

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

**Matter 11 – The housing allocations and the settlement boundaries: The Category A villages – Lower Stondon**

**Note:** *This Statement relates to site LS1*

***11.47 Is the proposed housing allocation deliverable? In particular, is it:***

***a) confirmed by all of the landowners involved as being available for the use proposed?***

1. Yes. A planning application for site LS1 was submitted to the Council for consideration in September 2017 (Application reference: 17/02175/1).

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

2. Yes. No site specific objection to the allocation has been received from Hertfordshire County Council (HCC). In response to the current planning application, HCC state that they have no objection to the principle of the proposed development.
3. Detailed design work and justification will be needed in order to support a reduction in the speed limit from the current 60mph on the A600 to facilitate the access. This is an issue to be addressed through development management processes as identified in the Plan (LP1, paragraph 13.244, p.191).
4. There is an existing footpath along the eastern edge of the A600. There are also potential opportunities to link cycle and pedestrian access into recent development on the southern edge of Lower Stondon. A site-specific criterion requires sensitive integration of these modes into the existing settlement (LP1, p.190).
5. The baseline 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).
6. 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 mitigations measures to ensure the continued operation of the highway network for which reasonable contributions will be sought. This may include

contributions towards improvements within Hitchin where several junctions are identified as requiring mitigation (LP1, paragraph 13.243, p.191). The impacts on the A600 should also be considered. A modification to the supporting text at paragraph 13.244 is proposed for effectiveness:

“Site LS1 will require the creation of a new access onto the A600 Bedford Road. The most appropriate solution, along with any consequential works – such as changes to speed limits entering / exiting the village from / to the north – will be explored through transport assessments. **Any transport assessment should also consider the traffic implications for the A600, and the junction of the A600 and Turnpike Lane, where improved facilities for pedestrians and cyclists may mitigate higher traffic volumes.**”

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

7. Yes. This site has been considered through the SHLAA and is considered a suitable location for development having regard to potential constraints (HOU9, site ref 331. See Appendix 3, p.25 and Appendix 4, p.39). This is expanded upon in answer to Issue 11.48 below.
8. All sites in the plan 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. The likely significant environmental affects of allocating the site have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.518, 616-618)<sup>1</sup>.
9. No fundamental constraints to development have been identified. Site-specific infrastructure and / or mitigation measures are identified as policy measures in the plan (LP1, Site LS1, pp.190-191).
10. The Plan recognises that it will be necessary to consider the interaction of this site with the existing settlement and facilities within Central Bedfordshire’s (CBC) administrative area.
11. The Regulation 19 representations of HCC, in their role as education authority, state that CBC advised there may be some expansion potential at Derwent Lower or Stondon Lower School and that the development was not considered to impact upon the provision of primary school places in Ickleford<sup>2</sup>.

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<sup>1</sup> Page references in LP4 refer to the NHDC page number in the top-left corner of the document

<sup>2</sup> Respondent ID 14046, p.19

12. 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.

***Question 11.48 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?***

13. Yes. 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.

14. Lower Stondon is identified as a Category A settlement within the plan. Beyond the towns these are considered the more sustainable locations where some development should be directed.

Site LS1

15. Site LS1 lies to south of Lower Stondon in an area currently designated as Rural Area Beyond the Green Belt. The site provides an opportunity to make a contribution to the District's future housing needs and five-year housing land supply.

16. The majority of the site lies within the Pirton Lowlands landscape character area as identified in the Council's evidence base (CG16a). The Pirton Lowlands (pp.114-119d) are considered to be of moderate to low sensitivity and low landscape value. The site immediately adjoins the edge of the River Oughton and Purwell Valleys landscape

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character area (pp.109-113c). This is considered to be of moderate sensitivity and moderate low landscape value.

17. The site is bounded and defined on three sides by the existing limits of Lower Stondon and RAF Henlow to the north, the A600 to the west and the access road to Old Ramerick Manor to the south. The eastern boundary is demarcated by the curtilage of buildings associated with the Manor and a field boundary.
18. The site is considered to be of low to medium ecological sensitivity. In response to the current planning application, neither Hertfordshire Ecology nor the Herts and Middlesex Wildlife Trust object to the principle of development on the site. Concerns are raised in relation to the detailed articulation of assessment and mitigation measures. These are detailed development management considerations that can be controlled through the application of generic policies and / or conditions. They do not call into question the fundamental suitability of the site for allocation.
19. Potential constraints identified by the SHLAA include an area of flood risk along northern edge of site. The site specific criteria state no residential development should occur within Flood Zones 2 or 3.
20. 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.
21. The site is traversed by the route of a former railway line. The SHLAA identified a potential source of contamination on the site as a consequence of this. In response to the current planning application, the Council's Environmental Health team have advised that the accompanying reports identify that the site is not impacted by contamination and there is no requirement for a land contamination condition.
22. The southern boundary and part of the eastern boundary of the site are bounded by Public Rights of Way.
23. The Grade II\* listed Old Ramerick Manor lies to the east of the proposed allocation.
24. In response to concerns raised by Historic England over the potential allocation of the site, the Council requested the completion of a Heritage Assessment to assess the significance of the asset and potential harm arising from the proposed allocation. This was completed on behalf of the site promoter in April 2016.
25. The immediate setting of the Manor and the open agricultural land it faces to the south will not be affected by the proposed allocation. The intervening agricultural and residential buildings and landscaping provide physical and visual separation between Site LS1 and the Manor.

26. These issues are addressed as necessary in the site-specific criteria identified for the site (LP1, Site LS1, pp.190-191). 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 these, appropriate detailed design and the application of the detailed development management policies of the plan.
27. In particular, the dwelling estimate for the site is predicated on the need to design any scheme so as to avoid development within Flood Zones 2 and 3 and to minimise harm on Old Ramerick Manor.
28. The Council considers that, with appropriate assessment and mitigation through detailed design, any harm arising from the proposed development of LS1 to the significance of this asset would be less than substantial. In pursuing this allocation, this has been weighed against the public benefits of use of the site for residential development.
29. The Housing and Green Belt Background Paper summarises the reasons for the selection of site LS1 (HOU1, Appendix 2, p.61). The allocation of site LS1 makes a significant contribution to the additional overall housing numbers identified since the Preferred Options stage and the five-year land supply. On balance, the positive opportunities afforded by this site are considered to outweigh harms.
30. The above findings, derived from the Council's own evidence base and the heritage assessment specifically requested to inform the proposed allocation, have been supplemented by additional work conducted by the site owner to support the current planning application. This work is publically available and provides reassurance that a number of the issues identified are being actively addressed.

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

31. In accordance with the settlement hierarchy it has been established that a quantum of development should be directed towards category A villages. Lower Stondon is defined as such a settlement benefitting from access to a good range of services.
32. The proposed allocation of Site LS1 represents one of a number of alternatives for the expansion of the settlement of Lower Stondon. However, it is the only alternative available within North Hertfordshire District. It is beyond the scope of the sustainability appraisal to assess alternatives beyond the administrative boundary.
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:

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- In or adjoining other village locations; and / or
- Within the Green Belt; and / or
- Subject to flood risk constraints which make them sequentially less preferable for allocation than the parts of this site within Flood Zone 1

**Question 11.50** *Is the proposed settlement boundary:*

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

**b) Appropriate and justified?**

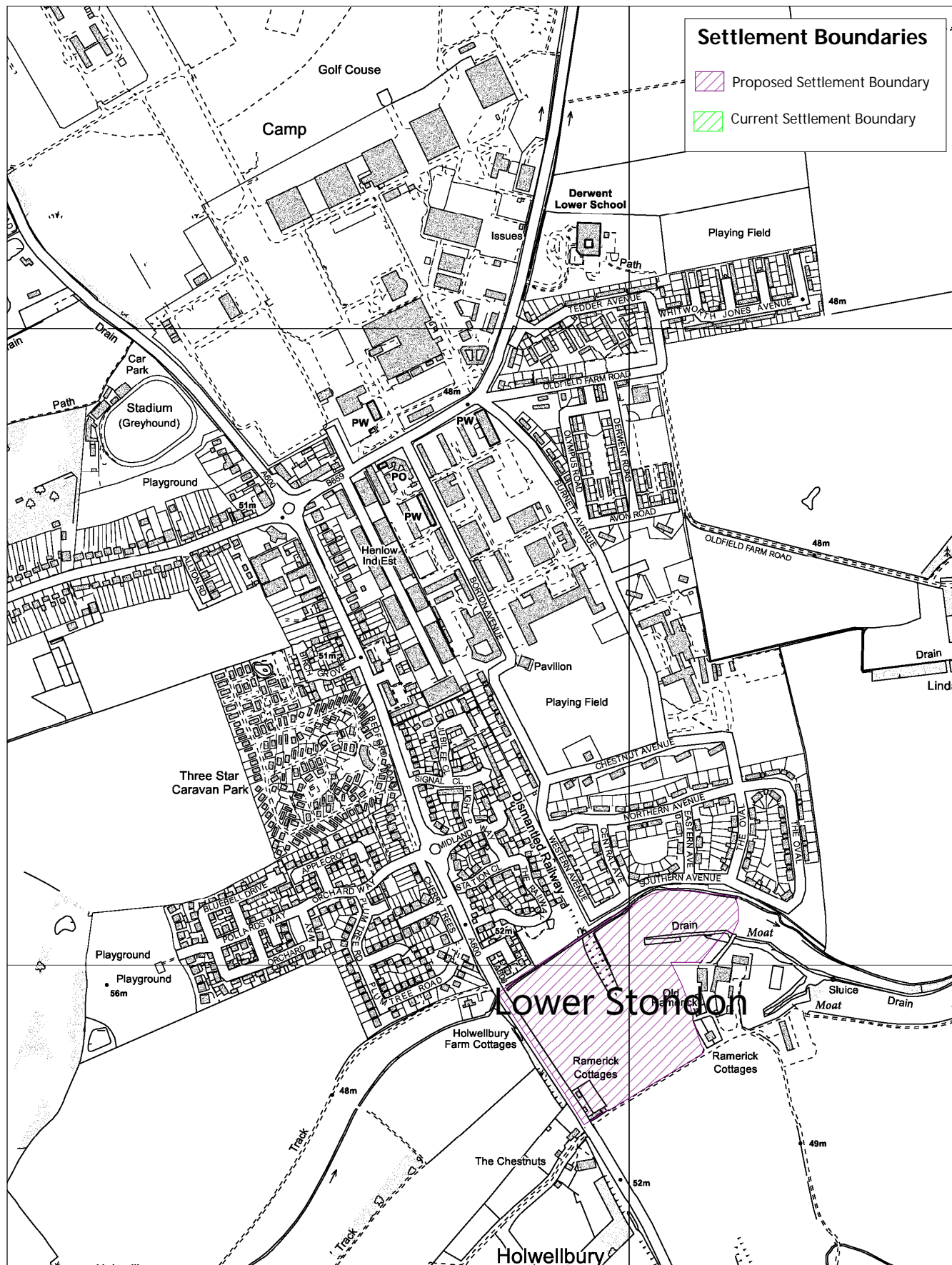
35. Since Lower Stondon lies almost entirely within Central Bedfordshire, the settlement boundary proposed within North Hertfordshire largely follows the outer edges of the proposed allocation along its eastern and southern sides. The existing cottages located at the corner of the A600 and the access track to Old Ramerick Manor are also incorporated within the settlement boundary to ensure its coherence.

36. As set out in Paragraph 17 above, the proposed boundary features are clearly identifiable on the ground.

37. A map showing the existing and proposed settlement boundaries for Lower Stondon are attached to this Statement as Appendix A to aid interpretation.

**Appendix A: Current and proposed settlement extent of Lower Stondon**

## Lower Stondon



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Date: 10:10:17

