ED150 : NHDC Final response to Inspector's Actions arising out of the Hearing Sessions

Matter 13 – Economic Development		
Action	Date on which Action Completed 31 May 2018	Examination Doc Reference No.
NHDC to propose amendments to Policy SP3 as follows:		
Reconsider proposed wording of SP3(a) to take	MM014, MM015 and MM016	
account of fact that NHDC is seeking to ensure that		
the needs of the FEMA sub-area are met rather than		
make provision towards "unmet needs"		
• Remove Letchworth power station from SP3(c).	MM380 Policies Map	
Ensure that it is included as safeguarded employment		
area in policies map and that any other consequential		
changes to Plan are made		
Amend SP3(c) to read "Support additional		
employment provision through <u>the</u> new allocations on		
the policies map as designations at"		
• Amend SP3(b) to read "Within the District's main		
settlements the Employment Areas <u>shown</u> on the		
Policies Map will be safeguarded to enhance their		
employment potential"		
Remove Business Areas from policies map to reflect	MM383 Policies	
MoU amendments	Мар	
NHDC to propose amendments to Policy ETC1 as follows:		
Amend ETC1(c) to read "For allocated employment	MM088	
sites, any relevant site specific criteria are met"		
Amend policy to read "Planning permission for other		
employment-generating uses will be granted"		
NHDC to propose amendments to Policy ETC2 as follows:		
• Remove criterion (a)	MM090 and	
• Reconsider criteria (b)-(d) in the context of settlement	MM091	
boundaries		
• In respect of criterion (i) consider what potential		
applicants ought to be asked to do regarding e.g.		
marketing periods		

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Matter 13 – Economic Development		
Action	Date on which Action Completed 31 May 2018	Examination Doc Reference No.
Amend policy to refer to "outside of allocated		
Employment Areas and allocated Employment Sites		
BA10 and RY9"		
NHDC to reconsider site specific criteria for BA10 and produce		
a paper demonstrating how reduction and/or amelioration of	MM211	
impact on GB is proposed to be achieved.		
NHDC to consider including extra criteria to reflect the	Supporting note enclosed as	ED150
findings of the landscape sensitivity study e.g. will green roofs	Appendix M13 -1	
be required on new commercial buildings.		
NHDC to ensure that any additional suggested criteria are		
made subject to viability testing		
NHDC to also reconsider site-specific criteria for RY9	No changes to RY9	

#### Appendix M13-1

ED150: NHDC Note regarding actions from the Hearing 13 Economic Development (B use classes) Hearing Session held on the 14 December 2017

#### North Hertfordshire District Council Local Plan

#### Matter 13 Economic Development (B use classes)

# Council's response to the Inspector regarding actions from the Hearing 13 Economic Development (B use classes) Hearing Session held on the 14 December 2017

#### 1. Introduction

- 1.1 The Hearing on Matter 13 Economic Development (B use classes) took place on 12 December 2017. At that meeting, an issue was raised in regards to BA10 to which the Council agreed to prepare a paper. This paper presents the proposed main modifications to the wording of the BA10.
- 1.2 It is the Council's view that this paper and the proposed modifications ensure the soundness of the Economic Development (B uses classes) policies of the North Hertfordshire Local Plan.

#### 2. Proposed main modifications

2.1 Action 13 D addresses the issue of green / brown roofs to provide a softer transition of development from the employment land allocation BA10 to the reaming green Belt at the Eastern edge of the allocation. Dixon Searl, the Council's viability consultants have confirmed this does not have any impact on the viability of the development.

#### Consideration of additional criteria for Policy BA10 - Action 13D

1. The Council's Landscape Sensitivity Study for Baldock, [CG4, p12] considered the land for Policy BA10 as Landscape Area 2. This land was considered to be moderate –low in sensitivity, defined in CG4, p5 as:

The majority of the landscape characteristics are less likely to be adversely affected by change. Although change can potentially be more easily accommodated, care would still be needed in locating and designing change in the landscape. There is an opportunity to create and plan/ design for new character.

#### CG4, p19 states:

Overall landscape sensitivity to possible residential and mixed use development is judged to be moderate-low due to the extent of existing urban influence, the lower, more level terrain and less rural character. Within this area, sensitivity can be considered to lessen towards the town and increase towards the higher, more open eastern end.

There are sensitivities relating to the dwellings along Bygrave Road and Royston Road, which all appear to date from the early 20th century and to have been built in the same style and so combine to influence character, but modern development to

the south of Royston Road, and the more urban character of this road, make the area to the south of the railway line less sensitive than that to the north.

2. BA10 is south of the railway line and therefore the least sensitive landscape area. Of the land within BA10, the western / town side is urban in character, further eastwards and in to the current Green Belt the sensitivity increases, but not significantly as the land still has a low terrain, less than the land north of Bygrave Road.

3. The Green Belt study (CG1, Table 5.3, page 104 – (B/e02 for the Green Belt area of BA10)) considers that the current Green Belt has a moderate impact in checking unrestricted sprawl and preventing towns from merging, a significant impact on safeguarding the countryside and a limited impact on the preservation of historic towns. To ameliorate or reduce the impact, the Baldock landscape sensitivity study (CG4, paragraph 4.18, page 19) includes the following recommendations:

- Landscaping could be used to add green corridors along existing field boundaries, and to enhance the ecological value of the railway corridor. A buffer of open grassland to either side of the railway would enhance GI links; and
- Scale, materials, colours and screening will be important considerations in any development of buildings associated with the provision of new employment. Developers should also be encouraged to consider the use of green or brown roofs on new commercial buildings. The aim should be to create a less harsh urban-rural transition to this side of the town than exists at present, and to avoid creating structures which are highly prominent in views towards Baldock centre (from any direction), detracting from the visual focus on the town centre area around St Mary's Church and giving the impression of linear urban 'sprawl' along the easterly approaches to the town. The Ashville Trading Estate buildings are, through their massing and colour, out of keeping with any other buildings on the eastern side of the town.

4. Strategic Policy SP9 considers good design to be a key aspect of sustainable development and requires masterplans for significant developments [LP1, p.52]. SP14 [LP1, p61], which is the site-specific policy for the strategic housing site BA1 includes certain criteria that would also be appropriate for BA10, including masterplanning, landscaping and retaining framed views of St Mary's Church.

5. As currently drafted BA10 does not relate to the evidence in the CG4 and does not make specific provision for a masterplan. The changes below address the issue of provision of a master plan and also address the need to provide green / brown roofs on the eastern edge of the site to act as a transition from the development to the adjacent Green Belt. Dixon Searle, the Council's viability consultants have confirmed the provision of such roofs is not a concern to the viability of the development.

In the circumstances, any additional cost associated with a green (or brown – i.e. self-seeded) roof appears very unlikely to impact in a fixed policy cost type of way that would usually be a viability concern and need to be more specifically described / limited etc. [Dixon Searle email to NHDC 24.01.2018]

### It is proposed to revise Policy BA10 as follows:

#### Economy

- 13.2 The town's current employment areas are relatively modest. In part, this is due to the town's close proximity to the major employment area east of Letchworth Garden City. This Plan proposes extending the current small employment area on Royston Road into a larger business park to take advantage of the good location close to the junction with the bypass and within reasonably close proximity of the railway station and town centre.
- 13.3 In order to help deliver additional local jobs in the District in combination with residential development over the plan period, policy SP3 identifies that 19.6 hectares of employment land should be allocated at Baldock. Given the site's location adjacent to the A505 it provides an ideal location for employment development and it is considered this will allow for future growth over the plan period.

Ref	Employment allocations and site-specific criteria	Hectares			
New empl	New employment allocation				
Policy	Royston Road	19.6			
	A masterplan to be secured prior to the ap	proval of			
BA10	any detailed matters;	-			
	Ensure access arrangements control HGV mo	ovements to			
	direct vehicles towards the A505 rather than t	hrough			
	Baldock;				
	<ul> <li>Address existing surface water flood risk issue</li> </ul>				
	any run-off through SUDs or other appropriate solution;				
	Landscaping to enhance the ecological value of the				
	railway corridor and reinforce a defensible Green Belt				
	boundary to the east;				
	Undertake Contaminated Land Preliminary Risk				
	Assessment, particularly in relation to current and				
	historic agricultural use;				
	Provide adequate mitigation measures for noise associated     with the aciduate line and for any actential analyzement				
	with the railway line and for any potential employment				
	<ul> <li>activity in relation to Clothall Common;</li> <li>Retaining framed views of St Mary's Church from</li> </ul>				
	within and beyond the site;				
	<ul> <li>Archaeological survey to be completed prior to</li> </ul>				
	development; and				
	<ul> <li>Use of green or brown roofs on buildings in order to</li> </ul>				
	create a less harsh urban-rural transition to the Green				
	Belt on the eastern side of this allocation.				
Designate	Designated employment areas				
BE1	Bondor Business Centre	2.5			
BE2	Royston Road	3.3			
Parts of e	Parts of employment areas designated for business use only				

BE3B1E3	Bondor Business Centre East	1.0

And for consistency with the only other employment land allocation.

#### Economy

- 13.4 The economy of Royston is split between the town centre functions and the large employment area to the north of the town although both are covered by the Business Improvement District (BID) area.
- 13.5 In order to help deliver the additional local jobs estimated to be needed in the District over the plan period, policy SP3 identifies that 10.9 hectares of employment land should be allocated at York Way. The existing employment area is currently thriving feeding off both the Hertfordshire and Cambridge economies, with a wide range of businesses located there including many operations associated with Johnson Matthey.

Ref	Employment allocations and site-specific criteria	Hectares
RY9	Land north of York Way	10.9
	<ul> <li>Site is within Health and Safety Executive (HSE) Consultation Zone;</li> <li>Site should deliver a new access to the Orchard Road employment area from the A505;</li> </ul>	
	<ul> <li>Address existing surface water flood risk issues, including any run- off, through SUDs or other appropriate solution;</li> </ul>	
	Sensitive design / layout considering views to and from the Scheduled Ancient Monuments located on Therfield Heath;	
	Compensatory or offsetting measures for loss of existing grassland habitat.	
Designated employment areas		
RE1	Orchard Road	38.9