



Strategic Planning & Research Unit

For and on behalf of  
**Linden Homes Strategic Land (Eastern)**  
**New Road (Ashbrook) Ltd. and the Taylor Family**

Examination of North Hertfordshire Local Plan  
Representations to Inspector's MIQs Hearings  
**Matter 2**

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## 2.0 MATTER 2 – SUSTAINABLE DEVELOPMENT: THE SETTLEMENT HIERARCHY POLICY SP2)

**Q2.1 - Policy SP2 sets out the Plan's settlement hierarchy. This comprises four tiers – Towns, Category A Villages, Category B Villages and Category C Settlements.**

### **a) Is each settlement placed within the most appropriate tier?**

- 2.1 We do not have an issue with the identification of the four principal towns. It is as a matter of fact that they are the predominant urban areas within North Hertfordshire, notwithstanding that the four towns each have their own distinct scale, location and functional characteristics – Royston and Baldock as small towns at the foot of the chalk downs, Letchworth with an essential history as the first garden city and Hitchin as the main market town – albeit that it is neither the administrative centre nor significantly the largest of the settlements.
- 2.2 The scale of growth proposed at Baldock (an approximate increase of 62% in the housing stock on a single site) is tantamount to being a new community. As such we question whether its treatment as an urban extension in common with others proposed is appropriate, particularly given that commencement will be dependent on significant infrastructure works and that development is expected to continue beyond the plan period.
- 2.3 Nor do we, in principle, have objection to recognising the Luton and Stevenage sites immediately on the boundary of the District; and that some development as an extension to either of these settlements, but within North Herts would be sustainable.
- 2.4 However, the Plan's approach to them seems to be different. At Luton, an urban extension is explicitly to meet Luton's unmet needs, with just 200 homes to meet the needs of North Herts. North of Stevenage, the proposed allocation is solely to meet North Herts' needs rather than that of Stevenage. The location appears to be an expedient approach with regard to the location at which demand actually arises within the district.
- 2.5 If future housing demand and need is distributed in the same way as the existing population, because for example the needs are generated by the existing population and future migrants may predominately seek to locate in the areas that are already popular then the table on the next page provides an initial view of the distribution of demand within the district.
- 2.6 This table also highlights the SHLAA's assessment of capacity (although it does not provide evidence on completions since 2011 or existing commitments). What the table does appear to illustrate is that according to the SHLAA evidence only Baldock out of the 4 main settlements has the capacity to meet its proportionate level of need.
- 2.7 The implications of this increased level of demand is that the approach in the SHLAA needs to be revisited in the case of the main settlements to re-evaluate the identified constraints to delivery additional development in these most sustainable locations.

**Table 1 Distribution of future demand for housing by 2011 population**

Area	2011	Pro-Rata Distribution of Housing	Total for Urban Area	Estimated capacity from SHLAA
Arbury	2,696	394		69
Baldock East	2,846	416		
Baldock Town	7,434	1,088	<b>1,504</b>	<b>3,625</b>
Cadwell	2,194	321		361
Chesfield	7,346	1,075		
Codicote	2,593	379		431
Ermine	2,608	382		325
Hitchin Bearton	8,489	1,242		
Hitchin Highbury	7,762	1,136		
Hitchin Oughton	5,085	744		
Hitchin Priory	4,388	642		
Hitchin Walsworth	7,877	1,153	<b>4,917</b>	<b>1,802</b>
Hitchwood, Offa and Hoo	7,261	1,062		
Kimpton	2,167	317		13
Knebworth	5,247	768		791
Letchworth East	5,818	851		
Letchworth Grange	7,117	1,041		
Letchworth South East	7,566	1,107		
Letchworth South West	7,515	1,100		
Letchworth Wilbury	5,233	766	<b>4,865</b>	<b>1,545</b>
Royston Heath	4,919	720		
Royston Meridian	5,432	795		
Royston Palace	5,430	795	2,309	1,078
Weston and Sandon	2,091	306		42
<b>Total</b>	<b>127,114</b>	<b>18,600</b>		

**b) What factors have been taken into account when deciding which tier each settlement should be placed in?**

2.8 We have no comments beyond those made above

**c) Is the hierarchy supported by the Sustainability Appraisal?**

2.9 There is no clear indication from the assessment at Appendix 3 of the SA (3.1 Housing) why the preferred option is chosen or what the consequence might be of an alternative option – or a rebalancing of the elements contributing to the preferred option – insofar as the SA draws the same conclusion/recommendation with respect to all of the options including the rejected option of a new settlement.

2.10 The SA however does single out the landscape impacts for Option c on the extension of Luton and Stevenage but with no clear indication what weight this might carry in the selection of the preferred basket of options and therefore whether the balance of options could be adjudged sound.

2.11 Overall it is unclear what the impacts on sustainability might have been from a strategy which focused a higher level of growth by way of urban extensions to the in the four principal towns.

**Q2.2 - Through Policy SP2, the “majority of the District’s development” is directed to the Towns. “General development” is allowed within the defined boundaries of Category A Villages. “Infilling development which does not extend the built core of the village” is allowed in Category B Villages. “Only limited affordable housing and facilities for local community needs” are allowed in Category C Settlements.**

**a) Should Policy SP2 be more specific about the amount of different types of development that is anticipated in each tier of the hierarchy, or even in each settlement?**

2.12 We ask that the Council produces a table listing each settlement, noting its place in the hierarchy, and setting out the amount of new development – housing, employment, retail etc – anticipated. For each entry the table should clearly show the source of development – whether through a strategic or local allocation in the Plan or anticipated through windfall or other source. This will greatly assist the examination hearings in disaggregating the effects of the broad intentions expressed in Policy SP2.

2.13 In particular, such a table would help illustrate the role of each settlement in meeting the OAN and provide a sense check for the settlement hierarchy.

2.14 It would also allow for the clearer correlation of housing and employment land allocations.

2.15 The table on the next page illustrates that the pattern of distribution of development does not follow the existing pattern of development within the District. All of the main urban areas are accommodating substantially less than their pro rata housing requirement based upon their population.

2.16 It is noticeable that Hitchin is accommodating far less development than the much smaller settlement of Baldock, the level of allocations are below the assessed level of urban capacity.

**Table 2 Distribution of allocations compared to population and urban capacity**

Area	2011	Pro rata distribution of housing	Total housing for Urban Areas	Estimated capacity from SHLAA	Total allocated, completed and permitted	Percent of population	Percent of allocation
Arbury	2,696	394		69	95	2%	1%
Baldock East	2,846	416					
<b>Baldock Town</b>	<b>7,434</b>	<b>1,088</b>	<b>1,504</b>	<b>3,625</b>	<b>3,290</b>	<b>8%</b>	<b>18%</b>
Cadwell	2,194	321		361	333	2%	2%
Chesfield	7,346	1,075			1232	6%	7%
Codicote	2,593	379		431	364	2%	2%
Ermine	2,608	382		325	260	2%	1%
Hitchin Bearton	8,489	1,242					
Hitchin Highbury	7,762	1,136					
Hitchin Oughton	5,085	744					
Hitchin Priory	4,388	642					
<b>Hitchin Walsworth</b>	<b>7,877</b>	<b>1,153</b>	<b>4,917</b>	<b>1,802</b>	<b>1,647</b>	<b>26%</b>	<b>9%</b>
Hitchwood, Offa and Hoo	7,261	1,062			2246	6%	12%
Kimpton	2,167	317		13	45	2%	0%
Knebworth	5,247	768		791	663	4%	4%
Letchworth East	5,818	851					
Letchworth Grange	7,117	1,041					
Letchworth South East	7,566	1,107					
Letchworth South West	7,515	1,100					
<b>Letchworth Wilbury</b>	<b>5,233</b>	<b>766</b>	<b>4,865</b>	<b>1,545</b>	<b>2,167</b>	<b>26%</b>	<b>12%</b>
Royston Heath	4,919	720					
Royston Meridian	5,432	795					
<b>Royston Palace</b>	<b>5,430</b>	<b>795</b>	<b>2,309</b>	<b>1,078</b>	<b>1,712</b>	<b>12%</b>	<b>9%</b>
Weston and Sandon	2,091	306		42	977	2%	5%
<b>Total</b>	<b>127,114</b>	<b>18,600</b>			<b>15031</b>	<b>100%</b>	<b>81%</b>

**b) Should Policy SP2 be more specific about the distribution of the “majority of the District’s development” between the Towns?**

- 2.17 Provision of a table as requested above would assist in identifying the extent to which the principal towns are providing a majority of the development (not just for housing) and might provide an indication as to whether the general statement set out in the policy needs elaboration.
- 2.18 It would also permit correlation with the intention at Table 2: Key Indicators and Targets for Monitoring Policies that at least two thirds of the development should come forward within or adjoining the principal towns.
- 2.19 From the analysis we have undertaken in producing the table above it is clear that this statement is in fact incorrect in that the majority of development is being directed into urban extensions of neighbouring towns that share an administrative boundary with the District.
- 2.20 Towns within the district appear to be accommodating some 48% of the development.
- 2.21 As the proposed urban extensions to adjoin towns will clearly be regarded as extension to those towns, it is less likely that they will be in a position to meet the needs of the district itself.
- 2.22 In the case of Luton is not an issue as this allocation is specifically to meet Luton’s unmet needs. In our calculation of OAN however this still leaves a considerable level of locally generated need unmet and this would be most appropriately accommodated in the larger towns. Certainly, it would appear unless there are significant infrastructure constraints (and we do not consider there are) then a much higher proportion of development should be accommodating with or adjacent to Hitchin.

**c) What is the “general development” that will be allowed in Category A Villages – should the policy be more explicit, for effectiveness?**

- 2.23 It is presumed that ‘general development’ means all forms of developed as opposed to ‘infilling’. The word ‘general’ is probably unnecessary.

**d) Paragraph 89 of the National Planning Policy Framework says that limited infilling in villages in the Green Belt is not inappropriate development. Is the approach to development in Category C settlements more stringent than this? If so, what is the justification for this?**

- 2.24 We have no comments on this.

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