Inspector's questions on allocated sites BA1, BA2, BA3 & BA4 (part). The document is structured in the same format as the Inspector's questions, with the questions set out in ***bold italics***, with our response below.
- 1.5 This statement should be read alongside the Statement of Common Ground between NHDC and HCC (Property) dated January 2018. The Statement of Common Ground references detail about the two planning applications submitted for the allocations BA1, BA2, BA3 and BA4 (part), as well as how it is envisaged they will be delivered.





## 2. Inspector's question 10.1 parts a, b & c

2.1 ***10.1 Are all of the proposed housing allocations deliverable? In particular, are they:***

2.2 ***a) confirmed by all of the landowners involved as being available for the use proposed?***

2.3 We can confirm on behalf of the landowner, HCC, that housing allocations BA1, BA2, BA3 & BA4 are available for their proposed uses. This is supported by the submission of two outline planning applications in December 2017, seeking permission for housing and associated development at allocations BA1, BA2, BA3 and BA4 (part), as well as employment allocation BA10. Reference to these applications is made within the Statement of Common Ground between NHDC ncil and HCC Property dated January 2018.

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

2.5 In addition to the evidence base produced by NHDC and HCC Highways to determine and justify the transport strategy and allocation of sites, planning applications have been submitted in support of allocations BA1, BA2, BA3 and BA4 (part) which demonstrate how safe and appropriate access to the sites can be achieved. Reference to these applications is made within the Statement of Common Ground between NHDC and HCC Property dated January 2018.

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

2.7 In addition to the evidence base produced by NHDC and HCC to determine and justify the allocation of sites, planning applications have been submitted in support of allocations BA1, BA2, BA3 and BA4 (part) which demonstrate a commitment to the provision of necessary infrastructure, what this is likely to be, and how environmental constraints can be overcome. Reference to these applications is made within the Statement of Common Ground between NHDC and HCC Property dated January 2018. The Statement of Common Ground includes description of the manner in which the development will be delivered within the plan period, which is supported by market attractiveness evidence and an assessment of viability. The Statement of Common Ground also details the delivery mechanism for the allocations, and the provision of on and offsite infrastructure through legal mechanisms.



### **3. Inspector's Question 10.2**

#### **3.1 *10.2 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?***

3.2 In addition to the evidence base produced by NHDC and HCC to determine and justify the allocation of sites, planning applications have been submitted in support of allocations BA1, BA2, BA3 and BA4 (part) which demonstrate that development of the allocated sites is appropriate as the likely impacts of development are acceptable or can be made acceptable through mitigation. The Environmental Statements submitted with both applications show that the projected impacts of the development (which includes mitigation) are appropriate. Reference to these applications is made within the Statement of Common Ground between NHDC and HCC Property dated January 2018.



#### **4. Inspector's Question 10.3**

##### **4.1 *10.3 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?***

4.2 The questions of spatial strategy and allocation of suitable sites are for NHDC to answer. However, we consider the housing allocations around Baldock: BA1, BA2, BA3 and BA4 present a very sustainable opportunity for development on land capable of being delivered comprehensively, without complicated means of assembly, as an integrated extension to the town. The vision for Baldock is explained in the Design and Access Statements accompanying the two applications submitted for development of the allocations BA1, BA2, BA3 and BA4(part), referenced in the Statement of Common Ground between NHDC and HCC Property dated January 2018.

4.3 Section 3 of this statement sets out that the allocations can be delivered by proposals that are appropriate in terms of their impacts, as demonstrated in the Environmental Statements submitted with the two planning applications.

## 5. Inspector's Question 10.4 parts a, b, c, d, e, f & g

5.1 **10.4 Sites BA1, BA2, BA3 and BA4 comprise of land in the Green Belt. For each:**

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

5.3 We do not wish to comment on the case for exceptional circumstances. We leave this for NHDC to answer.

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

5.5 We do not wish to comment on the extent of harm to the Green Belt in case of the specific allocations around Baldock. We leave this for NHDC to answer.

5.6 **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?**

5.7 We leave it to NHDC to explain how the impacts to the Green Belt proposed through the plan are acceptable.

5.8 **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?**

4.4 We leave it to NHDC to explain how the Green Belt newly adjacent to Baldock would perform Green Belt functions. We note that the site allocation specifications set out in the Local Plan require the creation of strong edges to the development, which reinforce the new Green Belt edge. The two planning applications submitted for outline planning permission for development at housing allocations BA1, BA2, BA3 and BA4 (part) (referenced in the Statement of Common Ground between NHDC cil and HCC Property dated January 2018) include a master plan that demonstrates how proposals could create strong Green Belt boundaries to reinforce the function and purposes of the adjoining Green Belt.

5.9 **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?**

5.10 We leave it to NHDC to state their position on how development needs may be met beyond the plan period, but would note that the District Council anticipates that a small proportion of the



development proposed at allocation BA1 is likely to come forward in the two years immediately following the plan period, based on projected build out rates for the site.

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

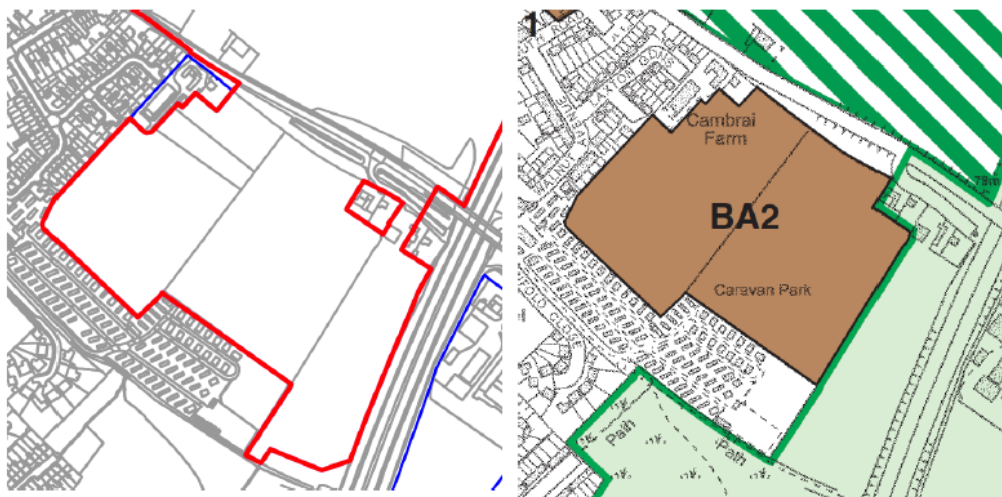
5.12 We leave it to NHDC to explain how the Green Belt boundaries proposed around Baldock accord with the Plan's strategy for meeting identified requirements for sustainable development. However, we note that the proposed amendments to Green Belt boundaries identify land around Baldock as allocated sites BA1,2,3,4 to come forward that have convenient access to Baldock railway station and Baldock town centre. The Design and Access Statements submitted with the two planning applications submitted for outline planning permission for development at housing allocations BA1, BA2, BA3 and BA4(part) (referenced in the Statement of Common Ground between NHDC and HCC Property dated January 2018) illustrate how the modification of Green Belt boundaries creates opportunities for the achievement of sustainable development.

5.13 ***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?***

5.14 We agree that the proposed Green Belt Boundaries around allocation BA1, and to the southeast of Baldock, including land released to facilitate site allocations BA3 and BA4 are clearly defined, using readily recognisable physical features, namely field boundaries and roads (A505 and North Road).

5.15 The planning application for development at BA2 to the southeast of Baldock shows development is proposed beyond the Green Belt boundary as it is currently proposed in the Local Plan, into the adjoining field (as shown on OS maps). This is illustrated in the comparison diagrams contained within the planning statement for Southeast Baldock at page 12. An extract of this is produced below for reference.

**Figure 2: Planning Application Boundary Extract (BA2 allocation area) + Local Plan Extract**



5.16 The Green Belt boundary shown in the HCC planning application is proposed as a result of further detailed landscape visual work undertaken which demonstrates that development in this location may be considered appropriate. We consider a Green Belt boundary drawn further south-east excluding this field from the Green Belt would be more appropriate, as it would utilise the strong and permanent boundary features of the A505 dual carriageway and a public right of way (Bridleway 'Weston 001') pictured overleaf, which would be more effective in meeting the requirements for new Green Belt boundaries.

5.17 Bullet point 6 of paragraph 85 of the National Planning Policy Framework requires local authorities to 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent' when defining new Green Belt boundaries. We consider that the A505 dual carriageway and a Bridleway 'Weston 001' provide strong, permanent and recognisable physical features and therefore would be a preferable Green Belt boundary.





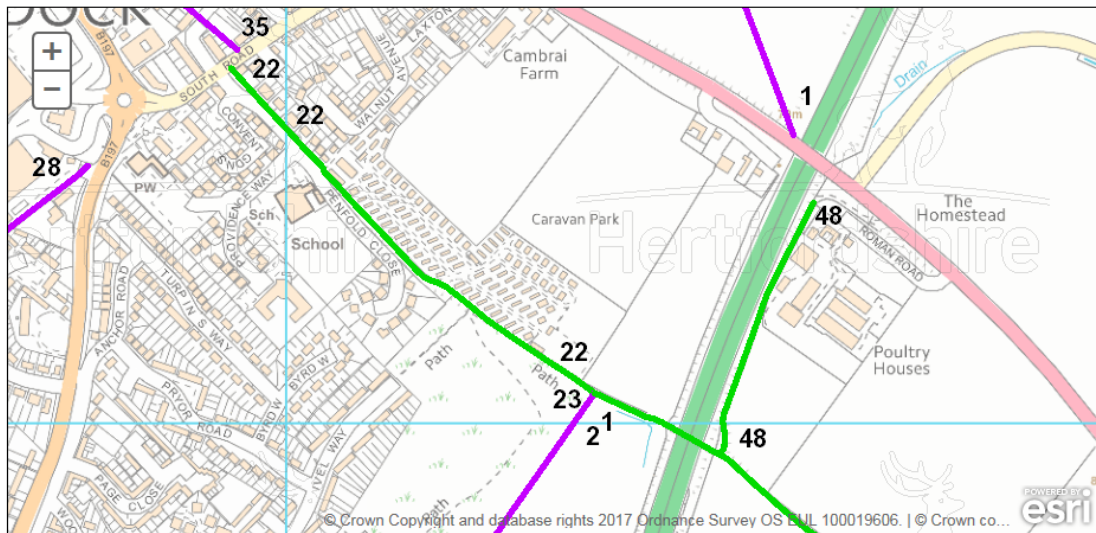
Hertfordshire County Council

Maps and geographic info   Public Sector Mapping Agreement   OS Copyright   Discl

**Legend**

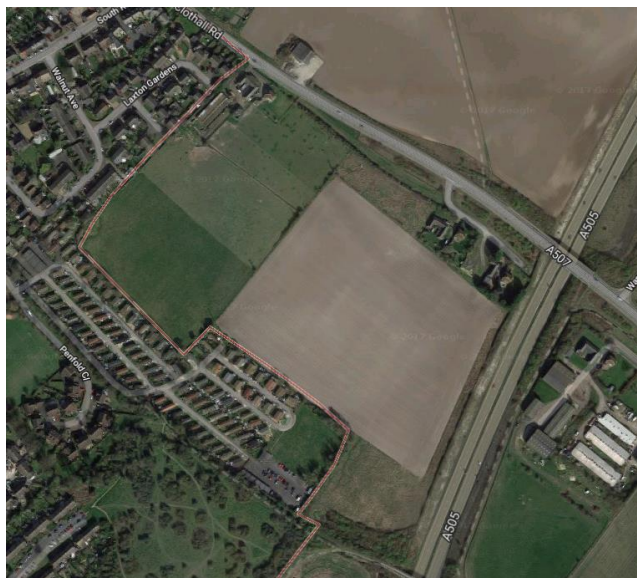
- Byway Open to All Traffic
- Restricted Byway
- Bridleway
- Footpath
- - - Temporary Footpath
- - - Temporarily Closed Footpath
- Unmetalled Unclassified County Road
- Rights of Way PTRO

### Rights of Way Map



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5.18 In reality, the fields proposed to be allocated as BA2 and the adjoining field (as shown on the OS map) are farmed as one large field, as shown in the google maps aerial extract below.



5.19 We leave the second part of point 'g' for the Council to answer.





## 6. Inspector's Question 10.5 parts a & b

6.1 ***10.5 Is the proposed settlement boundary:***

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

6.3 We leave it to NHDC to explain how their methodology for identifying settlement boundaries has been applied around Baldock.

6.4 ***b) appropriate and justified?***

6.5 We leave it to NHDC to explain how the proposed settlement boundary is appropriate and justified.