

THIS STATEMENT IS FOR:

**Matter 10 – The housing allocations and
the settlement boundaries: Baldock**

ISSUES: **10.1, 10.2, 10.3, 10.4 and 10.5**

Examination of North Hertfordshire District Council's
Local Plan 2011-2031

Hearing Statement

on behalf of
Greene King plc

January 2018

1 Introduction

- 1.1 This statement is made on behalf of Greene King plc, who own land on London Road, Baldock, between the George IV Public House to the south and Chalk Hills to the north. It is referenced by the LPA as site BA12 – see Appendix A Extract from Proposals Plan.
- 1.2 Our focus is on how the Submission Document's overall housing proposals and alterations to the boundary of the Metropolitan Green Belt affect the town of Baldock and our client's land. We have already submitted separate representations on Matter 4 and Matter 6.

2 Matter 10 – The housing allocations and the settlement boundaries

Issue: Baldock 10.1

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?*
- b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?*
- c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?*

2.1 We note the Statement of Common Ground, dated November 2017, between North Hertfordshire District Council and Hertfordshire County Council, concerning Strategic Allocation BA1. We agree that the landowner has confirmed site BA1's availability.

2.2 The Statement contains two short paragraphs on infrastructure that include a single reference to transport, a proposed link road to connect the A505 with the A507. We understand that the nature and route of this proposed link has yet to be determined, but we assume it will form a by-pass to the site from the roundabout where the B656 meets the A505 Baldock by-pass to a new junction with the A507 somewhere north of Blackhorse Farm.

2.3 In our opinion, substantial improvements will be needed to the A507 northwards to its junction with the A1(M) and southwards towards the junction with the B656. There is little or no opportunity for improvements to increase the capacity of the junction with the B656, which is currently traffic-light controlled. This junction is already frequently congested, a problem that can only be exacerbated by the additional traffic generated by the proposed new development of site BA1. The B656 runs through Baldock town centre and still acts as a busy through road to Letchworth as well as serving local traffic. The proposed A505 to A507 link is unlikely to provide an alternative to the B656 unless it were taken across the A1(M) to connect with Letchworth's industrial area.

2.4 The Statement says on other infrastructure:

“It is agreed that key social infrastructure of a local centre, community hall, GP

surgery and primary and secondary education provision will be provided.”

The proposed school provision has not yet entered the standard education planning process as reported on the County Council's website. There is a predicted surplus of around 15 primary school places up to 2020/2021. Secondary school spaces vary between a small deficit and small surplus up to 2020/2021. It is clear that new school provision will be needed, but specific planning for it has yet to begin.

2.5 Paragraph 8 says that a planning application is expected in early December 2017. As of 21 December 2017, and according to North Hertfordshire District Council's online planning application database, no such application had been submitted.

2.6 Paragraph 9 says:

“It is expected that from the grant of outline planning permission, that housebuilding would commence 12 months later with the first financial completion expected 18 months from the grant of outline planning permission.”

In the light of the research published by Nathaniel Lichfield and Partners in their November 2016 report, “Start to Finish”, we think this timetable is wholly unrealistic. The report examined 70 sites with a capacity of 500 or more dwellings. It said the average planning approval period was 5 years, and 6.1 years for sites of 2000 or more dwellings. The planning approval period was defined as:

“The ‘planning approval period’ is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing).”

This research is based on real life experience, which we think provides a better and more objective basis for estimating site BA1's housing trajectory. Assuming that the outline application referred to in the Statement's paragraph 8 is submitted in January

2018, a more realistic start date for a start on site is 2023/2024. The first completions could be then expected in 2024/2025 or even 2026.

- 2.7 Our argument is not that the necessary infrastructure cannot be provided; it is about the planning and timing of its provision. For example, it took about ten years from the initial decision to proceed with its design to giving planning permission for the Little Hadham by-pass in East Hertfordshire. The process involved detailed economic, landscape and ecological assessments; consultation on alternative routes and connections with the existing road network; a pre-application consultation and then the application itself. Yes, the circumstances here were different and it may well take less than ten years for example to plan and get permission for the proposed A505 to A507 road link. A start on development could possibly be made before the completion of the proposed masterplan and the necessary consultation and negotiations on the provision of essential infrastructure. However, we think this would be most unwise, given the local controversy that the scheme has caused. Such a move would not be in the true spirit of proper public consultation.

Issue: Baldock 10.2

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

- 2.8 The simple answer is that nobody knows what the likely impacts on the town will be. We have seen no evidence of any assessment of the impact of any of the proposed allocations, either individually or collectively, on the social, economic and environmental character of the town as a whole.
- 2.9 We have already referred to the existing traffic congestion problems, regularly affecting Baldock town centre, that go well beyond the “normal” morning and evening commuting peaks. In the short term these problems will be exacerbated by the amount of construction traffic that, in the absence of any alternative route, will have to go through the town. This could be at least partly ameliorated by early completion of the proposed A505 to A507 link. However this link is not even a line on a map as yet. If housing construction were to begin in accordance with the Common Ground

Statement's timetable, then it would be Baldock's historic centre, and the A507/B656 junction in particular, that would bear the burden.

- 2.10 In the longer term, the 3600 additional dwellings proposed for Baldock as a whole, including 2800 on allocation BA1, will further aggravate existing traffic congestion in the town and its centre, requiring additional roadworks and traffic management measures. Again, without an analysis and forecast of resulting traffic flows on the local road network, we cannot begin to tell what the consequences will be, especially for the town's historic fabric.
- 2.11 BA1, together with the other proposed allocations for Baldock will increase the town's total number of dwellings by 75%. This must surely have significant consequences for the town as a whole and its historic fabric, but the Plan says nothing about what these consequences may be and how they will be accommodated.
- 2.12 Policy SP14 mentions “... *A new local centre along with additional neighbourhood-level provision providing around 500m² (net) class A1 convenience retail provision and 1,400m² (net) of other A-class floorspace; ...*”. The idea is presumably for the neighbourhood centre to take pressure off the town centre. However, the odds of both succeeding in complementing and reinforcing each other must be small. The more likely outcome is that the existing town centre and the new centre will compete to the detriment of one or the other, or both.

Issue: Baldock 10.3

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

- 2.13 It was indicated at the Hearing session relating to Matter 4 that the EIP would not consider the merits or otherwise of alternatives or “omission sites” as they were referred to. We are therefore somewhat perplexed as to exactly what “alternatives” this question is considering.
- 2.14 We can illustrate that other, more reasonable, options do exist with reference to the land we have been promoting through the Local Plan process at London Road,

Baldock. Like proposed allocations BA1, BA2, BA3 and BA4, it is on the edge of the town and in the Green Belt. Unlike sites BA1, BA2 and BA3 it does not represent a major intrusion into open countryside or threaten the preservation of the town's setting. Its development would not lead to the loss of productive agricultural land, as is the case with allocation BA1. Its current use is very limited; its development for new dwellings would be a far more efficient, effective and beneficial use of the land without compromising any of the principal functions of the Green Belt, as set out in the NPPF's paragraph 80.

- 2.15 The LPA made the claim under discussion of Matter 6 that small sites take longer than large sites to bring into production. Of course there are many factors that determine how long it takes to get a particular site under way. Many small sites are the more difficult to develop urban infill sites. However, small urban peripheral greenfield sites will be easier and quicker; a regional builder estimates that the site we have been promoting, BA12, would take 6 months to get to the planning permission stage and then 15 to 16 months to full occupation of the completed development.
- 2.16 We appreciate the arguments on not considering every "omission" site at the EIP. However, in the case of this Local Plan, Green Belt designations are a very significant part of the overall strategy. It seems only right that other adjustments to the Green Belt around urban peripheries should be given full consideration. This is particularly the case with Baldock, where such major incursions are being considered that will almost double the size of a town that the Green Belt is supposed to protect. Site BA12 was deemed to be available, achievable and suitable up to the publication of the Submitted Plan.

Issue: Baldock 10.4

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

- a) *Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?*
- b) *What is the nature and extent of the harm to the Green Belt of removing the site from it?*
- 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?*
- 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?*
 - 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?*
 - f) *Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?*
 - 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?*
- 2.17 If there are exceptional circumstances, they are that the current local development plan, adopted in 1994, is now significantly out of date, resulting in a long term deficit in housing land supply. By its own admission, the LPA has had to rely on windfall sites for some years now to maintain any sort of residential land supply. A situation has developed that undermines one of the planning system's core principles, as set out in the NPPF's paragraph 17, that it "... be genuinely plan-led". However, as we stated in our representations on Matter 6, even now the Submission Document has to kick the five year land supply issue down the road to 2021.
- 2.18 The essence of our argument is that Hertfordshire County Council's rural estate around Baldock has been progressively used as a reservoir to soak up housing requirements that, for various reasons, the LPA think cannot be met in other parts of the District. Using the estate as a flexible 'catch-all' must surely be completely contrary to its existing status as part of the Metropolitan Green Belt. The evolution of allocations BA1 to BA4 illustrates well how this has been done.
- 2.19 The land that was to eventually make up the majority of the proposed BA1 Strategic Allocation made its first appearance in consultative documents in 2013. Previous to this, the options for north Baldock were essentially the four sites listed in Table 1. These were included in a series of consultations previous to 2013, including the North Hertfordshire Local Development Framework Core Strategy and Development Policies Preferred Options September 2007; Land Allocations Issues and Options Consultation January/March 2008; and the Land Allocations – Additional Suggested

Sites Consultation July 2009. There was no mention in any of these consultations of a strategic allocation the size of allocation BA1 on Baldock's northern edge.

- 2.20 North Hertfordshire published a paper on housing options in February 2013. It included four sites that lay within the proposed BA1 Strategic Allocation, as shown in Table 1.

Table 1

Reference	Site	Area (ha)	Dwelling Estimate
B/r1a	Land at Bygrave Road	2.6	60
B/r2a	Land south of Bygrave Road	5.1	114
B/r11a	Land north of Bygrave Road	4.6	140
B/r23	Land at North Road	4.4	105
Totals		16.7	419

- 2.21 This was followed by a further consultation on Housing Additional Locations in July 2013. This considered two further sites, referenced 200 and 201, owned by Hertfordshire County Council, as shown in Table 2. Site 200 included land beyond the track running from just north of Blackhorse Farm, eastwards to Bygrave village, that marks the northern boundary of proposed Strategic Allocation BA1. Site 201 lies entirely within the area of BA1. The report went on to state that *“Hertfordshire County Council have also indicated that if more housing is needed, they may be able to bring forward other areas of land from their rural estate around Baldock.”*

Table 2

Reference	Site	Area (ha)	Dwelling Estimate
B/r1a	Land at Bygrave Road	2.6	60
B/r2a	Land south of Bygrave Road	5.1	114
B/r11a	Land north of Bygrave Road	4.6	140
B/r23	Land at North Road	4.4	105
200	Land north of Baldock	174	3479
201	Land south of Bygrave Road	8.5	170
Totals		199.2	4068

- 2.22 The 2013 update of the SHLAA was published after these two papers, in March 2014. It included sites 200 and 201, but with the northern boundary of site 200

redrawn to follow the Blackhorse Farm to Bygrave track.

Table 3

Reference	Site	Area (ha)	Dwelling Estimate
B/r1a	Land at Bygrave Road	2.6	60
B/r2a	Land south of Bygrave Road	5.1	114
B/r11a	Land north of Bygrave Road	4.6	140
B/r23	Land at North Road	4.4	105
200	Land north of Baldock	101.5	2239
201	Land south of Bygrave Road	8.5	170
Totals		126.7	2828

The SHLAA said of site 200 that “*Infrastructure costs for major urban extensions may be significant.*” Phasing of its development was stated “from 2024 onwards.” It was classed as a Category 4 site, land that was currently Green Belt.

- 2.23 Blackhorse Farm subsequently appeared in the Local Plan 2011-2031 Preferred Options Consultation Document, published in December 2014, with an estimated capacity of 2800 dwellings.
- 2.24 This sequence of consultations points to a significant change around 2013 in the approach to housing land requirements, Baldock and its surrounding Green Belt. With the pressure that had been building up over the previous six years and a willing flexible landowner, north Baldock suddenly became the silver bullet for mopping up the housing land requirements that had not been allocated elsewhere.
- 2.25 The A1(M) and Letchworth to the west have already significantly affected Baldock's historic setting. Taken together, sites BA1, BA2, BA3 and BA4 represent an almost doubling in size of Baldock's existing housing stock. Taken individually, they all represent significant intrusions into open countryside that will effectively destroy the historical town's relationship with the surrounding countryside. It is our opinion that the purposes of the Green Belt around Baldock will be fatally undermined by such large incursions that will be widely visible, and particularly in the case of BA1, with its location on rising ground.

Issue: Baldock 10.5

Is the proposed settlement boundary:

- a) *consistent with the methodology for identifying the settlement boundaries?*
- b) *appropriate and justified?*

2.26 The best criteria for deciding whether or not the proposed settlement boundary is appropriate and justified are the five purposes set out in paragraph 80 of the NPPF.

2.27 We assume that the existing boundary was originally defined in relation to these purposes. What is important is the relative merits of the alterations that result from the proposed peripheral land allocations and other potential alterations that would be consistent with the five purposes.

2.28 We have been consistent in our views on major incursions into the Green Belt around Baldock. It is a small, historic market town and, apart from the Clothall Common estate's intrusion, the Green Belt has served well to protect its setting. The Submission Document now proposes to make sweeping changes to the settlement boundary to incorporate widely visible areas of countryside that currently serve as an essential part of the town's setting. Whilst the housing supply crisis that has resulted from years of planning delay is a significant factor, it does not constitute the very special circumstances needed to justify such a radical redrawing of the town's boundaries. Some redrawing is needed, but it should have been done in relation to the size of the existing town and the preservation of its setting as well as making a fair contribution to the District's overall housing needs.

2.29 We consider that individually and collectively, the alterations made to exclude allocations BA1, BA2, and BA3 from the Green Belt represents an inappropriate and unjustified balance between the purposes of the Green Belt around Baldock and the proportion of the District's overall housing needs allocated to the town.

2.30 The NPPF's paragraph 85 reminds LPAs in defining Green Belt boundaries to:

"... not include land which it is unnecessary to keep permanently open;"

2.31 We have consistently maintained there is no need to keep an area of land between

the road known as Chalk Hills, up to and including the George IV Public House, permanently open. The land has been underused for decades, and will remain so as long as it has a Green Belt designation. The North Hertfordshire Green Belt Review 2014 categorised this site as making a “moderate” contribution to Green Belt functions. We have argued strongly against such a categorisation on the following grounds:

- restricting the sprawl of built-up areas – the land has built form on three sides and its omission from the Green Belt will have no material effect on urban sprawl from Baldock
- preventing towns merging – as a result of its size, character and location it will not lead towards coalescence between Baldock and the closest urban edge, which is Letchworth to the south-west
- safeguarding the countryside – the land is a well defined and contained site, its omission from the Green Belt would have no material effect on the surrounding countryside
- preserving the setting and character of historic towns – the land's omission from the Green Belt would have no material impact on the town's setting.

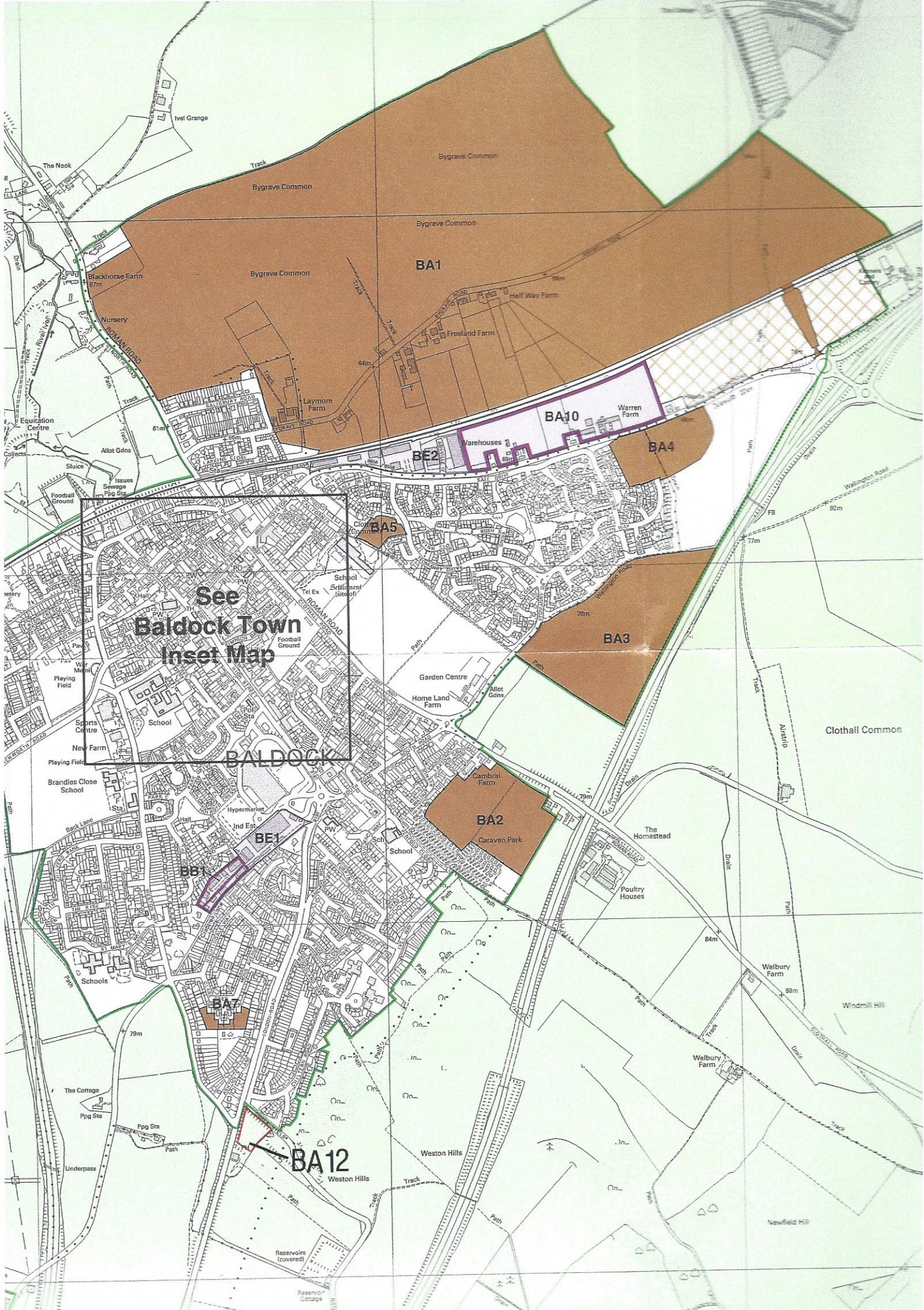
2.32 We therefore propose that the area of land shown outlined in red on the map at Appendix A to this statement is excluded from the Green Belt and included within the revised settlement boundary for Baldock. It would then be available to make an immediate contribution to the requirement for market and affordable housing, in a sustainable location with excellent access to existing local schools, healthcare facilities and the range of community and commercial services provided by Baldock's town centre.

2.33 Matter 10 is principally concerned with the amount of housing land allocated around Baldock; whether or not this amount can be supported by the existing and proposed infrastructure; and the consequences for the Metropolitan Green Belt around the town.

2.34 It is our opinion that the amount of development proposed, which will almost double

- the town's housing stock, will have serious consequences for its infrastructure. At the moment, there appears to be no assessment of its impact, for example, on the local road network as a whole or on town centre and railway station parking requirements.
- 2.35 The LPA's housing trajectory makes unrealistic assumptions about the length of time it will take to provide a comprehensive masterplan for Strategic Allocation BA1, and for the necessary planning and consultation processes involved in providing the supporting infrastructure.
- 2.36 The proposed allocations BA1, BA2, BA3 and BA4 represent major intrusions into the Metropolitan Green Belt. The history of allocation BA1 in particular suggests that it has been used to mop up housing provision that has not been made elsewhere in the District, without any significant assessment of the consequences for Baldock as a whole or for the Green Belt that surrounds the town. The allocation BA1 is shown together with those for neighbouring settlements on the Plan's Proposals Maps. It is by far the largest, and is completely out of character with the town's existing size and overall urban structure.
- 2.37 The LPA's proposed changes to the town's settlement boundary will fundamentally alter the relationship between the town and open countryside to the north and east. Baldock will suffer the same fate as many other historic market towns that have been progressively "doughnuted" by large housing estates.
- 2.38 In our opinion, the balance that has been struck by the Submission Document, between the need to find housing land and maintaining the character of Baldock and its relationship with the surrounding Green Belt, is fundamentally flawed. Baldock deserves better. Alterations to the settlement boundary, especially to the north and east, should be more modest in extent, reflecting both the town's size and its relationship with the surrounding countryside.

Appendix A



See
Baldock Town
Inset Map

BALDOCK

BA1

BA10

BA4

BA5

BA3

BA2

BE1

BE2

BA7

BA12

