

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 Hitchin

Question 10.6 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. The majority of landowners of the proposed allocations at Hitchin have confirmed that their sites are available for residential development. ED3, page 15. Table A indicates the representation to the Regulation 19 consultation indicating availability for all sites.

Table A: Confirmation of Site Availability.

Site	Name	Representation to Reg. 19 Consultation / Planning Status	Deliverability Summary
HT1	Highover Farm, Stotfold Road - Within Greenbelt - 700 homes	Bellcross Homes [16525] 6622	Green-Belt, farmed field Outline application expected end 2018 Site subjected to Design Review meeting by HCC Masterplan currently being prepared Statement of Common Ground with NHDC being prepared. Land Available
HT2	Land north of Pound Farm, London Road (St Ippolyts parish) - Within Greenbelt - 84 homes	[16080] 3804 Beechwood Homes Ltd	Green-Belt, paddock Pre-application advice currently being considered by NHDC Land Available

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HT3	Land south of Oughtonhead Lane - Within Greenbelt - 46 homes	The landowner has changed agents but no details have been provided to the council. The council has written to freeholder of the land seeking confirmation of the current availability of the land.	Green-Belt, Scrub-land Availability currently not re-confirmed.
HT5	Land at junction of Grays Lane & Lucas Lane - Within Greenbelt - 16 homes	[16072] 3771 Hill Residential Ltd	Green-Belt. Scrub-land Land Available
HT6	Land at junction of Grays Lane and Crow Furlong - Within Greenbelt - 53 homes	[14323] 4264 Manor Oak Homes Ltd	Pre-application advice provided April 2017 Land Available
HT8	Industrial area, Cooks Way - Within current settlement boundary - 50 homes	The council has written to freeholder of the land seeking confirmation of the current availability of the land.	This site is previously developed land and requires a preliminary risk assessment for contaminated land remediation. The site is partially completed - 18 flats completed 2017. Availability currently not re-confirmed
HT10	Former B&Q - Within current settlement boundary - 60 homes	Agents confirmed land is on commercial let until 2024	The site is flat and the buildings are brick and tile and relatively straightforward to clear. The site is subject to a preliminary risk assessment for any contaminates. Poundland vacated site in 2017. Site secured and being marketed until 2024 when it will be released for housing.

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

2. Each of these sites has been part of the plan preparation process and has been considered by Hertfordshire County Council (HCC). Each site is accessible to the highway and HCC has raised no objections to any of the sites on highway grounds. All sites provide opportunities to connect into the existing footpath network.
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 these sites (TI4, Figures 4.4 & 4.5, pp.14-15). However there may be schemes in the wider network that require further mitigation, such as the A602 route that passes through the southern part of Hitchin at its junctions with the B656 and the Paynes Park gyratory (Identified as schemes HM10 and HM15 in TI4).
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. The sites that are not awaiting confirmation of availability are considered to be deliverable. The landowners / agents have submitted representations to the plan to confirm that all the sites are available for residential development. The Infrastructure Delivery Plan(TI) and Viability Assessment update (TI2) of the plan show that the developments are deliverable in infrastructure planning terms and that the development would be viable under the total package of infrastructure, contributions and requirements of the plan needed to secure the development. Constraints have been considered through SHLAA / site-selection process.
6. The likely significant environmental affects of allocating these sites have been considered through the Sustainability Appraisal (LP4, Appendix 6, pp.561-572)¹. The sites have been subject to consultation with a range of statutory providers.
7. 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 for Site HT1 (LP1, SP17, p.67) and for the sites HT2, HT3, HT5, HT6, HT8 and HT10 (LP1, pp.162-163).

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

8. 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 10.7 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

9. Yes. All of the proposed housing allocations in Hitchin are justified and appropriate. The justification and appropriateness of the allocations are discussed below.
10. In broad terms, each allocation is justified by the pressing need 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 highly constrained by Green Belt and other considerations (see the Council's Statements on Matters 5, 7 and 9). Overall, this has necessitated that the significant majority of the deliverable and developable sites identified in the SHLAA (HOU9) be brought forward for allocation to meet the OAN.
11. No preferable, deliverable alternative sites exist which would allow the OAN to be met over the plan period in a substantively different way.
12. There is 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 (see the Council's Statement on Matter 7).
13. Hitchin is a primary settlement within the district settlement hierarchy (Policy SP2) and as such is expected to provide a significant proportion of the development needs of the district over the plan period. Some of the proposed allocations lie within the existing urban area and consequently do not require amendments to the Green Belt boundary – these are summarised in Table B. The others are within the current Green Belt and are discussed in answer to Question 10.9.

Table B: Impacts of development of non-Green Belt allocations in Hitchin

Site	Name	Impact of Development
HT8	Industrial Area, Cooks Way	This site is previously developed land and requires a preliminary risk assessment for contaminated land remediation and surface water attenuation. The site is partially completed. Availability currently not re-confirmed

Site	Name	Impact of Development
HT10	Former B&Q Site	<p>Previously developed land. Retail has not traded well at this site with successive closures including B&Q and Family Bargains / Poundland discount store. The site is within the Walsworth Road neighbourhood centre which is well served with convenience shopping including a Tesco Express. The site is within a conservation area sits prominent on an A505 roundabout, accessed off both Nightingale Road and Walsworth Road.</p> <p>The site has terraced housing to the west and three and a half storey properties to the southwest and south and is in close proximity to Hitchin railway station. The site would lend itself to a high-density gateway development of 90 d/h.</p> <p>Availability currently not re-confirmed</p>

Question 10.8 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

14. Reasonable alternatives are considered in HOU9. Sites have been considered on the basis of whether they are available and achievable. Two sites [SHLAA references 225 and 110), that are considered possibly achievable have been dismissed on the basis of their remoteness from Hitchin and their location in a flood risk area. Whilst a further site [SHLAA reference 209E] has been dismissed on the basis of its proximity to the district's only AQMA. All three sites are within the current Green Belt.

Question 10.9 Sites, HT1, HT2, HT3, HT5 and HT6 comprise of land in the Green Belt. For each:

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

15. Yes. Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at HT1, HT2, HT3, HT5 and HT6.

16. Under the saved policies of the current District Plan, Hitchin is tightly surrounded by the Green Belt.

17. The Council's general case for the existence of exceptional circumstances is set out in its response to Matter 7: The OAN for housing identified for North Hertfordshire exceeds the level of development which can be met on development opportunities on brownfield land or contained within existing urban areas.

18. 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 and supported by Section 4 of the Sustainability Appraisal in (LP4, Technical Summary, NHDC Page 17).
19. For HT1, the National Planning Policy Framework recognises (paragraph 52) that the supply of new homes can sometimes be best achieved through planning for larger scale development, including extensions to existing villages and towns.
20. Appendix 1 provides the site-specific reasons for seeking to allocate each site as set out in Appendix 2 of the Housing and Green Belt Background paper: [HOU1 –Appendix 2].

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

21. The Green Belt Review (CG1) appraised all alternative options for growth at Hitchin that passed the SHLAA. This included all sites that were presented to the 2016 SHLAA process.
22. The findings of CG1 in relation to the proposed allocations at Hitchin are summarised in the Table C below:

Table C: Contribution of allocations in Hitchin into the purposes of Green Belt

Site	Green Belt purpose				Overall contribution
	Sprawl	Merge	Countryside	Historic	
HT1 (326/39)	Significant	Significant	. Significant	Limited	The site makes significant contribution to the Green Belt. The site is outside settlement boundaries. Whilst the site adjoins Hitchin, it has no impact on the historic part of the town. It does however lie within an area of strategic importance between Hitchin and Letchworth. However, the gap between Hitchin and Letchworth with HT1, is not significantly narrowed from the current built form. The railway to north forms a strong boundary as does Stotfold Road to the east. The southern and western boundaries are the existing urban area.

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HT2 (98)	Significant	Moderate	Significant	Limited	Site makes a moderate contribution to Green Belt. Site adjoins development on one side. St Ippolyts is located to the south although as this is not a town it is not significant from a Green Belt perspective. Site is flat and well contained. Site does not impact on historic towns. Hedgerow boundaries exist on all sides.
HT3 (H/r30)	Moderate	Limited	Significant	Limited	The site makes a moderate contribution to Green Belt. The site is outside settlement boundaries and adjoins existing development on two sides. Whilst the site adjoins Hitchin, it has no impact on the historic element and does not affect the merger of towns.
HT5 (H/r25)	Moderate	Limited	Significant	Limited	The site makes a moderate contribution to Green Belt. The site is outside settlement boundaries and adjoins existing development on two sides. Whilst the site adjoins Hitchin, it has no impact on the historic element and does not affect the merger of towns. Well contained as hedgerow exists on western edge of site.
HT6 (H/r14)	Significant	Limited	Significant	Limited	The site makes a moderate contribution to Green Belt. The site is outside settlement boundaries and adjoins existing development on one side. Whilst the site adjoins Hitchin, it has no impact on the historic element and does not affect the merger of towns. The site makes a moderate contribution to Green Belt. The site is outside settlement

					boundaries and adjoins existing development on one side. Whilst the site adjoins Hitchin, it has no impact on the historic element and does not affect the merger of towns.
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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?**

23. In order to reduce to the lowest reasonably practicable extent impacts on the purposes of the Green Belt through the allocation of this site, the policies in the Local Plan contain criteria to be satisfied before the grant of planning permission on the allocated sites. The following actions are re-produced in Table D.

Table D: Reducing impact on the purposes of the Green Belt

(Key: 1- Sprawl 2-Towns Merging 3-Safeguarding Countryside 4-Setting)

Policy Reference /SHLAA Reference	Reducing impact on the purposes of the Green Belt
HT1 39	(2&3) SP17 g.[LP1, p.67] Lower density development and / or green infrastructure provision as informed by detailed landscape assessments at the north of the site to: i. maintain appropriate visual and physical separation between Hitchin and Letchworth Garden City; iii. respect the setting of the scheduled burrows to the north-east.
HT2 98	(1&3) [LP1, p.162] Sensitive design towards south-west of site and in areas viewed from Mill Lane to minimise harm to heritage assets.
HT3 H/r30	(1&3) [LP1, p.162] Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.
HT5 H/r25	(1&3) [LP1, p.162] Sensitive design to minimise impacts upon landscapes to the west, including longer views from the Chilterns AONB.
HT6	(1&3) [LP1, p.163] Sensitive design to minimise impacts upon

H/r14	landscapes to the west, including longer views from the Chilterns AONB;
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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?

24. As per Table B, site allocation criteria have been specifically designed in order to minimise the impacts on the adjacent Green Belt, in accordance with the findings of the Green Belt review, and to enhance the Green Belt function where appropriate.
25. Through the actions specified in the allocation criteria as set out above, the adjacent will continue to display contributions to the purposes set out in Table B.

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?

26. 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 District.
27. The review and release of land undertaken as part of this plan would extend each part of Hitchin to logical boundaries - please see Table 3 below.
28. 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)
29. 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.
30. 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?

31. 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 allow the full OAN for housing to be met over the plan period in accordance with the settlement hierarchy.

32. This seeks to allocate development to higher order settlements in the first instance as set out HOU1 (Sections 2 and 4) 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?

33. 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.
34. 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.
35. 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.
36. The approach for each allocation is set out in the table below:

Table C: Reducing impact on the purposes of the Green Belt

Policy Number	Boundary Detail
HT1	Railway to north and west forms strong boundary as does Stotfold Road to the east. The southern and western boundaries are urban.
HT2	Hedgerow boundaries exist on all sides. Also, the south-western side is bordered by the B656 access road to the site, the north-western side is built up and the north-west and south-east sides are bordered by the Ippollitts Brook.
HT3	Hedgerow to the west and south, built up on the north and east.
HT5	Hedgerow to the west and south, built up on the north and east. PRoW to the south.
HT6	Hedgerow to the west, south and north, built up on the north and east.

	PRoW to the north.
Remainder of Hitchin	<p>The only other change to the Settlement Boundary in Hitchin is the inclusion of the Priory School and Our Lady's School. This removes the schools from the Green Belt in order to enable school expansion. The northern boundary is bordered by the River Oughton, the eastern, southern and western boundaries are built-up. None of the purpose of the Green Belt are affected.</p> <ul style="list-style-type: none">- Sprawl, the boundary of the schools does not exceed the existing boundary.- Merging neighbouring towns. There is not a town, with which to merge in northern Hitchin.- Countryside encroachment. The land is school playing fields not countryside, and there is no countryside to encroach given the firm river boundary and buildings to the north of the river.- Setting of Historic Towns. There are no views to the conservation areas and historic parts of Hitchin. The land does have connection with the town

Question 10.10 Is the proposed settlement boundary:

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

37. The Council's proposed amendment to the supporting text of Policy SP2 (LP3, amendment to paragraph 4.13, p.2) makes clear that settlements are those areas excluded from the prevailing policy designation of the surrounding rural area.
38. For Hitchin, the approach to establishing the Green Belt boundaries and therefore the settlement boundary is discussed in the Council's answer to question 10.9(g) above.
39. The justification for changes to the boundary relate to meeting the OAN, the lack of urban capacity, the settlement hierarchy, the availability of sustainable sites and these factors make the Green Belt changes appropriate.
40. A map showing the existing and proposed settlement boundaries for Hitchin are attached to this Statement as Appendix 2 to aid interpretation.

Appendix 1

HT1	39 326	Land at Highover Farm	Hitchin	Stevenage HMA	Allocate site	Substantial site on land currently designated as Green Belt. Critical to overall housing numbers achievable and an opportunity to make significant contribution to five-year land supply. Development at this scale able to deliver supporting infrastructure to meet needs arising from within site. Site-specific criteria require consideration of key landscape, Green Belt, ecology, flood risk and heritage implications and assist in addressing site-specific issues raised through consultation. On balance, significant positive opportunities afforded by this site are considered to outweigh the harms.
HT2	98	Land north of Pound Farm	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Would contribute to overall housing requirements. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT3	Hr30	Land south of Oughtonhead Way	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT5	Hr25	Land at junction of Grays Lane and Lucas Lane	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT6	Hr14	Land at junction of Gray's Lane and Crow Furlong	Hitchin	Stevenage HMA	Allocate site	On edge of town on land currently within Green Belt. Ability to make contribution to overall housing requirements. Well contained site with defensible boundaries. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts and address issues raised from consultation. On balance, positive opportunities afforded by this site are considered to outweigh harms.
HT8	Hr52	Cooks Way	Hitchin	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.
HT10	366	Former B&Q	Hitchin	Stevenage HMA	Allocate site	Previously developed land within existing town. Site-specific criteria allow for appropriate mitigation of potential impacts.

Appendix 2

Proposed Addition to LP1 from Hertfordshire Highway Authority

Hitchin (page 166)

Reason for proposed minor mod to paragraph 13.145 is in relation to the NHDC Transport Strategy (ED14) which aims to reduce car traffic volumes below those informing the transport modelling and identifies a broader suit of potential projects and mitigation measures to ensure the continued operation of the highway network for which reasonable contributions will be sought.

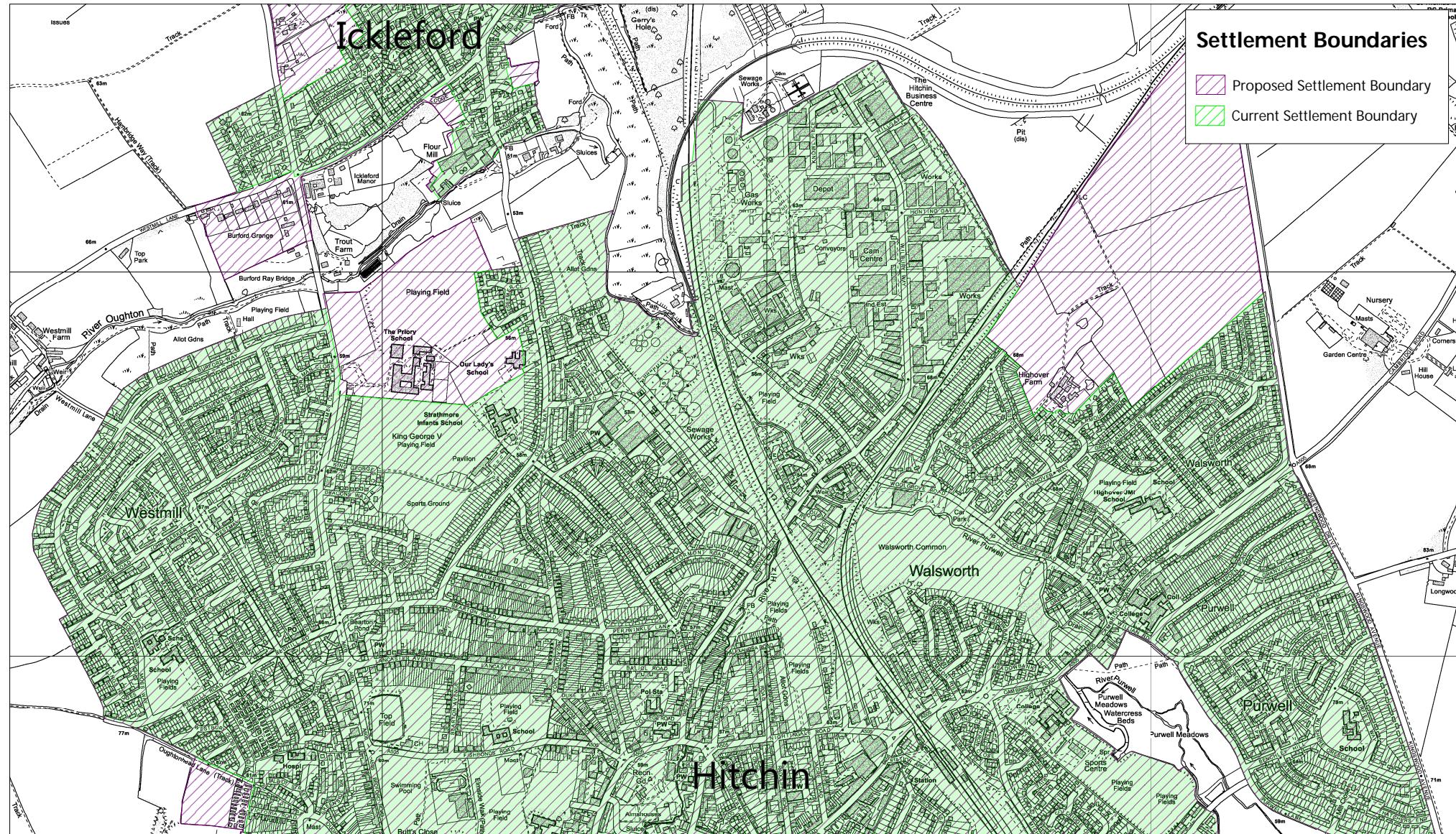
13.145 All schemes in Hitchin will be required to make reasonable contributions towards the funding of these works, ***and to walking and cycling schemes in Hitchin which aim to influence mode share and free up capacity for new development.*** However, appropriate funding arrangements will need to be made. These need to reflect the fact that background traffic growth triggers the requirement for the schemes with new development than utilising some of the additional capacity that would be provided.

Appendix 3

Settlement Boundary Changes

NORTH HERTFORDSHIRE DISTRICT COUNCIL

Hitchin (North)



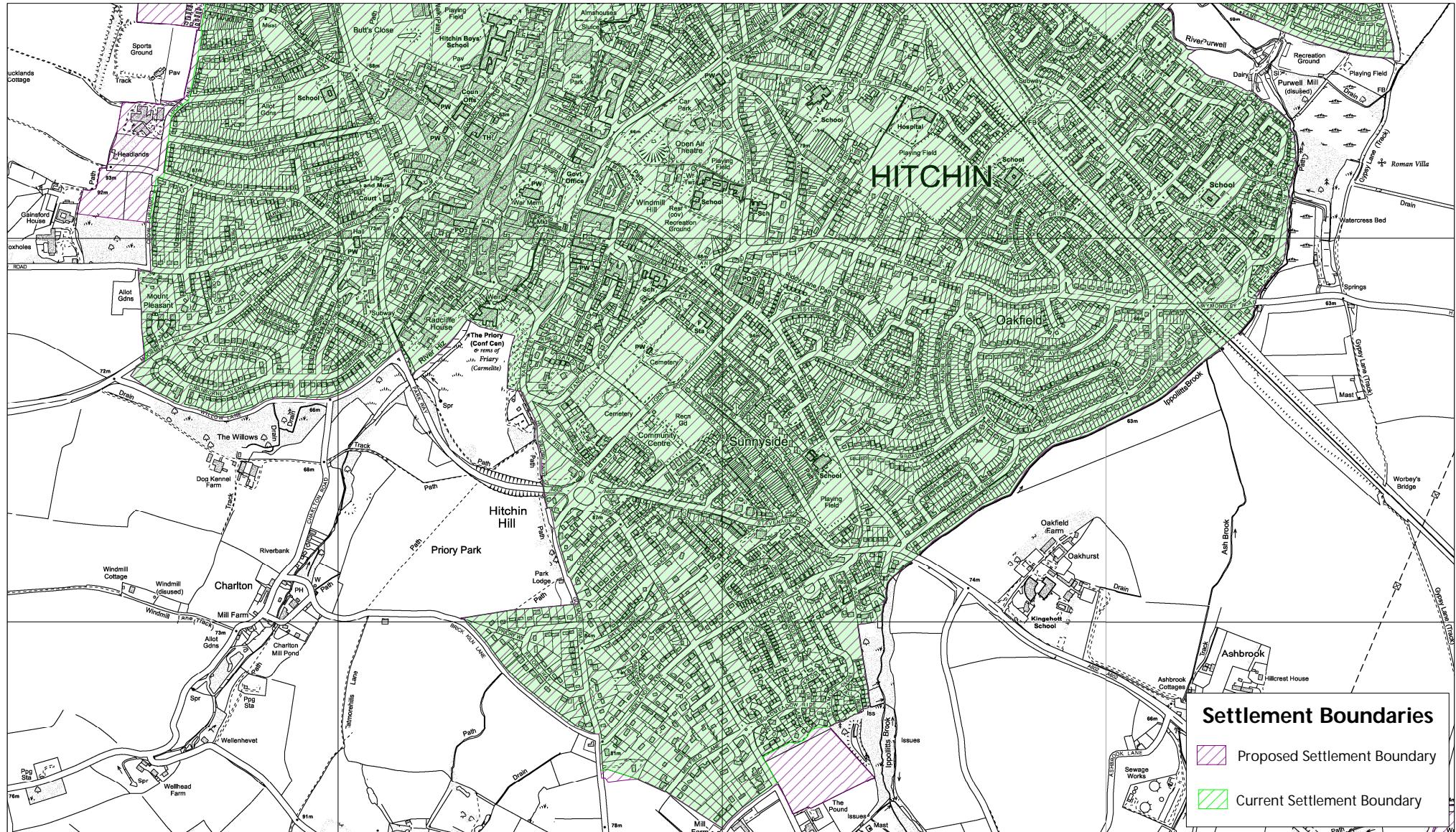
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NORTH HERTFORDSHIRE DISTRICT COUNCIL

Hitchin (South)



Settlement Boundaries

- Proposed Settlement Boundary
- Current Settlement Boundary

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