

For and on behalf of
New Road (Ashbrook) Ltd. and the Taylor Family (ID: 5189)

Matter 23
North Hertfordshire Local Plan 2011 – 2031 Examination

Green Belt Review and Site Selection Process

Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield

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Strategic Planning & Research Unit

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1.0 INTRODUCTION

- 1.1 This response to the Inspector's Schedule of Further Matters, Issues and Questions (January 2020) in respect of the North Hertfordshire Local Plan 2011 – 2031 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd.
- 1.2 This Statement addresses the Council's approach to site selection and the Green Belt Review.
- 1.3 SPRU has been instructed to appear at the Additional Hearings for the North Hertfordshire Local Plan Examination on behalf of New Road (Ashbrook) Ltd and the Taylor Family. Our client is an important stakeholder in achieving and delivering the Local Plan's objectives for sustainable development.
- 1.4 Our clients' specific interests are briefly summarised below and demonstrate opportunities to deliver sustainable development at land South West of Hitchin ('Hitchin Priory'):
 - New Road (Ashbrook) Ltd. and the Taylor Family (ID: 5189)
- 1.5 The Council's evidence base on relevant strategic priorities including housing need and release of land from the Green Belt provides support for the opportunities identified in order to provide for sustainable development at the main settlement of Hitchin.
- 1.6 These interests are in-turn informed by substantial local knowledge and experience of the context for development in North Hertfordshire and seeking to ensure this is reflected in a sound and legally compliant spatial strategy for the area.
- 1.7 SPRU have previously made submissions to previous rounds of consultation as part of the Local Plan process as well as participating in the 2017 Hearing Sessions. This statement should be read in conjunction with all previous contributions.

2.0 MATTER 23 – GREEN BELT REVIEW AND SITE SELECTION

Issue 1 – The Council's Approach to Site Assessment and Site Selection

2.1 The site selection process that has been engaged by NHDC in the Local plan remains opaque. The following is a brief summary of the concerns expressed in earlier submissions but remaining pertinent to the examination:

- There are clearly sites which represent viable reasonable alternatives to the sites selected that have not been properly assessed in the SA as required in the terms of the “*Newmarket*” High Court case - this is potentially a legal compliance as well as a procedural issue;
- These reasonable alternative sites are important as they potentially come into play if the inspector requires the council to allocate sites that will actually meet the OAN with the timeframe for this Plan; and
- It is unclear if the early review now being proposed includes an early review of the Green Belt boundaries (a process that is potentially contrary to guidance) - if it does not then the review of the Green Belt should be undertaken in terms of the level of safeguarded land with respect to the LHN calculated using the standard method as this is the future level of the housing requirement.

a) **Have I understood the approach taken correctly?**

2.2 The Inspector's 9 July letter usefully set out a requirement for the Council to clarify its approach to site selection, which has led to its response in Paper B. Notwithstanding incorporation of the Green Belt Review Update conclusions it should be noted that Paper B summarises the existing evidence base rather than providing new material to address wider soundness concerns. The summary of this process as a two-stage approach is broadly consistent with SPRU's representations at previous stages of plan-making. The objection to the omission of our client's land at South West Hitchin from the submission Local Plan is therefore maintained and reinforced by the explanation provided in the Council's Paper B.

2.3 While the Council describe the general process of site selection the justification for the judgements made with regard to allocations remains unclear. SPRU's earlier Reg 19 submission and statements for Matter 5 and 10 highlights:

- a. The lack of explanation as to why strategic growth is not planned at Hitchin, save for HT1 Highover Farm (Policy SP17) which lies to the north east of the town.
- b. The Green Belt Study CG1 page 111 notes that the reduced version of land southwest of Hitchin (Site 209) is only regarded as having a “moderate” impact on the Green Belt, whereas Highover Farm (HT1 - site 39 page 111) and North of Baldock (BA1 site 200 page 104) are classified as making a “significant” contribution. So, in Green Belt terms, allocated sites are not necessarily those that have the least impact on the purposes of the Green Belt even within the same settlement.
- c. In respect of the potential impact on Green Belt function the land at South West Hitchin (SWH Site 209) actually scores better than a number of the allocations in the plan – see SPRU Matter 7 Statement.
- d. There is nothing to be found in the council's evidence base which specifically identifies any insuperable constraints on land at South West Hitchin in either CG1 or CG7 - this is set out in detail in SPRU's matter 10 Submission (Paragraphs

10.10.2 to 10.10.14).

- 2.4 The summary in table A of paper B is simply an extract from HOU9 (SHLAA 2016 Update). The actual summary of the HOU9 page 37 is that the site is suitable in part for residential development not as inferred by its inclusion in a list of “Unsuitable sites” in Table A of paper B.
- 2.5 Paragraphs 20 to 22 of the Council’s Paper B set out the exceptional circumstances to justify the release of sites that make a significant contribution to the Green Belt functions.
- 2.6 In the present circumstances where the plan no longer contains sufficient sites that will deliver the OAN within the plan period it is unclear why such a justification should not be applied to sites that are judged to have a similar impact or in the case of 209E only a moderate impact, especially if they are judged by the SHLAA 2016 (HOU9) to be suitable for residential development.
- 2.7 It is the lack of clarity in the site selection process which has left the Council, and indeed the Inspector, in a position that there are no readily identifiable second tier of sites which have similar characteristics to those which are allocated. In practice reasonable alternatives exist that could be selected by the Council to make up the shortfall in delivery within the plan period, or to assist in meeting the OAN over the preferred 15 year plan period.
- 2.8 The approach outlined in paragraphs 20 to 22 of the Council’s Paper B are only applied to sites taken forward to Stage 2 and not to sites that are not selected to go through to stage 2 despite their suitability for development as judged by HOU9. This is at odds with the compelling references throughout the evidence base of South West Hitchin’s scope to support growth and infrastructure delivery at the main settlement of Hitchin, whilst contributing to housing needs throughout and beyond the plan period.
- 2.9 These potential factors contributing towards sustainable development could only be fully assessed following a more detailed understanding of potential capacity and layout for development (including the potential bypass route) than that which was available to inform the Stage 1 SHLAA. The Council’s Matter 10 Statement to the 2018 Hearing Session does not indicate how these factors were assessed (or the details of the site considered) prior to concluding exceptional circumstances could not be demonstrated for SHLAA Ref 209E and 209W.

b) Is the approach taken reasonable, adequately robust and consistent with national policy?

- 2.10 For the reasons outlined above and in SPRU’s mater 7 and 10 statements the approach to site selection and Green Belt impact is not considered to be appropriate for the following reasons:
 - a. the approach taken is not reasonable as there is a fundamental and ongoing failure to give adequate consideration to all reasonable alternatives. This is required in any SA and supported by the judgement in *Save Historic Newmarket Ltd v Forest Heath District Council DC* [2011] J.P.L. 1233, which was specifically in relation to the handling of alternatives. This failure to consider reasonable alternatives is contrary to national guidance;
 - b. The exclusion of some sites early in the process where such sites were considered to be suitable (such as 209E) has been done without adequate explanation and so the process lacks robustness; and
 - c. the opaqueness of the decision making approach means that it is unclear why some sites have been selected and others rejected. This results in the situation

now, where there is clearly a need for additional sites to be selected, that the process that has been used to determine the current allocations cannot be engaged to identify any additional sites. This inability to replicate the process is a clear demonstration of the lack of robustness of the approach.

- 2.11 These concerns are explored in detail in our representations on behalf of clients at the Regulation 19 Pre-Submission Stage and within our Matter 1 Hearing Statement to the 2017 Hearing Sessions in the context of the Council’s Sustainability Appraisal and the Plan’s overall evidence base.
- 2.12 The reasons for the rejection of alternatives is not given, nor is it found within the Council’s site selection process. The primary ground of the challenge in *Forest Heath* was that the Core Strategy and accompanying SA/SEA environmental report did not explain what reasonable alternatives to the proposed policies [or sites] had been considered and why they had been rejected. Collins J considered the requirement to consider alternatives in the context of an iterative plan making process (various drafts consulted upon, sifting the options, then final draft consulted upon, examined and adopted)
- 2.13 It is also clear from High Court judgements (*Heard v Broadland District Council*, *South Norfolk District Council*, *Norwich City Council*) that alternatives should be assessed to the same level as proposed sites and that all SA documentation should be consulted on together.
- 2.14 In respect of decisions regarding the release of Green Belt sites it is appropriate to note the judgment in the case of *Compton PC, Ockham PC & Cranwell v Guildford BC, SSHCLG & Ors* [2019] EWHC 3242 (Admin) provides an important update in the understanding of exceptional circumstances as part of plan-making. This judgment post-dates the Council’s findings under a ‘two-stage’ approach. A key principle of national policy identified through the judgment is that “exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt.
- 2.15 There are a number of important findings in the judgment. These highlight the potentially important contribution of infrastructure provision and the potential for release of land from the Green Belt to sustain housing land supply and provide for ‘headroom’ against identified requirements when determining the case for exceptional circumstances. The key principles are summarised in paragraph 72 of the judgment:

*“General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that “exceptional circumstances” exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need. I accept that it is clearly implicit in the stage 2 process that restraint may mean that the OAN is not met. But that is not the same as saying that the unmet need is irrelevant to the existence of “exceptional circumstances”, or that it cannot weigh heavily or decisively; it is simply not necessarily sufficient of itself. These factors do not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in *Calverton PC* of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable*

infrastructure.” (Paragraph 72, our emphasis)

- 2.16 These principles must be applied in a manner that ensures the simple question of potential exceptional circumstances is not judicially over-analysed. It is necessary that the question can be addressed in an objective and comparative assessment of alternatives. Paragraph 136 of the judgment demonstrates that mitigation measures may be considered when choosing between competing sites where these choices may be affected by combinations that contribute to a sound spatial distribution and provide for widely beneficial infrastructure.
- 2.17 These considerations are clearly relevant to the any decision regarding the suitability of additional sites to meet the identified shortfall in delivery such as the land South West of Hitchin in respect of exceptional circumstances. As a reasonable alternative this site should be reassessed and not simply ignored because the council decided not to take the site forward throughout the two-stage process.
- 2.18 As set out in previous submissions, we consider there to be fundamental issues with the robustness of the Council’s evidence and the site assessment process in the SHLAA (HOU9). It is considered that this does not provide an adequate basis for site selection.
- 2.19 In these circumstances the rejection of sites 209E and 209W (or the broad direction of growth at South West Hitchin) at Stage 1 of the process cannot be regarded as being soundly based. The Council’s Table A within Paper B makes unsubstantiated claims to potential impacts on Green Belt purposes from development in this location but fails to undertake an appropriate approach to the existence or otherwise of exceptional circumstances. This part of the process appears to be reserved for the preferred sites only.
- c) The Sustainability Appraisal is not influenced by the degree to which land does or does not contribute to the purposes of including land in the Green Belt. Should it be?**
- 2.20 The SA should not consider impacts on pure policy designations such as the Green Belt.
- 2.21 In our opinion the key issue of the Council’s Sustainability Appraisal, particularly in the context of the *Guildford* judgment and the Council’s explanation of the two-stage approach, is that it fails to demonstrate that the assessment of reasonable alternatives have contributed to conclusions on the potential for exceptional circumstances to be demonstrated.
- 2.22 Failure to consider the contribution of sites towards Green Belt purposes is only one factor of the wider shortcomings in terms of the assessment of competing alternatives and how these have been tackled in-combination. SPRU’s previous submissions demonstrate that our client’s land South West of Hitchin has not been considered as part of different options and scales for development.
- 2.23 This prevents the objectives and geographical scope of the plan being fully considered in relation to the site. In relation to national policy for the Green Belt in the NPPF2012 this prevents full consideration of the potential positive outcomes for sustainable development that arise from including the land with sound options for spatial distribution.
- 2.24 These options (for a capacity of development of around 2,200 units) would directly correspond with a more limited contribution to the purposes of including the land in the Green Belt compared with the findings in document LP8 as submitted.
- 2.25 Appendix 1 to this Hearing Statement provides an indicative Masterplan for the site following preparation of an updated Strategic Vision Document for ‘Land South of Hitchin Priory’. This demonstrates a capacity for around 2,200 units. The scheme provides a

deliverable opportunity for a new primary link from the A505 to a realigned Park Way at the Gosmore End roundabout. This would relieve existing pressure at the Tilehouse Roundabout and Willow Lane and provides an achievable route towards delivery of infrastructure solutions within the plan period, without prejudicing future options for a full bypass. Furthermore, the details provided for phasing and delivery of the indicative Masterplan reflect that Phase 1 (c.277 units) will be provided alongside the realignment at the Gosmore End roundabout. This demonstrates an early contribution towards infrastructure priorities and housing supply in the plan period.

- 2.26 This opportunity reflects the importance of the site as a reasonable alternative in the plan-making process, to be fully assessed in the context of the Council's evidence base. This importance is enhanced due to the Council's own admission that it is unable to meet the OAN in full during the plan period and its acknowledged issues in providing for a five year supply.
- 2.27 For site reference 209 the SA (LP4) notes "*The most recent iteration of the site assessment is contained in Appendix 7 of this report. It is named SWH (with a note that it includes sites previously named includes SWHa and 209E and 209W).*" The summary of potential development capacity refers to development of between 6,000 and 7,400 dwellings – much higher than the proposed site capacity. Potential benefits of the bypass therefore appear to be assessed in this context rather than a reasonable alternative providing a similar contribution towards infrastructure with a reduced capacity for development. Previous assessment of a 'Reduced SW Hitchin' option in the November 2014 SA (OLP7 – Appendix 8) appears to omit reference to the benefits of the bypass and has not been carried forward into the submission draft SA. This has only been clarified in the Council's supplementary note LP8.
- 2.28 These concerns are reinforced by the Council's explanation of the site selection process and demonstrate that the Sustainability Appraisal has failed to provide a full assessment of reasonable alternatives nor support relevant conclusions on whether exceptional circumstances have been demonstrated.

Q1) Issue 2 –Green Belt Review Update Conclusions

Note: These questions are explicitly about the change in the assessment and what that means for the Local Plan. Written and verbal statements must address this point only.

- a) **Should the change in the assessment of these parcels of land (including the safeguarded land to the west of Stevenage) lead to their allocation for development/identification as safeguarded land in the Local Plan being rejected?**
- 2.29 Paragraph 27 of paper B states that the Green Belt Review Update 2018 (GBRU) identifies 11 (parts of) sites that are now judged to make an increased, significant contribution to Green Belt purposes but are still proposed for allocation or safeguarding in the Plan.
- 2.30 We do not consider that the assessment findings of the Green Belt Review Update (ED161A) of these sites, having a significant contribution to the functions of the Green Belt, to be a reason to reject the proposed allocation or safeguarding of sites.
- 2.31 If there are exceptional circumstances to justify the release of these sites, then they should continue to be identified for release. However, **prior** to making this decision there is a requirement to reappraise these sites against reasonable alternative including those such as 209E that was found to only make a moderate contribution or the wider South West Hitchin which also makes a significant contribution in order to establish that none of the potential reasonable alternatives represent the more appropriate allocation.
- 2.32 Secondly, in circumstances now where there is an identified shortfall in delivery the acceptance that sites with this level of impact on the Green Belt are required to be released should require a reassessment of other sites. This must ascertain if in these changed circumstances further releases are justified in order to meet the OAN within the plan period.
- 2.33 It is apparent from paragraph 1.8 of ED161A that the revised assessment is guided by the judgment in *Samuel Smith Old Brewery –v-North Yorkshire County Council* [2018] EWCA Civ 489 regarding the visual and spatial dimensions of openness.
- 2.34 The judgment of Lindblom J in the Court of Appeal has been superseded by the ruling of the Supreme Court in *Samuel Smith Old Brewery (Tadcaster) v North Yorkshire County Council and Dorrington Quarries* [2020] UKSC 3. It is not disputed that the visual impact on openness of potential Local Plan allocations should be regarded as obviously material to the assessment of potential changes to Green Belt boundaries.
- 2.35 However, the Supreme Court judgment nonetheless emphasises the concept of openness as a 'broad' policy concept. The judgment considers that there has been no significant change in approach in terms of how the visual element of openness is to be assessed.
- 2.36 The matters relevant to openness in any particular case are a matter of planning judgement, not law. In this respect the conclusion of the Supreme Court respectfully disagreed with the ruling of the Court of Appeal, albeit in the context of a case considering development not normally regarded as inappropriate in the Green Belt. The main issues with the Council's evidence base therefore relate to its original reasons for site selection, though these are compounded by the Green Belt Review Update findings.
- 2.37 Paragraph 2.4 of the Green Belt Review Update summarises the scope of the revised assessment:

"In this context, the revised assessment considers the visual and physical openness of the parcel and the quality of parcel boundaries. However, in evaluating the contribution

of the land parcels towards Green Belt purposes, only the contribution of the parcel to the purpose of ‘safeguarding the countryside from encroachment’ has been specifically evaluated against the refined assessment methodology.”

- 2.38 Within the original evidence base (CG1) the contribution to safeguarding the countryside from encroachment at sub-parcels 11a-11d (Gosmore) covering the wider South West Hitchin Area is defined as moderate, albeit the contribution to this purpose from parcel 11 in total is considered ‘significant’. But this is no different from 11 of the sites proposed for allocation and should not be a reason for the rejection of the site from further consideration.
- 2.39 The overall contribution of each sub-parcel is considered significant, although as stated in our previous submissions this is disputed for sub-parcels 11a and 11b most closely corresponding to our client’s land.
- 2.40 Within the findings for sub-parcels 11a and 11b in the Green Belt Review Update the contribution towards safeguarding encroachment has been rated more highly, as ‘significant’, whereas the parcel 11c and 11d findings remain moderate. However, for 11a and 11b impact on visual and physical openness is only described as ‘mixed’. This appears contradictory to other sub-parcels, where even ‘mixed/high’ scores are only associated with ‘moderate’ impacts. While the scoring a parcels 11c and 11d as moderate is supported, this is counterintuitive given the similar topography, greater urban influences and closer proximity to existing built settlement in Hitchin found in parcels 11a and 11b.
- 2.41 In relation to sites, the potential visual impact of introducing potentially significant quanta of development are considered in relation to all four Green Belt purposes. However, paragraph 2.10 of ED161A confirms that only those potential *sites* not ruled out previously are considered within the updated site assessments. This means it is not possible to provide a comparative assessment of revised findings on visual impact for those sites proposed for allocation in the submission Local Plan and those previously rejected such as our client’s land at South West Hitchin.
- 2.42 This is significant given that the findings for Site Ref 209 in the original Green Belt Review (CG1) demonstrate only a *moderate* contribution to Green Belt purposes. There is no scope to compare findings in the updated evidence on proposed allocations where the impacts are **significant**.
- 2.43 Failure to provide a comparative site-specific assessment of impacts on openness for our client’s land renders the conclusions of the updated evidence based on the methodology unsound. Its ability to support conclusions on sites proposed for allocation is not justified.
- 2.44 We have previously demonstrated the ability of our client’s land to provide for a long-term defensible boundary to the Green Belt and ensure the contribution of surrounding land to Green Belt purposes is not affected. This is particularly important in terms of minimising the visual impact on openness. While it is clear that the visual quality of the landscape is not in itself an essential part of the “openness” for which the Green Belt is protected, the suitability of the site to accommodate development corresponds with findings on landscape sensitivity and minimising impacts on the Green Belt.
- 2.45 Regarding SWH, GC7 concludes “*Landforms in particular 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*”.
- 2.46 It is significant that due to the omission of the site from the Green Belt Review Update these findings cannot be correlated with an understanding of, in our opinion, limited or

moderate impacts on the visual and spatial dimensions of openness.

- 2.47 There remains no substantiated reason why development should not be allocated in the SWH sector, especially in these new circumstances in which the Council accept that they cannot deliver the OAN within the plan period. These conclusions are reinforced by details contained in the indicative Masterplan at Appendix 1 to this Hearing Statement, which has been prepared on the basis of ensuring retention of landscape character and enhancement to Green Infrastructure.
- 2.48 The alleged contribution of this site to Green Belt purposes is not different to that of other sites that have been allocated. In these changed circumstances the Council need to demonstrate clearly why some Green Belt sites are suitable for release to partially deliver the housing to meet the OAN but that other sites whose release will have a similar impact should be resisted.
- b) If so, and bearing in mind the methodology used, why does the change in the assessment render the Local Plan unsound in this respect?**
- 2.49 If those sites that are now found to have a significant green belt function are deleted from the plan this would render the plan unsound. SPRU's previous submissions have set out the reasons why the plan is considered unsound in terms of not meeting the OAN; not undertaking an assessment of reasonable alternatives for the SA; and the lack of robustness and transparency in the site selection process. The removal of additional sites resulting in even less of the OAN being met within the plan period with no engagement of the Duty to Cooperate would not overcome these issues; in fact, such Modifications would exacerbate these issues.
- 2.50 The change in the assessed impact on the Green Belt function for a number of the allocations would require the reappraisal of these allocations against the alternatives that have previously been rejected as having a significant or only moderate impact on the Green Belt function. In the circumstances of a more level playing field in terms of Green Belt impact it is entirely possible that other sites might emerge as being more preferable, or in this case where further sites are required, just as acceptable. This reappraisal has not been undertaken and so at the present time the inclusion of these sites within the plan is unjustified and renders the plan unsound.
- 2.51 We have previously identified that whilst CG1 provides an analysis of Green Belt on a parcel basis (Fig 2.3), this does not appear consistent or to have had significant bearing on the Council's selection of sites. Specifically, the assessment of Green Belt function is inconsistent between parcels, the summary rating based on the assessment of the four contributory criteria is inconsistent and there has been no discernible bearing on the decision to allocate land – for example HT1, LG1 and BA1, plus several of the larger allocations in Category A villages are in Green Belt where the assessment considered parcels to perform a significant overall Green Belt function. The Green Belt Review Update simply reinforces this position.
- 2.52 The findings of the Green Belt Review Update emphasise the Council's failure to assess potential candidates for Green Belt release on an objective or comparable basis. Preparation of the Green Belt Review Update reinforces the case for release of additional land from the Green Belt when exceptional circumstances have been demonstrated overall.
- 2.53 This raises soundness issues in terms of consistency with national policy in particular paragraph 85 of the NPPF2012 and the ability of Green Belt boundaries to endure beyond the plan period. Given the findings and Council's response to the Green Belt Review Update and continued support for the allocation of identified sites, alongside the

commitment to an early review, it is apparent that this will need to consider further alteration of Green Belt boundaries.

- 2.54 It is inappropriate to defer candidate sites such as land South West Hitchin until a review of this Local Plan. In this case the Council has not fully assessed the case for exceptional circumstances and the findings of the Green Belt Review do not provide conclusions to support the rejection based on Green Belt impacts, when compared with the process for sites selected for allocation.
- 2.55 Sites should be assessed objectively and allocated on the basis of their ability to support sustainable patterns of development as part of this plan-making process, rather than deferring conclusions across successive reviews of Green Belt boundaries. This opens the process to potentially contradictory findings in terms of evidence for impact of development the purposes of the Green Belt in successive rounds of plan-making.



Strategic Planning & Research Unit

North Hertfordshire Local Plan Examination
Matter 23 Hearing Statement
On behalf of New Road (Ashbrook) Ltd. and the Taylor Family
February 2020

APPENIDX 1 – LAND SOUTH OF HITCHIN PRIORY - STRATEGIC VISION DOCUMENT AND INDICATIVE MASTERPLAN

LAND SOUTH OF HITCHIN PRIORY, HERTFORDSHIRE

Strategic Vision Document

For and on behalf of:
New Road (Ashbrook) Ltd



25th February 2020

Reference: H5071/9

Version: Draft v.1

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1. INTRODUCTION

INTRODUCTION

This Strategic Vision Document has been prepared by BE1 Architects Ltd, on behalf of New Road (Ashbrook) Ltd, to support the promotion of the site with both the land owners, and in due course, with the local authority.

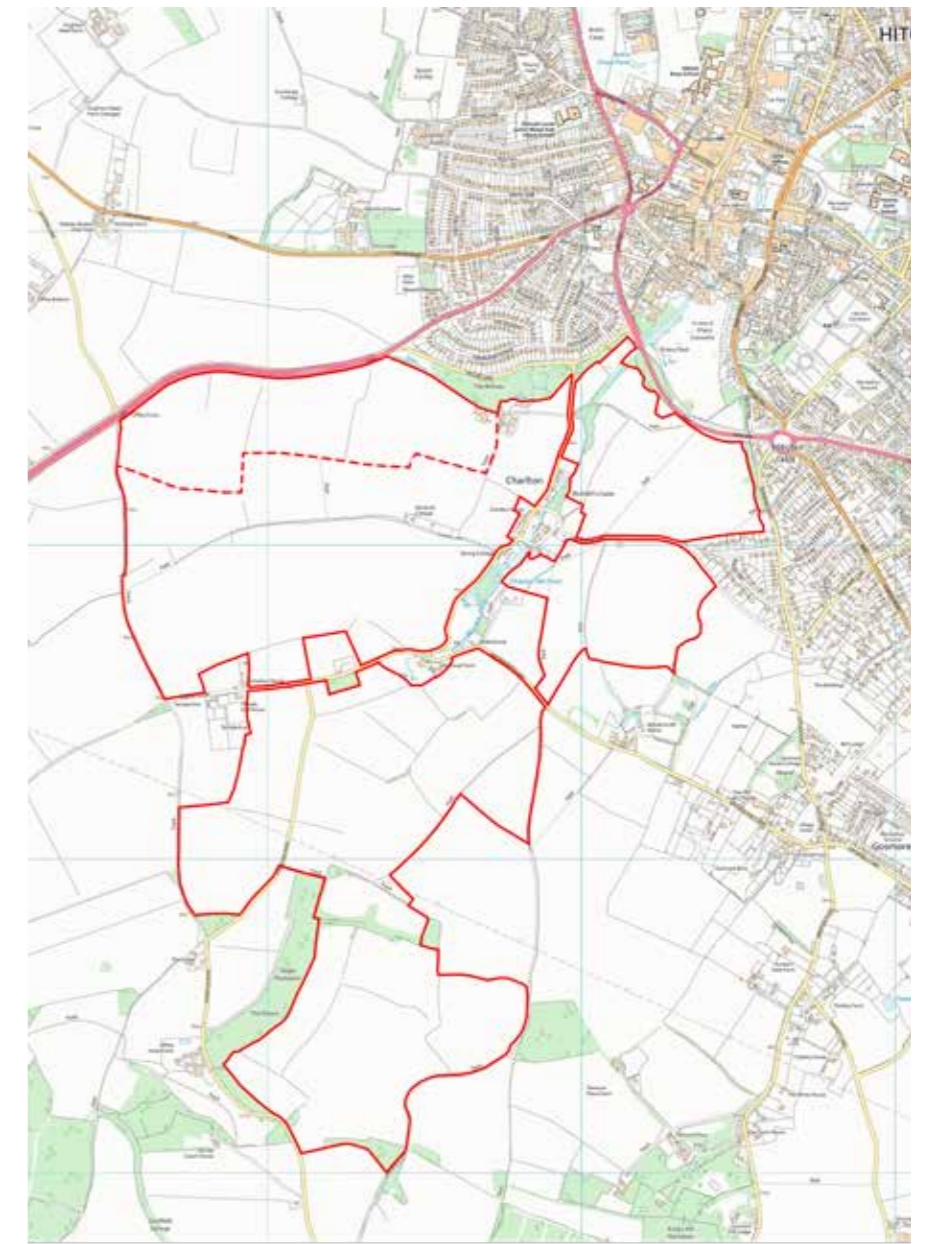
This document includes, in broad terms, the appraisal of the site, to establish development opportunities and constraints originated in local policy, site context and physical features. The appraisal is then followed by the setting out of the design proposals and demonstrates how the site assessment informed the proposals.

Promotion of the site is pursued in the context of the emerging North Hertfordshire District Council Local Plan.

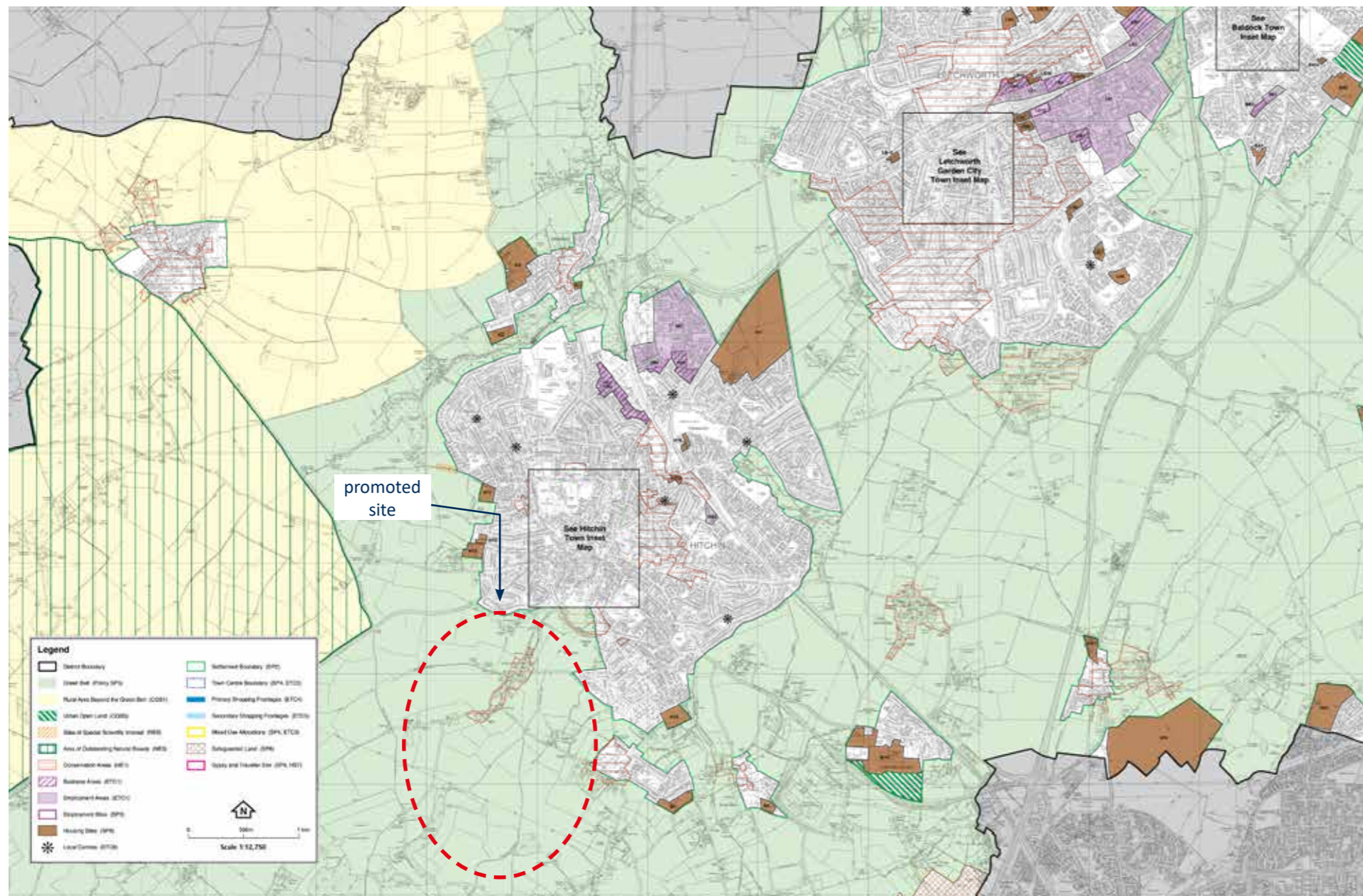
THE VISION

The revised vision for the site is to deliver a new, sustainable community to the south of Hitchin Priory, as part of the town's growth and to create immediate transport benefits related to development of a deliverable scale in the context of the continuing examination of the North Hertfordshire Local Plan.

The scheme will fully integrate with the structure, appearance, character and landscape of Hitchin by forming an extension to the south of the existing settlement. The proposed development will incorporate a generous and varied open space, which will be connected to existing built-up areas through enhanced pedestrian links set within attractive routes.



Site Location Plan



Extract from NHDC draft Local Plan - Proposal Maps: Hitchin, Letchworth Garden City and Baldock Areas

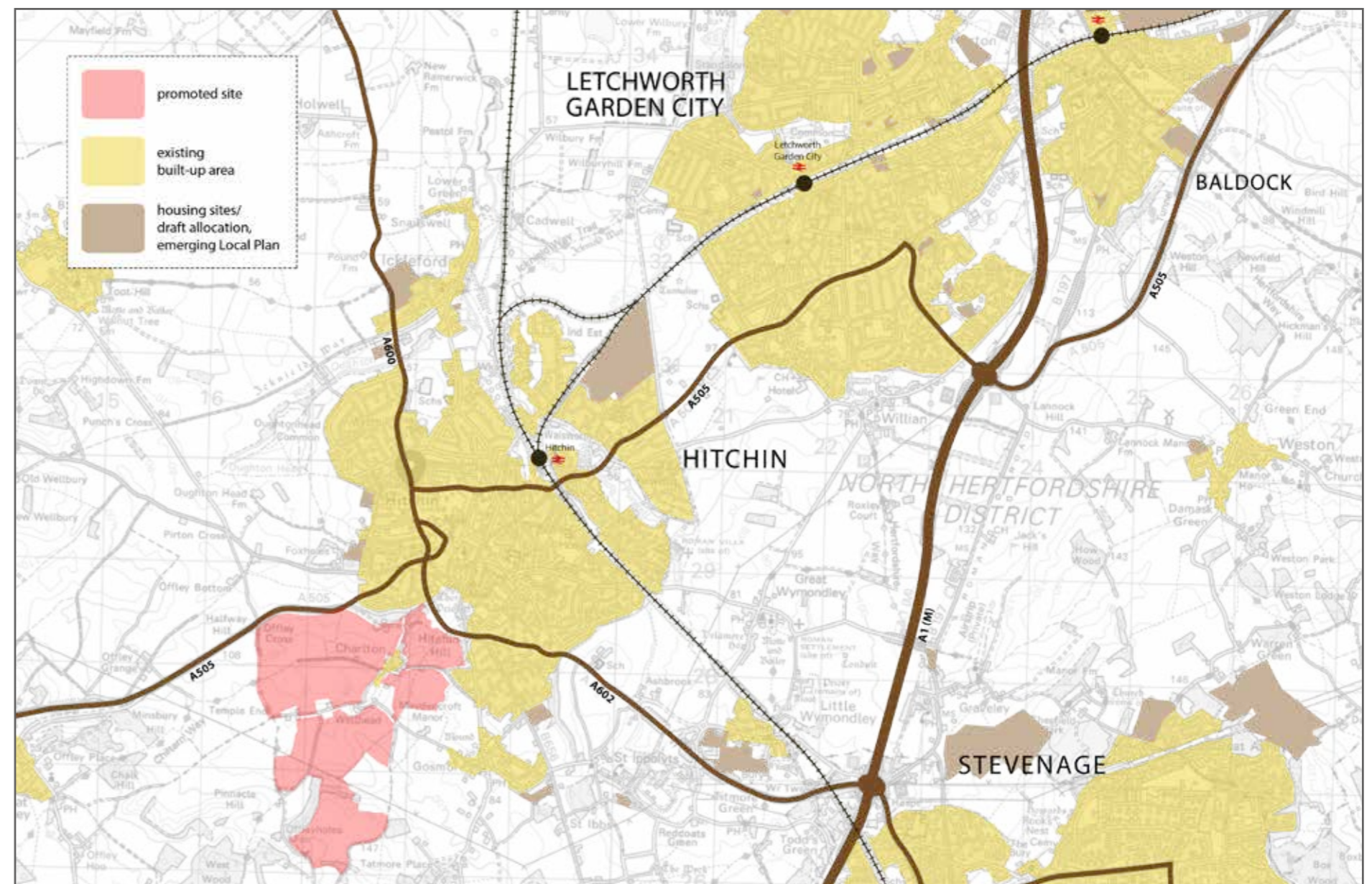
2. THE SITE AND SURROUNDINGS

WIDER CONTEXT

The site is situated to the south-west of Hitchin and to the south of Hitchin Priory. Its northern edge is located approximately 900m from Hitchin's town centre, and 1.9km from Hitchin's train station, both to the north-east.

The site benefits from connections to major infrastructure and important urban centres in the area. These are facilitated by the proximity of the A1(M), with junction 8 located approximately 5km to the east of the site, and via the A505, which links Hitchin with Luton, Letchworth Garden City and Baldock.

Proximity to Hitchin train station enhances the site's sustainability, with opportunities to promote sustainable mode of movement and connectivity to urban centre, which provide a wealth of employment, retail, education, leisure and recreation opportunities.



Wider Context Plan

LOCAL FACILITIES

The site is situated in close proximity to Hitchin, which is classed as a town, and together with Letchworth Garden City and Baldock, provide a wide range of employment, retail, education, leisure and recreation opportunities.

The main vehicular routes adjacent to the site (to the east and to the north) facilitate good connections to Hitchin's town centre, to Hitchin train station and to the nearby towns, as well as forming part of the local and regional bus network, providing regular service connections to these facilities.

In particular, the key A505 route along the northern edge of the site links Luton with Hitchin and the towns further to the north east. Additional important route is the A600 and the A602 to the east and north of the site, which together provide a good connection between the A1(M) to the east and Bedford to the north.

Hitchin's town centre is located approximately 1km to the north of the site, from the site's northern edge. The town centre offers a multitude of retail and employment opportunities. A number of schools are located around Hitchin's town centre, and these include:

- Hitchin Girls' School
- Highbury Infant and Nursery School
- St Andrews Primary School
- Whitehall Junior School
- Samuel Lucas Junior Middle and Infant School
- Hitchin Boys' School
- Oughton Primary and Nursery School
- Wilshere Doce Junior Academy
- The Priory School
- Strathmore Infant and Nursery School

Hitchin's industrial area is located further to the north-east from the town centre, and offers additional employment opportunities in close proximity and with good connectivity to the site.

The conservation areas of Hitchin and Charlton abut the site boundary, while Gosmore's conservation loes further to the east of the site.

Landscape Sensitivity Study (Land south-west of Hitchin, Dec 2012) undertaken as part of the draft submission of the Local Plan has identified a number of Local Wildlife Sites in the area, while four of them are located adjacent to the promoted site:

- Local Wildlife Site in Charlton, along River Hiz;
- The Willows to the north of the site and south of Willow Lane;
- Priory Park to the north of the A602; and
- a Local Wildlife Site to the west of Gosmore.

The Chilterns AONB (Area of Outstanding Natural Beauty) lies to the north-west of the site.

A network of Public Rights of Ways within and around the site strengthen pedestrian connectivity to Hitchin on the one hand and the open countryside and teh AONB on the other.

Proximity to local facilities within Hitchin, as well as good pedestrian, vehicular and public transport connectivity to the existing settlement and other major urban areas, contribute to the site's sustainable location for future housing.













Main route to Hitchin town centre



Retirement apartments in Hitchin



Hitchin's High Street

-  promoted site
-  conservation area
-  AONB (Area of Outstanding Natural Beauty)
-  area in Flood Zones 2 and 3
-  industrial / commercial / employment area
-  Local Wildlife Site
-  school
-  existing built-up area
-  housing site - draft allocation
-  bus route

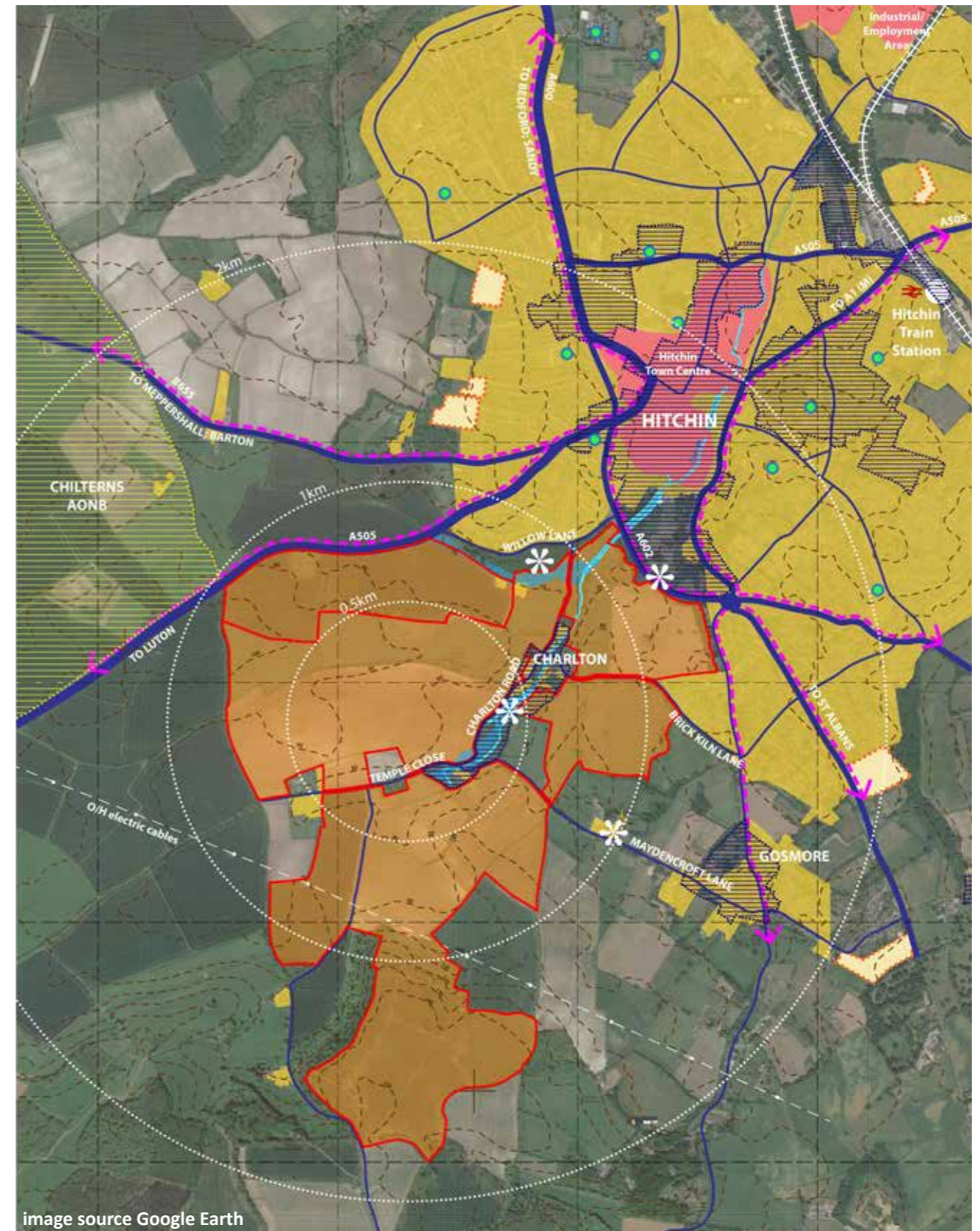


image source Google Earth
Local Facilities Plan

SITE DESCRIPTION

The 262.3 hectares site is made out of five land parcels, arranged to the south-west of Hitchin and around the hamlet of Charlton.

The site boundaries are well defined by the built-up area of Hitchin, existing vegetation, road network and Public Rights of Way.

To the north, the site is bound by existing hedgerows and field boundaries, as well as by the wooded area of The Willows. Further beyond to the north is the A5050 route, connecting Hitchin with major urban centres in the area.

Charlton Road defines parts of the southern and western site boundaries, along with field boundaries. The Downs plantation defines a portion of the western boundary, together with the built-up area of Temple House and the Public Rights of Way extending to the north, towards the A505.

The eastern edge of the site is bound by a field track, field boundaries and Hitchin's built-up area. Further beyond to the east lie the settlement of Gosmore.

Charlton Road and Temple Close cross the site and divide it broadly into northern and southern parts. River Hiz, running parallel to Charlton Road, the built-up area of Charlton and the landscape around them divide the site's northern portion into east and west parts.

A series of Public Rights of Way cross the site and extend beyond it, providing connections to Hitchin in the north and the open countryside in the south and west. In particular, a group of footpaths near and along River Hiz provide pedestrian links from the site to the built-up area of Hitchin.

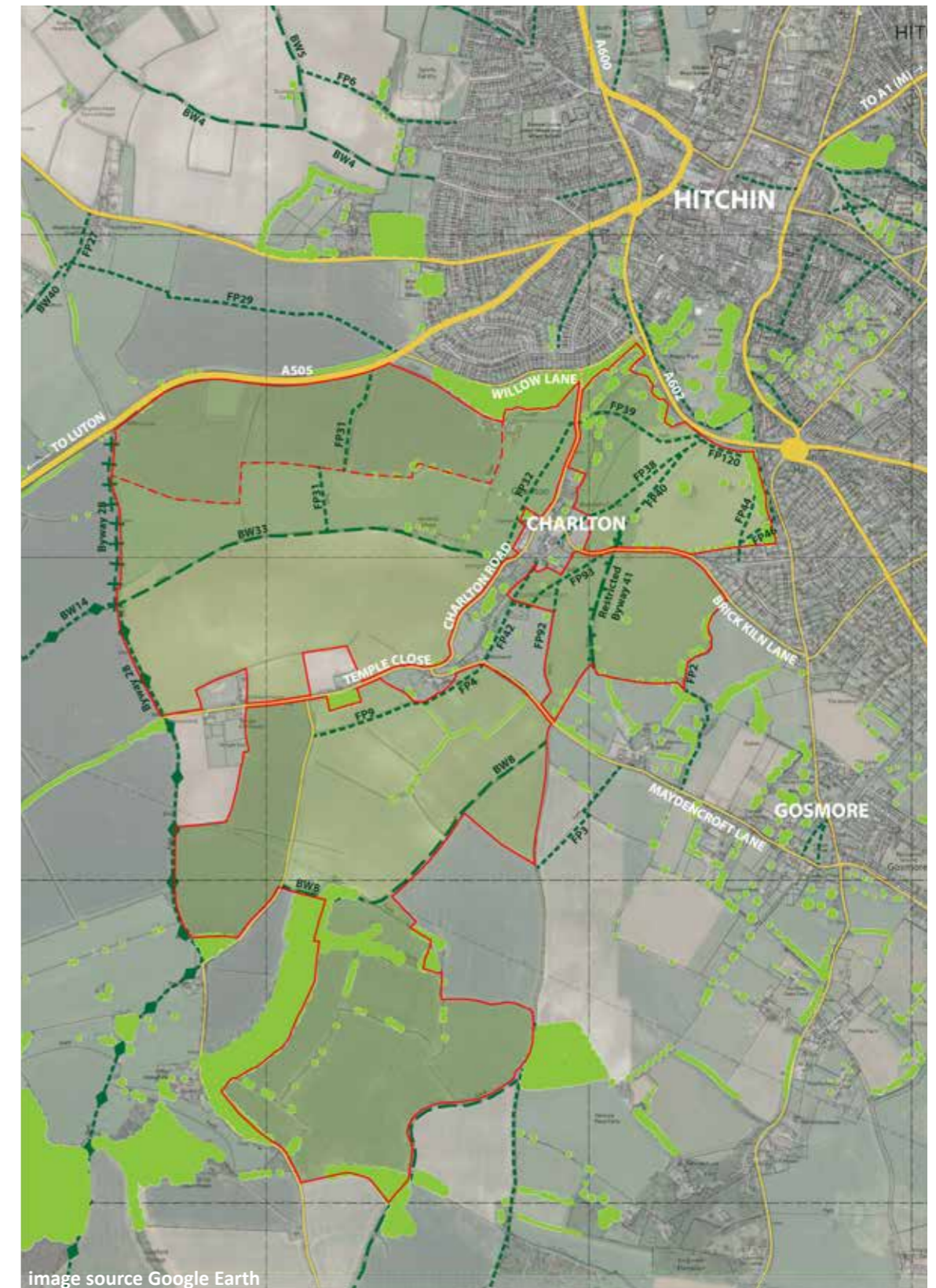


image source Google Earth
Site's aerial view

SITE PHOTOGRAPHS

The following site photographs illustrate some of prominent features within the site and along its immediate surroundings.

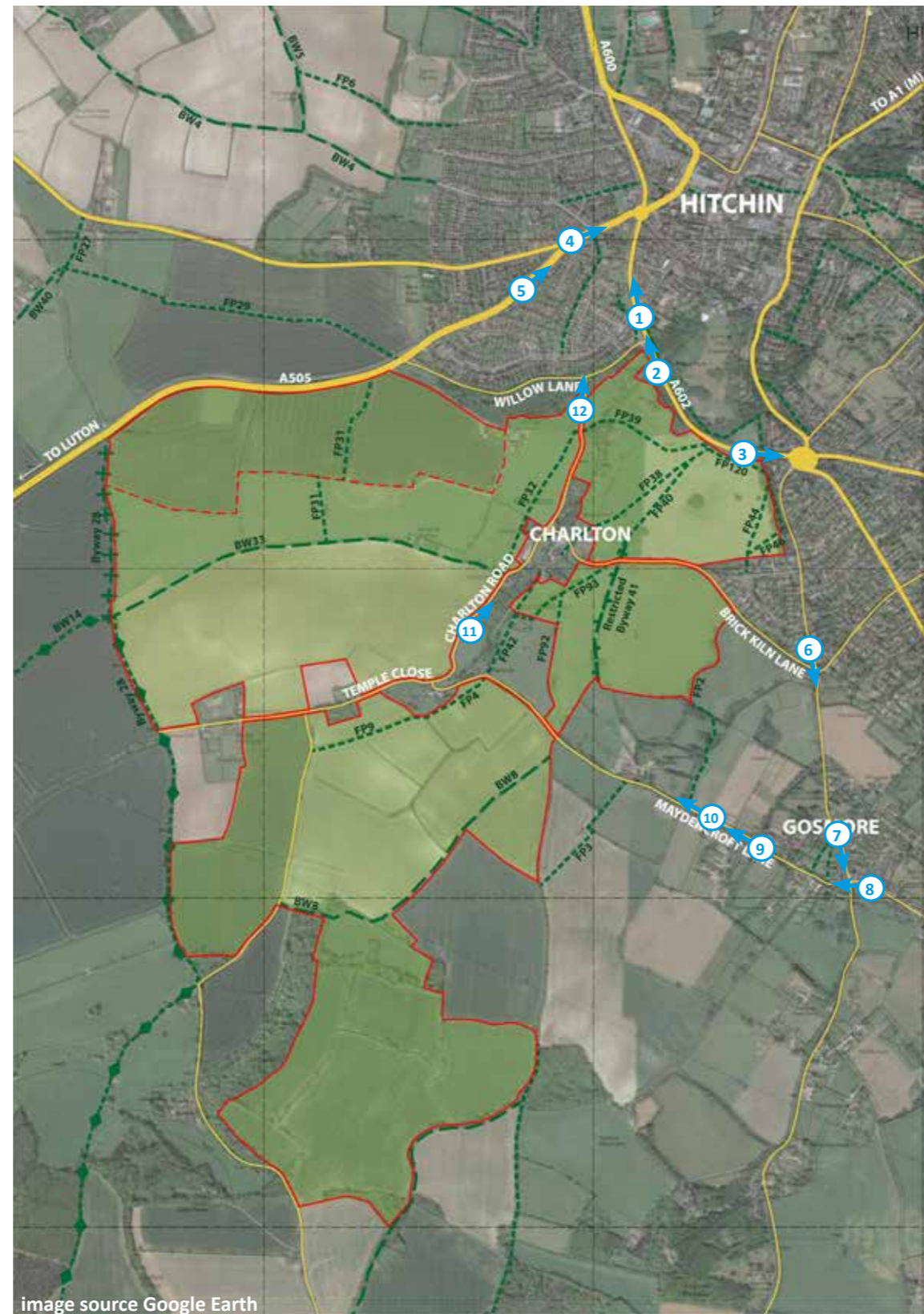


image source Google Earth
Key Plan for Site Photographs



Approach to Hitchin



A602 / Charlton Road junction



Pedestrian bridge across Parkway



Towards Hitchin train station



A505, the site area to the right



Hitchin Road towards Gosmore



Narrow carriageway with no pavement



Access through Gosmore



Towards Charlton



Towards Charlton with open fields to the left



Arrive into Charlton (south side)



Looking at Willow Lane / Charlton Road junction

3. SITE EVALUATION

The site evaluation identifies the physical constraints and opportunities, as well as those originated by the local policy. This analysis informed the process of the design development.

SITE'S OPPORTUNITIES

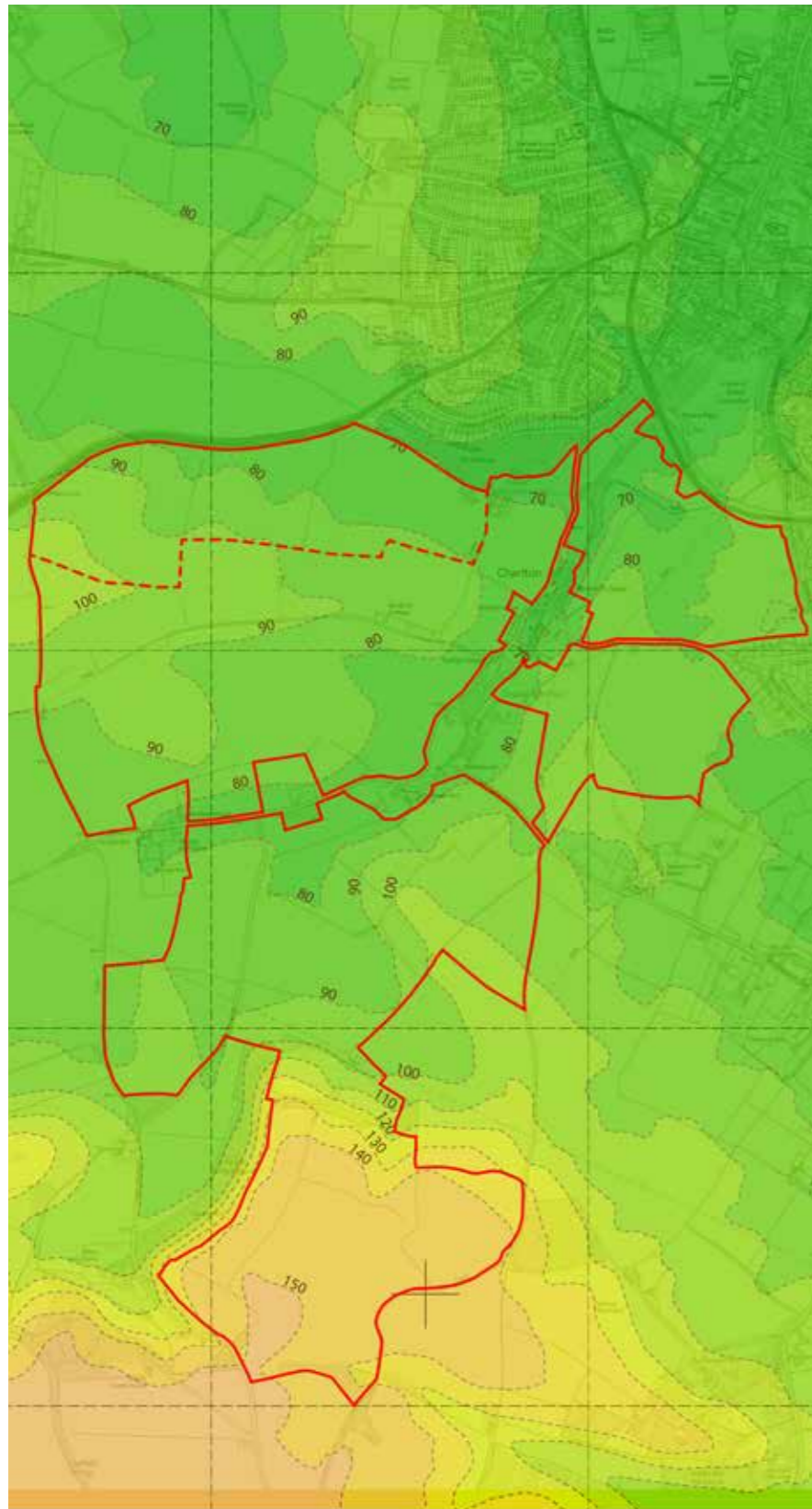
The site's design concept considers the following opportunities:

- Opportunity for a bypass as a major infrastructure improvement in the area, alleviating pressures on Hitchin town centre from east-west through-traffic along the A505;
- Opportunities for residential expansion southward and westward from the existing built-up areas of Hitchin and Gosmore;
- An opportunity to provide an interlinked network of green corridors to enhance pedestrian connectivity and site permeability, via the Public Rights of Way, also enhancing biodiversity and supporting existing habitats;
- Opportunity to consolidate the urban gap between Hitchin and Gosmore through the integration of proposed green corridors within the site;
- Proximity to Hitchin town centre provide an opportunity to benefit from the wide range of employment, retail, educational, medical, leisure and recreation facilities the town has to offer;
- Proximity to Hitchin's train station and good service of public transport support sustainable mode of movement from the site to other destinations offering major employment opportunities and a wide range of local facilities; and
- Potential for vehicular access point off A505 at north and A602 from the east.












SITE'S CONSTRAINTS

The site's design concept considers the following constraints:

- Potential noise and air quality issues related to the A505;
- Overhead electric cables at the southern part of the site;
- Existing vegetation and ecologically sensitive areas, particularly around Charlton and along River Hiz, would need careful consideration and incorporation into the scheme;
- High concentration of public footpaths in close proximity to one another, particularly at the north-eastern corner of the site, will restrict the scope of development in this area;
- The topographical slope of the land upward towards north and down towards the corridor of River Hiz will require consideration at the design of proposed roads' routes and of the massing and scale of buildings to mitigate the visual impact on the landscape;
- Charlton Conservation Area, around which the site's land parcels are arranged, will require consideration so as to mitigate impact on heritage assets in the area;
- Hitchin's Conservation Area, located in close proximity to the north of the site will require similar consideration regarding heritage assets;
- A small portion of the northern site edge lies within flood zones 2 and 3 and as such would be excluded from residential development; and
- Limited opportunities for vehicular site access.



Coloured Contours Map

-  promoted site
-  conservation area
-  AONB
-  AONB buffer
-  existing settlement
-  housing sites
-  potential expansion of settlement
-  urban boundary
-  noise pollution
-  potential green/wildlife corridor
-  highest point/view
-  potential access/bypass
-  grade I/II listed
-  existing green infrastructure
-  O/H cables
-  existing congestion
-  PROW (recreational)
-  PROW (byway)
-  PROW (footpath)
-  PROW (bridleway)

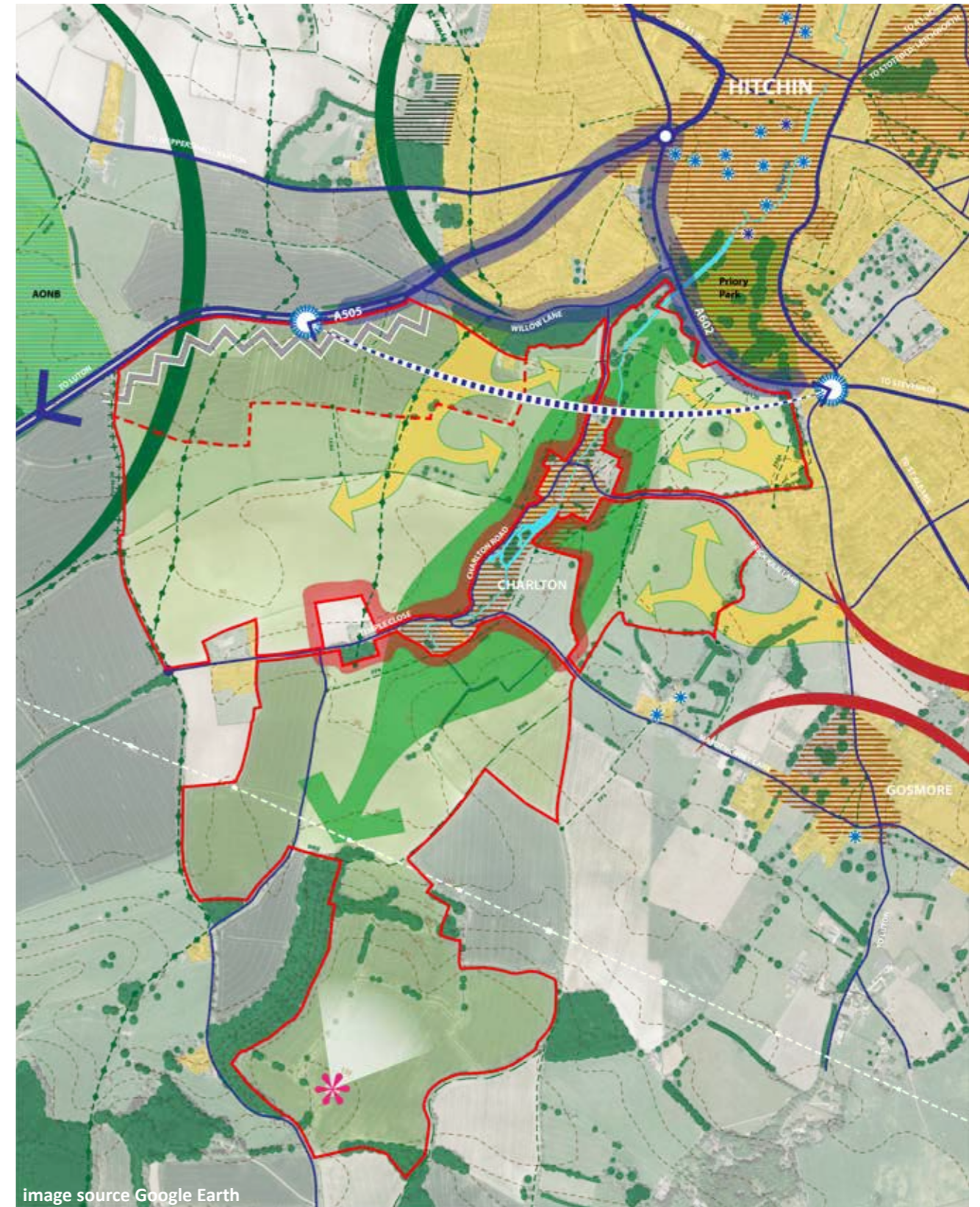


image source Google Earth
Constraints & Opportunities Plan

4. DESIGN PROPOSALS

HIGH-LEVEL STRATEGIC FRAMEWORK PLAN

The proposed development is generally restricted to the topographically lower, northern portion of the site, so that to maintain a suitable scale of development in proportion to the existing built-up area surrounding the site.

The proposals incorporate a bypass as a major infrastructure improvement in the area, alleviating east-west traffic along the A505, relieving Hitchin town centre from this major artery connecting the M1 at the east with Luton airport at the west. The scheme is therefore arranged to accommodate this feature.

The protection of Charlton Conservation Area, along with its heritage assets, is a principal consideration in the proposed scheme, where the development is spaced away from this sensitive area.

A key principle in the design concept is the integration of a green wildlife corridor along River Hiz, which crosses the site diagonally from Priory Park at the north-east, via Charlton, through to the wooded area and open countryside to the south-west.

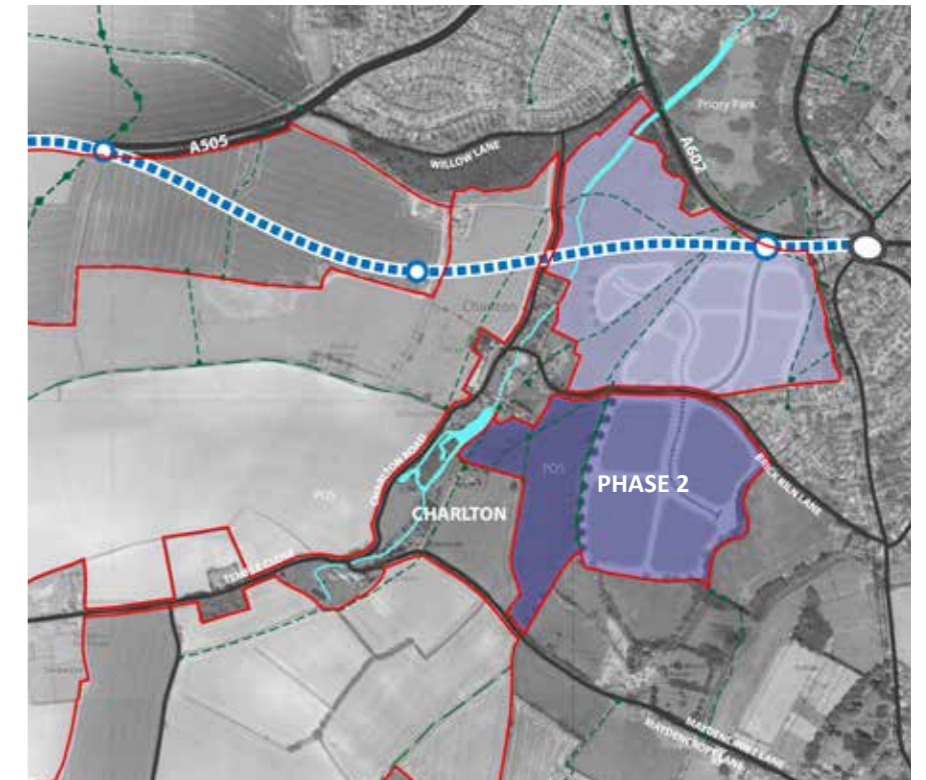
Incorporating an extensive network of existing Public Rights of Ways, this green corridor also enhances the site's pedestrian permeability and connectivity to Hitchin at the north, along with the wide range of social and economic facilities it offers, the open countryside at the south, east and west, and the Chilterns AONB at the north-west.

Smaller-scale green corridors are extended from this core feature, to provide an attractive setting to the existing pedestrian and cycle routes, as well as provide a structure to the residential development.

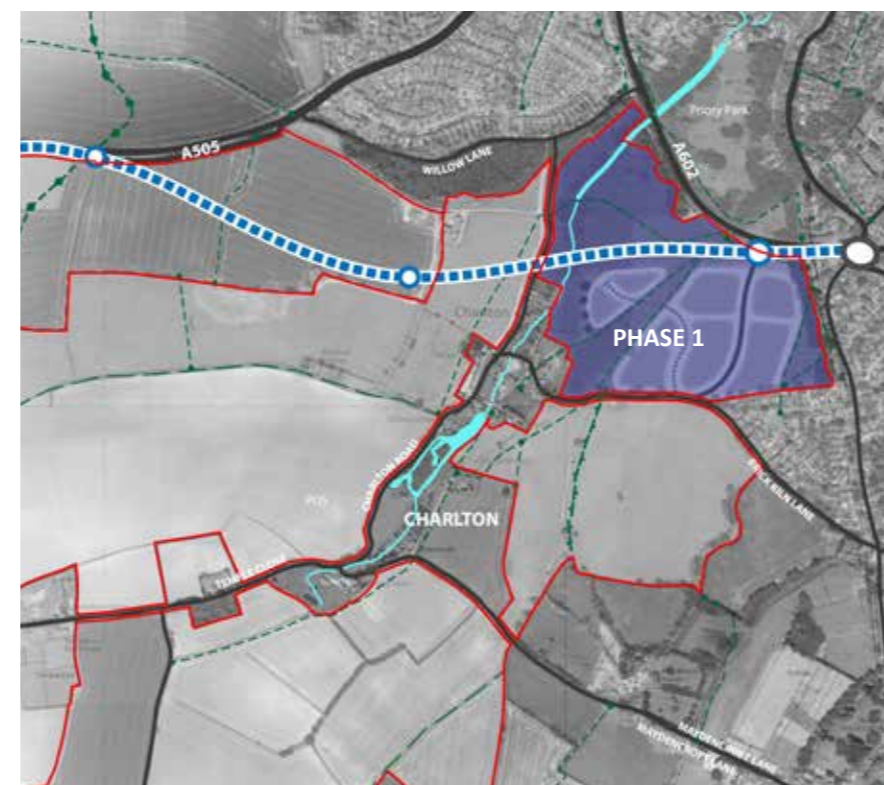
Two access points to the development are proposed, the first off the A505 to the north, and the second off Hitchin Road to the east. A through-route between these two access points facilitates a development which forms an extension to Hitchin.

The western portion of the site is retained as green public open space, in order to maintain a gap between the built up area and the Chilterns AONB, as well as to retain views into the open countryside.

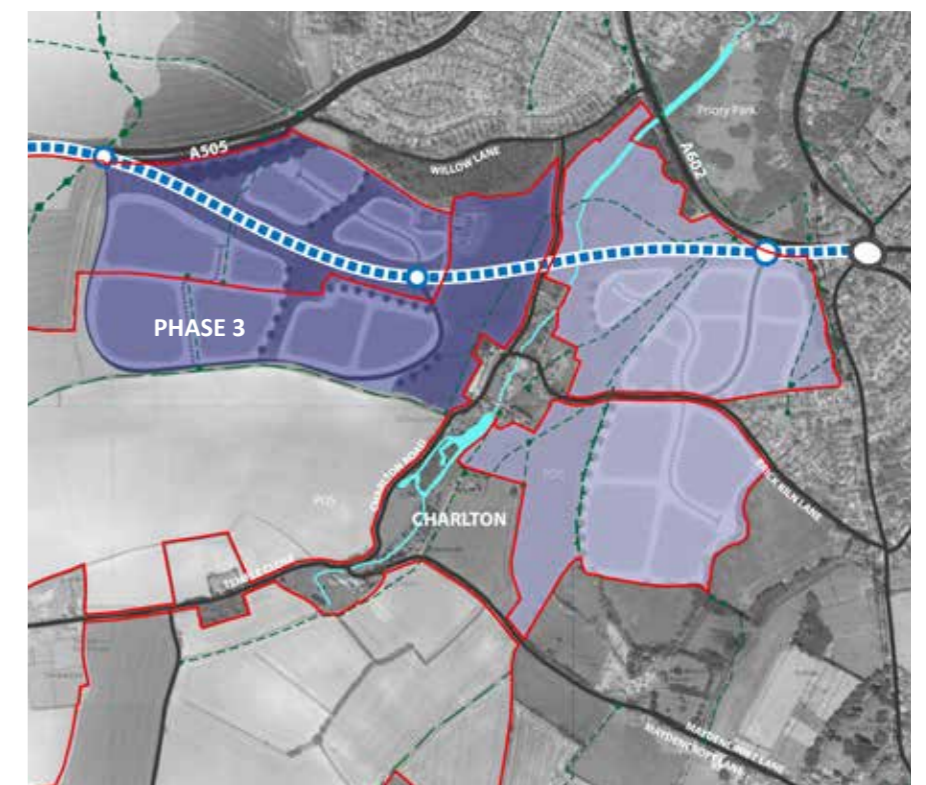
A phased approach is proposed for the scheme, in order to tie the development parcels with proposed green infrastructure features and access construction.



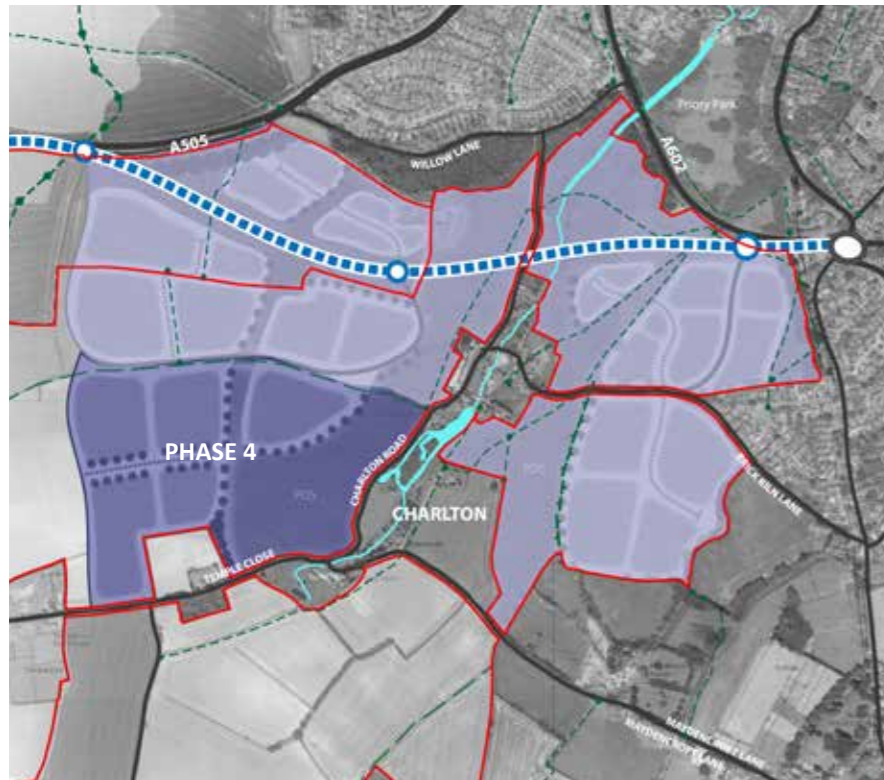
Phase 2 - High Level Strategic Framework Plan



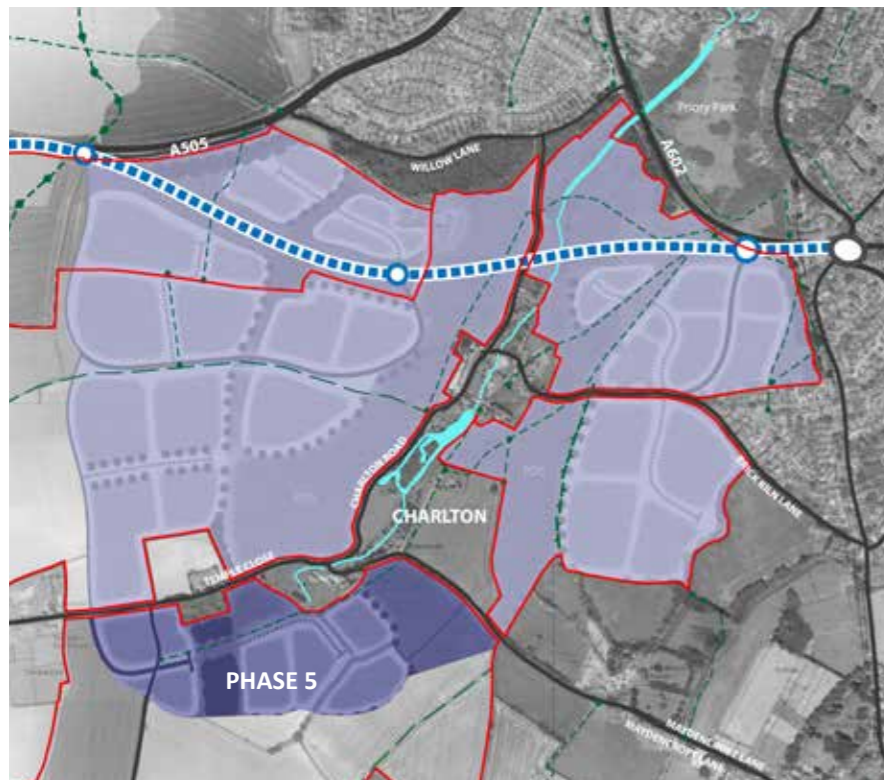
Phase 1 - High Level Strategic Framework Plan



Phase 3 - High Level Strategic Framework Plan



Phase 4 - High Level Strategic Framework Plan



Phase 4 - High Level Strategic Framework Plan

-  promoted site
-  proposed residential
-  existing settlement
-  proposed green infrastructure
-  proposed POS / green links
-  proposed community facility
-  proposed bypass
-  proposed primary road
-  proposed secondary road
-  existing road
-  PROW (recreational route)
-  PROW (byway)
-  PROW (footpath)
-  PROW (bridleway)

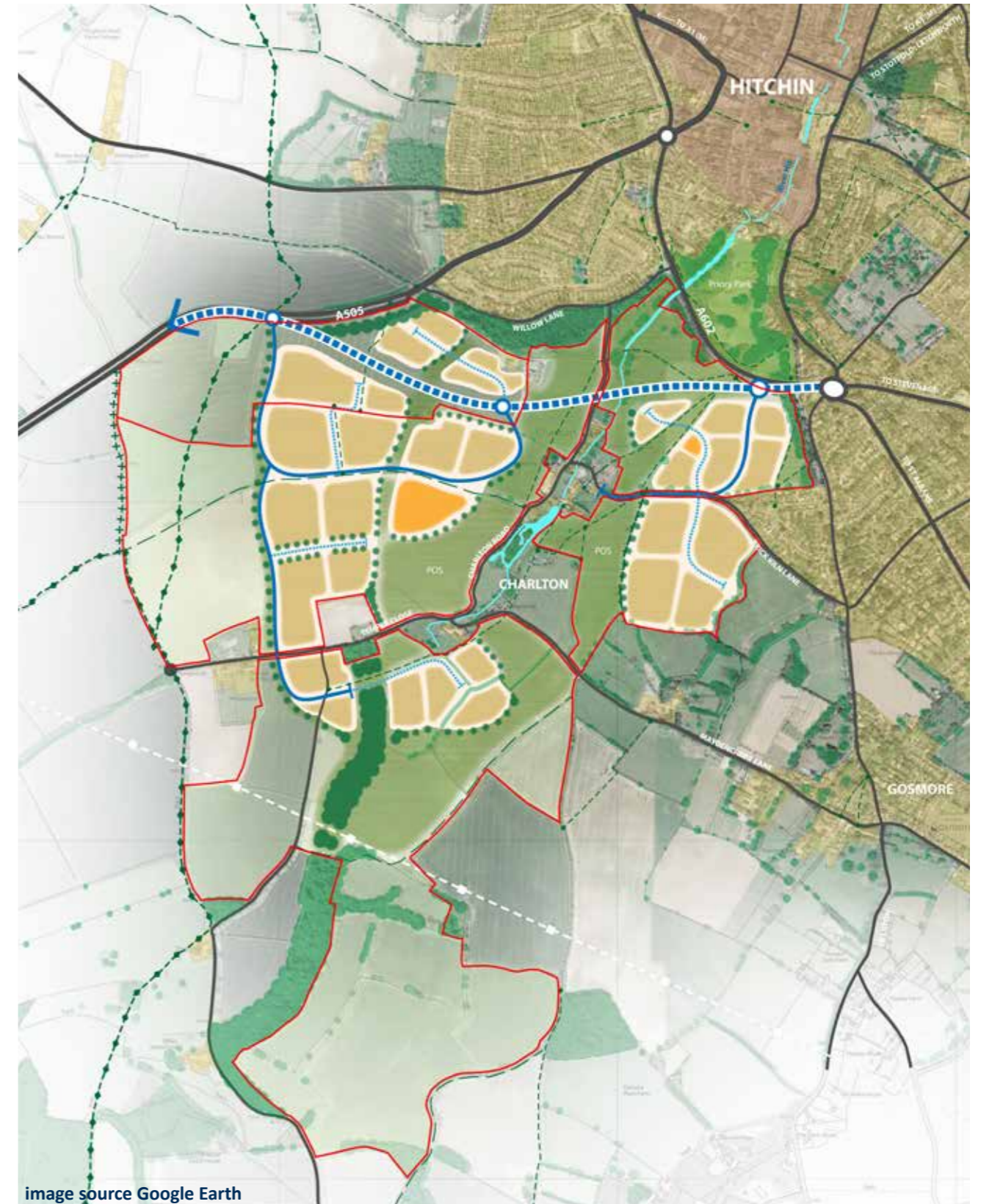


image source Google Earth
Illustrative Masterplan

LAND USE BUDGET

The indicative land use budget schedule assumes:

- Dwelling density calculated includes access roads, private garden space, car parking areas, incidental open space and landscaping; and
- All areas are assumed and subject to detailed specialist input, e.g. a topographical survey, highways, civil engineer, archaeology, ecology etc.

based on these assumptions, and on the basis of the analysis included in this document, the initial estimated capacity of the site is for circa 2,193 dwellings at an average net density of 33 dph.

| Item | Notes | Phase 1 | Phase 2 | Phase 3 | Phase 4 | Phase 5 | Remaining land | TOTALS |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| | | Land Take (ha) | Land Take (ha) | Land Take (ha) | Land Take (ha) | Land Take (ha) | Land Take (ha) | Land Take (ha) |
| TOTAL AREA IN OWNERSHIP (GROSS) | | 24.81 | 20.64 | 42.99 | 28.35 | 19.13 | 126.37 | 237.48 |
| NON DEVELOPABLE | | | | | | | | |
| Indicative Access Roads and bypass | Incl. carriageway, landscaped verges and footways / cycleways. | 2.47 | 0.38 | 5.04 | 0.55 | 0.71 | — | 9.15 |
| Green public open space - formal and informal | Incl. proposed parkland, existing vegetation and watercourse, proposed informal green open space, proposed formal children's play area and proposed attenuation basins. | 13.56 | 9.07 | 15.29 | 10.37 | 7.77 | 126.37 | 182.43 |
| Proposed community facilities | Incl. services such as schools, GP surgeries, retail (TBC at a later stage) | 0.40 | — | — | 3.85 | — | — | 4.25 |
| Total (Non Developable) | | 16.43 | 9.45 | 20.33 | 14.77 | 8.48 | 126.37 | 195.83 |
| NET DEVELOPABLE: | | | | | | | | |
| Residential Development | | 8.38 | 11.19 | 22.66 | 13.58 | 10.65 | — | 66.46 |
| Total (Net Developable) | Total: | 8.38 | 11.19 | 22.66 | 13.58 | 10.65 | — | 66.46 |
| TOTAL NUMBER OF DWELLINGS AT 33 DPH NET | | 277 | 369 | 748 | 448 | 351 | — | 2,193 |

GREEN INFRASTRUCTURE STRATEGY

The proposed green infrastructure strategy for the promoted site is in accord with the findings and recommendations made in the *Landscape Sensitivity Study for the Land South-West of Hitchin* (December 2012) which was submitted as part of the draft Local Plan.

The Study suggests that:

- The area along River Hiz forms a wildlife corridor, connecting to Priory Park;
- A buffer between Hitchin and the Chiltern's AONB should be maintained; and
- Development should be restricted to the lower parts of the site.

On that basis, a green open space with generous buffers is proposed along River Hiz within the site, so that to form a wildlife corridor. Additionally, landscaped buffers are proposed to maintain the green open space gap between Hitchin, the proposed development and the AONB, and between Hitchin and Gosmore.

Strategy for the green infrastructure also takes into account the extensive network of Public Rights of Way within the site and around it, so that to utilise these as green wildlife corridors which enhance biodiversity, support wildlife habitats, as well as provide an attractive backdrop to the development while helping to retain the landscape character of the area.

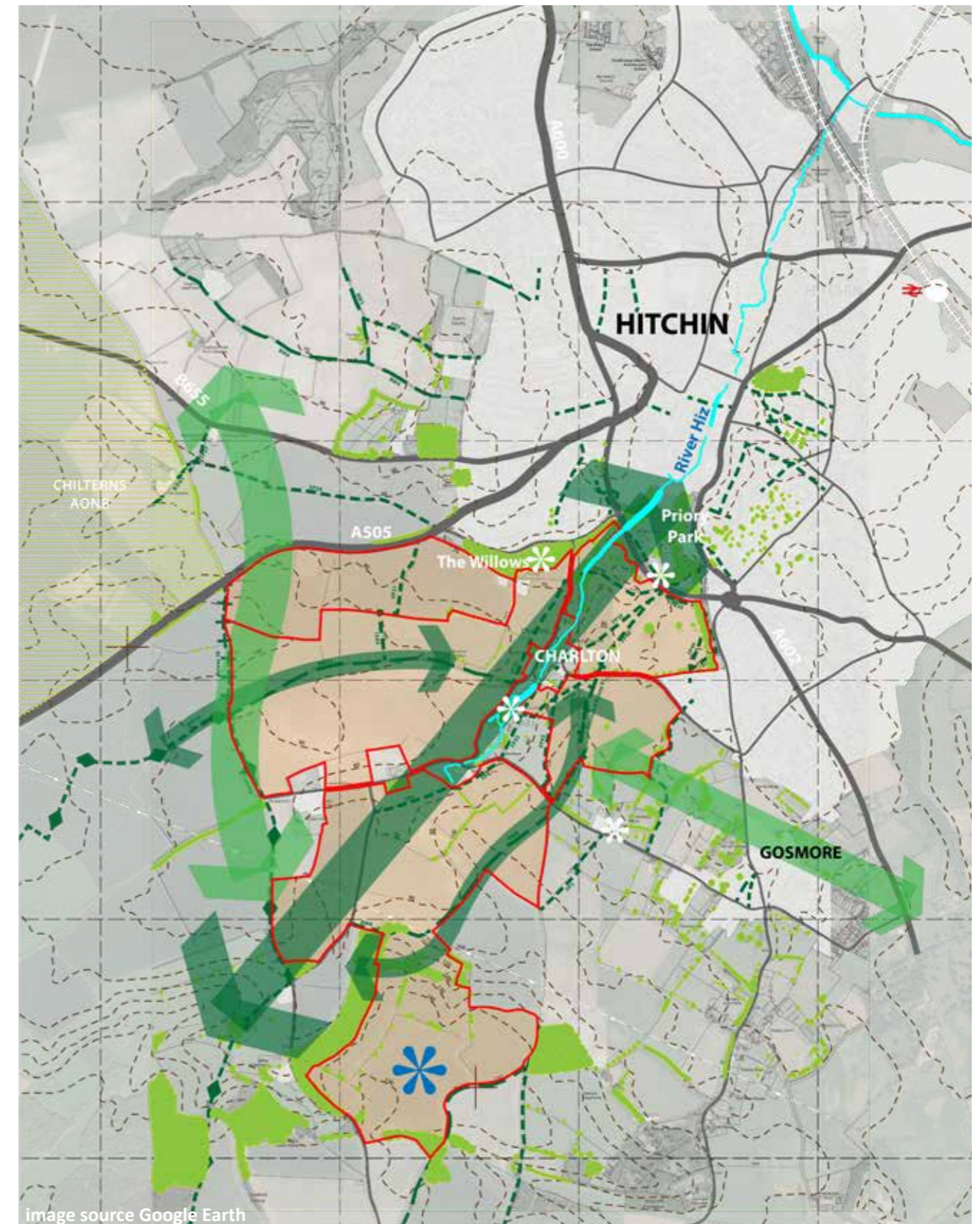
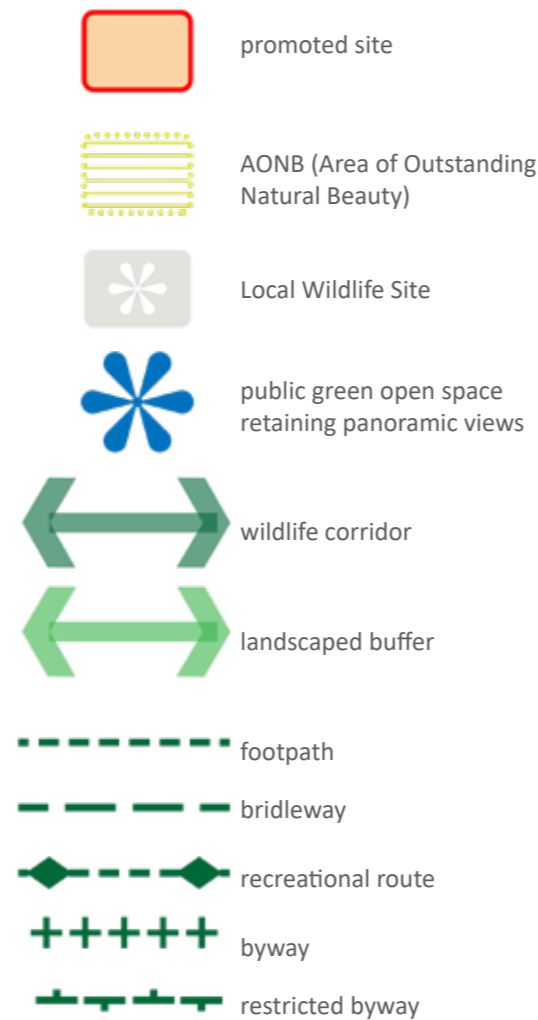
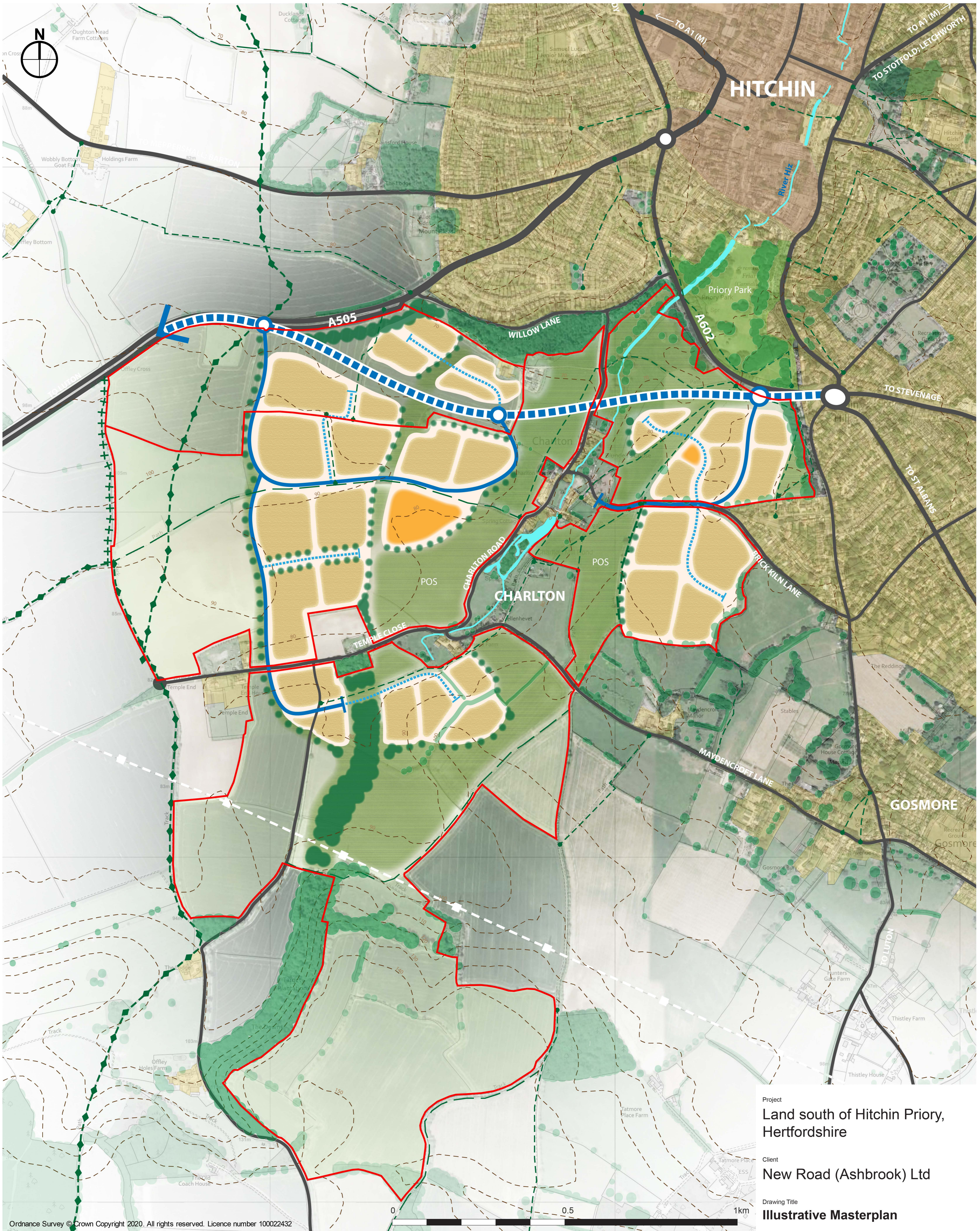


image source Google Earth
Green Infrastructure Strategy



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Project
**Land south of Hitchin Priory,
 Hertfordshire**

Client
New Road (Ashbrook) Ltd

Drawing Title
Illustrative Masterplan

Job No. H5071/9 Date 25.02.2020 Scale 1:5,000 @ A1

Drwg No. H5071(9)-SK08 Revision -

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**RTPI**

Chartered Town Planner

