

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 (sites outside of the Green Belt)

Note: *This Statement relates to sites in Letchworth which are not located within the Green Belt: Sites LG4, LG5, LG6, LG8, LG9, LG10, LG13, LG14, LG15, LG16, LG17 & LG18*

Question 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. All landowners of the proposed allocations at Letchworth have confirmed that their sites are available for residential development (ED3, pp.16-17). Table A indicates the representation to the Regulation 19 consultation and summarises the availability and deliverability of all relevant sites.

Table A: Confirmation of Site Availability and Deliverability.

| Site | Name | Representation to Reg. 19 Consultation | Deliverability Summary |
|-------------|---|---|---|
| LG4 | Land north of former Norton School, Norton Road | Representor reference 14046 | Hertfordshire County Council (HCC) will be bringing forward this development as lessees. The freeholders support the development. |
| LG5 | Land at Birds Hill | Representor reference 9861 | There are various leasehold interests on this site. Most of these tenancies will end during the plan period, which will enable the Freeholder to take a masterplan approach to the delivery of this site through phases |
| LG6 | Land off Radburn Way | Representor reference 14046 | Part NHDC and part HCC owned site. Planning permission granted on HCC owned parcel (ED3, para 3.6, p.7). An access option exists for the NHDC parcel through the adjoining land or alternatively there is potential for access from Radburn Way through existing garage court |

| Site | Name | Representation to Reg. 19 Consultation | Deliverability Summary |
|------|----------------------------------|--|--|
| LG8 | Pixmore Centre, Pixmore Avenue | Representor reference 9861 | Ground lessees are promoting the development, but are supported by the freeholders subject to the relocation of existing businesses within Letchworth. |
| LG9 | Former Lannock School | Representor reference 14046 | Outline planning application for 44 homes submitted by HCC September - 2017 ¹ . |
| LG10 | Former playing field, Croft Lane | Representor reference 14046 | Deliverable HCC owned site. Consultants have been appointed to work up a scheme to support the allocation. |
| LH13 | Glebe Road industrial estate | Representor reference 9861 | The freeholder supports the development of the site which is free from lessees. |
| LG14 | Site at Icknield Way | Representor reference 9861 | Ground lessees are promoting the development, but are supported by the freeholders. |
| LG15 | Garage, Icknield Way | Representor reference 9861 | Ground lessees are promoting the development, but are supported by the freeholders. |
| LG16 | Foundation House | Representor reference 9861 | Prior approval for conversion from office to 16 residential units. Site advertised for sale with vacant possession of existing office anticipated by May 2018. |
| LG17 | Hamonte | Planning permission granted | Planning permission for 71 units (gross) (32 units net) granted May 2017 (ED3, para 3.8, p.8)[16/02915/1]. |
| LG18 | Former Depot, Icknield Way | Representor reference 9861 | Development of the site is supported by the freeholder, but it is held on a long ground lease to North Herts District Council who are promoting residential development of the site. |

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

- No site specific objections to the allocations have been received from the highways authority. These sites are within the current limits of Letchworth Garden City. They either have existing highway frontage allowing for vehicle and pedestrian access to be directly taken from and connected to the highway network, or provide the opportunity to create such access connections.

¹ NHDC application reference: 17/01280/1

3. 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).
4. 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?

5. Yes. All sites have been considered through the SHLAA and are considered suitable locations for development having regard to potential constraints (HOU9, see Appendix 3, p.26 and Appendix 4, pp.41-43). This is expanded upon in answer to Issue 10.12 below. Table B below identifies the relevant SHLAA site references.

Table B: SHLAA site references for non Green Belt allocations in Letchworth

| Local Plan site reference | Name | SHLAA site reference(s) |
|----------------------------------|---|--------------------------------|
| LG4 | Land north of former Norton School, Norton Rd | L/r18 |
| LG5 | Land at Birds Hill | L/r16 |
| LG6 | Land off Radburn Way | 337, L/r24 |
| LG8 | Pixmore Centre, Pixmore Avenue | 234, 356 |
| LG9 | Former Lannock School | L/o2 |
| LG10 | Former playing field, Croft Lane | L/o7 |
| LG13 | Glebe Road industrial estate | 339 |
| LG14 | Site at Icknield Way | 354 |
| LG15 | Garages, Icknield Way | 355 |
| LG16 | Foundation House | 338 |
| LG17 | Hamonte | 357 |
| LG18 | Former Depot, Icknield Way | L/r02 |

6. The sites have been subject to consultation with a range of statutory providers. The Infrastructure Delivery Plan (TI1), feedback from key infrastructure providers and the 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.
7. The likely significant environmental affects of allocating the sites have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.515-517 and pp.594 - 612)².

² Page references in LP4 are to the "NHDC Page Number" in the top-left hand corner

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, p.182-185).
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. A modification to the supporting text in the Letchworth section of Chapter 13 of the Plan (LP1, para 13.228, p.188) is proposed to more effectively address transport infrastructure and reflect the aims of the transport strategy:

13.228 Schemes in Letchworth will be required to make reasonable contributions towards these schemes and / or other schemes in nearby locations (see Baldock and Hitchin sections of this chapter in particular) where traffic generation arising from new development will have an impact. ***In addition schemes will be required to make contributions to walking and cycling schemes in Letchworth which aim to influence mode share and free up capacity for new development.***

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 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 one of the towns 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. The proposed allocations lie within the existing urban area and consequently do not require amendments to the Green Belt boundary in order to bring them forward for development.

14. The proposed allocations within Letchworth are within the existing urban area and represent a range of brown and green field development opportunities. The likely impacts of development for each of the sites are shown in Table C.

Table C: Impacts of development of non Green Belt allocations in Letchworth

| Site | Name | Impact of Development |
|------|---|--|
| LG4 | Land north of former Norton School, Norton Road | Loss of playing field and potential impact on the Croft Lane Conservation Area, Letchworth Conservation area and Grade II listed buildings. |
| LG5 | Land at Birds Hill | Previously developed site currently in employment use and subject to employment designation. Loss of employment land. Possible conflict between residential development and any retained employment uses. Potential impact on the setting of the Letchworth Conservation area and Grade II listed buildings. |
| LG6 | Land off Radburn Way | Number of dwellings proposed for the site reflects the need for separation from the existing surrounding residential properties. Potential impacts on orchard habitat which is to be retained or re-provided. |
| LG8 | Pixmore Centre, Pixmore Avenue | Previously developed site currently in employment use and subject to employment designation. Loss of employment land. Possible conflict between proposed residential development and any retained employment uses to be resolved. Potential impact on setting of the Letchworth Conservation area and Grade II Listed buildings. |
| LG9 | Former Lannock School | Number of dwellings proposed for the site reflects the retention of a sense of openness to help mediate the relationship with the surrounding residential uses. Loss of open space. |

Matter 10 (Letchworth Garden City, sites outside of the Green Belt), North Hertfordshire District Council

| Site | Name | Impact of Development |
|-------------|----------------------------------|---|
| LG10 | Former playing field, Croft Lane | Subject to access considerations as the existing access is narrow. Loss of playing fields. The number of dwellings proposed on the site reflects the surrounding low density residential uses. Potential impacts on Croft Lane Conservation Area and setting of nearby Grade II Listed Buildings. |
| LG13 | Glebe Road industrial estate | Previously developed site currently in employment use and subject to employment designation. Loss of employment land. Potential impacts on Letchworth Conservation Area. |
| LG14 | Site at Icknield Way | Potential impacts on the setting of Letchworth Conservation area. |
| LG15 | Garage, Icknield Way | Previously developed site where the proposed use is in keeping with the surrounding residential development. |
| LG16 | Foundation House | Previously developed site of offices which has gained prior approval for residential conversion. Some scope for tension between retained employment uses to the west but site is bounded by residential development to the north and east. Loss of employment land. Potential impacts on the setting of the Letchworth Conservation Area. |
| LG17 | Hamonte | Previously developed site of a residential institution which has gained planning permission for redevelopment for residential use. |
| LG18 | Former Depot, Icknield Way | Previously developed site with residential development to the north. Possible conflict between residential use and adjacent railway to be considered. |

15. The issues listed in Table C are all addressed in the site-specific criteria identified for each of the sites (LP1, pp.182-185). These have been guided by responses received from key consultees as the Plan has been developed. Any impacts can be managed through the application of the site-specific criteria, appropriate detailed design and the application of the detailed development management policies of the Plan.
16. The Housing and Green Belt Background Paper summarises the reasons for the selection of these sites as housing allocations in the Plan (HOU1, Appendix 2, p.57). The allocation of these sites will make a contribution to the overall housing numbers that are achievable through the Plan and are also important in their contribution to achievable levels of five-year housing delivery.

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

17. The proposed allocations represent all reasonable alternatives for the development of housing within Letchworth that are considered to be suitable, available and achievable for allocation over the plan period. There are no reasonable alternative uses of the sites that will enable the Council to meet its OAN.

Question 10.14 (a) to (g)

18. Not applicable. A separate statement addresses sites LG1 and LG3.

Question 10.15 Is the proposed settlement boundary:

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

b) appropriate and justified?

19. 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) in the corresponding statement relating to Green Belt sites at Letchworth.

20. None of the sites addressed in this statement result in any further alterations.