

Examination of the North Hertfordshire Local Plan (2011-2031)
Examination hearing sessions
Statement of North Hertfordshire District Council

Matter 10 – The housing allocations and the settlement boundaries: The Towns - Letchworth

Note: *This Statement relates to sites in and around Letchworth which are currently located within the Green Belt: Sites LG1 and LG3*

10.11 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?

1. Yes. The landowner of both sites confirms that they support the allocations and their deliverability for housing in their representation to the Regulation 19 consultation on the plan (ED3, p.16).

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

2. Yes. No site specific objections to the allocations have been received from the highway authority. Both sites provide opportunities to connect into the existing pedestrian footpath network.

3. Two options for securing access to Site LG1 are currently being explored by the landowners, both of which are considered to be deliverable.

4. The transport modelling undertaken to support the plan does not identify any significant issues with the operation of the highway network in the immediate vicinity of the sites (TI4, Figures 4.4 & 4.5, pp.14-15).

5. The Council's Transport Strategy (ED14) aims to reduce car traffic volumes below those informing the transport modelling and identifies a broader suite of potential projects and mitigation measures across Letchworth Garden City to ensure the continued operation of the highway network for which reasonable contributions will be sought.

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

6. Yes. Both sites have been considered through the SHLAA and are considered suitable locations for development having regard to potential constraints (HOU9, site refs NL [LG1] and L/r13 [LG3]. See Appendix 3, p.26 and Appendix 4, pp.42-43). This is expanded upon in answer to Issue 10.12 below.
7. The sites have been subject to consultation with a range of statutory providers. The Infrastructure Delivery Plan (TI1) and Local Plan Viability Assessment Update (TI2) show that these developments are deliverable in infrastructure planning terms and that the development would be profitable such as to support a package of infrastructure measures. The likely significant environmental affects of allocating the site have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.514, 590-592)¹. The sites have been subject to consultation with a range of statutory providers.
8. No fundamental constraints to development have been identified. Site-specific infrastructure and / or mitigation measures for these sites are identified as policy measures in the plan (LP1, Policy SP15, pp.63-64 and Site LG3, p.182). This includes the provision of a new primary school as part of the development of site LG1.
9. These measures will be supplemented by the generic development management policy requirements that apply to all sites in relation to issues including (but not limited to) affordable housing, housing mix, transport, design and heritage.
10. Amendments to Policy SP15 are proposed to more effectively address infrastructure provision, particularly in relation to education. These are attached as Appendix A to this statement.

Question 10.12 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

11. Yes. All of the proposed housing allocations in Letchworth are justified and appropriate. The appropriateness of the individual allocations is discussed below.
12. In broad terms, each allocation in the plan is justified by (see the Council's Statements on Matters 5, 7 and 9):
 - The need to seek to meet the Objectively Assessed Needs (OAN) for housing as far as is consistent with the policies set out in the NPPF in a district that is currently highly constrained by Green Belt and other considerations;
 - The 'presumption in favour of sustainable development' and plan-making requirements set out in Paragraph 14 of the NPPF. Potential adverse impacts and specific policies in the Framework which indicate development should be

¹ Page references within LP4 correspond to the "NHDC Page Number" printed at the top left of each page.

restricted have been properly considered. Mitigation measures have been identified to address key issues. A balanced planning judgement has been made on the benefits and impacts of each individual site.

- The significant majority of the deliverable and developable sites identified in the SHLAA (HOU9) being required for allocation if the District is to be able to meet the OAN;
- No preferable, deliverable alternative sites existing which would allow OAN to be met over the plan period in a substantively different way;
- There being no reasonable prospect of other authorities in shared housing market areas being in a position to assist under the Duty to Co-operate should North Hertfordshire have resolved not to meet its OAN in full.

13. Letchworth is a town within the district settlement hierarchy where draft Policy SP2 (as proposed to be amended) directs the significant majority of new development over the plan period.

Site LG1

14. The site LG1 lies to the north of Letchworth in an area currently designated as Green Belt. The site provides an opportunity to make a strategic-scale contribution to the District's future housing needs. Paragraph 52 of the National Planning Policy Framework identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development including extensions to existing towns that follow the principles of Garden Cities.

15. The justification and impacts in relation to Green Belt are discussed under Issue 10.14 below.

16. The site lies within the Arlesey – Great Wymondley landscape character area as identified in the Council's evidence base (CG16a, pp.103-108d) This is a large parcel that stretches across the entire district and is considered to be of low to moderate sensitivity and low landscape value.

17. A detailed assessment of landscape sensitivity has been carried out for this strategic site (CG6). This concludes that the allocation lies within land parcels of low or low-moderate landscape sensitivity.

18. In terms of landscape impacts the site is currently well screened from existing development by means of extensive tree belts to the south. To the north, the topography of the site is such that screening can be achieved through the use of effective planting on the ridgeline to the north of the site boundary which will also help to establish a defensible Green Belt boundary for the future.

19. The site comprises an area of Grade 2 Agricultural Land. Where significant development of agricultural land is demonstrated to be necessary, Paragraph 112 of

the NPPF says local planning authorities should seek to use poorer quality land in preference to that of a higher quality. The Housing and Green Belt background paper (HOU1, p.21) shows that limiting new housing development on the basis of agricultural land quality would significantly impact the District's ability to meet its housing needs.

20. Other potential constraints identified by the SHLAA include a low risk of surface water flood risk on part of the site and public rights of way. Hertfordshire Ecology has identified no apparent fundamental ecological constraints. These issues can be dealt with through appropriate masterplanning and the application of the detailed development management policies of the plan.
21. Potential impacts upon heritage assets include the potential presence of archaeological remains and the setting of the SAM at Radwell Lodge and the setting of the Croft Lane and Norton conservation areas. The policy for this site requires heritage assets to be considered through the masterplanning process (LP1, Policy SP15(a)(iv), p.63). This follows advice received from English Heritage (now Historic England) at the Preferred Options stage of the plan.
22. The Housing and Green Belt Background Paper summarises the reasons for the selection of site LG1 (HOU1, Appendix 2, p.62). The allocation of site LG1 is critical to overall housing numbers that are achievable through the plan. Development at this scale is able to deliver key supporting infrastructure to meet needs arising from within the site. This includes a new primary school. For effectiveness, it is proposed to amend the relevant policy criterion to make clear this will be provided on site in response to representations by Hertfordshire County Council at the Regulation 19 consultation².
23. On balance, the significant positive opportunities afforded by this site are considered to outweigh the potential harms of its development.
24. The above findings, derived from the Council's own evidence base, have been supplemented by additional work conducted by the site owner to support the allocation. This work has been shared with the District Council and provides further reassurance that key issues are being actively addressed.
25. A Statement of Common Ground with the owner of this site has been prepared and submitted to the examination (ED31). This primarily related to broad issues of delivery and infrastructure to support earlier hearing sessions.
26. It is intended that a supplementary statement addressing the site specific issues above will be prepared and, subject to its agreement, will be made available to the examination in advance of the hearing sessions.

Site LG3

² Representor reference 16452

Matter 10 (Letchworth Garden City – Green Belt sites), North Hertfordshire District Council

27. The site LG3 lies to the north east of Letchworth in an area currently designated as Green Belt. The justification and impacts in relation to Green Belt are discussed under Issue 10.14 below.
28. LG3 is currently surrounded by development on three sides, with residential development to the north, allotments with residential development beyond to the west and an industrial estate to the south. The development is screened from the rest of the Green Belt and the open countryside beyond by means of a tree belt to the east of the site.
29. LG3 lies adjacent to the Norton Conservation Area. Site specific criteria to guide development are included in line with advice received from English Heritage (now Historic England) at the Preferred Options stage of the plan.
30. A range of further site-specific criteria are identified to address and / or mitigate against potential impacts arising from development of the site (LP1, p.182). Other issues can be dealt with through appropriate detailed design work and the application of the detailed development management policies of the plan.
31. The Housing and Green Belt Background Paper summarises the reasons for the selection of site LG3 (HOU1, Appendix 2, p.62). The allocation of site LG3 makes a contribution to the overall housing numbers achievable within the plan and the five-year land supply. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and to address issues raised through consultation. On balance, the positive opportunities afforded by this site are considered to outweigh harms.

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

32. The proposed allocation of site LG1 and LG3 represent the only two reasonable alternatives for the expansion of Letchworth beyond its existing limits. HOU1 (Appendix 2, pp.62-63) shows that all potential sites identified within and around Letchworth are being carried forward for proposed allocation in the plan and no reasonable alternate sites have been discarded.
33. The Council's Matter 5 statement demonstrates there is a lack of reasonable alternatives for an alternate distribution of development between the District's main settlements if the proposed housing requirement is to be met.
34. A review of the sites not proposed for allocation through the plan (HOU1, Appendix 2) shows that these are generally:
 - In or adjoining less sustainable village locations; and / or
 - Also within the Green Belt; and / or

- Subject to flood risk constraints which make them sequentially less preferable for allocation than these sites

10.14 Sites LG1 and LG3 comprise land in the Green Belt.

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

35. Yes. Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at LG1 and LG3. The sites provide the only reasonable alternatives for the expansion of Letchworth beyond its current limits (see also Paragraph 32).
36. Under the saved policies of the current District Plan, Letchworth is tightly surrounded by the Green Belt. The Council's general case for the existence of exceptional circumstances is set out in its response to Matter 7. The objectively assessed need for housing significantly exceeds the level of development which can be met on development opportunities on brownfield land or contained within existing urban areas or in rural areas beyond the Green Belt.
37. The District is highly constrained by Green Belt and many of the most sustainable locations for new development are within or adjacent to existing higher order settlements as set out in Policy SP2.
38. The harms to the Green Belt of the potential allocations have been assessed and weighed against the benefits of development in these locations. Measures to ameliorate or reduce the consequent impacts to the lowest reasonably practicable extent have been identified.

Site LG1

39. Site LG1 provides the opportunity to make a strategic scale contribution to the District's Objectively Assessed Housing Needs, along with the delivery of supporting infrastructure, adjoining one of the main towns identified by Policy SP2 of the Plan and in accordance with paragraph 52 of the NPPF. There are not considered to be any insurmountable non-Green Belt constraints to development of the site which cannot be addressed through the policy requirements of the plan.

Site LG3

40. Site LG3 provides the opportunity to make a contribution to overall housing requirements and five-year land supply adjoining one of the main towns identified by Policy SP2 of the Plan. There are not considered to be any insurmountable non-Green Belt constraints to development of the site which can not be addressed through the policy requirements of the plan.

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

41. All of the land parcels surrounding Letchworth were assessed as making a significant contribution to the purposes of the Green Belt by the 2016 Green Belt Review (CG1, Figure 2.8, p.31). However the Green Belt Review also took a fine grained approach to the assessment, further dividing the parcels into sub-parcels and also assessing individual sites.
42. The assessment found that the contribution of site LG1 was significant for two of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.118 assessed as site reference NL).
43. The assessment found that the contribution of site LG3 was significant for two of the four purposes of Green Belt assessed with an overall moderate contribution (CG1, p.117, assessed as site reference L/r13).

Table A: Contribution of allocations in Letchworth to the purposes of Green Belt

| Site | Green Belt purpose | | | | Overall contribution |
|----------|--------------------|-------------|-------------|----------|----------------------|
| | Sprawl | Merge | Countryside | Historic | |
| Site LG1 | Moderate | Significant | Significant | Limited | Moderate |
| Site LG3 | Limited | Significant | Significant | Moderate | Moderate |

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?

44. Actions have been specified as conditions which must be satisfied before the grant of planning permission on the allocated sites.

Site LG1

45. Policy SP15(e) (LP1, p.63) requires the inclusion of “Structural planting to create a sense of place, integration into the surrounding landscape and a long-term, defensible Green Belt boundary, particularly to the north-west and east.”

Site LG3

46. The site-specific criteria for site LG3 (LP1, p.182) include:
- The inclusion of structural planting to reinforce the Green Belt boundary along the north-eastern perimeter of the site; and
 - Sensitive design and/or lower density housing where the site affects the setting of the Norton Conservation area.

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

47. Through the actions specified in the allocation criteria as set out above, the adjacent Green Belt to LG1 and LG3 will continue to contribute to the purposes of Green Belt.

48. The assessment of the strategic land parcels and sub-parcels in CG1 shows that land beyond the proposed allocation boundaries already serve Green Belt purposes (CG1, Figure 2.8, p.31 and Figure 3.6, p.66).

49. The adjacent Green Belt land would continue to play an important role in, in particular, preventing encroachment and maintaining the separation of Letchworth from Baldock.

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?*

50. The extent to which existing settlements might be further expanded in order to meet future need is finite particularly given the dense settlement pattern in existence at the more sustainable locations in the west and central areas of the District.

51. The review and release of land undertaken as part of this plan would extend Letchworth to its logical maximum to both the north and the east. Proximity to Hitchin precludes any realistic prospect of future expansion to the west.

52. The remaining land within the Green Belt assessed as sub-parcels 22c and 22d by CG1 respectively provide a significant role in preventing encroachment into the countryside and preserving the setting of Letchworth.

53. The Plan recognises that, in the longer-term, continual incremental additions to existing settlements may not be the best solution (LP1, paragraph 4.100, p.50). It is presently anticipated that alternative options for accommodating growth in future plan periods are likely to first necessitate exploration of a new settlement approach and the operation of the Duty to Co-operate rather than pursuing further expansion of settlements located within the Metropolitan Green Belt. However, each settlement will need to be assessed for further expansion capacity to inform this process.

54. It is the intention of the plan that the Green Belt boundaries amended by the plan to accommodate growth of settlements will endure beyond the plan period in order to continue to ensure the Green Belt continues to perform its key strategic functions.

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

55. Green Belt boundaries have been determined with a view to achieving the most sustainable pattern of development. The new Green Belt boundaries have been established in order to accommodate the reasonable maximum of development that can be accommodated within the District at the present time in accordance with the settlement hierarchy.

56. This seeks to allocate development to higher order settlements in the first instance in accordance with Policy SP2 (as amended) and supported by the Sustainability Appraisal in (LP4, Section 4). This approach to the distribution of development and the establishment of enduring Green Belt boundaries is supported as the most sustainable approach to achieving the development needs over the plan period.

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?

57. Every effort has been made to clearly define the Green Belt boundaries around allocated sites using physical features such as roads and watercourses that are readily recognisable and likely to be permanent.

58. Where no such permanent features exist, or where use of such features would necessitate release of substantial additional land beyond the proposed allocation boundary from the Green Belt, it has been necessary to use semi-permanent existing features such as field boundaries, hedgerows, public rights of way and / or tree belts.

59. Where no features exist the allocation criteria specify that the allocation should seek to establish a landscape feature that will sufficiently contain the site and be identifiable as the Green Belt boundary such as through the establishment of hedgerows or tree belts.

Site LG1

60. There are currently limited existing features that can be used to define a new Green Belt boundary around the limits of LG1. A boundary has been identified based where possible on these features or their alignment. New structural planting will be required to establish and reinforce the new boundary.

61. This boundary will consist of (clockwise from the west) and as shown on the Policies Map:

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- A broad continuation of the boundary alignment drawn across the rear of properties on Avocet in a NNE direction using an existing hedgerow as far as Footpath 32a;
- New planting to create a boundary continuing on this alignment from the north of Footpath 32a to the track and hedgerow at the northern corner of the allocation;
- Following this track in a ESE direction to the point where it bears north towards Norton Road;
- New planting to create a boundary continuing on the same broadly ESE alignment to its intersection with Footpath 31;
- Following Footpath 31 broadly S; and
- New planting in a broadly SSW direction from Footpath 31 to align with the rear of existing properties on Eastern Way.

Site LG3

62. The current Green Belt boundary is poorly defined by the urban to rural fringe including allotments and the boundaries of an industrial area.
63. The proposed alteration to the boundary is already defined for much of its length by a track connecting to the Letchworth Greenway and a well established dense tree belt and will create an almost straight line 'connection' in a broadly NNW direction between the current Green Belt boundary to the east of the industrial properties on Blackhorse Road and the residential properties to the south of Norton Road.

Question 10.15 *Is the proposed settlement boundary:*

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

64. The approach to establishing Green Belt boundaries and therefore the settlement boundary of Letchworth is discussed in the Council's answer to question 10.14(g) above.
65. Beyond the two proposed site allocations, no further alterations are proposed to the Green Belt boundary around Letchworth.
66. A map showing the existing and proposed settlement extent to the north of Letchworth is attached to this Statement as Appendix B to aid interpretation.

Appendix A: Proposed modifications to Policy SP15

Policy SP15: Site LG1 – North of Letchworth Garden City

Land to the north of Letchworth Garden City, as shown on the Proposals Map, is allocated as a Strategic Housing Site for approximately 900 homes. Planning permission for residential development will be granted ~~where~~ **provided that** the following site-specific requirements are met:

- a. A site masterplan to be ~~approved~~ **secured** prior to the ~~submission~~ **approval** of any detailed matters which also sets out;
 - i. How the site will follow and implement Garden City principles;
 - ii. The most appropriate points of vehicular access considering landscape and traffic impacts;
 - iii. An appropriate education solution ~~with a presumption in favour of on-site provision of~~ **which delivers** a new **2FE** primary school **on-site**; and
 - iv. Any measures required to address nearby heritage assets including the Scheduled Ancient Monument at Radwell Lodge and the Croft Lane and Norton Conservation Areas;
- b. Neighbourhood-level retail and community facilities providing around 900m² (net) of A-class floorspace;
- c. At least 9 serviced plots for self-build development;
- d. Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach;
- e. Structural planting to create a sense of place, integration into the surrounding landscape and a long-term, defensible Green Belt boundary, particularly to the north-west and east;
- f. Diversion and / or re-provision of the Letchworth Greenway to provide a revised route around the new urban edge.
- g. Undertake a detailed odour assessment to demonstrate no adverse impact on future residents and occupants of non residential buildings.**

4.187 Letchworth holds a special place as the world's first garden city. Although development of the town to Ebenezer Howard's original vision of 32,000 residents has been achieved, it is considered there remains scope for a sensitive extension of the town to the north, which respects the town's original ideals while making provision for the needs of the 21st Century. A masterplan will be required for this site which demonstrates how these principles will be incorporated.

4.188 The masterplan will also be required to demonstrate an access solution which works in both highway and urban design terms. Previous work has shown that a new access from ~~Stofford~~ **Norton** Road could be accommodated in landscape terms³. However, this needs to be balanced against a requirement to properly

³ Land north of Letchworth: landscape sensitivity study (LUC, 2013)

integrate this site with the existing Garden City. At the same time, any impacts upon the existing local highway network need to be managed within acceptable limits.

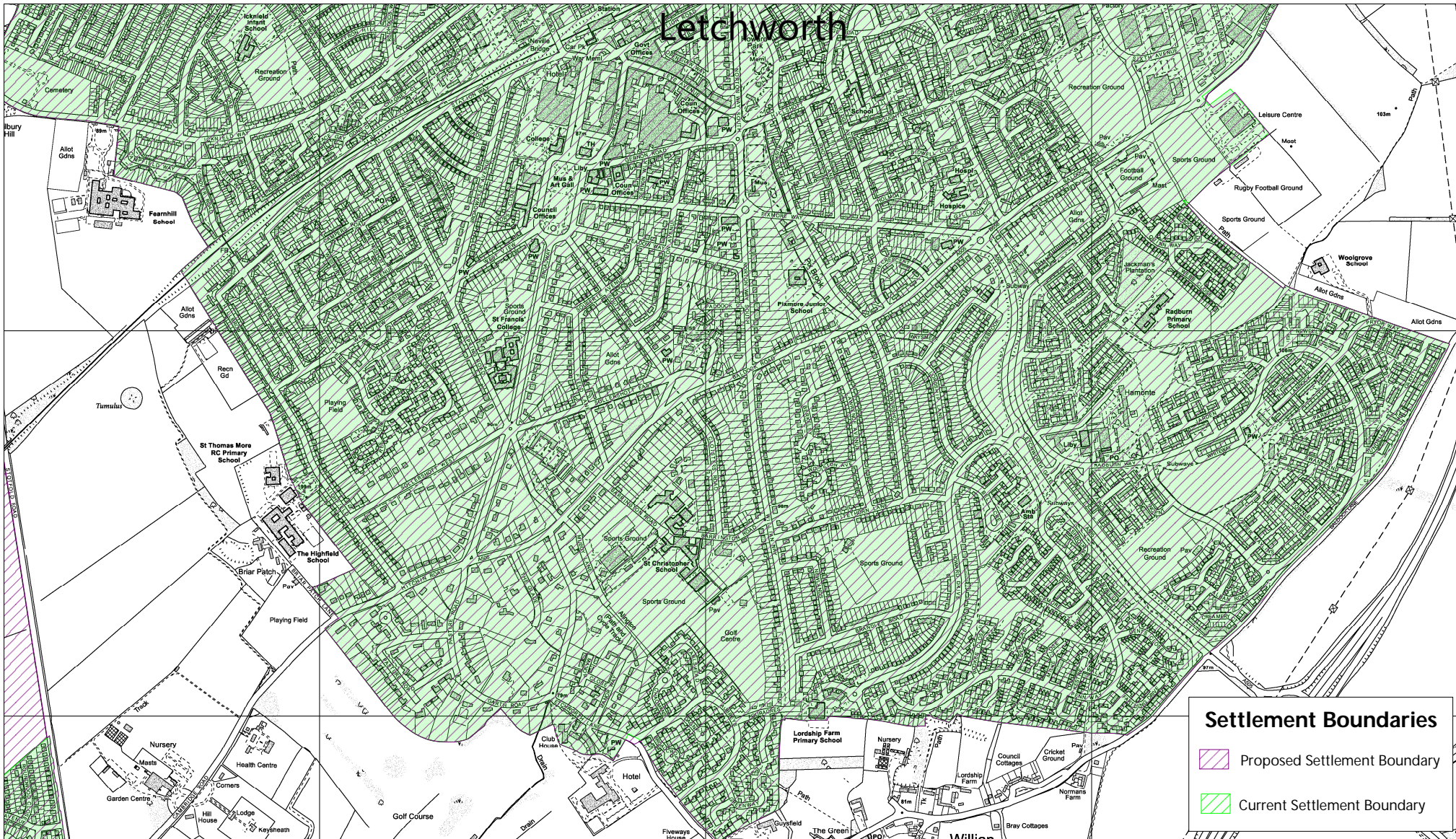
- 4.189 Sites at this scale generate enough demand to support the provision of new primary schools on-site. ~~The presumption is that Ssite LG1 will follow this principle.~~ However, the irregular shape of the site and the location of surrounding schools ~~and an existing reserve school site in the area~~ mean that this requires further consideration **through the masterplanning process to ensure existing school intake and travel patterns are not unduly affected.**
- 4.190 Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable.
- 4.191 This site forms part of the elevated northerly edge to Letchworth. Much of the site is relatively flat though falls away to the north-west towards Pix Brook and to the north / north east to the Ivel Valley, with several ordinary watercourses on the site draining broadly in these directions.
- 4.192 Our evidence shows that, within the plateau on which most of the site sits, there is only low landscape sensitivity to development. In the peripheral areas, there are views across a much wider landscape which continues into neighbouring Central Bedfordshire⁴.
- 4.193 Although parts of the north-eastern boundary are quite clearly defined, there are currently limited features demarcating the north-west and eastern edges of the site. These should be addressed in a comprehensive strategy which limits any harm to the wider landscape and preserves the setting of nearby heritage assets whilst creating new defensible limits to the town.
- 4.194 The Letchworth Greenway is an off-road circular route around the edge of the town. It was constructed in 2003 to celebrate the town's centenary. Development of this site will result in incorporation of part of the existing Greenway into the urban area. These affected sections should be re-routed and re-provided as part of any application. The possibility of providing radial link paths from the existing urban area, through the site to the Greenway (and beyond) should be explored as part of a comprehensive green infrastructure strategy.
- 4.xxx An odour assessment will need to demonstrate that a suitable distance is provided between Letchworth Garden City Water Recycling Centre and sensitive development (defined as buildings which are regularly occupied) as part of the detailed masterplanning of the site.**

⁴ Land north of Letchworth: landscape sensitivity study (LUC, 2013)

Appendix B: Current and proposed settlement extent of Letchworth Garden City



Letchworth Garden City (South)



Scale: 1:14142
Date: 10:10:17

