

*HITCHIN TOWN ACTION GROUP
(HTAG)*

This response to the NHDC Preferred Options Consultation Report

has been prepared by

Civic and Community groups in Hitchin:

Hitchin Forum

The Hitchin Society

Hitchin Historical Society

(With support from Hitchin Initiative)

February 2015

CONTENTS

1. INTRODUCTION	3
2. VISION AND OBJECTIVES	6
3. ECONOMY AND TOWN CENTRES	8
4. COUNTRYSIDE AND GREEN BELT	11
5. TRANSPORT	15
6. HOUSING AND DEVELOPMENT STRATEGY	18
7. DESIGN	25
8. HEALTHY COMMUNITIES	30
9. NATURAL ENVIRONMENT	33
10.HISTORIC ENVIRONMENT	37
11.INFRASTRUCTURE AND DELIVERY	39
12.COMMUNITIES (HITCHIN)	42
APPENDIX 1: HOUSING NEED 2011- 2031	55

1. INTRODUCTION AND SUMMARY

1.1 Introduction

Hitchin Town Action Group (HTAG) has been active since 2013, and has a contact list of 2,000 supporters, in addition to our separate memberships. Representatives of HTAG have been able to examine the key documents with assistance from a team of our own members who have a wide range of expertise and experience. We have also discussed the issues with our members and with interested members of the public. We held public workshops on Saturday 17th January with 100 attendees including many younger people contacted via twitter and facebook. We have also met with groups from Letchworth and Baldock.

With the Preferred Options Report (POR) having excluded Priory Fields we have not mounted a further campaign to repeat that pursued in the summer of 2014. At that time we organised a well supported walk, conducted a survey of the recreational use of the area, wrote to Councillors on the issues, and encouraged the public to contact the Council. We consider that it is very important that the Council is consistent in its application of the technical factors that have ruled out Priory Fields from this consultation.

We have therefore concentrated in this consultation period on providing a review of the Preferred Options Report and its background documents with a view to making the Local Plan as robust and useful as possible. We consider that it is vital that we have a Plan in place as soon as possible to defend the District from the pressure of unplanned development.

We hope that Councillors and officers will find our review of some use, and hope that we can continue to be involved as the process is taken forward.

1.2 Summary

We include here a very short summary of the issues that we are raising in the full response and some of our key conclusions.

- ***We suggest that there should be a clearer vision of what the District will be like in 2031, and how the changes will be delivered.*** We think the set of vision statements should respond to the different elements of sustainable development, and that there should be measurable objectives related to each statement that can be included in modified Annual Monitoring Reports. In the context of implementing major change it is vital that there is better co-ordination of housing growth, the infrastructure to support it, and how it will be financed.
- ***We think that it is possible to lower the housing target and reduce the loss of Green Belt.*** We have set out the reasons why we think NHDC should adopt a lower housing target of 10,700 homes. This figure is robustly based; it enables needed levels of

affordable housing to be provided; and can be delivered at a build rate which is achievable. On the suggested Green Belt sites we want to see clear and defensible boundaries, improved facilities, and some very difficult access issues addressed.

- ***We are concerned about the future of our town and district centres and the main employment areas.*** We believe there needs to be greater emphasis on the unique character of each of the towns. There must be more emphasis on a range of leisure and cultural facilities in town centres. Hitchin is the main retail, service and market centre for North Herts, and is fulfilling a growing role as a visitor destination. Employment areas must be able to attract more investment and a greater range of businesses. To achieve this in Hitchin, an improved environment and a new access road are needed.
- ***We consider that more is needed on the strategies and policies required to protect and improve the quality of life of existing and new residents.*** We call for clearer strategies to be outlined in the Local Plan on sustainable transport, and the range of community and recreation facilities needed; and for clearer policies on sustainable energy and water supply and sewage disposal, and for protection of landscape character and the historic environment.
- ***We have concerns about the standards of design for housing and other development.*** We suggest additional policies to ensure a mix of housing types and suitable space standards, energy efficient homes and work places, and a higher quality of design for buildings and the local environment.

Our key conclusions are that:

1. It is very important that the Council fix on a robust housing target, and not continue to make adjustments when it is clear from government guidance and experience elsewhere that there is no requirement on it to do so, and when constant changes threaten to undermine the process of Local Plan preparation.
2. Our analysis suggests that a local housing target of 10,700 homes, 1,400 fewer than proposed in the POR, would meet housing need including for affordable housing, and that this reduction would do much to, for instance, lessen the impact of the site north of Baldock - without requiring an alternative site to be found elsewhere.
3. There is need of more work on clearer strategies and policies to help shape the type and quality of new developments and to enhance existing settlements and their

settings - so as to provide a network of successful and attractive communities, open space and countryside.

4. It is vital that there should be immediate studies on the transport and other infrastructure issues related to specific housing sites and to the cumulative impact of all the sites, before decisions are made on the Local Plan proposals.
5. It is clear that the District cannot continue to meet housing demand indefinitely, and the Council should seek co-operation as soon as possible with others (locally and further north) to pursue the idea of a new community for the next Plan period.

2. VISION AND OBJECTIVES

2.1 Introduction

There is no vision set out in this section to describe what the District could be like by 2031. This lack of vision is reflected in the Preferred Options Report (POR) as a whole, which is very focused on how to deal with applications. The National Planning Policy Framework (NPPF para 17) suggests that plan making should **‘not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives’**.

We understand that this is not an easy exercise, particularly over the long timescale involved, but we suggest that:

- This section should start with a clearer statement of what constitutes sustainable development, as a basis for presenting a vision for the District that will help residents and businesses have a clear idea of what North Hertfordshire will be like as a result of the Local Plan.
- There should then be a set of statements about the vision/strategy covering the full range of issues dealt with in the Local Plan. Related to these statements, there should be a set of specific objectives, against which the implementation of the Plan can be assessed.

2.2 Sustainable development

Policy SD1 indicates that NHDC will take a positive approach to development proposals to reflect the NPPF’s presumption in favour of sustainable development. However, there is no clarification of sustainable development in the POR and what it means for the District.

The NPPF (para 7) itself provides a useful starting point:

‘There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy’.

We think that it would be very helpful to have this section of the NPPF quoted in full as the basis for a set of statements on how these will be reflected in the District at the end of the Plan period.

2.3 Vision and objectives

For each of the topics to be covered in the Draft Plan, it should be possible to summarise how the Plan is addressing the relevant sustainable development issues as set out above. The vision statements would clarify the outcomes for the District, and measurable objectives can be identified to allow assessment of progress as part of the Annual Monitoring Reports (as discussed in Section 11). Table 2.1 provides examples:

Table 2.1 Examples of Vision/Objectives

Vision statements	Measurable objectives
There will be greater range of local employment through improved facilities in the main towns, providing alternatives to commuting, and strengthening the local economy	The number of new businesses and jobs in the District will increase over the Plan period.
New affordable and market housing will reflect the needs of different households, providing a better balance with existing stock and supporting communities of mixed age and stage in life	The number of affordable houses completed each year will meet target. The proportion of homes of different sizes will reflect the expectations set out in policy (see Section 6).
New housing will be of the highest standards in terms of design and energy and water efficiency, raising the quality of the built and natural environment, and reducing carbon emissions	All new housing stock will meet space standards set out in policy (see Section 6) All new homes will be zero carbon from 2016
There will be increasing use of sustainable transport modes, including cycling and public transport, reduced congestion and carbon emissions, and increasing health	The proportion of non-car trips to school and work will increase over the Plan period
There will be increased accessibility to open space and countryside, improving the health opportunities and overall quality of life of residents.	Provision of accessible open space for recreation and quiet enjoyment will increase in net terms during the Plan period.

3. ECONOMY AND TOWN CENTRES

3.1 Introduction

We have three main areas of concern in relation to Economy and Town Centres.

- There is insufficient attention given to the opportunities for investment in existing employment areas.
- The distinctive characteristics, needs and opportunities of each town centre need to be highlighted in order for the Local Plan to protect and promote the vitality, viability and well-being of each of the District's towns.
- There should be greater emphasis given to activities other than just shopping, in order to increase diversity of provision and strengthen each town's resilience in the current climate of changing High Streets.

3.2 Employment Areas

The Employment Background Paper (November 2014) indicates (para 6) a 10% drop in employment (4,800 job losses) in North Herts between 1998-2011, at a time when national and regional employment figures were up 8%. These figures are not reflected in the Preferred Options Report (POR), nor are they analysed or solutions proposed within any strategic framework. Nevertheless, additional employment land is allocated in Baldock (8ha provided, 11.9ha safeguarded), Royston (10.9ha) and Letchworth (1.5ha); no additional employment land is allocated in Hitchin.

However, we feel greater consideration should be given to improving and investing in existing employment areas. This is particularly the case, given that the Council wants to promote the knowledge economy by increasing the number of highly skilled jobs in the District, targeting knowledge-intensive growth sectors such as research and development, life sciences and advanced manufacturing and computer related activities (POR para 3.16, Preferred Options). These types of employers are unlikely to be attracted to areas that are run-down with poor facilities, including access.

We suggest that **Policy ETC1: Provision and distribution of employment** should include a second paragraph :

With regard to existing employment areas where there is opportunity for increasing employment, studies will be undertaken to explore access and environmental improvements to encourage increased investment.

We suggest that **Policy ETC3: Appropriate uses in employment areas** should include reference in particular to consideration of and support for starter workshop units and provision for creative/art related industries.

We consider the implication of these policies for Hitchin in Section 12.

3.3 Town Centres

We are concerned that **Policy ETC6: Town and local centres** is distinctly underpowered; it is more a list than a policy and does not reflect statements at paras 3.33 and 3.35 that "*the Council is committed to protecting the vitality and viability of all centres*" and "*the Council is committed to promoting the well-being of the four town centres in the district.*" In order to have any policy strength in protecting vitality and viability and promoting the well-being of the district's town centres, the Local Plan must acknowledge (indeed, highlight) the different characters, roles, opportunities and needs of the district's four towns.

The Local Plan needs to take a District perspective and part of that is a re-affirmation of the retail and service hierarchy of the four towns across the district. Hitchin sits at the top of that hierarchy, and like each of the other three towns, has its own particular characteristics. For example, Hitchin's unique selling points include its physical attractiveness (the historic fabric of its medieval core), and its range of facilities (the variety of independent shops, galleries, cultural and community facilities and services). The unique and distinctive character of each town centre needs to be affirmed in the Local Plan, with greater detail of how the Council will protect and promote these.

We suggest that **Policy ETC6: Town and local centres** should state that the Council will support proposals that enhance the distinctive and differing characteristics and attractiveness of each of the district's four town centres.

There should also be greater acknowledgement of the changing functions of town centres. Town centres now need to provide for a greater range of community, cultural and leisure facilities as well as shopping, in order to flourish or indeed survive. The Local Plan needs to consider how each town centre can develop and flourish in this context, based on the distinctive opportunities of each town centre.

It is disappointing, therefore, that **Policy ETC8: New retail, leisure and other town centre development** promotes town centre uses that focus only on retail, food and drink, office and professional services. Mention of community uses or facilities is relegated to the supporting text to **Policy ETC6: Town & Local Centres** (3.35) where it says Town Centre Strategies cover this, and the supporting text to **Policy ETC10: Local Centres** (3.63).

We suggest that **Policy ETC8: New retail, leisure and other town centre development** should include the following as a first paragraph:

Town centres should provide for a greater range of community, cultural and leisure facilities as well as shopping to strengthen their role as centres of activity.

In the context of the changing nature of town centres, **Policy ETC5: Tourism** should acknowledge the differing characters and hence attractions of the four towns, and encourage tourism with measures such as support for visitor information centres and visitor signage to attractions where appropriate.

Policy ETC7: Additional retail floorspace - we are pleased that the Council's priority is on filling vacant shops and that this is seen as fulfilling the need for additional retail floorspace at least up to 2021 (para 3.43).

Policy ETC9: Primary & secondary shopping frontages - we support in particular the redesignation of most of Hermitage Road as secondary instead of primary. This reflects what has been happening in recent years and will allow for greater flexibility of use here. We would like specific reference to live/work units being acceptable in secondary frontages.

Policy ETC10: Local centres - we support this policy to resist the loss of shops in local centres but would like to see policy support for the creation of live-work units in these areas where possible.

We consider the implications of these policies for Hitchin in Section 12.

4. COUNTRYSIDE AND GREEN BELT

4.1 Introduction

We believe this is a balanced and generally well-prepared part of the Preferred Options Report (POR). However, we do have concerns:

- A key issue is the scale of the housing target which we do not consider reflects the constraints applying to the District.
- There are specific issues with some of the areas where it is proposed that the Green Belt should be rolled back.
- We are also disappointed that the Council has not shown a greater degree of vision and ambition in these aspects of the plan to make the District a still better place for local residents and visitors alike.

On the last issue we recognise the severe financial and other constraints under which Local Authorities are now operating, but this topic is an area in which real and lasting benefits can be achieved at little or no direct cost to the Council. We urge the Council to take a positive approach to the suggestions below, as constructive ways for the Local Plan to bring long-term benefits to people living in this District.

4.2 Green Belt

We consider that the first sentence of **Policy CGB1** is too general and potentially open to challenge. It needs to be unambiguously clear that changes to the Green Belt boundaries proposed in the POR are based specifically on the NPPF principle that it is the responsibility of the Local Planning Authority (LPA), and no-one else, to decide on its own housing target taking into account constraints such as the Green Belt (see Section 6). On this basis, we consider that the housing target should be reduced by 1,400 dwellings, and that one or more of the strategic housing sites should be reduced in size to reduce the impact of the additional housing on the local area.

4.2.1 *Edge of Hitchin sites*

In the case of Hitchin, the sites at Highover Farm and to the west of Hitchin are controversial, and the roll-back of the Green Belt boundary is to be regretted. We believe that any loss of Green Belt should be minimised, with mitigation requirements specified as a condition of any release. In the case of the west of Hitchin sites, any development should remain behind the ridgeline to reduce the visual impact, while screening planting should be required at Highover Farm to define the edge of the development, and to mitigate noise from the railway which is on a raised embankment at that point. In both cases, it is essential that the revised boundaries are capable of enduring beyond the Plan period. This is the

basis on which the Green Belt Review (GBR 2014) was undertaken, in compliance with the NPPF (para 85).

We also consider that transport studies should be carried out rigorously in advance of any such roll-back of the Green Belt occurring, as there are already difficulties in Hitchin due to the inadequacy of the existing transport infrastructure (see also Section 5). A fuller analysis of the issues related to the Green Belt sites on the edge of Hitchin is provided in Section 12.4

4.2.2 Sites East of Luton

In the case of the proposed release of Green Belt land east of Luton, we recognise the need to demonstrate cooperation between neighbouring local authorities. If the number of homes and the extent of the site are dictated by the requirements of the Luton housing market, then it remains essential that any development in that market area remains behind the ridgeline to protect the landscape of the valley, and to provide a long-term defensible Green Belt boundary.

4.2.3 Safeguarded land west of Stevenage

The proposal to roll back the Green Belt boundary adjacent to the border with Stevenage west of the A1(M) is included in the POR to facilitate an expansion of Stevenage into this area at some stage in the future. The relevant land is to shown as safeguarded for future development, and no longer part of the Green Belt. Should an expansion of Stevenage be justified in the future, and assuming it passes the test of exceptional need, then the land could be released from the Green Belt at that stage. However there is no need to release it now:

- A possible option is for Stevenage Borough Council to explore arrangements for the period beyond 2031 with neighbouring (and other) local authorities to deliver homes outside the Borough (Stevenage First Consultation (SFC), June 2013). The constraints of the Green Belt suggest that seeking co-operation with other LPAs to the north would be appropriate, including (as the SFC suggests) the possibility of a new settlement within the Stevenage housing market area in the next round of Local Plans. There may therefore be no requirement for the area to be released from Green Belt.
- We would also suggest that the proposed area remains unsuitable for housing development, due to the geographical and access constraints. It is understood that the only road access will be by a route under the A1(M), and quite correctly with no links to the rural road network of North Herts. Until need is established and access improvements are in place we continue to believe that such a constrained site is unsuited to housing development, and that no change should be made to the Green Belt status of this land.

4.2.4 Extension to Green Belt

Although we welcome, in its own right, the proposed extension to the Green Belt to link the Metropolitan and Luton Green Belts south of the A505, we do not believe that should be seen as compensation for the loss of Green Belt land elsewhere in the District. An inherent feature of the Green Belt is its permanence, with development only permitted in exceptional circumstances. The need to meet housing targets hardly constitutes exceptional circumstances in any meaningful way. Indeed, we believe that a more rigorous and robust approach should be taken towards housing targets in a District so constrained by the existing extent of Green Belt land, as has been successfully argued elsewhere (for example, in the case of the Reigate and Banstead Local Plan). We cover the housing issues more fully in Section 6.

4.2.5 Landscape Conservation

We are concerned that for rural areas the POR only uses the categories of AONB, Green Belt or Rural Areas beyond the Green Belt. Conservation Areas are limited to built-up areas in towns and villages. In contrast, the previous draft Local Plan No.3 (February 2000) included a designation of Landscape Conservation Areas, which could include, and reinforce, the protection given to certain areas of Green Belt land, as well as some areas not within the Green Belt. It is a matter of considerable regret that this provision is not part of the POR, following the government direction that local designations of this kind can no longer be used.

The European Landscape Convention (the Florence Convention) which has been in force in the UK since 1 March 2007, promotes the concept of landscape conservation, and we have suggested a new section in **Policy NE1** covering landscape character in order to increase the protection of high value landscape such as that south and west of Hitchin.

4.2.6 Countryside beyond Priory Park ("Priory Fields")

It is appreciated that this sensitive and important area of countryside is not now being put forward for housing development. It is understood that it was rejected for development on technical grounds, although the Council has not specifically recognised the recreational and community value of this stretch of unspoilt countryside so close to the centre of Hitchin. It is characterised by a high density of public rights of way which are intensively used by people from Hitchin and from further afield. Hitchin has no significant area of public parkland (unlike Royston, Letchworth or Stevenage), and it is important that this area is protected for public access, including for health-giving exercise, now and in the future. The Council should use its best endeavours to secure the protection of this land for the long-term benefit of local people.

4.2.7 Extension to Northern Chilterns AONB

Countryside of exceptional landscape quality to the north of the A505 is designated as an Area of Outstanding Natural Beauty. However, the southern boundary to the AONB along the line of the A505 has often been felt to be somewhat arbitrary and failing to take into account the landscape quality of the Lilley Bottom Valley and the areas to the east towards Preston.

While we recognise that the Local Plan cannot in itself redefine the boundaries of an ANOB, we believe that the Council should work with others including English Heritage, Natural England and the Chilterns Conservation Board to promote a change in the status of this area south of the A505. Creating an extension to the AONB would be a lasting legacy for the people of North Herts and beyond to safeguard and celebrate the quality of landscape so close to highly populated areas.

4.3 Rural Areas Beyond the Green Belt

We support the proposed restraint on inappropriate development as proposed on **Policy CGB2**.

4.4 Exception sites in the rural area

Policy CGB3 seems very reasonable provided that the need for market housing to cross-subsidise affordable housing is carefully controlled, and is not allowed to become the driving force towards inappropriate development.

4.5 Rural Workers' Dwellings

We support **Policy CGB4**, and would only add that if dwellings are created under this policy, and subsequently found to be no longer required for agricultural workers, then they should not be sold as market housing, but should be retained as affordable housing for the local community.

4.6 Existing Rural Buildings

Policy CGB5 is also very reasonable, and the only comment we would make is that the style and detailed design of changes to existing buildings must not detract from the character of the rural environment. This is stronger than the proposed requirement for there to be no materially greater impact than the original building.

5. TRANSPORT

5.1 Introduction

This section of the Preferred Options Report (POR) is very limited and would benefit from a much more extensive and ambitious approach. There are already serious problems with congestion on the transport network in the District and a lack of any meaningful progress towards more sustainable modes of transport. There is a clear inconsistency between the development being proposed in the District and the lack of any significant transport proposals, and this needs to be rectified in the Local Plan. The following key points need to be taken into account:

- We believe high standards in transport offer major benefits to the community both in terms of quality of life and a successful economy. Our view is also that, for the Local Plan, 'transport' should not just be equated with 'highways'. The growth in car usage can offer convenience and choice, but the dominance of private cars comes at a high price: the road network is increasingly congested with no practicable relief possible with new road building. Parked cars dominate the street scene in many areas, both residential and town centre. Advantages are only available to those with access to a car; the young, many older people, and the economically disadvantaged are excluded from the benefits. Motor vehicles waste resources and contribute disproportionately to damaging emissions, in terms of both global climate change and their effect on local air quality.
- In contrast sustainable modes of transport such as walking, cycling and good public transport offer major benefits to the community. The first two provide convenience for relatively short local journeys, an absence of damaging emissions, and an opportunity for healthy exercise and can be supported by well coordinated public transport. Such sustainable and connected modes of transport should be promoted above the priority traditionally given to motor traffic.
- We appreciate the Council is not the Highway Authority and therefore has limited power to deliver sustainable transport policies. We also recognise that, due to political decision making over many decades, it will not be easy to achieve the better integrated transport solutions taken as normal in many developed countries. Current austerity, and likely further downward pressure on public expenditure, makes it difficult to see this situation improving, even in the mid-term.
- Against this background it is all too easy for a low-expectation culture to develop. The view can be taken that nothing much can be done and effort is channelled into justifying not doing things. In contrast, we consider that the District Council should be pro-active, imaginative and ambitious in providing leadership and, where possible resources, towards schemes that can make a real difference to the local community. We cannot expect the County Council to fulfil this role on a local basis; the District Council must identify local needs and opportunities and should act as the local champion for progress towards sustainable, and much better integrated, transport systems.

- We understand the difficulties in promoting improved public transport and that the District Council has no direct responsibility for this field. However, we believe that the Council should be much more pro-active in favour of good public transport, to increase the possibility of a modal shift away from dependence on the private car.
- In Section 12 we make specific reference to public transport improvements necessary in Hitchin. These measures need to be applied elsewhere across the District, notably proper coordination of bus and rail into an integrated system and bus priority measures to make bus a much more attractive form of transport for all.

5.2 Sustainable transport

As shown in the comments above, we clearly believe that the Council could, and should, be more ambitious in this policy area. In particular, the Council should use its powers as the Local Planning Authority to require significant new developments to be in sustainable locations with good access to public transport routes and, where near a town centre, to incorporate features that encourage walking and cycling.

Development proposals need to do more than simply “complying” with the provisions on the Local Transport Plan (LTP) as in paragraph 2 of Policy T1. The LTP may lack detail and strength on provisions that could relate to a specific development, but the Council needs to be prepared to use its planning powers to ensure that sustainable transport outcomes are actually achieved.

The Council needs to take the initiative; it is not sufficient to “allow for” the early implementation of sustainable travel infrastructure. The Council should require such facilities to be in place from an early stage in the development for the reasons stated in the policy.

A key element in sustainable transport is a high standard of public transport. This requires various modes of transport to be integrated to an extent not now contemplated, with a particular emphasis on connecting rail / bus services, through (and across mode) ticketing and a focus on key District hubs such as Hitchin railway station.

We conclude that the following changes should be made to **Policy T1 Sustainable transport:**

- Point 2 should be changed to: enable the implementation of the Local Transport Plan...
- Point 4 should be changed to: ensure the early implementation of sustainable travel infrastructure....

5.3 Parking

The provisions of this policy seem broadly sensible in relation to their application to new developments. Attempting to reduce car-dependency through restrictions in parking provision, especially in residential developments, is all too likely to have unintended consequences adversely affecting neighbouring streets and other possible parking areas. Similarly, employment sites should be required to include adequate parking, and not result in high levels of on-street parking causing congestion and other problems.

The policy is, however, silent on the key issue of town centre parking, whether for shopping or for employment purposes. It is also likely that the need for town centre parking will increase with a move towards more town centre living, hotel accommodation without parking provision, and a possible (and desirable) increase in tourism and leisure visitors. A balance is needed between provision and pricing policy such that a vibrant and successful town centre economy is not put at risk, while at the same time managing supply and demand so that parking space will generally always be available.

The Council needs to regularly review the need for more parking capacity in town centres, and take any opportunities for improvement as required by new residential, commercial or leisure development. It should also be more ambitious in seeking new technology to control town centre parking more effectively, including pay on exit, barrier-less NPR technology, and displays of parking space availability.

Policy should provide guidance on how to adjust town centre parking capacity in the event of new developments being proposed. These may possibly include changes in retail capacity but may also involve new or expanded venues for leisure purposes that will generate additional parking demand.

We conclude that the following addition should be made as a second paragraph to **Policy T2 Parking:**

The Council will provide a regular review of the needs, constraints and opportunities for parking provision in the town centres in the context of changes in pricing policy and parking technology to inform its own actions and those of developers.

We also suggest an alteration to paragraph 2:

Applications should refer to both the parking standards and the Council's most recent parking review in devising proposals, and should clearly identify.....

Note: more detailed analysis of the transport issues in Hitchin is provided in **Section 12** under the following headings: walking and cycling improvements, public transport improvements, road network, access to the industrial area, access to Hitchin railway station, and the A505 Cambridge Road railway bridge.

6. HOUSING AND DEVELOPMENT STRATEGY

6.1 Introduction

We have five major areas of concern in relation to the Housing and Development Strategy:

- The figure of 12,100 homes for local needs is higher than is required, and the figure of 10,700, which will be able to provide for affordability needs, should be adopted (see 6. 2). The total growth in dwellings in the district of 12,800 (including the allowance for Luton) will still be in the order of 23%.
- It is therefore vital for the Plan to include a much clearer vision and strategy for the District to set out how quality of life for residents will be protected and improved, and to take into account the pressures that there will be on infrastructure and how these will be mitigated (see our comments on Sections 2 and 11 of the Preferred Options Report (POR)).
- There should be much fuller coverage of the criteria to be taken into account in the provision of the new housing if it is to be sustainable over the longer term (for instance mix of housing types, and enhanced space standards), and appropriate policies should be included in this section of the POR or clearly referenced to coverage elsewhere (see 6.3).
- Some consideration should also be given as to how the existing housing stock will be improved, by for instance setting out expectations of energy efficiency measures when permissions are sought for extensions or conversions (see 6.4).
- The specific issues related to the potential sites in Hitchin need to be flagged up in the Local Plan to ensure that these are taken into account in assessing proposals. Commentary is provided under Section 12.

6.2 Housing Needs

We have undertaken a review of the documentation on housing that forms the background to the housing figures presented in the POR. Our full analysis is presented in Appendix 1.

Our starting point for the review is that local housing targets are not dictated by government. As is made clear in the National Planning Policy Framework (NPPF, para 47) and Planning Practice Guidance (PPG, paras 44 - 46), it is up to the Local Planning Authority to decide the need it should be trying to meet in the context of constraints such as Green Belt.

Our analysis suggests that the low trend figure of 10,700, which would reflect the net in-migration over a representative period of 2003-6 which overlaps the housing 'boom', would

still enable the need for affordable housing to be met, and be more feasible in terms of building rates than the mid trend target suggested in the POR.

In this context we understand that NHDC has been working on a revised approach to the SHMA outside this formal stage of consultation. Our concern is that any further revision of the housing target at or after the end of the consultation period could endanger the integrity of this process. Our view is that any significantly higher target in response to such a revision (or to changes in nationally based figures) could be considered contrary to the requirement in the NPPF that the Local Planning Authority should consider local housing need in the context of local constraints.

Our conclusion is that **Policy HDS1 Provision of Housing** should be altered as follows:

Over the period 2011-2031, sufficient land will be released for development to allow the delivery of (OMIT at least) 12,800 dwellings

Of these 10,700 dwellings are to meet.....

We have no comment on **Policy HDS2 Settlement Hierarchy** except to acknowledge that some growth in the villages to allow these communities to continue to function does seem appropriate.

On **Policy HDS3 Affordable Housing**:

- We are content with the change to the percentages as amended by Council (27 November 2014). The small number of sites with under 24 dwellings means that the change in total affordable provision from this source is minimal (about 20 over the Plan period). However, we would like to see the reference to minimum percentage retained so as to allow for changes in need identified over time.
- We support the inclusion of the statement in the policy that a condition or legal agreement is necessary to ensure that the housing remains affordable for subsequent occupiers.
- We would, however, like to see the following statement (noted in para 6.31) included in the policy to give it appropriate weight: Developers are expected to factor in the costs of affordable housing, and overvaluation after the publication of this policy will not be sufficient to justify a lower level of affordable housing.

6.3 Provision of New Housing

There is only one design policy related to housing in this section of the POR. Our view is that the Plan currently omits many issues related specifically to housing, and these need to be clarified in Section 6 of the POR. Paragraph 6.31 of the POR mentions the importance of developers taking fully into account the expectations in respect of affordable housing when

they make their financial offers to owners. It would be very helpful for the same point to be repeated at the beginning of this subsection and the introduction to **Section 7 on Design**.

6.3.1 Density

On density, the POR recognises (para 6.35) there has been a preponderance of flats built in the District in recent years – reflecting the opportunity, in for instance Hitchin, of brown field sites close to the centre of the town and the railway station. In many instances the density levels have been extremely high: the average density for new development in the towns was 53.6 dwellings per hectare in 2012/13, with 4 schemes over 100 (Annual Monitoring Report para 7.16).

In well designed schemes, flats can provide for the needs of younger and older residents. However:

- they can lack both private and public space and appropriate landscaping, and have difficulty in retaining privacy – directly impacting on the quality of life for residents.
- they can also impact on the wider area with building heights and massing of the development causing overlooking and shadowing, and altering the character of the wider area.

Similar problems can be experienced in higher density schemes with a preponderance of houses.

We therefore support **Policy HDS4 Density**, but would like to add a further paragraph:

A density level will not be acceptable unless it can also be shown to be *the product* of a full range of relevant design and management factors including: provision of private or communal garden spaces adequate for seating and relaxation, and (additionally in family housing) for at least small scale play and clothes drying; external storage (including recycling with direct external access); and nearby designated car parking and cycle storage.

6.3.2 Housing Mix

There is no reference to the mix of housing requirements in Section 6. The Strategic Housing Market Assessment (SHMA) Part 2 does, however, suggest that there is a future requirement to 2031 for an overall provision of 49% of new housing to be 3 plus bedroom homes, and 51% to be 1 and 2 bedroom homes (Figure 31 page 38). Our view is that there should be policy in the Plan to refer to this requirement.

The Hertsmere Core Strategy (HCS) suggests that there is a need for a similar provision of mix (Para 3.43), and also identifies an ageing population's need for a proportion of sheltered or other special needs housing (para 3.48). The HCS includes both aspects in their Policy CS7.

We suggest a new **Policy HDS4(a) on Housing Mix:**

New housing should provide an appropriate mix of size and type of new homes - with sites between 10 and 24 units containing some variation, and sites of 25 units plus reflecting current identified variations within the District's housing need. In the strategic sites the need for a proportion of sheltered or extra care housing should be considered.

The requirement for mix of housing types and opportunity for sheltered housing should also be included in **Policy ID2 Masterplans**.

The NPPF makes clear (para 50) that LPAs should plan for the needs of different groups in the community including people wishing to build their own homes. Nationally a fifth of new homes in the recent recession were self built (DCLG Announcement 3 May 2011), and the ambition is that such provision should be available to a wider cross section of the community. Ensuring availability of custom build plots across the District helps individuals or communal groups to develop their own lower cost market housing, supports the local economy by providing work for local builders and tradesmen, increases the diversity of housing supply, and encourages sustainable construction methods.

Our view is that there should be a specific policy on self build housing, rather than relying on a mention in Policy ID2 related only to the strategic sites. It would be helpful to have recent evidence of the number of potential custom builders who have paid subscriptions to search for sites in North Hertfordshire to provide a firmer basis for policy. As an illustration, if strategic sites have 5% of building plots reserved for self build then about 170 self build homes would be available in the Plan period. Involving all sites over 100 homes at a 5% rate would double the number of self build plots to 350.

We therefore suggest, as a starting point for consideration and dependent on the findings of research into local demand, a new **Policy HDS4 (b) on Self Build Housing:**

Developers will offer for sale at least 5% of dwelling plots on sites of more than 100 homes to custom builders, as part of their affordable housing allocation. The developments will be controlled by: an agreed design code; conditions requiring custom build developments to be completed within 3 years of a custom builder purchasing a plot; where plots have been made available and marketed appropriately for at least 12 months and have not sold, that the plot(s) be offered to registered housing providers; and control through a legal instrument of the subsequent sale price of the housing to 80% of market value to ensure that it is affordable for future occupiers.

6.3.3 Space Standards

It is clear from international research that space provided in UK homes is considerably less than elsewhere in Europe (Housing Statistics in the EU 2003): the average size of a new home in the UK is under 83 square metres compared to 109 square metres (over 30% larger) in Germany.

Work based on Lifetime Home Standards (London Housing Design Guide 2009, section 4.1) suggests the minimal dimensions to allow rooms to be large enough to take on a variety of uses including locations for work and study, and provide adequate storage and circulatory space (see Table 6.1).

Table 6.1 Minimum space standards for new development (gross internal area)

Flat	1 bedroom	2 persons	50 sq m
	2 bedroom	3 persons	61 sq m
House	3 bedroom	4 persons	86 sq m
	4 bedroom	5 persons	100 sq m

We suggest a new **Policy HDS4(c) on Space Standards**:

New housing should meet the minimum internal space standards set out in Table 6.1, and should also seek to provide good quality accommodation by, for instance, enabling dual aspect, natural ventilation for kitchens and bathrooms and increased floor to ceiling heights; 10 % of new housing should be designed to be wheelchair accessible or easily adaptable for wheelchair users.

6.3.4 Sustainability

The full range of issues related to sustainable design and construction are covered in our response to **Section 7 Design** and reference should be made to the policies proposed there, so that these can be taken into account at the start of any housing development design process.

However, there is a particular set of issues related to Zero Carbon Homes that should be covered in Section 6 of the Plan.

The concept was originally related to the Code for Sustainable Homes which could be adopted in a Local Plan. Building Regulations are now set to take over the role with a mandatory zero carbon Level 6 to be achieved for all new homes by 2016 through the use of: energy efficiency measures (such as low energy heating); on-site zero carbon technologies (such as solar panels); and off-site measures to deal with any remaining emissions (for instance through contributions to a national or local carbon abatement fund).

We suggest a new **Policy HDS4(d) on Zero Carbon Homes:**

All new housing will be expected to comply with increasingly demanding Building Regulations over the period to 2016 and then to fulfil the need for zero carbon provision.

Actual performance of completed developments in use should be monitored against the zero carbon standards, and a reference to this requirement should be included in **Section 11 on Deliverability.**

6.4 Existing Homes

6.4.1 Empty Homes

The number of empty properties in North Hertfordshire is small: 87 had been empty for over two years in November 2014. The properties are regularly monitored and pay 100% Council tax, plus a 50% levy. Some short term turnover of empty properties is to be expected to enable the housing market to function.

6.4.2 Retrofitting Existing Homes

Existing housing stock is the major contributor to carbon dioxide emissions. Even with the significant increase in new zero carbon housing stock in the Plan period there will remain a majority of older housing much of which is likely to have poor insulation and significant inefficiencies in terms of heating and water use.

It is likely that newer affordable housing will be of a higher standard in terms of condition and energy efficiency, together with former social housing areas that have been subject to recent refurbishment. Some uptake of grants will also have led to improvements in the owner occupied sector. It would, however, be useful to have results of research to clarify which housing sectors and locations in the District are most in need of retrofitting to bring them closer to the standards expected in new housing stock (see 6.3.4).

We suggest that to improve the energy efficiency and performance of the existing housing stock there should be a new **Policy HDS4(e) on Retrofitting:**

The Council will expect that:

- applications for individual home extensions or conversions will include energy efficiency measures that will improve the performance of the whole building;
- new larger scale development which includes decentralised energy and renewable energy provision should explore their use for existing neighbouring communities; and

- the sustainability principles covered in 6.3.4 and **Section 7 Design** should be applied when major estate refurbishments are undertaken.

Note: We have no comments to make on **Policy HDS5** (Relatives' and Dependents' Accommodation); nor on **HDS6** (Gypsies, Travellers and Travelling Showpeople).

7. DESIGN

7.1 Introduction

We have three areas of concern in relation to Design:

- The section on Design and Sustainability needs to be substantially strengthened by more rigorous analysis of the issues and a clear set of conclusions directly related to a set of appropriate policies.
- House extensions and replacement buildings should be subject to the same criteria as new buildings.
- There is opportunity to clarify some of the issues of importance in protecting living conditions.

7.2 Design and Sustainability

We consider that this section of the Preferred Options Report (POR) is particularly weak:

- The supporting text is full of good intentions but does not appear to satisfy the NPPF which expects provision of robust policies based on stated objectives.
- The section is poorly coordinated with other sections of the POR, with little cross referencing which reduces its usefulness.

We consider that the starting point should be the NPPF requirement that Local Plans set out the qualities of development that will be expected in the area; and that developers should take fully into account the expectations in respect of design when they make their financial offers. We suggest that this section should be organised under four separate headings with four separate policies to replace the existing Policy D1 in order to clarify the qualities expected and make the expectations clear to all involved in design and delivery of development.

7.2.1 Quality and Character

Developments should be of high quality. High-quality designs possess some fundamental characteristics; they are informed by current knowledge about functional performance, contexts and technology, they indicate the application of careful thought and they show respect for their occupants and surroundings. High quality design guidance is available in the current NHDC Design Supplementary Planning Document (SPD), which should be brought up to date in terms of the references it makes to NHDC plans and national guidance.

We wish to emphasise the importance of the Design and Access statement as a tool for ensuring that careful thought has been given to the context of design and that alternative options have been considered.

Developments should also have character. For instance, standardised designs which create anonymous environments should clearly be refused, as should developments which do not reflect the local pattern of growth.

We suggest that there should be a **new Policy D1(a) Character and Quality**

The Council expects good design in terms of character and quality, and developments should:

1. reflect the guidance in the Design SPD,
2. be explained and justified in a Design and Access Statement,
3. respect the existing character and setting, and where little character can be demonstrated the development should seek to create a new distinctive character of high quality,
4. take positive advantage of existing topography, landscape features, watercourses, site orientation, microclimate etc.,
5. address the street with a continuous building line set by the existing buildings and create active frontages where appropriate,
6. incorporate attractive, well-connected streets, squares and public spaces,
7. support a mix of land uses, forms of tenure and built form,
8. integrate parking into the development in those cases where parking is provided.

7.2.2 Respect for the Natural Environment.

Sustainability is the main plank of the NPPF and we fully support this objective. We are concerned that political initiatives to reduce administrative burden may be interpreted by developers as an invitation to place quantity before quality. We consider that quality is paramount and that developments should be designed to respond comprehensively to the sustainability agenda.

We consider that developments which show respect for the natural environment and which adapt to, rather than reshape it, also contribute to health and well-being. Building features, such as the provision of good natural daylight, respect for orientation, natural ventilation, (particularly cross-ventilation in dual aspect designs) and access to private open space all contribute to health and wellbeing.

We suggest there should be a **new Policy D1(b) Respect for the Natural Environment**

The Council expects good design in terms of respect for the natural environment, and developments should:

1. fully address the nationally stated objectives with respect to control of carbon emissions,

2. aim to exceed regulatory standards with regard to critical issues, such as energy consumption, water consumption, waste generation, use of sustainable materials, surface water run-off, ecological impact, health and well-being of occupants. The certification of the standards achieved through assessment schemes such as BREEAM or other voluntary sustainability standards will be encouraged,
3. consider the impact of climate change, including future extremes of temperature, precipitation etc.,
4. accord with the recommendations of BS 5837 “Trees in Relation to Construction”,
5. contribute towards the creation of a hierarchy of public and private open spaces,
6. have good access to public transport to help reduce car dependency.

7.2.3 Flexibility.

As a society we tend to think of housing or commercial developments in terms of categories: starter homes, family homes, retirement homes, sheltered housing, offices, workshops, manufacturing space, etc. However, this is a very rigid and costly way of thinking. This results in a poor social mix in residential areas and forces people to leave the area when they pass from one category to another. In commercial developments these strict categories lead to shortages in one category and surpluses in another as the market changes. Also, start-up businesses are constricted by the terms of commercial leases or the lack of small units.

We do not know what the future holds as to the impact of global warming on climate, on population and on the economy. We therefore propose that planning policy be used to introduce greater flexibility into the building stock. Policy in the Local Plan should provide the authority with powers to implement flexibility by calling for a mix of land uses, forms of tenure and built form.

We suggest there should be a new **Policy D1(c) Flexibility**

The Council expects good design in terms of incorporating flexibility into new developments which should:

1. for residential developments, address the criteria stated in the “Lifetime Homes Design Guide”,
2. for non-residential developments, produce long-life and loose-fit buildings to incorporate the flexibility to respond to changing uses.

7.2.4 Accessibility and security

We are concerned about the increasing privatization of public space and the tendency to create gated developments as a response to security issues. We also wish to encourage

walking, cycling, mobility among older people and the disabled. We therefore propose a policy to enhance accessibility and a permeable urban structure.

We are aware that this issue is closely associated with security issues, such as those discussed in the document “Safer Places - The Planning System and Crime Prevention”. We support the principles outlined in this document, with the qualification that a balance is achieved in their application regarding an understanding of the particular local context.

We suggest there should be a new **Policy D1(d) Accessibility and security**

The Council expects good design in terms of incorporating accessibility and security into new developments which should:

1. ensure that community facilities such as shops, schools, workplaces and open spaces are easily accessible through safe routes and be located at appropriate distances,
2. be integrated into the existing circulation network consisting of roads and footpaths, and strengthen this existing pattern of routes,
3. provide easy wayfinding through and around buildings and layouts.

7.3 House Extensions and Replacement Buildings.

We consider that paragraph 7.16 does not fully address the design quality of the proposed extensions. We consider that the same criteria should apply to an extension as apply for a new build e.g. that they should comply with the Design SPD checklist and applicable principles set out in our proposed policies D1(a) to D1(d). This paragraph should also cross refer to our proposed policy HDS4(e) Retrofitting on providing energy efficiency improvements to the whole property.

With respect to paragraph 7.17 regarding modest rural workers dwellings we consider that the design quality and energy improvements outlined above should also apply. We also propose that a requirement that the development not detract from the rural environment be added to the conclusion of this paragraph. There should be a cross reference to our proposal for **Policy CGB5**.

We therefore propose the following additional item for **Policy D2**:

3. Extensions and replacements should comply with the same design criteria as those required of a new building.

7.4 Protecting Living Conditions.

We consider that paragraph 7.18 requires further clarification:

- After ‘...ensure that the adverse impacts of the development on these people are minimised’, add ‘For example (a) Domestic extensions can often be highly contentious (b) Some farm diversification schemes could seriously affect living conditions’
- Also add: ‘Noise, odour and air pollution during the construction phase should be suitably controlled.’

We have some concerns regarding paragraph 7.19 which deals with the practicality of providing absolute protection for existing residents' and occupiers' current living conditions. This would be strengthened by adding ‘at the Design and Access Statement stage.’ to the sentence at the end of this paragraph.

We propose the following to be added to **Policy D3 Protecting living conditions**:

5. (including light pollution and odour)
6. dominance and visual discord

Also a new last sentence is suggested:

The potential impacts of construction will also be taken into account and appropriate proposals for mitigation will need to be identified.

Note: we suggest that **Policy D4: Air Quality** should be transferred to Section 9 where it can be broadened to cover issues related to the wider environment.

8. HEALTHY COMMUNITIES

8.1 Introduction

We have four major areas of concern in relation to this section:

- There is insufficient analysis of, and emphasis on, the need for community facilities such that all residents have access to them; and there is no provision to supply such facilities for residents who currently do not enjoy them.
- There is little in this section which addresses the need for specific facilities (such as schools and health related facilities) for significant developments which are insufficiently large to justify a Masterplan.
- The approach to the provision of green space in the most recent Green Space Study is flawed and will ensure the continued erosion of all types of green space.
- The section fails to refer to the role of walking and cycling in promoting healthy living and well-being.

8.2 The needs of communities

The provisions of Policy HC1 are reasonable, but the conditions for developments resulting in loss of facilities are not sufficiently robust, and could result in replacement facilities being inaccessible. There is no overview of future needs in the context of existing provision and the specific requirement related to the new housing.

We note that in para 8.1 items listed include such essential facilities as schools and health related facilities. We are concerned that, in the absence of a Masterplan for small developments, planning for such facilities to serve developments (which may still be significant in size) may be weak and result in unacceptable impact on existing facilities. We are concerned that there is no requirement for local stakeholders to have a say in the potential closure of community facilities. Elsewhere there are areas that are not served by a local community facility.

We suggest that there should be references in **Policy HC1** to health facilities and schools.

In addition **Policy HC1** would benefit from re-drafting as follows;

- 2. We suggest '...alternative location which is readily accessed by public transport, cycle and pedestrian routes from the community which the previous facility served.'
- The final paragraph should be modified to add 'to ensure all residents in all electoral wards have access to a local community centre within reasonable walking distance'.

8.3 Green space

Green space contributes significantly to the health and well-being of communities and individuals in a number of ways which are well documented. We are therefore concerned at the proposed changes to dilute the standards identified in the 2009 Green Space Study.

NPPF para 73 states: ‘.....assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.’ The Green Space Background Paper (Nov 2014) is, by contrast, based on an empirical approach to what has been achieved in terms of green space over recent years. There is no attempt to identify specific needs as required by the provisions of NPPF para 73, and was undertaken for the 2009 Green Space Study.

We welcome the fact that the Council is currently commissioning an Indoor and Outdoor Sports Facilities Study and that it will meet the latest Sport England requirements. We are, however, concerned that until this study is completed, some existing sports facilities may be considered as preferred development land or be given planning permission for redevelopment.

Our conclusions are that:

- If the 2009 Green Space Study is no longer fit for purpose, it should be amended on the basis of the current situation, using currently accepted standards. We would point out that the significantly lower standards applied in recent developments will mean that current overall provision will be lower than in 2009.
- **Policy HC2**, assuming that the needs remain the same as in 2009, should be modified to include a commitment to implement the quantity standards specified in table 39 and the accessibility standards in table 41 of the August 2009 Green Space Standards document for each of the 4 towns as a whole by the end of the plan period.
- No planning application involving sports facilities should be determined until the Sports Facilities Study has been published.

8.4 Promoting Healthy Lifestyles

Whilst we are pleased that there is some provision in this section for outdoor sports, we believe that an opportunity has been lost in the Preferred Options Report (POR) as a whole to promote the health benefits of exercise through walking and cycling.

NPPF para 75 states: 'Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.'

Hertfordshire County Council's Rights of Way Improvement Plan April 2011 (ROWIP) Core Action 9.1 states that it will 'Support the development of Supplementary Planning Guidance for new Local Development Frameworks in order to ensure that improvements to the non-motorised network are identified and incorporated in all new developments.'

Whilst acknowledging that NHDC is not a highways authority, it is clear that other District Councils in the County have a proactive and successful approach to such provision. For example, Hertsmere Development Plan Document: Core Strategy (2013) para 7.24 states: 'Since the late 1990s the Council has actively promoted the development of a largely car-free network of routes known as Greenways. These routes for pedestrians, cyclists and horse riders are intended to run within and between urban destinations and into the countryside. The Council also recognises the role of Hertfordshire County Council's Rights of Way Improvement Plan in maintaining networks of those routes around the Borough and across the County.' The Greenways referred to are popular, and we believe that NHDC could implement a similar policy with equal success. The policy would need to include a commitment to linking existing footpaths and bridleways where historical routes have been severed by more recent infrastructure development.

To maximise health benefits, such an initiative will require publicity and education. This policy should provide for actions supported by HCC's ROWIP Core Action 12: 'Identify and address potential demand for access to the countryside amongst those who currently do not use the network.'

Our conclusions are that:

- There should be a cross reference from this section to Section 5 on the need to develop new walking and cycling routes, and also to link existing routes safely.
- A new **Policy HC3** should be drafted:
The Council will undertake research into demand from potential walkers and cyclists, and will implement measures to publicise and incentivise the health benefits of cutting the number of home to school and work car journeys. In this context, the Council will work with developers to ensure that appropriate routes are provided in conjunction with development to encourage non-car trips.

9. NATURAL ENVIRONMENT

9.1 Introduction

We have six major areas of concern in relation to the Natural Environment section:

- Insufficient emphasis placed on the landscape character areas in the District which could lead to inappropriate development and failure to provide adequate protection to sensitive areas.
- The lack of specific policy statements that promote biodiversity.
- The omission of policies that address air quality, noise and recycling.
- Flaws in the assumptions underlying the commitment to the water consumption limit of 105 litres per person per day which will make it unrealistic, and failure to distinguish between water supply and water demand.
- Failure to take full account of the implications for waste water treatment works over the plan period.
- Inconsistent drafting of several policies which could lead to failure to carry out key risk assessments prior to granting of planning permission.

9.2 Respect for the Character of Landscapes

We are concerned that the provisions of Policy NE1 will provide insufficient protection from inappropriate development for sites that are not designated as SSSIs, AONB or RAMSAR sites. The policy refers to the North Herts Landscape Study, which we regard as a valuable piece of work. However, it does not fully take into account the potential of this comprehensive assessment and its recommendations to provide protection against detrimental development.

Our conclusion is that the second sentence of **Policy NE1** should be re-worded as follows:

Development proposals should be of a size and nature that respects the Strategy and Guidelines for Managing Change laid down for the landscape character areas identified in the North Herts Landscape Study (2011). Developers must show evidence that they have taken these guidelines into account in any planning application.

The third sentence can then be removed.

9.3 Promoting Biodiversity

We believe that Policy NE2 could be more proactive in specifying ways in which green infrastructure could be extended and improved. There are examples of good practice in schemes adopted by other LPAs. Sefton Council, for instance, has required developers to plant three trees for every new home created, and two trees to be planted for every tree not retained as part of a development (Sefton Council, Green Space Trees and Development SPD,

July 2008, para 2.50). Trees not only contribute to biodiversity, but to air quality and the aesthetic appeal of a location, so such measures have wide-ranging benefits.

Our conclusion is that Policy NE3 should include an obligation for specific biodiversity offset measures.

9.4 Air quality, noise, and waste reduction

The NPPF para 109 states: ‘The planning system should contribute to and enhance the natural and local environment by..... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.’

Policies on noise and air pollution appear in Section 7 (D3 and D4) but these are limited to the direct impact of, or on, new developments. The intention of NPPF para 109 is to provide protection to existing communities as well, which is likely to include measures aimed at addressing issues within, for instance, Air Quality Measurement Areas (AQMAs).

Our conclusion is that new Policies NE3(a) to (d) are needed to address the issues related to:

- improving air quality (incorporating supporting text and wording from **Policy D4**)
- reducing noise
- reducing CO₂ emissions
- increasing recycling and re-use (and reducing the amount of waste sent to landfill).

9.5 Delivering sustainable water supply

Policy NE5 is entitled ‘Delivering sustainable water supply’ yet it is entirely about water use.

In relation to use, there are significant flaws in the assumptions underlying the water consumption limit.

The Rye Meads Study makes it clear that the target of 105 litres per day per person will not be achieved simply by the fitting of a range of appropriately designed taps and toilets etc. That figure can be achieved only if grey water is recycled, and if consumers are appropriately educated (Rye Meads Study 5.2.2). The long-term viability of householder-maintained grey water re-use schemes is currently unproven beyond individual experiments.

We conclude that there need to be substantial changes to **Policy NE5**:

- The policy needs to address issues of water supply.
- If the target of 105 litres per day per person is to be achieved, we believe that the Local Plan should be much clearer on the tactics that will be employed by NHDC in the drive to achieve it in new properties.

9.6 The impact of development on Waste Water Treatment Works (WWTW)

In the explanatory text for Policy NE8, paras 9.46 to 9.48 discuss the Stevenage and Royston Water Cycle Studies, but are silent on other treatment works, notably Hitchin, Ash Brook and Letchworth.

The Rye Meads study states that Ash Brook WWTW may have the potential to take waste water from the West of Stevenage and/or North of Stevenage developments, but would require upgrading and may have difficulty meeting dilution requirements. It suggests that a post-treatment sewer would be required to the River Hiz beyond Hitchin WWTW which is a substantial distance (see Rye Meads Study page 103).

The study also states that Hitchin and Letchworth WWTWs have some capacity, but may require mitigation measures for increased throughput. The Rye Meads study (page 127) states that development of Hitchin WWTW may be constrained by flood risk, and by downstream water quality. The Strategic Flood Risk Assessment (SFRA) identifies that while the capacity of Hitchin WWTW is adequate up to 2021, it has limited capacity for expansion and that Anglian Water do not see its expansion as practical in the long term. It is unclear whether the impact of the proposed housing developments in Hitchin, or elsewhere, have been taken into account in this assessment. There is discussion in the SFRA of the potential location of a new Works.

We would expect Section 9 to refer to Ash Brook, Hitchin and Letchworth WWTWs and to discuss the consequences of the Plan's provisions on them - their capacities and ability to cope with the Plan's provisions and/or the implications of any required increase in capacity, particularly discharge dilution. If Hitchin WWTW is likely to reach capacity during the Plan period, we would also expect the location of any new treatment works to be discussed.

Our conclusion is that **Policy NE8** should include text after para 2 relating to impacts of developments other than those around Stevenage on other WWTWs in North Herts. Tightening of the requirement for drainage strategies for smaller developments is dealt with in section 9.7 below.

9.7 Inconsistent drafting of policies

NPPF para 120 states: 'To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.'

Several policies in this section are not, in our view, consistently robust in the demands made upon developers to demonstrate that such impacts will be taken into account. We believe that this can be achieved by re-drafting of policies to ensure that appropriate impact assessments are made as part of the planning application process. This applies equally to policies affecting water supply and flood protection. We are also concerned that there is no drainage strategy required for smaller sites.

Our conclusion is that a number of policy sections need to be re-worded:

Policy NE2 Green Infrastructure

Developers must demonstrate that they have applied the guiding principles of the Green Infrastructure Plan in the preparation of any planning application (see para 3).

Policy NE6 Reducing Flood Risk

As part of the application process, developers must show that any flood protection and mitigation measures which may be necessary do not have an unacceptable impact on nature conservation, landscape and recreation (see para 4).

Policy NE8 Water Framework Directive and waste water infrastructure

New paragraph 2:

As part of the planning application process, developers must demonstrate that the effect on nearby watercourses has been taken into consideration, and proposals for watercourse restoration must accompany the application.

On all sites of 10 or more dwellings, developers will be expected to submit with a planning application a drainage strategy to show how adequate infrastructure will be constructed, and will be required to ensure it is in place before development commences (para 3).

Policy NE9 Contaminated Land

All development proposals must be accompanied by an assessment by a suitably qualified person on the potential or actual impact of land contamination on surrounding receptors, otherwise the proposal will be refused (para 1)

Move the last paragraph on receptors to the end of the first (as modified above).

10. HISTORIC ENVIRONMENT

10.1 Introduction

We strongly support the commitment to the Historic Environment in the Plan, and the principle that the historic environment is central to the District's 'attractiveness' as a place to live and work. We do however have some concerns:

- The text does not address the distinct identities of the main towns which is a key issue for the District.
- There are some issues related to identification of heritage assets that we think should be covered.
- Wider coverage of the urban landscape context should be included in guidance.
- There needs to be a fuller statement of what should be taken into account when considering demolition of Buildings of Local Interest.

10.2 Distinct Identities of the Towns

The current drafting is sometimes an uncomfortable mix that lacks overall context but includes elements of micro-management. For example, there is mention of concerns over 'long straw' under 'Listed Buildings At Risk' (which might be better placed under 'Listed Buildings'). In contrast, there is no specific recognition in Section 10 that the essential characteristics of **the** historic environment (and linked identities) vary across the District and not just in relation to Conservation Areas. The crucial point is that three of the main towns are in close proximity but, nevertheless, preserve very distinct identities.

Our suggestion is that **Policy HE1** should begin with the following statement, to replace the existing sentence:

The Council will, on a timely and consistent basis, deliver its Heritage Strategy recognising intrinsic differences in local historic characteristics within the District. These differences will be carefully reflected in the application of the relevant policies and in the contexts of the detailed Settlement Summaries contained in Section 12.

10.3 Identifying Heritage Assets

In paragraph 10.10 on Historic Parks and Gardens, there is mention of the Council working with the Hertfordshire Gardens Trust (HGT) to identify other sites of interest. A key omission for us is any reference to Hitchin Priory Park (both 'inner' and 'outer'). The Park was the subject of a detailed assessment prepared by the HGT for NHDC in 2003; this omission is in spite of the fact that the current draft implies the importance of working with the HGT and accepts the English Heritage Register is incomplete.

In paragraph 10.13 on Heritage Assets of Local Interest, there is no mention that Local List criteria require specific provision for periodic 'spot' updating/reassessment. This is in addition to the normal cycle of Conservation Area reviews and a reference should be made as follows: '... the council intends to continue its programme of producing local lists for each town and parish and will undertake periodic 'spot' updating/reassessment.' We consider that this statement should also be included in **Policy HE1**.

10.4 Design Guidance

Design Guidance should be developed for the wider urban landscape issues within settlements. In addition to references to shop-fronts and advertisements in Conservation Areas., there should be additional wording in **Policy HE1**:

5. guidance on wider urban landscape issues (such as use of local/compatible materials, scale, grain and historic legacies of streetscape, types of street furniture etc)

10.5 Demolition of Buildings of Local Interest

Under Local List criteria (both within and outside Conservation Areas) reference should be made to exploring reuse and modification.

Policy HE1 should include a reference to 'whether within or outside a Conservation Area' in the two mentions in paragraph 2. It should also include at the beginning of paragraph 3:

Permission to demolish should not be granted unless a proposal for re-use/modification has clearly been assessed as impossible. Assessment of proposals affecting heritage assets should include careful consideration of the particular historical contexts of the location affected.

11. INFRASTRUCTURE AND DELIVERY

11.1 Introduction

The Preferred Options Report (POR) is particularly weak on infrastructure and needs to be strengthened considerably for the Local Plan.

In particular, it is clear from the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA, November 2014) that the overall effects of the current policies and proposals are only very marginally considered to be positive. Of the objectives assessed to be either uncertain in outcome or potentially negative, a significant number are dependent on delivery, for instance: the objective of improving conditions and services that engender good health and reduce inequalities; reducing pollution from any source; and promoting community cohesion (SA/SEA Table 3). Targeted delivery of facilities and services in the context of the policies and proposals could make a significant difference to achieving the Local Plan's objectives.

Our specific comments are as follows:

- There is need for greater clarity on infrastructure delivery including monitoring.
- It is vital for the financial aspects of delivery to be clarified in the Local Plan when it comes forward for the next stage of consultation.
- The requirement for Masterplanning should be extended to the next level of sites below the strategic, in order to deal with the full range of issues involved at these sites.

11.2 Infrastructure Delivery and Monitoring

Supporting evidence includes an Infrastructure Delivery Plan (IDP). Although running to 218 pages, this document contains very little on infrastructure to be provided, timing or costs. The IDP dates from January 2013, and where it is specific it is often out of date. As well as being edited down to a concise and readable document, the IDP needs to be brought up to date in the context of the latest proposals. The Hertsmere document *Hertsmere Infrastructure Assessment, Feb 2013* might provide a useful model for enhancing the IDP: It is much shorter, more readable and with more planning detail.

The following specific points should be addressed:

- The Local Plan and IDP need to include a schedule of house-building activity for the years of the Local Plan (a 'housing trajectory' in NPPF terminology) which clarifies when the main sites are likely to be developed, so that scheduling of infrastructure provision can be more easily planned and co-ordinated.
- The mechanism for monitoring progress in house-building and infrastructure needs to be made clear so that development does not take place without the prior or simultaneous provision of the necessary infrastructure. There needs to be a

commitment to liaison with service providers as part of the monitoring process each year.

- There is clearly an inconsistency between proposed new housing development and supporting local road infrastructure. The implicit assumption is that problems with congestion and excessive traffic in residential areas are simply to be allowed to get worse. It is necessary to make a case for either reducing the housing numbers or strengthening infrastructure provision. The POR as it stands is unsatisfactory.
- Annual Monitoring Reports, as well as covering infrastructure requirements, should include the additional key issues raised in our response and formulated as objectives (see Section 2), such as: the mix of housing types, the space standards achieved in new housing, and the actual performance in use of completed developments monitored against zero carbon standards.

11.3 Financing of Infrastructure

The Local Enterprise Partnership (LEP) funding process is largely business-led and is likely to lead to infrastructure development only where it generates extra economic growth. It is therefore doubly important that the Local Plan identifies investment which will have a primarily environmental benefit and help to reduce single occupancy car traffic, such as provision of safe cycle routes. Furthermore, although the LEP vision focuses on the major economic centres on the north/south axes, it fails to address the severely overstretched and underdeveloped east/west transport links – which are likely to become an even greater issue with the proposed increase in housing in the District, including the edge of Luton and around Stevenage.

In the context of the likely continuation of budgetary constraints on other sources, the key to the realisation of the IDP hinges critically on use of Section 106 and the Community Infrastructure Levy (CIL). The POR places some reasonable and robust requirements on developers, and this is welcomed. However, the lack of synchronisation between the IDP and proposals needs to be remedied.

A fully revised IDP together with a CIL proposal should be put forward for consultation alongside the next draft of the Local Plan. A CIL will ensure that adequate funds are raised to meet the infrastructure requirements arising from the combined burden of the smaller developments, as well as the larger sites.

We therefore urge that **Policy ID1** should include a firmer commitment to the use of CIL in paragraph 4 by changing ‘may’ to ‘will’; and ‘and/or’ to ‘and’.

11.4 Masterplans

The range of issues at Highover Farm suggests that, if it is to be included in the Local Plan, it should be subject to a Masterplan. In addition to the strategic sites, we suggest that sites of about 500 homes should also be subject to an overview (undertaken with the existing local community) of how the housing, access, open space, landscape improvement and related facilities will be achievable on the site, and address the full range of policies in the Plan.

Our conclusion is that **Policy ID2** should be altered as follows following the list of strategic sites:

Masterplans will also be prepared for the following non strategic sites: Highover Farm in Hitchin, and land off Mendip Way in Great Ashby (with its need for a primary school).

We also suggest that:

- The main list of matters for the existing list 1 of strategic sites should include: mix of housing sizes and type, and provision for sheltered accommodation as suggested under 6.3.2.
- A note should be included at the end of the policy to clarify that the list 2 sites are not expected to include provision for employment or sheltered housing.

12. COMMUNITIES - HITCHIN

12.1 Introduction

We find this section on the individual communities extremely disappointing, because, apart from the actual lists of the preferred sites in each settlement, the text is almost purely descriptive of the place in question and completely lacking in specific forward-looking ideas or sense of aspiration for the future.

It is tacitly acknowledged in Section 12 of the Preferred Options Report (POR) that each of the towns has its own character, but little attempt is made to explain how, through the planning process, the character of a town could be enhanced or improved. We would have expected at this point a much more detailed and 'tailor-made' approach to each settlement, in particular to the three neighbouring towns of Hitchin, Letchworth and Baldock, to reflect not only their own individual characteristics, but also their future needs.

We can approve paragraphs 12.90 and 12.91, though we regret that the Town Centre Strategies were not reviewed in time to be included in the Preferred Options Supporting Documents and thus could not feature in the present consultation.

Our purpose in this section of our response is to assess the effect which the policies contained in sections 2 – 11 of the POR would have in the case of Hitchin; we outline here the characteristics, needs, opportunities, ideas and aspirations which we would have liked to see identified in Section 12 of the POR.

12.2 Vision and Objectives

We believe that each of the towns in the District deserves to have its own distinctive vision and set of objectives, and we give below some examples of the kind of aims which we would like to see included for Hitchin, in order to improve or maintain the vibrancy of the town centre's day and night time economy for residents and visitors:

- Ensure that the town centre meets the needs of present and future residents by flexibility in the provision of housing, encouraging such initiatives as live/work units, and catering for differing age ranges and changing family circumstances.
- Meet community needs by providing adequate local community facilities which can be accessed by all sectors of the population.
- Foster and maintain a destination town centre, which remains prosperous and is welcoming to visitors, by ensuring adequate parking, signage and other facilities, such as an attractive public realm and perhaps a dedicated tourist office.
- Encourage retail development in incremental steps to match the traditional development of the town centre's historic core, and work together with Hitchin Markets and Hitchin Initiative to improve and enhance the infrastructure of the market.

- Actively support and encourage new cultural and leisure facilities in the town centre for all tastes and age groups.

Beyond the town centre we would like aims to include:

- Improve and maintain the network of footpaths through the town and leading out of it, enabling easy access to open space and the countryside beyond.
- Strengthen the urban edge of the town with additional planting and other landscape treatment.
- Ensure new housing meets local needs and improves the balance of the existing stock in terms of type and size of accommodation.
- Ensure the new development fits with the grain of the surrounding area, and provides local pedestrian and cycle links to open space and facilities.

12.3 Economy and Town Centres

Employment Areas – It is clear that Hitchin's industrial/employment area has languished since the mid 1990's, not least because of the embargo placed on traffic-generating development here in the 1996 Local Plan (p. 62): *"Currently, the traffic generated by employment areas HE1 and HE2 creates significant adverse effects on the environment of adjoining areas and the roads and on the safety aspects of the road system. The Council will refuse development proposals which will give rise to significant increases in traffic until the completion and operation of highway works, based upon a satisfactory outcome of a traffic study of the surrounding road system."* We regret that this issue has still not been addressed.

For Hitchin, we suggest three options which we feel will lead to greater investment and improvement in the employment area:

- The metal recycling plant in Hitchin should be actively encouraged to relocate to a more appropriate site (away from residential areas) with better road connections (i.e. close to the A1 (M) motorway). This would conform to NHDC's redesignation of the employment area to business use only.
- A new direct link road should be created to Stotfold Road. Discussion with Letchworth groups indicates that they would not object to this. It is regrettable that the Proposals Map does not even show the route of the new railway flyover as this could provide some parameters for a suitable route.
- Encouragement for creative and art related industries could lead to incremental improvement and investment in the less attractive areas and those office buildings that have been vacant for long periods.

Town Centre – Hitchin's historic medieval core is of special importance. It retains an early medieval street pattern focused on the parish church and original market place that has evolved over almost

1500 years. Many surviving buildings can be dated in origin to the 15th century and subsequent changes have created a unique grain and scale which it is vital to preserve as modern needs are accommodated. Much of the historic core forms Hitchin's largest Conservation Area and includes many Listed and Locally Listed structures. Practical policies are needed for the long term management of this key area, e. g. respect for the Conservation Area Character Statements and attention to detail in applying a Shop Front Design Guide.

In the context of Policy ETC5: Tourism, we would wish to see support for Hitchin becoming increasingly a 'destination' centre, drawing visitors from a wider area to its market, specialist shops and services. It is a matter of concern that there is no reference whatsoever to Hitchin Market in the Preferred Options Report (POR), given it is one of Hitchin's main visitor attractions, but also its importance to the town's economy and the much wider hinterland around the town. As we indicated in *Planning Hitchin's Future (PHF)*, Hitchin is "*the main town centre in the District and with the draw of its attractive historic environment, Market, specialist shops, major museums, theatres and other facilities, it has a strong basis to increase its role as a destination for day visits for a wide range of retail, service, leisure, cultural and recreational purposes*" (1.3). This provides important opportunities for the town's future prosperity and should be acknowledged in this chapter in the context of Policies ETC6: Town and local centres and ETC8: New retail, leisure and other town centre development.

Opportunity areas in Hitchin should also be identified here:

- Churchgate: the draft Plan should give a clear direction in the light of the Council's changed priorities here.
- Public realm improvement opportunities: the environment along Queen Street, improved hard and soft landscaping at Moss's Corner, the long-promised continuous riverside walk, and traffic calming and environmental improvements at Paynes Park.

12.4 Countryside and Green Belt

We would like here to comment on the Hitchin sites, non-preferred as well as preferred, which are in the Green Belt:

Countryside beyond Priory Park ("Priory Fields")

As stated at 4.2.6, we very much welcome the fact that this area is no longer a preferred site for housing. In addition to the technical grounds for removing it from the list, we feel there needs to be greater recognition of its recreational / leisure value for Hitchin. This was highlighted at the end of July 2014, when almost 300 people marched over Priory Fields to demonstrate their outrage at the prospect of losing it. The high level of use was further documented in September/October 2014 with a walker survey (available on: <http://www.hitchinforum.org.uk/priory-fields-user-survey/>). It would be very helpful to

have this recreational aspect recorded in the background documentation at the next iteration of the Local Plan. Priory Fields also contributes to the setting of Hitchin, it contains the Icehouse Wildlife Site, areas of archaeological interest and Tree Preservation Orders, it is adjacent to the Charlton Conservation Area and to listed buildings. If built on, access would be extremely problematic. The Council should use its best endeavours to secure the protection of this land for the long-term benefit of local people.

HT1 – Highover Farm

This, although not a strategic site, is expected to take a relatively large amount of new housing. It is admitted in the Site Selection Matrix (SSM) and in the Planning Constraints Matrix (PCM) that there are concerns about many aspects of this site, most significantly school capacity and access, for instance, existing congestion on roads and at junctions on Stotfold Road, Cambridge Road and Walsworth Road must be addressed. These and other issues will need to be investigated thoroughly. At the very least, Transport and School Capacity Assessments must be carried out before NHDC produces the next draft of the Local Plan, and ideally we would like to see a Master Plan developed for this site. We also suggest that a range of sites could contribute to financing additional school provision.

Careful attention must be paid to the impact of any development on the setting of Highover Farm. Substantial boundary planting will be needed to provide a buffer around the original buildings so that their context of an ancient farm is protected. These Buildings of Local Interest are referred to in the Planning Constraints Matrix and centre on an old established farm house, dating from 1599, together with barns, one of which is thought to contain timber-work dating from the 17th century. In this connection several points need to be clarified both for the short and long term – for instance, is the farm to continue operating on a smaller scale on land surrounding or adjacent to the new development? What is to become of the farm buildings? Are they intended for other uses? If so, what future uses are envisaged? It is important that answers to these questions are provided in the next draft of the plan.

We hope too that planners will be mindful of the necessity for integrating the new community into its surroundings by providing such facilities as pedestrian and cycle routes to Cambridge Road and Woolgrove Road, improving rather than closing the Walsworth Community Centre and ensuring that density should be low at the settlement edge. Planting will also be essential here to protect what is an exposed site and to provide a visual green context in views from Stotfold Road.

HT3, HT4, HT5 and HT6 – West of Hitchin Sites

These sites, although relatively small individually, will together comprise over 100 houses, with attendant demands on local facilities, notably roads and schools. As for all Hitchin sites,

the PCM admits issues with school capacity, so we think it essential that a town-wide School Capacity Study be undertaken.

As far as access to these sites is concerned, all are problematic. For example for HT4, the SSM states that 'access via Lavender Way should be acceptable', but if drivers go via Victoria Road/Lavender Way, then onto Oughtonhead Way, the roads are narrow and the houses lack garages, so there is often much on-street parking and consequently considerable congestion. Again, it is essential that Transport Assessments are carried out before the next draft of the Local Plan is issued.

It is vitally important, if building does take place in these areas, it should extend no further than the natural boundary of the ridge line and that height and density should be low at the settlement edge with extensive planting to provide screening, to ensure that the new developments are not visible from the valley.

HT2 – Pound Farm near Gosmore

We feel strongly that development should never extend further than this towards Gosmore, and that this limit should be indicated by a strong settlement edge.

We would reiterate for all the sites that transport studies should be carried out rigorously in advance of any roll-back of the Green Belt occurring, as there are already difficulties in Hitchin due to the inadequacy of the existing local transport infrastructure (see also Section 5).

12.5 Transport

The key transport reference document is the Hitchin Urban Transport Plan (HUTP) of May 2011. This provides a summary of the key local problems identified at that time, and although progress has been made in one specific area (disabled access within the railway station now achieved through the installation of lifts), little or no progress has been made elsewhere. We consider that the Local Plan should include specific aims in relation to key deficiencies in Hitchin's transport infrastructure.

Walking and cycling improvements

- Changes to the road network of Hitchin over recent decades have been made to reduce congestion and speed-up motor traffic with little regard for the needs of pedestrians and no provision for cyclists. Priorsy bypass (Park Way) resulted in the severance of long established walking and cycling routes, while the Paynes Park one-way system isolated important community and retail sites from the core of the town centre. The difficulties in providing better access for pedestrians and cyclists are recognised and are partly due to poor decision-making in the 1970s.

- The A505 Cambridge Road offers possibilities for improved cycle and walking access, linking with an existing segregated cycle path towards Letchworth. From this direction, access to the railway station is very poor with the A505 railway bridge being highly unattractive for pedestrians, and hazardous for cyclists. We believe that with an additional housing allocation likely at Highover Farm, and with greatly improved facilities at North Herts College, new walking and cycling links are needed at this point.
- There is also an urgent need for better and safer facilities for pedestrians and cyclists at:
 - A602/B656 Three Moorhens roundabout
 - A602/A505 Tilehouse Street roundabout
 - A600 Bedford Road/Redhill Road junction
 - A505 Cambridge Road/Stotfold Road junction
 - Cadwell Lane crossroads.
- We consider that these changes should be prioritised ahead of any expenditure to relieve motor traffic congestion at these points.
- NHDC put considerable effort into planning a *North Hertfordshire Towns Proposed Cycle Route Network*, publishing an extensive report and plan in 1999. There has been negligible progress since that time, and despite the inclusion of some of the routes in the latest HUTP, there still appears to be no activity. The cycle network needs to be properly promoted in this Local Plan.

Public transport improvements

- We find major inadequacies here – Hitchin’s rail services are of key importance for a range of destinations both within the county and beyond. The town is by far the most important rail-head in the District judged by passenger numbers, service levels and wider linkages. The station forecourt has been re-modelled to facilitate bus services; ideally these should be expanded and co-ordinated with rail services in terms of timetabling and through ticketing. At present, because there is no such co-ordination, the linkages provided fall far short of any form of integrated transport model. The District Council should press for better bus-rail integration at Hitchin, and key weaknesses, such as the lack of bus services for early morning and evening passengers, should be addressed.
- While we understand the pressure to re-use brown field sites for housing development we would deplore any further losses to Hitchin’s ‘rail-connected’ land without very careful thought indeed. Disposal of such land could create a rail operational strait-jacket and threaten Hitchin’s current place in the hierarchy of passenger services as well as preventing any imaginative reuses such as for freight, improved station access (see below) or East-West rail project links.
- Buses provide the main form of public transport within Hitchin. Through ticketing should be an objective, so that passengers are not disadvantaged if a journey requires a change of bus or, indeed, bus company. Similarly, rail/bus through

ticketing is an essential aim for any modern integrated transport system. Digital displays of bus times are available at certain bus stops in Hitchin. These displays should be provided at all the key bus locations showing both timetable and 'real time' information. Bus priority measures should also be provided to improve the quality of services, and make them more attractive to people already with access to a private car. There are currently no bus priority measures in Hitchin and opportunities should be sought for implementing these where possible. Overall, a step change in the quality of bus services is required if they are to play their part in a move towards more sustainable and integrated public transport, and this means NHDC being much more pro-active in urging such measures on Hertfordshire County Council.

Road Network

- Under supporting evidence, there is a worrying document: *Transport modelling for cumulative impacts of Local Plan Preferred Options paper (AECOM, November 2014)*. One of the main thrusts of this is to try to force more traffic through the Paynes Park one-way system, rather than improve it by traffic calming or a return to two-way traffic. Under scheme HM3 there are details of a slip road through the garden of Charnwood House, stealing land from the pavement and planting by the ex-courthouse. Scheme HM2 suggests replacing the A505/B655 with traffic lights and a land-grab from front gardens in Upper Tilehouse St. This may well be due to faulty modelling as this junction works very well; the hold-up is all at the Paynes Park roundabout. NHDC needs to push back against this kind of scheme promoted by traffic engineers and prioritise improvement to the urban environment over an ultimately doomed quest to relieve congestion by adjusting junctions. The one-way system remains a major obstacle to the promotion of more walking and cycling by local residents.
- The Paynes Park one-way system separates important community sites, and a major supermarket, from the town centre. Traffic using this system is often fast (30mph or more) and intrusive in what should be an area of town in which pedestrians and cyclists should feel comfortable and welcome. We believe that the Council should actively promote the abolition of the one-way system and the restoration of two-way traffic as appropriate. In particular, Paynes Park should become a pedestrian priority, so that pedestrian (and cycle) flows linking various parts of the town centre take precedence over motor traffic. If the highways authority is unwilling to make such a change in the foreseeable future, then an amelioration scheme should be promoted urgently. This should include segregated cycling facilities, and a far more "pedestrian friendly" form of crossing over a speed-restricted stretch of Paynes Park.
- The junction at Bedford Road/Paynes Park and Oughtonhead Way adds to the problem of the system. Traffic was already at 90% capacity there in 2012 – as recognised in the Response from Hertfordshire Highways 21.08.2013 (Samuel Lucas Expansion) – and there is no provision for cyclists. The time allowed for pedestrian crossing is short and car access to and from Oughtonhead Way is hazardous because

of the narrowness of the street and on-road parking. Proposed development at the top of Lavender Way and Bedford Street, both feeder roads to the junction, will only add to the hazards.

- Highover Farm (HT1) development has the potential to further overload the congested A505 on the east of Hitchin, particularly the Walsworth traffic light junction. A plan for dealing with the traffic from the development needs to be specified if it is to go ahead.
- The proposed development sites West of Hitchin (HT3, HT4, HT5, and HT6) have access problems with the only access routes being via Oughtonhead Way, Lavender Way, Victoria Road, Westbury Close, West Hill, Gaping Lane and Grays Lane, which are mainly limited to single file traffic by parked cars. Grays Lane's junction with Upper Tilehouse Street already suffers from severe congestion morning and evening, as does Oughtonhead Way. Traffic issues need to be resolved by adequate highways studies and plans before any development is allowed.

Access to the industrial area

- Improved access to the industrial area, especially for HGVs, should be an important aim of the District Council. The unsatisfactory situation of access being through residential streets is exacerbated by the size and number of HGVs carrying scrap metal to the industrial area. No apparent thought has been given to the idea of a new direct road link to Stotfold Road. This needs to be considered as a possible solution, although it is a matter of regret that this was not explored more actively when the Hitchin Curve rail scheme was at the planning stage. It is not clear whether the new rail line effectively precludes the option of a new road access to the industrial area; if it does, and no other possible road access route is available, then it might be regrettably concluded that no further expansion of the industrial area should be permitted.
- It is also regrettable that, when the Hitchin Curve was constructed, no consideration was given to the possibility of rail access to the industrial area - directly relevant to the sensitive issue of scrap metal movement.

Access to Hitchin railway station

- Given the District importance of Hitchin station as a railway hub it is unfortunate that access to the station has not kept pace with the steady rise in its usage. Access is from the west (town centre) side of the East Coast Main Line (ECML) and suffers from a restricted entrance on Walsworth Road. Access from the east of the ECML is problematic.
- Potential solutions to these difficulties have long been identified but no action has been taken. Improvement to traffic flows in and out of the station forecourt from Walsworth Road could be achieved by 'easing' the junction and traffic and pedestrian/cyclist lights; in particular, buses turning right out of the station could be helped by some form of bus-priority.

- A critical issue is the restricted pedestrian access to the station from east of the ECML despite the growth, over 40 years, of significant new housing and educational locations which generate rail traffic. The problem of the Cambridge Road bridge – with its single narrow width footpath - must be addressed as a matter of urgency (see also below). A new east side station pedestrian access from St Michael’s Road would help, as would another pedestrian link from the Benslow footbridge to the south end of the station car park.
- Rising passenger numbers at Hitchin have also put pressure on station car parking. Consideration should be given to providing decked accommodation, e.g. towards the south end of the station car park or to the east of the ECML off St Michael’s Road. Management of this issue has, so far, been entirely reactive by applying restrictive residents’ parking regimes to adjacent streets affected by overspill.

A505 Cambridge Road railway bridge

- The Cambridge Road bridge is a highly unsatisfactory part of Hitchin’s road network. It is a low bridge which cannot take high vehicles or double-decker buses. Despite warning lights, there is a risk of “bridge-bashing”, causing delays to rail services and an obstruction to road traffic. It is also dark and narrow, and must present a hazard to any cyclist prepared to travel this route. The pedestrian footpath is on one side only (the side away from the station entrance) and is so narrow that, for example, two walkers can barely pass.
- In many other locations (Harpenden and Luton are nearby examples) a bored passageway under the railway has been provided. This could be used by both pedestrians and cyclists, but this has always been rejected for Hitchin on cost grounds. With additional housing likely to be approved at Highover Farm, and with upgraded facilities at North Herts College, we believe the time has come for improved walking and cycling links to be provided at this point. This would also greatly improve access to the station for those living or working to the east of the railway, reducing the need for a separate entrance on the east side of the station.

12.6 Housing and Development Strategy

We have dealt with issues arising from sites in the Green Belt in 12.4. Here we comment on the Hitchin sites within the urban area in the context of Section 6 of the Preferred Options Report:

Preferred sites

HT7 – John Barker Place

We welcome the regeneration here, a major improvement and a good example of high quality design reflecting the needs of the area.

HT8 – Cooks Way

This is a sustainable location close to the station, but major landscape improvements will be needed to translate it into a high quality residential environment.

HT9 – College Site, Cambridge Road

This is a pleasant, convenient site not far from the station, which would contribute to revitalising the local centre.

Non-preferred sites

We would like to comment here on two of the sites not selected in the Preferred Options Paper for housing development:

Land at and around Churchgate

It is perhaps worth mentioning that this site could make some contribution to housing in the town centre, if the present Churchgate Centre were to be refurbished.

Goods Yard, Nightingale Road

The Site Selection Matrix considers that this site, if available, would be suitable for housing. We, on the contrary, are of the opinion that this land should be preserved for potential future railway use (see also Section 12.5). The Preferred Options Report (POR) excludes the location from the list of development sites, but includes an open invitation to anyone to come forward with a housing proposal. This reference is completely contrary to the proper procedure for preparing a Local Plan, and must be excluded.

12.7 Design

Hitchin has an important and unique historic character. So far as is practicable all development proposals affecting the Hitchin Urban Area should respect that unique character. Particular attention should be paid to schemes proposed for the Conservation Areas, although the attractive make-up of the town depends on the combination of the grain and texture of all its built-up area.

Standardised designs which create anonymous environments should clearly be refused, as should developments which do not reflect Hitchin's pattern of growth in small increments around the medieval core. We consider that developments in Hitchin, whether in the town centre or on its rural edges, should be informed by the guidance provided in the Hitchin Urban Design Assessment of 2007 and the Conservation Area Character Statement of 2011.

The essential character of Hitchin, which gives it a distinctive sense of place, is that of a network of well-connected streets and footpaths with buildings that address the street and that are of varying design but of limited extent and height, and constructed in traditional materials. We do not wish to

depart appreciably from this pattern. Any development on the periphery of Hitchin should have a new, attractive character of its own.

As Hitchin grew historically in small increments, developments generally adapted to the distinctive topography rather than reshaped it. Existing field boundaries, planting and watercourses were retained. This pattern of development should continue and become increasingly sensitive to its impact on the natural environment.

12.8 Healthy Communities

Community Needs - In Hitchin, needs and concerns centre around facilities which are either being demolished or will be insufficient for the larger population envisaged in the Preferred Options Report (POR). In the Planning Constraints Matrix (PCM), school capacity in the town is cited as being inadequate for every proposed new development. We feel that a proper school capacity study should have been undertaken before the POR was published. Surgeries in Hitchin are said in the PCM to have capacity, though dentists are not mentioned. Community facilities in Hitchin are inadequate – Bancroft Hall is to go, Walsworth Community Centre is under threat, and Bearton and Priory wards have no community centre at all. Indoor facilities are very necessary for social contact and cohesion, as well as for good mental health, especially when the population is getting older, and isolation and loneliness can become a problem. All of these issues should have been addressed in Section 12.

Green Space - We welcome the fact that the most extensive area of green space in Hitchin (Priory Fields) has not been chosen as a location for new housing. As well as having high visual sensitivity, it is of vital importance to the physical health and mental well-being of Hitchin residents who use it in large numbers for exercise and recreation.

Priory Fields, and indeed Hitchin generally, has a wealth of footpaths which link one area of the town to another and the town to the surrounding countryside. As well as being a part of the historic fabric and character of Hitchin, they are of huge value in facilitating safe access to open spaces within and outside the town. They should be enhanced and extended where possible as part of new development proposals.

12.9 Natural Environment

Respect for the Character of Landscapes - We believe that any new development in Hitchin, especially that on the Highover Farm site (HT1) and the West of Hitchin sites (HT3-6), must take account of the local landscape, not extend beyond ridge lines and obey very robust rules about mitigation and protection.

Promoting Biodiversity - It would be very desirable to have trees planted at a similar rate to dwellings built on all new developments, except the very smallest.

Air Quality - Hitchin has several areas of poor air quality, including one Air Quality Management Area in Stevenage Road. There are others where NO₂ levels are high. We would like to be assured that monitoring of these areas and action to improve the air quality will be undertaken, and demonstrated to be effective, before new developments bring even more traffic onto the congested streets of Hitchin.

Waste Water - The ability of Hitchin's Waste Water Treatment Facility to do its job efficiently and safely is questionable. We would therefore urge the Council, in collaboration with utilities companies, to put measures in place to ensure that the impact of new development in the town will be properly catered for in this respect.

12.10 Historic Environment

In place of the rather poor description of Hitchin in Section 12 of the Preferred Options Report (POR), we feel it should provide the most accurate encapsulation possible for Hitchin. In this regard our detailed comments are as follows:

Place in the Settlement Hierarchy

- Hitchin should be recorded as the historic centre of North Hertfordshire: it is one of the oldest continuously inhabited towns in the county, it was a Minster-parish centre and its Saxon Half Hundred, Royal Manor and de-facto Borough status predated the later administrative units of the district including the former Justices Bench, Poor Law Union, Registration District, Local Board/Sanitary authority and Urban and Rural District Councils down to 1974. Commercially it has been the area's key market, agricultural and service centre for almost 1500 years.

Hitchin's Heritage

- The origins of the town probably rest with both the church and the early market centre; it likely included original settlement along Queen Street in the fifth century in succession to Roman Baldock. Hitchin's present town centre has an early medieval pattern that has evolved over almost 1500 years.
- The distinctive layout and landscape of the town has been heavily influenced by its early medieval field patterns and the fact that Hitchin was never formally 'enclosed'. Today's urban area also includes the formerly separate, but historically connected, hamlets of Charlton, Walsworth and part of Ippolytts. Piecemeal development within this historic framework has impacted on the urban morphology of the town even after 1945. The resulting 'grain' of urban structure needs to be taken into account in assessing modern developments and framing policies for them. Note that it is incorrect to describe Bearton Green as a 'hamlet' absorbed by expansion of the core town.

- The town has an important legacy of Listed and Locally Listed buildings, a central core and three subsidiary Conservation Areas, three major and several smaller historic green spaces and a distinctive built structure and layout throughout. Hitchin scores particularly highly on the English Heritage ‘points criteria’ for historic importance for a town of its size.
- Hitchin has an important and unique historic character. Hitchin Urban Design Principles should be devised for the policies applied to the town as a whole, based on the Conservation Area Character Statements, to ensure retention of this distinctive historic identity.

12.11 Infrastructure and Delivery

All the shortcomings listed in Section 11 of our main response apply to Hitchin. We need to know a great deal more about specific infrastructure and delivery intentions than has been written in the Preferred Options Report (POR) and its supporting documentation. It is important to clarify issues such as the following:

- Arrangements have to be made about inadequate water and waste water facilities, since parts of the town already experience low water pressure and the treatment centres serving Hitchin are close to full capacity.
- There is a pressing need for provision of extra nursery and school places in Hitchin; this must be addressed as a matter of urgency, because the education service is at capacity now.
- Real problems can be envisaged in the delivery of infrastructure and housing, especially in the construction phase, in a town with such narrow streets and so much on-street parking, particularly on the approaches to the HT 3, 4, 5 and 6 sites to the west of Hitchin.

These issues have not been articulated in the POR, and they must be addressed in the next iteration of the Local Plan.

APPENDIX 1: HOUSING NEED 2011- 2031

1. Introduction

Establishing local need

- 1.1 Local Planning Authorities (LPAs) are not being given figures by the Government on how many houses need to be provided in their area. The National Planning Policy Framework (NPPF para 47 bullet point 1) and Planning Practice Guidance (PPG: para 46 of 06.10.14 revision) make clear that it is the role of the LPA itself to establish local housing need.
- 1.2 The North Hertfordshire Strategic Housing Market Assessment (SHMA January 2013 para 30) states that any figures from the Office of National Statistics do not represent a national 'target', should not constrain local decision making, and are not used as the basis of any projections.
- 1.3 In this context the SHMA (para 42) confirms that each of the growth scenarios considered in the document (low, mid and high) is likely to be compatible with the requirements of the NPPF.

Taking account of constraints

- 1.4 The PPG (para 44 of the 06.10.14 revision) goes on to state that LPAs should meet objectively assessed needs 'unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include.....land designated as Green Belt'.
- 1.5 The revised PPG (para 45) concludes that LPAs use their Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing 'take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need'.
- 1.6 We have therefore examined the information provided as part of the current consultation to assess overall housing need, and tested whether NHDC have

taken national policy and guidance sufficiently into account, and whether a lower housing need figure should be adopted.

2. The Local Context

Characteristics of the District

- 2.1 North Hertfordshire District is made up of a series of small compact historic towns and villages set in attractive countryside. Much of the rural area is covered by Green Belt around the main cluster of Hitchin, Letchworth and Baldock, and adjacent to Luton and Stevenage.
- 2.2 However, between 2001 and 2011 North Hertfordshire's population increased by 8.7% compared to an increase of 7.9% in the County as a whole (Office of National Statistics census data). This is reflected in the higher proportion of its housing stock having been built since 2001: 12% compared to 9% in the County (SHMA Figure 2 page 6). The District has been taking a high proportion of development.
- 2.3 Apart from major developments on the edge of town at Royston and Great Ashby, most of the recent housing has been delivered on brown field sites. There is now very little opportunity for further significant brown field development in the District. Hitchin, for instance, has received 31% of the new housing in the District since 2001 within its urban area. This represents a growth of over 1,400 homes and there are now few significant housing sites within the town. Other towns have similar restrictions. This means that the pressure for additional housing is now focused on the areas around the towns – much of it with Green Belt designation.

Opportunities and constraints

- 2.4 In this context, government guidance would suggest that it is appropriate to consider the local housing need, and include an element for migration that is constrained enough to limit the impact on the Green Belt. This is the correct basis for judging the level of migration, rather than the unlimited pressure for migration from places like London.
- 2.5 In fact there is increasing policy commitment (via for instance the Local Enterprise Partnership Strategy for Growth, March 2014, page 19) for growth to

be concentrated in the County at specific points on the main transport corridors such as Stevenage. In contrast much of North Hertfordshire provides an important recreational resource for the main urban populations in terms of its landscape quality and the quality and interest of its built environment. It is this role that the District can continue to play, while providing homes for local people and an appropriate amount of in-migration from London and elsewhere within the local constraints.

- 2.6 In the longer term it is going to be important to co-operate with a wider range of other LPAs, particularly to the north within the housing market area, in order to explore how housing that will be needed can be met after 2031 - by for instance a new community.

3. Proposal

Experience elsewhere

- 3.1 Hertsmeire Borough Council has been able to find an appropriate balance between meeting needs and avoiding any loss to the Green Belt. The Hertsmeire Core Strategy was adopted in January 2013. It makes clear (para 2.26) that it can accommodate a 'minimum target' of nearly 4,000 homes over the 15 year period without developing on the Green Belt. The different nature of the towns means that there are large scale urban sites that will help to meet need, but it is clear that housing numbers have been constrained 'to protect the living standards of residents and retain the environment which makes the Borough an attractive place to live' (para 3.1).
- 3.2 In the North Hertfordshire context it is now going to be difficult to completely avoid loss of Green Belt (see 2.2), but the example of Hertsmeire clarifies that it is appropriate to seek a lower target if this reduces impact. Our suggestion is that the low trend option of 10,700 homes is adopted.

Low migration option

- 3.3 This figure was put forward in the Housing Options Consultation (HOC) February 2013. It was accepted as a robust figure at the time, and no specific reasons have been supplied to suggest that the figure should be changed, other than the spurious one of a changing government 'target' (see Section 1).

- 3.4 The figure represents a net local population increase of 3,200 people, and a net inward migration of 10,500 people - a total of 13,700 people or 10,700 homes:
- The figure is based on average annual net migration of 527 persons in 2003-6 (SHMA January 2013, para 44) which represents a period which overlaps with the housing 'boom' of 2005-8, and can therefore be considered robust.
 - It includes the need associated with Great Ashby which is otherwise not included in any Local Plan (HOC para 1.38).
- 3.5 The figure accords with an employment led projection for the District which is based on current labour market trends continuing (SHMA para 51). There are indications from a recent Local Plan examination (Planning Newspaper 21 November 2014 page 04) that improved provision for employment is expected and that job forecasts and housing strategy should be aligned (see also Draft Local Plan Section 3).
- 3.6 There is an expectation that the LPA will also take into account housing market signals when assessing housing need, as explained in the Housing and Settlement Hierarchy (HSH) background paper (November 2014). The aim is to test whether the District is experiencing higher price rises than would be expected in other comparable areas, and therefore needs more housing. A fuller assessment is promised in an updated SHMA, but the current analysis suggests (Figure 4 and para 2.24) that none of the North Hertfordshire areas are experiencing significantly steeper growth rates - which suggests the area is not under unusually high housing pressure.

Implementation issues

- 3.7 It is important to consider what effect this lower figure of 10,700 homes might have on the provision of ***affordable housing***:
- The SHMA Part 2 (May 2013) outlines the tenure mix requirement 2011-2031 for the different growth scenarios (Figure 29). The results are similar across all the options, but the low trend migration option provides for a slightly higher *percentage* of affordable housing because affordability needs tend to be generated locally rather than from migrant households (para 5.9).
 - For the mid trend option of 12,100, the requirement is for 6,700 (55%) market and 5,400 (45%) affordable, providing 270 affordable homes a year. For the low trend migration figure of 10,700, the requirement is for

5,700 (53%) market housing and 5,000 (47%) affordable. That would meet a need for 250 affordable homes per annum over 20 years.

- The fullest recent analysis of affordability needs was provided in the Housing Needs Survey (HNS) updated in 2006¹. It is clear from this report that if the backlog of affordable housing need is to be reduced in 5 years then much higher provision for affordable housing would be required. However, as the HNS accepts (para 6.4.19), the LPA is able to spread the reduction over the whole Plan period, and this is the approach taken by many LPAs (including the Greater London Authority) in the context of the major difficulties in implementation.
- The HNS report accepts that it is difficult to make finite predictions of annual affordable need beyond five years (para 6.8.20), and the figures should be regularly revisited. The SHMA Part 2 (May 2013) indicates that it is particularly difficult to make judgements in the context of very different responses that might be taken by households in the current changing benefit regime (para 3.23). Our conclusion is that the low trend migration option is as likely to meet affordable housing needs as the mid trend option, within the current levels of uncertainty.
- In terms of deliverability, it is understood from North Hertfordshire Homes that they and the other registered providers are normally able to construct over 100 new affordable homes per annum in the District. It is likely, based on the percentage rates suggested in the Draft Plan as amended (Council Minutes , 27 November 2014), that the balance of need should be achievable via market developer contributions, with the low trend alternative being able to realise over 200 affordable homes per annum (see Table 1).

¹ http://www.north-herts.gov.uk/housing_needs_survey_update_final_report_2006.pdf

Table 1 Affordable Housing Delivery over Plan period from 2015 - Low Trend option

	10-14 dwellings category	15-24 dwellings category	25 plus category	Total Homes: All Identified Sites 2015 to 2031
No of homes	96	169	9,836	10,133 ²
Minus 1,400			8,436 ³	8,733
Affordable %	20%	30%	40%	
Total Affordable Homes	19	59	3,374	3,452
Annual No of Affordable Homes (over 16 years)				216

3.8 The second major implementation issue is that of **construction rates**:

- The construction rate required for the mid trend option of 12,100 is 610 per annum; that for 10,700 is 530 per annum (SHMA Figure 5). The actual rate of completions 2001 – 2012 (including Great Ashby) was 461 per annum (Housing Background Paper August 2007; NHDC Annual Monitoring Reports from 2007).
- The mid trend option of 610 homes per annum would therefore require a 32% increase over the longer term build rate. In fact the 610 figure was only exceeded in the period 2005 – 8 during the housing ‘boom’. During the period up to 2031 it can be expected that the building rate will vary over a wide range reflecting changing economic conditions and will therefore be closer to the longer term figure of 461. A consistent uplift in build rate of nearly a third seems not likely to be achievable.
- The low trend option build rate of 530 homes per annum would require a 15% increase over the historic longer term build rate. This increase would reflect the national expectation of significant change in building rates, but is likely to be more achievable over the long term than that associated with the mid trend option.

² Preferred Options Report Figure 2 page 37; includes 32 homes in sites of 9 or under

³ It is assumed that the reduction of 1,400 homes is taken from one or more of the strategic sites

4. Conclusion

- 4.1 Our starting point for this review is that local housing targets are not dictated by government. As is made clear in the National Planning Policy Framework and Planning Practice Guidance, it is up to the Local Planning Authority to decide the need it should be trying to meet in the context of constraints such as Green Belt.
- 4.2 Our analysis suggests that the low trend figure of 10,700 is robust. It reflects the net in-migration over a representative period of 2003-6 which overlaps with the housing 'boom', would still enable the need for affordable housing to be met, and be more feasible in terms of building rates than the mid trend target suggested in the current Draft.
- 4.3 In this context we understand that NHDC has been working on a revised approach to the SHMA outside this formal stage of consultation. Our concern is that any further revision of the housing target at or after the end of the consultation period could endanger the integrity of this process. Our view is that any significantly higher target in response to such a revision (or to changes in nationally based figures) could be considered contrary to the requirement in the NPPF that the Local Planning Authority should consider local housing need in the context of local constraints.