



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 5

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MATTER 5 – THE HOUSING STRATEGY: THE SPATIAL DISTRIBUTION OF NEW HOUSING (POLICIES SP2 AND SP8)

Q5.1 - Policy SP2 aims to focus the majority of the District's development within or adjoining the Towns, and also allows 'general development' within Category A Villages and infilling development in Category B Villages. However, neither Policy SP2 nor Policy SP8 quantifies the spatial distribution of new housing.

a) What is the overall distribution of new housing proposed through the Plan? Should it be clearer in this regard? Would the inclusion of a Key Diagram or some kind of illustration assist?

5.1.1 The preparation of a Key Diagram would demonstrate the inequity of the distribution of housing in relation to the scale and overall sustainability of settlements.

b) What level of new housing is directed towards each of the Towns and the Category A and B Villages?

5.1.2 Hitchin is, significantly, the largest urban area but proportionately has the smallest allocation of growth in percentage and absolute terms.

c) How has this distribution been arrived at and what is the justification for it?

5.1.3 The distribution appears inexplicable. The Plan states that each town has a distinctive role (Vision bullet 6), whilst SP1 refers to maintaining the role of the key settlements. Para 4.11 states the Council wishes to focus the majority of new growth on the towns to make maximum use of existing facilities and so forth.

5.1.4 In this context, Royston is the third largest town with a population of almost 16,000, but whilst beyond the Green Belt, it is constrained by topography and its relationships are as strong with East Hertfordshire along the A10 and with Cambridge, as they are with the core towns in North Herts.

5.1.5 Baldock is a town of 10,000 population, one of the three closely related principal towns, as described at LP1 paragraph 13.14.

5.1.6 Letchworth is the second and central of the three core towns, with a population of 33,000 but specifically characterised by its status as the first and perhaps most important Garden City, and the importance of this is recognised at LP1 para.13.212.

5.1.7 Hitchin is the principal town in terms of population (just over 33,000), historically the main market town (LP1 para. 13.117), but notable for its station on the East Coast Main Line at the junction with the Cambridge route, its range of employment and retail opportunities and its location on the important east-west link between the A1M at Stevenage and the M1 west of Luton – providing the strategic road access to Luton Airport.

5.1.8 Hitchin is proposed to increase its housing stock by 11%. This is significantly less than the growth ascribed to Letchworth (15%), and significantly less than the smaller towns of Royston and Baldock (25% and 73% respectively).

- 5.1.9 Given Hitchin sits to the west of the three principal towns such that any development would not add to the perception of coalescence, planned expansion would not of itself compromise the reason for designating Green Belt.
- 5.1.10 There is no overt explanation why strategic scale growth is not planned for at Hitchin, save for HT1 Highover Farm (Policy SP17) which lies to the north east of the town. Here the Green Belt Study CG1 notes that land southwest of Hitchin (Site 209) is only regarded as having a “moderate” impact on the Green Belt, whereas Highover Farm (HT1) and North of Baldock (BA1) are classified as making a “significant” contribution. So, in Green Belt terms, allocated sites are not necessarily optimised in relation to their Green Belt function and land at South West Hitchin (SWH Site 209) actually scores better than a number of the allocations in the plan – see also our Statement on Matter 7.
- 5.1.11 There is nothing to be found which specifically identifies any insuperable constraints on land at SWH in either CG1 or CG7.
- 5.1.12 Should this Examination accept our proposition in respect of the correct OAN – see our Matter 3 Statement – then there is clearly a need to focus additional growth provision on Hitchin which is demonstrably under contributing to housing provision whilst being the largest and, by definition, the most sustainable location in which such growth can be accommodated.
- 5.1.13 With regard to our Statements on Matter 10, and Matter 7 concerning Green Belt, in simple terms as Baldock and Letchworth can grow northwards on the fringe of Green Belt, so can Hitchin grow south-westwards without giving rise to coalescence with any other Category A or B settlement, or harmful to other of the purposes of the designation.
- d) Is the distribution consistent with the settlement hierarchy set out in Policy SP2?**
- 5.1.14 The distribution may be consistent so far as 70% of housing is directed to the four principal urban areas and to urban extensions of Luton and Stevenage, however within that overarching strategy, there is no recognition of the scale, capacity, sustainability or indeed housing market need within the principal settlements
- 5.1.15 Our Reg19 submission (Section 7, Table 13) sets out a distribution by demand for housing by 2011 population. It demonstrates a shortfall of some 3115 dwellings at Hitchin.
- e) Is the distribution of housing supported by the Sustainability Appraisal, and will it lead to the most sustainable pattern of housing growth?**
- 5.1.16 No.
- 5.1.17 The SA does not fully and adequately consider reasonable alternatives, beyond differing scales of development (LP4 section 4.2). The SA then states that the Council has chosen an option – and effectively not considered any alternative.
- 5.1.18 Appendix 5 of the SA sets out area appraisals – it reviews only the allocations for Hitchin and does not consider reasonable alternatives. This is notwithstanding that consideration has been given to SWH at earlier stages of the evidence base preparation – references in site assessments, landscape appraisal et al.

f) Has the Green Belt, and any other constraints, influenced the distribution of housing and, if so, how?

- 5.1.19 With regard to White Paper "*Fixing our broken housing market*" paragraph 1.39 which effectively advocates a sequential approach to land allocation in areas affected by Green Belt, and having regard to our Matter 3 submission, we have no objection in principle to the allocation of land at Royston outside the Green Belt. We do not believe that locations beyond the Green Belt are capable of delivering significantly more development in the Plan period – albeit there is no overall landscape assessment and as noted, the SA only addresses the preferred option.
- 5.1.20 For the reasons set out in regard to Matter 7, it is necessary to alter green belt boundaries to meet the housing needs of the District – particularly where the exercise of the Duty to Co-operate has resulted in the need to allocate land to meet unmet needs arising in Luton Borough.
- 5.1.21 In doing so, it is necessary to consider the function of green belt in the areas in question but this needs to be in context of the scale and sustainability of the settlement, its housing need and indeed the function of the green belt in question. In short, the green belt south west of Hitchin serves relatively limited function – certainly compared to other flanks of the town – and could be altered whilst retaining those strategic functions in the longer term.

Q5.2 No housing allocations are proposed in the Category B Villages or Category C Settlements. What is the reason for this, and is this approach justified?

- 5.2.1 We have no comments on this question.

Q5.3 – Overall, is the spatial distribution of housing justified?

- 5.3.1 No.
- 5.3.2 There is no evidenced justification for restricting the growth of Hitchin, the largest and on account of the special historic characteristics of Letchworth Garden City, the town most sustainably capable of accommodating planned growth.
- 5.3.3 Moreover, there are significant infrastructure issues in terms of local traffic congestion and more importantly strategic cross County traffic movements which are simply ignored by this Plan.
- 5.3.4 Whilst we acknowledge that T18 refers to an 'off line' east-west strategic connection as an alternative to an on-line improvement to the A602-A505 link, this will not be provided for many years, if at all. The need for relief at Hitchin is acknowledged to be present (T13 para 3.14-3.21) and arising even with no planned development.
- 5.3.5 Framework para 7 identifies that one of the dimensions of sustainable development is the provision of infrastructure needed to support economic growth, that planning should proactively drive infrastructure (paragraph 17 bullet 3) and specifically, that in drawing up plans, local planning authorities should identify infrastructure provision (paragraph 21). Paragraph 31 states that viable infrastructure should be planned to support, amongst other things, the growth of airports and crucially at paragraph 157, it states that local plans should plan positively for the infrastructure required in the area to meet the objectives of the Framework – the golden thread of sustainable growth providing an increase in the supply of homes and economic prosperity.

- 5.3.6 Notwithstanding the long-established need to address acknowledged congestion – which in turn gives rise to air quality issues in Hitchin – the LP is silent on this matter. This is despite the consideration given to the subject particularly in the early preparatory stages of plan making.
- 5.3.7 Read in conjunction with our statements on Matters 3 and 10, our clients proposal can address the immediate traffic issue whilst facilitating completion of a full Hitchin bypass in a later plan period.

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