

**HITCHIN TOWN ACTION GROUP
(HTAG)**

**Response to
NHDC Submission Local Plan**

prepared by

Hitchin Forum

The Hitchin Society

Hitchin Historical Society

(With support from Hitchin Initiative)

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1. Introduction

1.1 Hitchin Town Action Group (HTAG) was formed in 2013 to develop and present a unified view on the emerging District Local Plan, with a particular emphasis on Hitchin issues. Our joint group was established by the following community, civic and historical organisations in Hitchin:

- Hitchin Forum, a community organisation founded in 1992, with the aim of campaigning on issues raised by members and others on significant issues affecting the town.
- The Hitchin Society, founded in 1962 as the civic society for Hitchin, with the aim of protecting and promoting a greater appreciation of the historic and built environment of the town. It is Registered Charity No. 1091056.
- Hitchin Historical Society, founded in 1977 to promote the study, research, publication and greater knowledge of the local history of Hitchin. It is Registered Charity No. 280746.

1.2 HTAG was launched by holding an open day of workshops to ascertain local views and to ensure that we represented the widest possible range of opinion in the town. Later in 2013 we published the document 'Planning Hitchin's Future', which aimed to reflect these opinions. The memberships of the societies which make up HTAG comprise over 600 interested residents of Hitchin, and in addition we have a supporter database of about 1,800 people.

1.3 In preparation for our response in 2015 to the Preferred Options Report (POR) and for this response to the Submission Local Plan (SLP), we have continued to keep our members informed at meetings and through newsletters, and have consulted them regularly, most recently when we held a joint meeting at the start of the consultation period for members of all three societies to discuss the SLP. A team from all participating organisations has contributed to this response, and an editing group, again made up of representatives from each society, has produced this final document.

1.4 Previous HTAG publications to which reference can be made are:

- Planning Hitchin's Future (2013)
- HTAG Response to NHDC Preferred Options Report (2015).

Both these documents are available on our websites:

www.hitchinforum.org.uk

www.hitchinsociety.org.uk

www.hitchinhistoricals.org.uk

Our previous response to the Preferred Options Report is referred to in this SLP response as 'HTAG POR Response'.

1.5 We would emphasise that in submitting this response our aim is to make a constructive and positive contribution to this Local Plan. We wish it to succeed, as we would like the District

and Hitchin in particular, to benefit from it in the long term. In that spirit we offer this response with suggestions for improvements to address our concerns about the soundness of the Plan.

- 1.6 We would request the Inspector to visit two key sites in Hitchin:
- (i) The town centre, to review the Churchgate area and the Paynes Park area (see Section 5, paras 5.11 to 5.20 of this response).
 - (ii) The congested area around the station, including the Cambridge Road under-bridge and potential access to the station from the east. (see Section 7 paras 7.10 and 7.11 of this response).
- 1.7 If possible, and if the Inspector decides to visit these sites, we would like one of our representatives to accompany him or her on the visits.
- 1.8 We do not specifically ask to speak at the Hearing, but if the Inspector thinks we can contribute, we would be pleased to attend specific sessions.

This response to the SLP is submitted on behalf of HTAG by Adrian Gurney.

Signed:



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2. Key Issues

The purpose of this section is to set out the key issues identified in this submission. In each case we consider that these detract in some way from the overall soundness of the SLP, although we also believe that the relevant policies can be adjusted so that the Plan becomes sound. For each of the Key Issues identified below, we suggest ways that we believe are realistic and feasible to remedy any lack of soundness, without prejudice to the overall integrity of the SLP.

Sustainable Development

4A Accommodating Local Variation and Distinctiveness – concerns about soundness. See para 4.3

Economy and Town Centres

5A Hitchin’s Main Employment Area – not sound as presented. See paras 5.2 to 5.5

5B Gross Retail Floor-space Targets – not sound. See paras 5.6 to 5.10

5C Hitchin Town Centre Retail Sites – not sound. See paras 5.11 to 5.20

Countryside and Green Belt

6A Need for one or more major new settlements – unsound unless remedied. See paras 6.4 to 6.9

6B Safeguarded land west of the A1(M) at Stevenage – unsound (unjustified). See paras 6.10 to 6.13

Transport and Infrastructure

7A Traffic in Hitchin – unsound (not justified/effective). See paras 7.5 to 7.8

7B Sustainable and Public Transport – unsound (not justified/effective). See paras 7.9 to 7.14

Housing and Development

8A Housing Targets – not sound as presented. See paras 8.3 to 8.8

8B Housing Policies – some unsound. See paras 8.9 to 8.13

8C Housing sites – some aspects unsound. See paras 8.14 to 8.24

Design and Sustainability

9A Quality and Character – omission unsound. See paras 9.4 to 9.7

Healthy Communities - Key Issue

10A Physical and green infrastructure – unsound. See para 10.2

Natural Environment

11A Controlling Pollution – omission unsound. See paras 11.3 to 11.5

Historic Environment

12A Practical Implementation – concern about soundness. See paras 12.4 to 12.5

Communities

13A Strengthening of Hitchin Communities text. See paras 13.4 to 13.8

Implementation, Monitoring and Review

14A Targets – Unsound as presented. See paras 14.2 to 14.3

Other Issues

In addition to the Key Issues above, a number of other important issues have been identified that we believe require further changes to ensure the plan is sound. These issues are set out in the appropriate sections of this response.

3. Vision and Strategic Objectives

3.1 We are pleased that this section of the SLP articulates a clearer Vision and has provided some Objectives, both of which we had asked for (HTAG POR Response 2.1 and 2.3).

4. Sustainable Development

Introduction

- 4.1 HTAG supports a pro-active approach to Sustainable Development but, in order to maintain for the long term the distinctive communities and characteristics that make up North Hertfordshire, the policy needs to be more specific.
- 4.2 HTAG has concerns of soundness related to the extent to which the accommodation of local circumstance is reflected in the proposed policies despite the fact that 'local knowledge' is rightly identified as crucial (SLP para 4.7). The need for a more realistic appreciation of the variations found within the District is also relevant to the Communities section and the more careful crafting of the settlement hierarchy within it. We have covered these concerns more fully in Section 13.

We consider therefore that there is one key issue to be addressed here:

4A Accommodating Local Variation and Distinctiveness

Key Issue

4A: Accommodating Local Variation and Distinctiveness

Policies SP1 a. and SP2. Unsound with important issue omitted.

- 4.3 We suggest that local variation can be better accommodated in Sustainable Development policy. The following changes are, therefore, needed:

SP1 a. 'Maintain the role, by capitalising on their respective and existing strengths, of the key urban settlements within and adjoining the District as the main focus...'

SP2 'The majority of the District's development will be located within, or adjacent to, the key urban centres but with particular care being given to mitigate impacts on the established historic towns'.

5. Economy and Town Centres

Introduction

5.1 We have three key issues of concern about the soundness of the SLP with regard to Economy and Town Centres as considered in this Section:

- 5A Enhancement of Hitchin's main employment area
- 5B The scale of gross retail floor-space sought in the District as a whole
- 5C The designation of specific retail sites in Hitchin Town Centre

We cover other issues and related monitoring at the end of this Section.

Key Issues

5A: Hitchin's Main Employment Area

Policy SP3 and para 13.127. Unsound as presented.

5.2 We are pleased that Policy SP3 states that: 'The Council will proactively encourage sustainable growth, support new and existing businesses and seek to build on the District's strengths, location and offer'. We are particularly pleased that SP3 a. refers to employment land in Hitchin, and that SP3 b. mentions not only safeguarding but enhancement of employment areas in the main settlements.

5.3 However, there is no evidence in the detail of the SLP of the need to invest in Hitchin's main employment areas in order to meet the overall aims of the SLP. In particular, we wish to draw attention to the following aspects of Policy SP3 that directly relate to the needs of Hitchin. Without coverage of the need for specific investment, Policy SP3 will not be effective:

- Access to Hitchin's main industrial/employment area at Wilbury Way was an issue identified in the previous Local Plan (p. 62, 1996): 'Currently, the traffic generated by employment areas HE1 and HE2 creates significant adverse effects on the environment of adjoining areas 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 access issue has not been addressed in the past 20 years and is not even mentioned in the SLP. Instead, Aecom Technical Note of 22 September 2016 (p.47) refers to a mitigation proposal from 2009 for a link road joining Cadwell Lane and Wilbury Way around the northern edge of the employment area which would serve only to redistribute traffic, not create a better access.

- A new access road from Stotfold Road would:
 - make possible the authority's stated intention to encourage further investment, development and sustainable growth, enhancing both the physical environment and business strength of the area;
 - and, additionally, remove HGV traffic from existing residential streets to improve the living environment for residents in the immediate area, as well as residents on other roads throughout the town which are used as access routes for heavy vehicles. There is an identified environmental impact from these vehicles in terms of pollution levels in particular (see section 10).

5.4 A clear statement of support and intent to facilitate a new access road from Stotfold Road into the employment area during the Plan period is needed:

Para 13.127 in the Community section should be amended along the following lines:

..... 'protection and enhancement of the existing employment areas will be important to ensure.....wider economic growth. The Council will undertake the necessary preliminary studies to facilitate work on a new access to the Wilbury Way employment area, and any cost/benefit analysis will cover the environmental as well as economic effects'.

5.5 We understand that Hertfordshire County Councillors Billing and Ashley have commissioned and funded a transport study "Hitchin Industrial Estate Relief Road" to assess the feasibility of a new access to the area from the Stotfold Road. Although this is not published at the date of writing, we understand it will be available by the time of the Examination, and we ask that it should be taken into consideration at the Hearing, and that those who have expressed an interest should have the opportunity to make Written Representations.

5B: Gross Retail Floor-space Targets

Policy SP4. Not sound (not justified).

5.6 Policy SP4 articulates a positive approach to town centre development. However, the detail fails to take into account the rapidly changing nature of retail growth. The retail figures included in Policy SP4 d. are based on work reported in the Retail Study Update of July 2016 by Nathaniel Lichfield and Partners (NLP). Our contention is that the figures as used are not well founded, and that the retail strategy is therefore not justified as it currently stands.

5.7 There are two key factors NLP have not properly addressed:

- The NLP Report (para 3.19-3.23) mentions the changing patterns in retail, including on-line shopping. NLP quote the figures from Experian that suggest that on-line shopping may grow to form 20% of total retail sales by mid 2030s. Evidence from the British Retail Consortium (On Line Sales Monitor, October 2016) suggests, however, that over the last year on-line comparison sales have increased by 11%, while in-shop sales have reduced by 9%: and, for comparison sales, on-line already has a penetration rate of over 22%. In this context, we are pleased that NLP (para 5.6) recognises that 'long term floor-space projections (up to 2026 and beyond) should be treated with caution...'

- The NLP Report (para 3.33) also mentions the current importance of the larger centres outside the District in terms of attracting major comparison retailers and shoppers. However, NLP have not undertaken any investigation of proposals in for instance Milton Keynes, Cambridge, Bedford or Stevenage in order to judge how far these centres might provide for the additional comparison demand in the District. Additionally we note the recent opening of a major retail park at Biggleswade adjacent to the A1, comprising a large element of comparison shopping, is already affecting retail conditions in North Hertfordshire. We appreciate that it would be beneficial for the District to retain retail expenditure as far as possible, but the reality is that the larger centres are likely to be increasingly attractive for comparison shopping.

5.8 The SLP includes (Policy SP4 d.) precise figures over the full Plan period. The NLP Report claims (para 3.23) that ‘relatively cautious growth projections’ have been adopted. But comparing the figures from the POR indicates otherwise:

- The proposed total growth in comparison and convenience retail floor-space in the SLP of 31,000 sq m represents an increase from the POR figure of 23,770 (para 3.45) of 7,300 sq m or 31%.
- The comparable change in housing numbers is 16,900 in the SLP, compared to 14,200 in POR (para 6.14) – an increase of 2,700 dwellings or 19%.

5.9 We recognise that there are other factors involved, but we are not convinced that the NLP report provides the justification for an increase in retail provision so much greater than the expected increase in housing (and thus of residents) since the last set of calculations. A figure closer to 28,000 sq m of floor-space (representing a 19% increase) might better reflect the likely growth in population, though it still does not take into account the increase in on-line retail since the earlier study.

Policy SP4 d. We ask that NHDC be requested to revisit the data available and that more realistic figures for comparison and convenience retail floor-space (possibly of the order of 28,000 sq m) are included to reflect the above concerns.

5.10 The NLP Report (para 5.6) states that ‘Long term projections should be monitored and kept under review’. We would urge the need for a flexible approach to retail development targets to be made clear (as it was in the POR Policy ETC7), and linked specifically to regular reviews and modifications of town centre strategies with clearly defined timescales. This approach should be included in policy:

Policy SP4 e. ‘Keep these figures under review in the context of the major changes that are taking place in the retail sector:

- i. linking these regular reviews to updating of town centre strategies to reflect the changes in demand for retail floor-space; and
- ii. undertaking a Local Plan Retail Review in 2021 if changes are likely to affect the soundness of the Plan;’

5C: Hitchin Town Centre Retail Sites

Paras 13.129 to 13.135, HT11 and HT12 and Proposals Map. Not sound. Strategy not justified.

- 5.11 We are very concerned that it is only in the SLP that the specific sites in Hitchin have been mentioned. The POR made no mention of specific sites, instead referring (Policy ETC7) to the preparation of town centre strategies as the appropriate vehicle for keeping under review retail floor-space required after 2021. The draft proposals town centres map did not identify any locations for additional floor-space. These proposals have not, therefore, been the subject of prior consultation: this is the first time the public has had a chance to comment on them. We urge that careful consideration is given to the issues now raised in the SLP so that an appropriate and justified retail strategy for Hitchin can be adopted in the Local Plan.
- 5.12 The proposed allocations for 4,000 sq m gross at both Paynes Park and Churchgate (HT11 and HT12) are for the period up to 2026 (Retail and Town Centres Background Paper (RTC), Table 1). The following factors suggest that, while it is accepted that there will be increase in retail and related town centre uses in Hitchin, the scale of change proposed is not required within the time scale up to 2026, and would be detrimental to the town centre as a whole:
- The surveys (NLP para 3.93, 3.112) indicate that Hitchin is the most highly considered of the District's town centres, with fewer requests for improvement - reflecting its position in the VENUSCORE ranking within the top 300 centres in the country (NLP Table 2.1 page 4), and suggesting that there is no significant demand for a very major increase in retail provision in the town.
 - The existing historic character of the town centre is one of its main attractions making it a destination for leisure as well as retail related trips. The largely medieval and intimate layout of the centre with its historic market, and the range of open spaces and listed buildings make it an attractive centre which has been able to absorb small scale changes over time, and provide accommodation for a very wide range of uses. None of these features or constraints are mentioned in the NLP report or the RTC Background Paper, though they should play a major part in assessing the appropriateness of large scale change.
 - Hitchin town centre currently has about 50,000 sq m of retail and associated space (NLP Report Table 2.3 page 7). It is proposed that this should increase by 8,000 sq m by 2026; with a further 3,700 sq m by 2031 for which an allocation is not specified (RTC Table 1). This represents a growth of over 23% in the whole period, with two thirds of that increase before 2026. The magnitude of such change with two new shopping areas being developed in the period to 2026, is likely to have severe detrimental effects on the existing shopping in the town, with losses of occupiers in the historic core, and with a potential long-term deterioration in the balance and character of the historic town, as experienced in towns elsewhere in the country.
 - Hitchin is comparatively remote from two of the main areas of proposed population growth up to 2031, and would be difficult to access by car without increasing congestion across those parts of the District that are already the most congested. There is nowhere

any consideration of access to the town centre considered vital by government guidance (Ensuring the Vitality of Town Centres, Planning Practice Guidance, para 005). There is also no mention of access needs of those using public transport – also likely to be more difficult with the greater distances from new population.

- The overall scale of retail growth seems to have been over-estimated by perhaps 3,000 sq m (see Key Issue 5B above). It is also significant that the SLP Housing Trajectory (page 221) suggests that the bulk of housing is likely to be built in the period after 2021; but that, while a little over 6,000 homes could then be built up to 2026, over 5,000 could be expected in the following five years. This incremental growth in population should be reflected in the incremental provision of the supporting services.

5.13 Our conclusion is that the total retail figure required for Hitchin should be somewhat reduced, and that a different strategy for the town centre would be appropriate to provide incremental change, which would allow for the gradual rise in population in the town and wider District, and take into account the high level of uncertainty with regard to the future retail market. It is the exploration of such a strategy in relation to both Paynes Park and Churchgate that we would have expected to appear in the supporting text in Section 13 Communities (page 161).

Churchgate

5.14 Paras 13.129-13.135 on page 161 are devoted solely to Churchgate, and It is also notable that the Heritage Assessment Report (HA) of July 2016 only covers Churchgate. A large-scale redevelopment of Churchgate has been promoted by the Council for a decade, despite strong public opposition. The main problem is that the size of the area available for development tempts developers towards a uniform and monolithic set of buildings that simply do not fit in with the heart of Hitchin's Town Centre Conservation Area, which has developed organically over the centuries. Development proposals have been unsuccessful, partly for this reason and partly because of their complexity (they involve finding a new location for the Market and providing replacement car parking), the lack of retail justification and unrealistic financial returns set by NHDC. It is understandable that NHDC, as the freeholder, wishes to profit from this, but as Local Planning Authority it should be promoting improvement that will benefit the town centre, not because it would benefit its own estate. A decade on, we are still not convinced that this proposal in particular has been objectively assessed in terms of its retail need.

Paynes Park

5.15 HTAG have long identified the opportunities at Paynes Park as being significant. We held a workshop with a wide range of our memberships and invited experts, and included our findings in HTAG's study "Planning Hitchin's Future" (Section 5.2.3 pages 18-19). In our view, redevelopment at Paynes Park is the much more appropriate proposal. There are large un- or under-used areas, there would be a less significant loss of car parking, and it would provide a retail link between the Waitrose supermarket, the Lairage car park, the Library and the town centre. It would also open up an opportunity to improve the street environment for pedestrians.

Comparative Analysis

5.16 We would therefore urge that NHDC be asked to provide a revised section of supporting text that takes proper account of the opportunities and constraints provided by both sites, and that they should do so in the context of Policy SP4 b. which states that the Council will 'support proposals for main town centre uses ... where they are appropriate to the size, scale, function, catchment area, historic and architectural character of the centre'.

5.17 Our proposal is that the following points should be included in the supporting text starting at **para 13.129**:

- The aim should be to ensure that the developments can take place incrementally to lessen the impact on the currently successful town centre, and be able to respond to changes in the retail market over the plan period. It is vital that a balance between demand and supply of retail space is appropriately matched to avoid blight through excessive vacancy rates.
- Since the Churchgate site (as shown on the proposals map and described in the Heritage Assessment Report) includes a considerable area of existing parking that will need to be replaced as early as possible, it is very unlikely that it can be developed incrementally, and enable the sort of flexibility that the uncertainty of the retail market indicates.
- The Heritage Assessment Report (para 3.3) while acknowledging its lack of built amenity, does accept the existing Churchgate's positive contribution to the vibrancy of the town centre: ' ... the current use of the allocation site (as a car park, service ranges, a small shopping centre and a location for Hitchin Market) provides good incentives for shoppers and supports the vibrancy of the town as a whole'.
- We would therefore suggest, in response to this assessment and our retail need argument in para 5.12 to 5.13, that a refurbishment of the Churchgate Centre with modest extension and enhancement of surrounding car parks, alongside investment in Hitchin Market and extension / enhancement of the river walkway as an appropriate way forward.
- The SLP supporting text then needs to provide a justification for redevelopment at Paynes Park in order to give proper consideration to the impact of such a large-scale development on Hitchin town centre, and describe the opportunities provided (see 5.15) as background.
- Mention should also be made of the importance of the sequential provision of the new floorspace so that the town is able to integrate the new development over a suitable period of time up to and beyond 2026.

5.18 HT12 would remain as drafted, but there should be consequent changes to Proposal HT11.

HT11 We suggest the first two bullet points be replaced with the following text: 'Refurbishment of the existing shopping centre, with possible modest extension.'

Bullet 3 should be reworded as follows:

'Identification of suitable long-term location for Hitchin Market to ensure its future and investment if an extension of the Churchgate Centre makes this necessary.'

Bullet 4 should be reworded as follows:

'Ensure an appropriate level of car parking is retained together with environmental enhancement.'

Bullet 5 should be reworded at its end as follows:

'... Portmill Lane, Bancroft and the river walkway extended along the River Hiz to Bridge Street.'

Sub-bullet 4 under bullet 6 should be re-worded as follows:

'Any refurbished buildings or their extension required to: ...'

Proposals Map

- 5.19 The Proposals Map shows the Churchgate site covering a wider area than would be needed for a modest extension and re-siting of the Market. The wider area is designated in the current Town Centre Strategy for related environmental improvement (see **Appendix A**). Since there is no justification in the SLP for use of these areas for retail or housing development we ask that a smaller portion of the site be shown in the Proposals Map. Longer term changes of uses in the wider area can be considered in the Town Centre Strategy Review.

Site Visit

- 5.20 Our view is that it will be important for there to be a site visit to Hitchin town centre to enable the context of these developments to be assessed. We would be very pleased to send a representative to accompany such a visit.

Other Issues

- 5.21 With regard to employment, Section 7 also mentions the need to ensure the adequacy of public transport and cycle and pedestrian links to existing employment areas to improve accessibility and reduce traffic, and a cross reference would be helpful.
- 5.22 There is no reference to the need to encourage the supply of small economic units for business start-ups and co-operatives. These are a distinctive feature in Hitchin and a potential source of future employment growth throughout the District. We ask that this be rectified by inclusion in policy:

Policy SP3 f. 'Promote the expansion of the knowledge based economy and small business start-ups, small workshop units and co-operatives in the District. Proposals for ...which increase the level of knowledge-intensive and small business employment.....'

5.23 There is no mention of the two development proposals for Churchgate (HT11) and Paynes Park (HT12) in Section 4 of the Local Plan and there is no cross-referencing to their mention in the Communities Section. These and other town centre allocations are important proposals that should at least be referenced in the supporting text for Policy SP4. We suggest inclusion of a final sentence:

Para 4.40 'In the context of the new proposals for increased floor-space in the main towns (as specified in SLP Section 13) it will be important to update the town strategies.'

Monitoring

5.24 Policy SP3 has no key indicators and targets for monitoring purposes. This needs to be remedied since the economic landscape is changing rapidly and in Hitchin in particular a lack of investment in the past needs to be addressed and the outcomes monitored to ensure growth in appropriate areas in a timely fashion. We suggest an addition to SP3 Target (Table 2, page 218):

SP3 'For at least 90% of business development.....allocated employment sites, with floor-space additions reported by employment area.'

5.25 Insufficient attention has been paid to the need to monitor and review progress across Policy SP4 and the associated Communities sections for Hitchin. Whilst mention is made of town centre strategies under Policy SP4, we suggest that new SP4 reference is made in Table 2. Page 218:

SP4 'Indicator: Updating of Town Centre Strategies. Target: A six monthly cycle allowing monitoring and update every two years.'

6. Countryside and Green Belt

Introduction

- 6.1 Great importance is attached by HTAG to the protection of the countryside around Hitchin and in particular to preserving the integrity of the Green Belt. It is however recognised that the requirement for new homes to meet current and future needs cannot be met by the use of previously developed land within the District, and that large-scale housing schemes in the North Hertfordshire countryside beyond the Green Belt cannot be regarded as sustainable development.
- 6.2 It is therefore regrettably accepted that some readjustment of Green Belt boundaries is unavoidable if housing requirements are to be met, and we broadly support the analytical approach used in the preparation of this Plan.
- 6.3 Key issues identified by HTAG are:
- 6A Need for one or more major new settlements
 - 6B Safeguarded land west of the A1(M) at Stevenage

Key Issues

6A: Need for one or more major new settlements

SP8 e.i. Unsound unless remedied.

- 6.4 Policy SP8 e.i. articulates the Council's intention to identify new settlement options within North Herts., and 14.35 reiterates this intention.
- 6.5 Given the need to protect the Green Belt and the countryside beyond, and on the basis that the demand for additional housing is unlikely to slacken in future years, urgent steps should now be taken to identify sites for one or more substantial new settlements in which such additional housing can be concentrated. While it is regretted that currently proposed adjustments to the Green Belt boundaries around Hitchin are unavoidable if housing targets are to be achieved, it is considered essential that effective options should be in place so that further erosion of the Green Belt does not become inevitable in any future local plan.
- 6.6 It is highly unlikely that suitable sites can be found in the rural area of North Hertfordshire beyond the Green Belt due to the lack of sustainable transport infrastructure. The duty to co-operate with neighbouring local authorities should therefore now lead, without delay, to a search for suitable locations, most likely on existing or planned transport corridors, and most probably beyond the limits of the Metropolitan Green Belt and beyond the boundaries of North Hertfordshire.
- 6.7 The absence from this SLP of any such a commitment to future co-operation with nearby authorities in the same HMA amounts to a serious deficiency in this Local Plan, and to its soundness being questioned. This can, however, be remedied by the inclusion in the new

Local Plan of a policy committing the Council to co-operate with adjoining local authorities in the search for one or more new sites suitable for major new sustainable settlements; such a settlement would need to be of around 10,000 homes (like Northstowe in Cambridgeshire) in order to support a good range of local facilities. The cross-border co-operation between Colchester, Braintree and Tendring District Councils is a good example of this procedure. Relevant guidance is also provided in the ATLAS Final Report: North Hertfordshire New Settlement Study, April 2016.

- 6.8 The lead time in identifying suitable sites and for site acquisition, settlement planning' and infrastructure provision is such that it is highly unlikely that housebuilding will be able to commence before 2031, but it is vital that NHDC begins dialogues as soon as possible. The wording of policy item SP8 e.i. should therefore be modified to:

SP8 e.i. 'Working with the Government, nearby Local Authorities and relevant agencies to identify sustainable new settlement options within North Hertfordshire, Central Bedfordshire and South Cambridgeshire that can provide additional housing supply after 2031.'

- 6.9 Any new settlement site so identified is likely to be most effectively and sustainably developed using the principles of Garden City development in which the uplift in land values is retained for the benefit of the new community, including for the provision of sustainable transport links.

6B: Safeguarded land west of the A1(M) at Stevenage

SP8 e.ii. Proposals Map. Unsound (unjustified)

- 6.10 Although this policy appears in the Housing section of the SLP (SP8), we feel it should be dealt with here, as the impact of the policy falls on the Green Belt.
- 6.11 An area of land west of the A1(M) at Stevenage is shown in Policy SP8 e.ii. as being withdrawn from the Green Belt, but safeguarded 'to provide long-term certainty... for up to 3,100 dwellings in the period beyond 2026 subject to a future review of this plan'.
- 6.12 In view of the provision already made within North Hertfordshire Local Plan to meet housing needs through to 2031, and as Stevenage is part of the Stevenage Housing Market Area, extending geographically as far north as Biggleswade and Sandy, there are no exceptional circumstances existing now, or reasonably foreseen to exist until well after 2031, for the release of such land from the Green Belt. This is reinforced by the problems of access to this land by a route under the A1(M), with quite correctly no connection to the rural road network of North Hertfordshire, and by capacity problems in the house building industry. There is therefore no reasonable prospect of such land being required for housing development until well after the currency of the proposed Local Plan.

- 6.13 The release of this land from the Green Belt is therefore premature and should be deferred, if it is ever needed, until exceptional circumstances justifying removal from the Green Belt can be established in a future Local Plan.

SP8 e.ii. and the designation on the Proposals Map should therefore be excluded as they are unjustified.

Other Issues

Green Belt releases adjacent to Hitchin

- 6.14 We regret that there are no cross references in the SLP between Section 6 Countryside and Green Belt and Section 8 Housing Strategy; we believe such references are necessary, as the two themes are so closely related in an area such as North Hertfordshire, where towns like Hitchin are surrounded by Green Belt. Please see our Section 8 for further references to this topic.
- 6.15 We acknowledge that some releases of edge-of-town Green Belt land are unavoidable given the magnitude of the housing requirement for North Hertfordshire. However, we consider that the proposed releases of Green Belt land will only lead to sustainable development schemes if appropriate mitigation measures are applied as set out in sections 7 and 8 of this submission concerning transport and housing issues.
- 6.16 With reference to the strategic release at Highover Farm (HT1), we would stress the crucial importance of the mitigation measures set out in SP17 g.i. concerning the reduction in the separation between Hitchin and Letchworth Garden City. The gap between these two settlements, each of a very different character and history, will be reduced to just 650m. One of the fundamental purposes of the Green Belt is to prevent settlement coalescence, and this minimal separation should not be further eroded in any future Local Plan.
- 6.17 We support the mitigation measures indicated in 13.126 for the three smaller releases proposed on the western edge of Hitchin (HT3, HT5 and HT6). These sites have been highly controversial, so mitigation measures are particularly important to protect the overall amenity of this area, and to safeguard views from the nearby countryside, which, as 13.126 notes, extends westwards towards the Northern Chilterns AONB.
- 6.18 The proposed release off London Road between Hitchin and St Ippolyts (HT2) has the effect of substantially closing the gap between Hitchin and the villages of Gosmore and St Ippolyts. So again, the mitigation measures proposed in 13.126 will be of vital importance to protect the rural nature of this location, including tree planting along the boundary with London Road (B656).

Land at Priory Park, Hitchin

- 6.19 An area of parkland and open countryside southwest of the A602 Priory relief road (Park Way) at Hitchin has been considered, but quite correctly rejected, by the Council as a potential housing allocation. This area is, however, still included in the Infrastructure Delivery Plan

dated September 2016 (Section 4.16, page 24) as a major greenfield extension for a total of 300 dwellings. It is assumed that this site has been included in error.

- 6.20 The area in question consists of historic parkland (Priory Park, some of which is in the Town Centre Conservation Area) and open countryside beyond forming part of the Green Belt. As such the area constitutes a vital portion of the historic context of Hitchin's wider landscape and its link to the town's medieval urban core. The origins of Hitchin Priory itself (a Grade I Listed Building) can be traced to a Carmelite Friary founded in 1317 which, shortly after its dissolution in 1538, was purchased for use as a private house. The extent of the Priory grounds was then increased and in the 18th century a landscape park and gardens were created. Designed by Nathaniel Richmond, a leading landscape architect, these have since remained largely intact except for the construction of the relief road (Park Way) in 1980-81. The portion of the Park immediately surrounding the house preserves important features such as a flint faced bridge and an 18th century ice-house, and the park as a whole retains its largely 18th century planting and its carefully contrived views across the landscape beyond, most of which formed part of the Priory estate. HTAG considers that the landscape quality of this whole area and the historic features of the parkland are sufficient for Historic England to consider Priory Park for inclusion in the Register of Parks and Gardens; see also the reference to the Hertfordshire Gardens Trust report in Section 12 of this response.
- 6.21 The area of Priory Park and the countryside beyond is of a very high amenity value to Hitchin and the surrounding area on account of its landscape quality, its rich pattern of public rights of way, and the absence of any alternative large public park in the built-up area of Hitchin. The historical, amenity and recreational character of this land is such that its value should be recognised within this Local Plan and, for the reasons set out above, the area should not be considered as a potential housing allocation now or in any future Local Plan.

Rural Areas beyond the Green Belt

- 6.22 We support the proposed restraint on inappropriate development in rural areas beyond the Green Belt as set out in policy CGB1, and also the provisions of Policy CGB2, Exception sites in rural areas.
- 6.23 The provision for rural workers' dwellings is supported, although we consider that the removal of agricultural occupancy conditions should be strengthened such that any housing surplus to employment requirements is not sold as market housing but is retained as affordable housing for the benefit of the local community.
- 6.24 Policy CGB4, Existing rural buildings, is supported, although we believe that changes to existing buildings should not detract from the character of the rural environment. Where practicable, this should include protection of the rural 'street scene' by the preservation of hedges and soft landscaping in preference to hard features more appropriate to a suburban setting.

Urban Open Land

- 6.25 We welcome policy CGB5, providing additional protection for land left open in an urban setting. It is recognised that in general such land will remain in private ownership, although contributing to the general amenity of an otherwise built-up area. We would however suggest that where such land arises within or adjacent to major development sites, then the presumption should be that such open land should become available for public access unless required for specific development as specified in policy CGB5.

Monitoring

- 6.26 Progress in working with nearby local authorities to identify one or more sites suitable for a major new settlement beyond the Green Belt needs to be monitored regularly and progress reported to Council on at least an annual basis. The first such annual report should be published 12 months after the adoption of this Local Plan.

7. Transport and Infrastructure

Introduction

- 7.1 Hitchin already suffers from traffic congestion in both morning and evening peak periods. The situation has been deteriorating as a result of the burden of additional local population and traffic generated by growth in background traffic. Car dependency is high. There will shortly be two Air Quality Management Areas in the town due to the high levels of vehicle-generated pollution.
- 7.2 Traffic growth from additional housing mooted in the local plan represents a considerable additional challenge which needs to be dealt with if the town is to function effectively and provide a safe and healthy environment for its residents.
- 7.3 Other infrastructure will come under pressure, with water supply and sewerage being a particular concern.
- 7.4 Key issues which HTAG would like to raise are therefore:
 - 7A Traffic in Hitchin
 - 7B Sustainable and public transport (including A505 rail under-bridge and station eastern access)

Key Issues

7A: Traffic in Hitchin

Para 13.143 to 13.145 and 14.8, 14.9: Unsound (not Justified/Effective)

- 7.5 The large amounts of additional housing proposed for Hitchin and the remainder of the District will inevitably generate significant extra traffic. The SLP (para 14.8) correctly identifies that Hitchin already suffers from congestion, but we cannot agree with the assertion in para 14.9 that this is not a constraint on the local plan as it stands.
- 7.6 The most serious problems have been identified in the Infrastructure Delivery Plan (IDP) as occurring at a number of junctions on the A505 and A602 (IDP Table 5.4 items 7, 8, 9, 10 and 15). The proposed mitigation is largely in the form of modifications to these junctions, as detailed in SLP para 13.143.
- 7.7 The online evidence base contains two transport modelling reports, “North Hertfordshire Local Plan Model Testing (AECOM, 2016)” and (“Local Plan Transport Technical Review, Odyssey Markides, 2016”) The first of these contains (in Appendix C) details of junction modifications.
- 7.8 In our view there are two serious deficiencies in the evidence base:
 - (i) Although there is much description of traffic modelling, there is no clear indication that the proposed junction modifications will solve traffic problems resulting from the

cumulative effect of housing development in the local plan. Rather worryingly, the Infrastructure Delivery Plan (para 5.105) suggests that action needs to be taken to cope with background growth in traffic without additional local plan growth.

- (ii) There is no assessment of alternative approaches to environmentally-damaging traffic engineering at junctions. Such measures are likely to be opposed by residents and councillors because of their adverse effect on the urban environment. In particular the use of “shared space” solutions at junctions, which would be much friendlier to pedestrians cyclists and residents, could help to achieve the plan’s objectives with regards to both congestion and sustainable transport and need to be considered properly.

Para 13.143 ‘Our transport modelling predicts that a number of junctions in Hitchin, which are already congested, would be become even more of a problem by 2031:

- A505 Cambridge Road / Willian Road / Woolgrove Road
- A505 Upper Tilehouse Street / B655 Pirton Road
- A505 & A602 Paynes Park
- A602 / B656 / Gosmore Road
- Cadwell Lane / Wilbury Way / Woolgrove Road

Before any additional development is approved, the best way of dealing with these junctions will be determined. Preference will be given to modifications which reduce congestion while providing improved conditions for pedestrians, cyclists and residents, hence encouraging a shift to more sustainable transport modes. The use of modern “shared space” solutions will be assessed as a means of achieving these aims.’

Para 13.144 ‘An access road from the Hitchin industrial area to Stotfold Road will be considered to solve the capacity problems at the Cadwell Lane/Wilbury Way/Woolgrove Road junction. This would have the added benefit of removing HGV traffic to the industrial area from residential roads, notably Grove Road.’

See Section 5 of this report for a fuller discussion of the need for the access road.

7B: Sustainable and Public Transport

Policy SP6 d.: Unsound (not Justified/Effective)

- 7.9 The wording is too weak to be considered the best alternative and not likely to be effective in ensuring that the required shift to sustainable transport is made.

SP6 d. ‘Require the early implementation of sustainable travel infrastructure on Strategic Housing Sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage’.

- 7.10 Sustainable transport measures, particularly relating to the Highover Farm housing development, cannot be expected to succeed unless improvements are made to access to Hitchin town centre and station from the east.

Additional paras to follow 13.144 with subsequent paras renumbered:

Additional para 1: 'The unsatisfactory A505 rail under-bridge near Hitchin station discourages walking and cycling to the centre of Hitchin and the station from the east, where there will be a new strategic housing site at Highover Farm. Improved pedestrian and cycling access will be implemented in conjunction with Hertfordshire County Council and Network Rail.'

Additional para 2: 'Access into Hitchin station is currently from the west only. By working with Hertfordshire County Council , Network Rail and the train operator, access from the east will be improved to assist in reducing the number of cars using the station forecourt and car park by allowing a more pleasant direct route for pedestrians and cyclists.'

Site Visit

- 7.11 Our view is that it will be important for there to be a site visit to the congested area around the station, including the A505 under-bridge and potential access to the station from the east.
- 7.12 The SLP wording is too weak to ensure that the public transport and other sustainable transport options are provided to support growth required.
- SP6 c.** 'Work with Hertfordshire County Council, Highways England and public transport providers to ensure sustainable transport options are provided. We will seek to maximise the scope of existing public transport networks while investigating the provision of new and improved options for pedestrians, cyclists and for better rail and bus services and their interlinkage.'
- 7.13 SLP para 4.63 should recognise that the District has a key spinal railway link between Hitchin and Royston that is potentially much more than just 'north-south'. It should also note that existing bus routes need better coordination with railway services. Significantly, Hitchin is not only by far the most important railhead in the District (passenger numbers, junction interchange and journey options), but it also has key bus links (most importantly to/from Luton, Bedford and St Albans) which mitigate the identified difficulty of east-west travel by public transport).
- 7.14 While recognising in SLP para 4.65 the County Council is the key player in transport policy the Plan should commit the District Council to formulate its own views on how local strategic needs fit into the wider county/area picture.

Other Issues

Traffic Management

- 7.15 The Plan treats traffic largely as a problem of providing enough road capacity, with efforts to induce a change to alternative, more sustainable, transport modes. However, if Hitchin is to function effectively and provide a safe environment, problems caused by high levels of traffic and poor traffic schemes also need to be dealt with.
- 7.16 Traffic speed reduction measures are necessary to improve safety around schools, the quality of life for residents generally and also for pedestrians, cyclists and motorists. In particular, planned 20 mph speed limits should be extended to a town-wide scheme. Where the limit remains at 30mph, there is need for more rigorous enforcement and better calming measures. A town-wide scheme will not only improve quality of life and safety, but enable the reduction of highway signage and street clutter such as railings which inhibit natural pedestrian movement, consistent with NPPF para 35.
- 7.17 The Paynes Park gyratory system is an example of poor 1970s traffic engineering which has created a hostile environment for pedestrians and cyclists in Hitchin town centre. Calming this traffic system, possibly by returning it to two-way traffic is essential to ensure the success of planned additional development along Paynes Park itself (Ref. HT12). See also Section 5.

Monitoring

- 7.18 Policy SP6 (Sustainable Transport) has no key indicators or targets for monitoring purposes. This needs to be remedied since sustainable transport is an area where negligible progress has been made in the past. There is a very real danger that this will continue unless proper plans are made and reviewed to ensure progress. In view of the congestion which already afflicts Hitchin, it is particularly important that a switch to more sustainable methods of transport is monitored to ensure the success of the Plan. Therefore targets are necessary for
- Junction improvements to help pedestrians and cyclists, involving shared space ideas where possible
 - Improvements to public transport
 - Cycle route network implementation

We suggest that targets are agreed with Hertfordshire County Council as a matter of urgency and written into the Plan to ensure soundness. See also para 10.6.

8. Housing and Development

Introduction

- 8.1 The key issues on which HTAG wishes to raise concerns regarding soundness (see section 2 below) are related to:
- (A) the scale of the housing targets for the District in the Plan period;
 - (B) the housing design policies that are needed to ensure the new homes meet future requirements;
 - (C) the Hitchin housing sites where local concerns should be addressed in the Local Plan.
- 8.2 We address a few other issues where minor modifications of wording or cross referencing would increase the effectiveness of the document (section 3). The implications for strategic objectives and monitoring are also covered (in section 4).

Key Issues

8A: Housing Targets

SP8. Not sound as presented.

- 8.3 In the context of the national and local need for housing (including affordable), we reluctantly accept that North Herts. will be subject to a major increase in housing stock up to 2031. Policy SP8 a. refers to a reduced housing target of 14,000 homes, and we understand NHDC's preference for retaining the allocations from the Draft of July 2016 in order to provide an increased buffer in the context of market pressures.
- 8.4 However, we do have specific concerns with Policy SP8 which is currently extremely misleading. Our view is that the figures as presented in the policy do not reflect clearly the scale of the change proposed in the Local Plan area, and that unless this is clarified one of the main drivers of change up to 2031 will not be fully recognised by those delivering the Local Plan and its related infrastructure over the full period, seriously undermining the Plan's effectiveness. Our specific concerns and suggested alterations are described below.
- 8.5 SP8 a. states that the District's own need is for 14,000 homes. Under SP8.c the total figure of completions and site allocations, excluding east of Luton, is 14,950 homes. This is the figure (related to the Stevenage and North Hertfordshire Market Area) that is used in the Cabinet papers of 28 September 2016 (Agenda item 6 para 8.29 and 8.30) to calculate the buffer of 6.8% which is considered likely to be acceptable and is referenced in footnote 48. We urge that this figure of 14,950 should be clear in policy.
- 8.6 We therefore suggest that, to increase clarity and soundness, mention of Luton's specific need and allocation of 1,950 homes is omitted from paras SP8 b. and c., and that a revised para b. (based on existing para c.) should begin as follows:

SP8 b. (former c). ‘Deliver these homes through the sites and allowances identified in the Plan that will support approximately 14,950 homes to meet the District’s need, and provide a 7% buffer.’

8.7 In this context footnote 48 will then make sense. And there are two consequent changes:

SP8 b.ii. 6,100 homes from six Strategic Housing Sites:

- EL1/EL2/EL3 East of Luton for 200 homes

8.8 We ask that mention of Luton’s need and provision should therefore be provided in a new para c, together with a reference to the fact that the total sought in North Hertfordshire is therefore 16,900 homes. This is the growth figure that the appropriate authorities need to deliver in terms of infrastructure and investment, and which has been tested in the Draft SA/SEA (CAG, July 2016 section 2.2). It should therefore be clear in policy to ensure the effectiveness and thus soundness of the Local Plan:

SP8 c. ‘Provide additional land within the Luton HMA (sites EL1/EL2/EL3) for a further 1,950 homes as a contribution towards the unmet needs for housing arising from Luton, giving rise to a total housing target in the area of the Local Plan of 16,900 homes.’

8B: Housing Policies

Policies SP8 f., HS2, HS3. Some unsound.

8.9 In this context of major house building, we have been very concerned that there should be a set of clear policies to ensure that housing meets future requirements. We therefore welcome the new policies included in the SLP including the addition of housing mix in Policy SP8 f. and HS1 and HS3; supported and older people’s housing in Policies SP8 g. and HS4; accessible and adaptable housing in Policy HS5 (and supporting text); and space standards in Policy SP8 d. We requested inclusion of these policy areas in the HTAG POR Response (sections 6.3.2, 6.3.3 and 7.2.3). There are, however, some policy areas where we would suggest stronger wording to increase their effectiveness.

Design-Led Approach

8.10 We welcome the change from use of density to a design led approach (SLP paras 8.3 and 8.21), as urged in the HTAG POR Response (section 6.3.1). To ensure that this important change in approach has the appropriate effectiveness in influencing future applications, we ask that it be included in policy:

HS3b. ‘...the scheme is based on a design- led approach which would provide a density, scale.’

Affordable Housing

8.11 On affordable housing (Policy HS2) we support the approach and target percentages, including the omission of sites for under 10 homes to enable small local builders to be involved. We also

welcome the reference to a stringent approach on viability issues (Policy SP7 f.). However, we have the following concerns in relation to soundness:

- Policy HS2c.ii. refers to review mechanisms in the context of ensuring affordable housing is secured for first and subsequent occupiers, but the supporting text referring to such mechanisms (para 8.10) relates to reviews of viability, not to security for occupiers.
- We urge that **Policy HS2c.ii.** be deleted from the Local Plan since any review could only undermine security for occupiers, and therefore undermine the purpose of the policy.
- In order to ensure that the maximum gain in affordable housing is achieved and the Local Plan is effective in this regard, we suggest a new policy is used to refer to the issue of viability covering the review mechanisms as explained in para 8.10, and the importance of developers factoring in costs of affordable housing in their offers to landowners (as included in POR para 6.31):

- New Policy HS2e.***
- i. 'The Council expects developers to factor in the cost of affordable housing; over-valuation of land after the adoption of this policy will not be sufficient to justify a lower level of affordable housing';
 - ii. 'In circumstances where below target levels of affordable housing are agreed, optional review mechanisms that are linked to construction milestones will be built into any relevant agreements and be triggered at the discretion of the Council.'

Self-Build

8.12 We welcome the inclusion of self-build (Policy SP8 f.), but the current figure of 100 plots represents just over 1% of dwellings on the strategic housing sites, based presumably on the figure for Stevenage quoted in the Stevenage and North Herts. SHMA (Update Volume 2, August 2016 para 4.32) as a reasonable response for Stevenage. We consider, looking at the relevant section in the SHMA report as a whole, that a larger figure would form the basis of more sound strategy for North Herts. - one which would meet the expectation of the NPPF (para 50), and the Planning Practice Guidance (ID 2a – 021) which states that 'There is strong industry evidence of significant demand for such housing':

- Self-build currently represents 10% of housing completions in the UK (SHMA para 4.25), and it can be assumed that the government is hoping for the figure to rise higher than this to levels seen elsewhere in Europe, where self-build has been able to underpin a much higher housing provision than has been achieved in the UK (SHMA Update para 4.25).
- No numbers are given in the SHMA report but, unlike Stevenage, there have been registrations for plots in the wider Housing Market Area (para 4.30 and Figure 36) including Hitchin, Letchworth and Royston; and we understand that there are 31 registered requests in the District as of November 2016. While it may take time for the market to grow locally it can be anticipated that with increasing housing pressures from London there will be significant interest during the Local Plan period.

- We therefore request that a 5% figure (going half way to current national provision) is adopted as a sounder strategy for the Local Plan as being a more positive basis for meeting this recognised need, and suggest changes in policy:

SP8 f.iii. '385 plots for self-build development over the plan period, representing 5% of the homes provided on strategic sites.'

- We also consider that there should be a mechanism to ensure that plots are built out and become a valuable part of the housing stock over the plan period. We suggest that there should be an additional development management policy to cover the issues:

New Policy HS3A: Self-build

Self-build developments will be permitted where conditions are placed requiring that:

- 'developments are to be completed within 3 years of self-build developer or community building group 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.'

8.13 We have looked in detail at Policy SP8 e. on a **new settlement** and **land west of Stevenage** under Section 6 Countryside and Green Belt since they are particularly related to those topics.

8C: Housing Sites

Policy SP17, HT2, HT3, HT5, HT6 some aspects unsound

8.14 We are concerned at the loss of Green Belt land around Hitchin (see Section 6), but we do accept that if the areas are well planned and developed in accordance with the policies set out elsewhere in the Local Plan they could be integrated into the town and provide the long-term boundary between the urban area and the Green Belt. For the sites adjacent to Hitchin we have been in discussion with local members and residents, in some cases over several years. We suggest that local concerns should be addressed within the policies of the Local Plan, if it is to be sound and set an effective framework for future applications.

Highover Farm

8.15 At Highover Farm (Policy SP17) we can provide some guarded support for the increase to 700 homes since it will mean that the development will have a fuller range of on-site facilities and be able to function more sustainably. However, we urge some amendments to policy to strengthen delivery.

8.16 We support the inclusion of the Highover site amongst the strategic sites with requirement for a site masterplan. However, our experience elsewhere suggests that there is much to be gained by early involvement of local people in gathering first ideas for a development. Local people can provide insights into how the wider area works, and what local issues could be

addressed leading to more imaginative and practical solutions. We therefore suggest a change in policy – which we believe should be applied to all the strategic sites:

SP17 a. 'A site masterplan to be prepared with the early involvement of local people and approved.....'

- 8.17 We welcome inclusion of neighbourhood retail facilities and a primary school, and it will certainly be important for the development to have an identifiable centre for a range of activities (and as a focus for public transport). However, in the context of the vision for the Local Plan (community facilities: bullet point 9, page 27), and the importance of the effective integration of the new and existing residential areas, we ask that a reference should be included:

at the end of para 4.203:

'Studies for the masterplan may indicate the need for financial support for expanding existing local community provision.'

- 8.18 We agree with the proposal that the principal access should be from Stotfold Road (SP17 c.), but we are concerned that it should be made clear that there should be comprehensive transport studies to clarify how the local roads system will cope, and how public transport, cycling and walking will be integrated into surrounding areas (see also Transport and Infrastructure Section 7) - to ensure that the development is sustainable both locally and in relation to the wider town:

SP17 c. 'The site masterplan will be supported by transport studies that cover the following access arrangements and off-site works:

- (i) Principal access from Stotfold Road with appropriate integration to the local highway network, and appropriate off site works.
- (ii) Secondary access for public transport, walking and cycling to be devised using connections to the south and east of the site, integrating the development with the existing residential areas.
- (iii) Support for an extended bus service, and for works to improve direct local access from the east of the railway station for pedestrians and cyclists.
- (iv) Support for augmentation to car parking provision in the town centre for those seeking town centre facilities.'

- 8.19 We urge use of a modified figure for self-build (see 8.2.7above) so that this can be taken into account in valuation of the site and in developing the masterplan, in order to ensure the effectiveness of the relevant housing policies:

SP17 d. 'Based on the indicated number of dwellings for the site, at least 35 serviced plots for self-build development.'

- 8.20 We welcome the mention of lower density development and green infrastructure in Policy SP17 g. However, we urge that policy be strengthened in order to make it more effective in ensuring that the site does not adversely impact on the function of the Green Belt to maintain separation between Hitchin and Letchworth.

SP17 g. ‘Lower density development, green infrastructure provision and use of an open space buffer (as referenced in Policy NE5b), as informed by...’

8.21 We are also concerned about the effect on more local and wider views. Much of the development will be on high ground, with a prominent ridge-line which also runs close to the boundary with existing housing development. Development on the reverse slope facing northwards, could have adverse landscape impacts over a significant area beyond Hitchin. We therefore suggest that there should be an additional policy for the rest of the site:

New SP17 h. ‘Green infrastructure should also be provided elsewhere on the site:

- (i) along the ridge line to benefit long distance views, provide local open space, and help local climatic conditions in an exposed location; and
- (ii) at the back of existing properties to protect privacy of existing residents.’

8.22 The opportunity for retaining and re-using the historic buildings of Highover Farm (for perhaps community, residential or small business use) should be included in policy to enable the historic context of the area to be conserved, and an identity for the new development to be established at an important potential pedestrian and cyclist entry to the area:

New Policy SP17 j. ‘Restoration of the key buildings of historic interest at Highover Farm to provide:

- (i) residential, business, arts/crafts, or other local accommodation;
- (ii) an attractive local entry to the development for pedestrians and cyclists; and
- (iii) an historic context to help foster a distinctive character for the development.’

West of Hitchin

8.23 The three releases proposed west of Hitchin (HT3, HT5 and HT6, pages 159-160) have been highly controversial and make only a small contribution to the overall housing target. It is considered that mitigation measures are necessary if development here is effectively to meet Strategic Objectives ENV2 and ENV3. Measures should be mentioned in the appropriate entries to protect the overall amenity of the area, to safeguard views from the nearby countryside (which extends towards the Northern Chilterns AONB), and to ensure that traffic impacts are taken into account:

- With regard to access to **site HT3**, there should be a second bullet point stating that:
‘A transport study will be required to test the impact on the wider road network and identify any off-site works that may be needed.’

- For sites **HT5 and HT6** the additional bullet point should read:
‘A cumulative transport study together with site HT6/ site HT5 (see reference to multiple sites in Policy SP7 a.i.) will be required prior to permission being granted for either, with a view to identifying any off-site works needed.’
- For sites **HT3 and HT6**, which have their boundaries on the ridge line at the revised boundary of the Green Belt, a final bullet point should be added to protect the integrity of the boundary and long distance views:
‘An open space buffer (see Policy NE5 b) is required of sufficient size to prevent the ridge line being breached visually at any time of the year.’

Pound Farm

8.24 For land at Pound Farm (HT2) there are significant local concerns which should be addressed in the Local Plan:

- Sewage management is critical: the current system is already overloaded and overflows into the brook in times of heavy rain. The nearby pumping station at Pound Farm is unlikely to be capable of handling increased flows, and we ask for an addition to the end of the first statement:
...‘infrastructure; and any off-site works required to be supported by the development’.
- There are significant local concerns about surface water, and we are pleased to see reference to a natural SUDS solution in the context of the local environment. Available pumping machinery to connect to the reservoir may not be sufficient to manage such a large area, so we are content that the second bullet point mentions ‘or other appropriate solution’; but we would urge the inclusion at the end of the second bullet point of:
‘, but preferably through SUDS.’
- The proposal site will close the gap between Hitchin and the villages of Gosmore and St Ippolyts and it would be helpful to specify additional planting along the London Road. We ask that an addition is made to the end of the third bullet point:
‘...south east of the site, and provide additional planting along London Road.’
- The only practical access is onto the London Road, uncomfortably close to the current ‘new’ roundabout. Given the existing 30mph restriction on London Road (B656) and the slow-moving traffic at peak hours, a major traffic engineering scheme may not be appropriate. We urge inclusion of an additional bullet point:
Means of access to the London Road to take into account local environment as well as safety.

Other Issues

- 8.25 There need to be cross references in the Housing section to ensure that applicants are shown clearly all the aspects that they need to take into account in designing housing schemes, and the range of infrastructure provision required:

Policy HS1 should include an additional bullet point d to refer to the 'full range of design policies' contained in the Local Plan (including Policy D1), and to 'infrastructure requirements and developer contributions' as set out in Policy SP7.

Monitoring

- 8.26 There is one change to the targets that would make the monitoring more useful in assessing progress:

- Housing Completions by Size: the target should be to supply a broadly even split between small and large properties within each of the main towns to ensure that each benefits from a balance in provision.

- 8.27 In relation to the Housing Trajectory we are concerned that the building rates envisaged are likely to be higher than is achievable:

- At the beginning of the plan period that rate is expected to rise to a figure experienced before the 2008 crash, despite the potential loss of workforce following the UK's departure from the European Union, and the long-term preference of developers to regulate releases of housing to retain a flow of work.
- For the period after 2020 the larger sites will offer opportunity for more rapid build out because the infrastructure will be in place, but the factors mentioned above are still likely to prevail.

- 8.28 In this context, the comments in section 2 above are particularly important if the Local Plan is to be deliverable - ensuring that:

- Key Issue 5A: the scale of housing need is clear;
- Key Issue 5B: there is clarity in housing policy to provide a significant increase in affordable housing and self-build; and
- Key Issue 5C: statements on specific sites make clear the full range of requirements so that time is not taken unnecessarily at planning application stage on issues that should be clear in the Local Plan.

9. Design and Sustainability

Introduction

- 9.1 HTAG is pleased to note that the wording of the SLP is generally more assertive than the wording used in the POR. The references to sources of further information and the cross references to other policies have also been enhanced.
- 9.2 We welcome several additional policy statements including, among others, the requirement for master-planning of significant developments (SP9 b.), assessment of proposals against the detailed policy requirements set out in the Plan and the Design SPD (SP9 c.), and the requirements for higher environmental standards generally stated in Policy D1.
- 9.3 However, we consider there has been insufficient emphasis on one key issue raised in the HTAG response to the POR:
- 9A the coverage of design quality and character.

Key Issue

9A: Quality and Character

- 9.4 In the HTAG POR Response (Section 7.2.1 suggested Policy D1(a)3) we proposed that developments should be required to have a distinctive 'character' as opposed to the standard designs which create anonymous environments. Although character is referred to in many sections of the SLP it is generally in connection with protection of the existing character, seen in terms of setting, landscape or history, rather than a requirement for a new distinctiveness. We argue that without proper reference in policy to distinctiveness, the Local Plan will fail to meet Strategic Objective ENV2 which refers to creating a 'distinctive sense of place'.
- 9.5 Policy D1(a)5, as suggested by the HTAG POR Response, also called for developments to address the street with a continuous building line and for the creation of active frontages where appropriate. Policy D1(a)6 saw this as incorporating well-connected streets, squares and public spaces.
- 9.6 We also asked, in our Policy D1(a)7 for developments with a mixture of land uses, forms of tenure and built form. We note the references in Policy HS2 to housing mix and the references to mixed uses in local centres in 5.29. However, we do not consider these specific policies alone will achieve the economically and socially sustainable developments that need to be created to meet the Plan's objectives.
- 9.7 We suggest that there should be a new policy to cover these issues in the Local Plan, replacing the existing Policy D4 (see 9.9 below):

New Policy D4: Character and Quality

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

- (a) reflect the guidance in the Design SPD,
- (b) be explained and justified in a Design and Access Statement,
- (c) 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,
- (d) take positive advantage of existing topography, landscape and historic features, watercourses, site orientation and microclimate,
- (e) address the street with a continuous building line set by the existing buildings and create active frontages where appropriate,
- (f) incorporate attractive, well-connected streets, squares and public spaces,
- (g) support a mix of land uses, forms of tenure and built form,
- (h) integrate parking into the development in those cases where parking is provided.'

Other Issues

- 9.8 In this context, we would like to emphasise the importance of the requirement for master-planning of significant developments for the Strategic Site identified at Highover Farm in Hitchin (see paras 8.15 to 8.22 above).
- 9.9 HTAG observations on Policy D4 Air Quality are provided in Section 11, to which we suggest the policy is moved to sit with other aspects of the Natural Environment.

10. Healthy Communities

Introduction

10.1 The succinct wording of policy HC1, with helpful definition of the range of community facilities in para 10.2 makes for a clear policy. We are pleased to see the protection given to existing community facilities in SP10 f. and HC1 (HTAG POR response 8.1 bullets 1 and 2). There are areas of policy which we would expect to see under the heading of Healthy Communities notably regarding physical and green infrastructure and rights of way:

(A) Physical and green infrastructure

Key Issue

10A: Physical and green infrastructure

Policy HC1. Unsound - omission

10.2 We consider this section to be unsound because there is no specific Development Management Policy statements on physical and green infrastructure and rights of way to underpin SP10 f., consistent with the requirements of NPPF para 69 and 75:

- (a) Although policy NE5 does address the creation of open space within new developments, that is not the same as physical and green infrastructure.
- (b) There is no part of policy HC1 which would provide, enhance or protect rights of way for walkers or cyclists as required by NPPF Para 75. Policy T1 d.ii. is the only Development Management Policy which impacts on this. As a transport policy, it is weak due to the caveat 'as far as is practicable' and because it only deals with major developments.

We therefore suggest a new Development Management Policy:

New Policy HC2. Rights of way, physical and green infrastructure and access

'Planning permission will be granted for developments that

- a. facilitate walking and cycling by creating physical and green infrastructure which incorporates safe rights of way for pedestrians, wheelchair users and cyclists within the development and which link to existing rights of way at its boundaries, or
- b. provide a financial contribution to the creation of either new, or the enhancement of existing, safe strategic rights of way for pedestrians and cyclists beyond the boundaries of the development '

Other Issues

Clarity on open space standards

- 10.3 SP10 Para 4.130 says that requirements for open space provision are set out in the detailed policy. That is not borne out within the policy statement or the explanatory notes for policy HC1. Whilst we are pleased to see that the erosion of green space standards implied in the POR appears to have been dropped, the standards are now unclear and need to be made explicit. (See HTAG POR Response 8.3.)

Monitoring

- 10.4 In section 5 table 2, there is no mention of any monitoring of SP10 or HC1, or any health-specific policy. We would highlight two areas where appropriate targets would make SP10 more effective.

Lack of improvement of provision of community facilities for all

- 10.5 In those communities where provision of community facilities is already poor, and where some small development is permitted, there is little to guarantee any improvement, with the possible exception of para 10.4, which is not explicitly part of the policy. We therefore suggest:

- Addition to the Glossary (SLP p. 243).

A facility is defined as 'accessible' to an individual if it is capable of being reached and entered within 15 minutes from their home using that person's most active mode of transport (for most on foot, but this may be self-propelled wheelchair or electric mobility scooter) and its facilities are capable of being enjoyed by that individual independently or with appropriate levels of support in the case of those with a registered disability.

- An indicator and target for SP10

Accessibility of community facilities - the number of accessible (see definition above) community facilities in each category per head of population will increase during the lifetime of the plan. See New Policy HC2a above.

No target for active modes of transport.

- 10.6 A number of opportunities to define indicators and targets to measure the progress of policy implementation on sustainable transport and the health of communities have been missed which will compromise the expressed aspiration of SLP para 14.24. No vision statement directly relates to SP10, and particularly the role of this policy in promoting healthy communities by ensuring the adequate provision of infrastructure to facilitate cycling and walking (see 10.2 above).
- 10.7 Strategic Objective ECON7, relating to sustainable transport, is comparably weakly supported by Strategic polices SP6 c., d. and g. These are then further limited to larger developments in

the Development Management Policy T1dii. No indicator or target for SP6 appears in section 5 table 2. The success of policies must be assessed by the extent to which modal shift occurs over the lifetime of the plan. We therefore suggest:

- The words '(as far as practicable)' be deleted from T1dii
- Indicator for SP10 (or SP6) 'Uptake of active modes of transport':
Target for SP10 or SP6: 'The proportion of home to/from school/work journeys using non-motorised transport will increase by, say 2%, year on year over the lifetime of the plan.'

11. Natural Environment

Introduction

- 11.1 We welcome the much more consistent wording of the Development Management Policies compared to their equivalents in the POR. This ensures that developers are required to satisfy a number of requirements prior to submission of any planning application (HTAG POR Response 9.7). This brings policies into line with the requirements of NPPF para 120, and should support the protective aspects of Strategic Objectives ENV3, 4 and 5.
- 11.2 We are, however concerned that Policy D4 on air quality, which would be expected to appear under the heading of Natural Environment given the provisions of the NPPF, is weak, and consider that its strengthening is a key issue:

(A) controlling the effects of pollution on health, the natural environment and general amenity.

Key Issue

11A: Controlling Pollution – omission unsound

Policy D4. Unsound – omission.

- 11.3 We consider that insufficient attention is given to the control of pollution as required by NPPF para 109 bullet 4, in relation to the following:
- For air pollution, the recent judgement in the High Court in the case brought by ClientEarth, and the failure of the government to meet the requirements of the Air Quality Standards Regulations 2010, are particularly significant. The aim of policy should therefore be not merely to reduce emissions, but to maintain them within nationally agreed standards.
 - **Policy D4** in its current form:
 - does not provide sufficient protection against a full range of predictable impacts, for instance, as a result of increased traffic movements on the wider road network beyond the development;
 - is weak in that ‘give consideration to’, in subsection a, is unclear;
 - omits to mention that completion of an air pollution impact assessment is necessary before ‘appropriate levels of mitigation’ can be proposed;
 - does not give stronger guidance on the most effective mitigation measures;
 - does not makes any mention of active and more sustainable modes of transport.
 - On noise pollution, there is no policy to ensure conditions to control noise during the demolition and construction of a development.

- There is no policy on light pollution. In this case, no policy exists elsewhere where it might be expected - under the headings of Design, Transport or Healthy Communities.

11.4 We therefore suggest a new policy to replace D4 in this section, in line with NPPF para 120:

New Policy NE13: ‘Controlling the effect of pollution on health, the natural environment and general amenity

Planning permission will only be granted to development proposals which:

- a. assess the impact of the development on local air quality, including on the road network beyond the boundary of the development, both
 - i. during the demolition/ construction phase and
 - ii. due to a predicted increase in vehicle movements as a result of the occupation and use of the development;
- b. propose appropriate levels of mitigation to limit emissions to nationally agreed standards which include encouragement of active modes of travel by providing walking and cycling routes within the development, and contributing to linked further provision beyond its boundaries;
- c. agree a schedule to control maximum noise levels during construction, specifying allowable working hours and arrangements for delivery of materials, with the Local Authority; and
- d. limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and wildlife habitats, both during the construction phase and final occupation and use of the development.’

11.5 The existing explanatory details (SLP paras 9.24 to 9.33) should be appended to the new policy and may also need some amendment, especially in relation to active modes of transport.

Other issues

11.6 Clarification would be helpful in relation to use of the word ‘considered’ in Policy NE1 d., and of ‘close to’ by providing an appropriate distance in NE9 c. We therefore suggest:

Policy NE1 d. ‘include plans for the long-term management and maintenance of any existing and proposed landscaping.’

Policy NE9 c. ‘... where developments are situated within x metres of a river or considered to affect water quality or waterside habitats ...’

11.7 The government’s technical standards for water efficiency are mentioned in SP9 d., and a cross reference to this policy should appear under the heading of Natural Environment. It is arguable whether the reduction of water consumption mentioned in ENV5 is a realistic aspiration in the context of increasing population.

11.8 Whilst we are pleased to see that the unrealistic water consumption target of 105 litres per day per person has been removed (HTAG POR Response 9.5) there is now no policy in this section that supports the intention of Strategic Objective ENV5 to reduce water consumption

Monitoring

11.9 There are missing indicators and targets:

- Whilst the indicator and target for SP11 are reasonable, they are confined to those areas of the policy that are designed to protect the environment and mitigate impact of development. There is no indicator by which the effect of SP11 a. on renewable and low carbon energy development can be measured.
- There are no indicators or targets for air pollution.

11.10 We therefore suggest that additional indicators and targets for SP11 be included in Table 2 (page219):

SP11 Indicator: 'The annual amount of energy generated from renewable and low carbon sources.'

Target: 'The annual amount of energy generated from renewable and low carbon sources will increase by x% year on year for the lifetime of the plan.'

Indicator: 'Observed annual NO₂ monitoring levels.'

Target: 'Average annual monitored NO₂ levels at all monitoring stations will not exceed 40 µg/m³.'

12. Historic Environment

Introduction

- 12.1 HTAG emphatically endorses the SLP's conclusion that the Historic Environment makes a 'strong positive contribution to North Hertfordshire' and supports the fuller consideration given to the issue in the current draft (see our previous comments in the HTAG POR Response, Section 10 pp 37-38). HTAG also welcomes that the Council will 'take a positive and pro-active approach to this historic environment' (SLP paras 4.153, 154) and those Strategic Objectives (ENV 2 and 3) that support this approach. This issue is particularly vital for Hitchin where the quality and effective management of the historic environment are central to the town's continued success as an attractive traditional market, retail, service and residential centre.
- 12.2 In this important area of District policy our view is that the SLP would, overall, benefit from closer editing and better cross referencing. Historic Environment policies are also central to those in Design, Countryside and Green Belt amongst others. A tighter, better linked, text would improve the workability, impact and accessibility of the Plan.
- 12.3 There is one Key Issue on which HTAG wishes to raise concerns of 'soundness' and which will undermine policy outcomes in Historic Environment unless addressed. This concerns relates to the practical outcomes:

(A) Practical implementation

12A: Key Issues: Practical Implementation

Policy SP13 and paras 4.152-4.172, HE1, HE2, HE3, paras 12.1-12.18. Unsound – omission.

- 12.4 The Council's past record on 'historic outcomes' is mixed. For example positive results have included the pragmatic use of local knowledge in reviewing the Hitchin Conservation Areas in 2010-11. But negative outcomes have included some controversial Hitchin planning decisions, such as the demolitions of Victorian buildings in Walsworth Road, where good arguments of local historical importance and Hitchin-specific distinctiveness were over-ridden. Given the accepted importance of Historic Environment issues in the District the Council's Conservation Section is under resourced; we address that (para 12.6 below) by suggesting much better use be made of cost-effective sources of 'local knowledge'.
- 12.5 The following two Key Issue changes are, therefore, needed:

New Policy SP13 e. 'The Council will work in a connected and coordinated way both internally and with relevant outside parties to understand, protect, manage and promote the historic environment'.

Policy HE1 addition 'The relevance of Historic Environment issues must be considered with reference to the Conservation Officer when implementing all other policies but especially those relating to planning, design, and the environment.'

Other Issues

12.6 A number of detailed drafting alterations, as set out below, would improve the policies concerned in practical support of Historic Environment objectives -

- SP13 a.** – Maintaining...setting, taking into account the distinct historic identities/characteristics within the District ;
- SP13 c.** – redrafted to 'Regular (at least ten yearly) reviews of Conservation Areas and other locally designated assets; spot reviews will be undertaken when key issues arise';
- SP13 d.** – redrafted to 'The timely preparation of relevant management plans and the publication of detailed guidance'.
- Para 4.164** – redrafted to 'Working with the Hertfordshire Gardens Trust and relevant local societies and based on their advice...of interest (for instance Hitchin Priory Park).'
- Para 12.1** – redrafted to 'Designated heritage...Listed Buildings, Locally Listed Buildings...'
- HE2** – redrafted to 'Proposals...registers will be rejected...'
- New HE3 c.** – 'Where a Designated building of local interest is unavoidably lost in whole or in part its historical features and context must first be recorded'.
- Para 12.11** – Omit 'Where appropriate'.

13. Communities

Hitchin

- 13.1 We comment on the specific proposals for Hitchin (HT1 – HT12) in the topic sections of our response (particularly in Sections 5 and 8). Here we refer to the Hitchin Communities text from page 158.
- 13.2 We recognise the aim of the Communities section is, in part, to encapsulate the varied characteristics of the settlements that make up the District. This function impinges on wider policy making because those policies are framed against a factual background and analysis which should influence outcomes - for instance in according priorities for investment.
- 13.3 The SLP should have aimed for a more 'tailor made' approach for the communities concerned (see HTAG Response to POR Section 12): HTAG is concerned that a more systematic and analytical approach across the District should be presented in the Communities section to provide a sound basis for the Local Plan and that this is a key issue that should be rectified:

13A Strengthening of Hitchin Communities supporting text.

Key Issue

13A: Strengthening of Hitchin Communities text

Paras 13.117 to 13.124. Not sound as presented.

- 13.4 HTAG is, of course, only competent to comment in detail on the draft from a Hitchin perspective (paras 13.117-124). A more accurate descriptive account of the town should be devised to support the current and future roles of Hitchin within the District.
- 13.5 Hitchin is not just 'one of' the main towns of the District; it was historically the central commercial and administrative town. It is still the major town centre in the District (see Section 5 above) and has been a continued success in a rapidly changing commercial context. Reflecting this history, Hitchin is also the main communication focus of the District in terms of rail and bus links. Hitchin has evolved a diverse social structure and some more balanced assessment of this is needed as it impinges on policies developed towards housing (sizes, succession/types, costs), education, employment and social deprivation. We suggest the following changes:

Para 13.117: ' Hitchin is the District's oldest continually inhabited main urban settlement. It has been a market, service and ecclesiastical centre since Saxon times, and has had roles as headquarters to a royal manorial estate, petty sessions, poor law union, both a Rural and Urban District Council and parliamentary division. It is now the major market, retail and service centre in the District, and an important hub in its public transport system.'

13.6 Hitchin in 2016 is again the largest urban centre in the District; it took over 60% of the population increase in the four towns between 2001-11 (NHDC Monitoring Report.) This remains relevant context to current housing policy (see Section 8):

Para 13.119 ‘... most populous individual urban area in the District. Between 2001 and 2011, Hitchin received the majority of the new housing in the four towns, thus in population narrowly.....’

13.7 Hitchin has evolved incrementally over at least ten centuries. Further growth, maintaining its vitality, must be carefully managed within this historic framework and tailored historic environment policies applied accordingly:

Para 13.120 ‘The town has grown incrementally.....’

New final sentence: ‘The distinctive character of the historic town centre, and of the different stages of development of the wider town, should provide the basis for the design of future incremental change’.

13.8 Hitchin has developed a diverse social structure which needs to be taken into account in relevant housing, educational and social provision (see SLP Sections 8 and 10). Also in this context the town has an important industrial area providing a range of employment opportunities including for smaller start-up businesses; opportunities for enhanced local employment are important:

Para 13.121 ‘...and improve community facilities, and local employment opportunities’.

14. Implementation, Monitoring and Review

Introduction

14.1 This is one of the most important elements of the Local Plan and we have considered the monitoring impact in each of the sections of this response. We therefore conclude that this is a key issue:

(A) Targets

Key Issue

14A: Targets

Paras 14.24 to 14.29 and Table 2 (pp. 218 to 219). Unsound – not comprehensive.

14.2 Whilst a target culture is often criticised, there is an obvious place for judicious use of targets to monitor the progress of the Local Plan. The previous sections of this report detail where we believe additional targets are necessary.

14.3 We urge that NHDC be requested to provide a more comprehensive set of achievable targets as suggested at the end of most sections of this response.

Other Issue

Community Infrastructure Levy

14.4 Many of the infrastructure schemes identified in the IDP rely on CIL as a means of funding. Some of these are short-term, hence for the plan to be sound (effective) a CIL regime needs to be put in place quickly to avoid the danger of housing being built without the appropriate infrastructure. We understand that NHDC is making this a priority.

Appendix A – Churchgate Development and Enhancement Area

