

Standing up for Hertfordshire's countryside

Clare Skeels  
Planning Policy and Projects Group  
North Hertfordshire District Council  
PO Box 480  
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Our Ref:

Your Ref:

28<sup>th</sup> March 2013

Dear Clare,

**North Hertfordshire Local Plan: Housing Options Growth Levels and Locations 2011-2031  
Consultation Paper**

In response to your invitation of 8 February 2013 to comment on the above consultation paper, CPRE Hertfordshire asks that the Council takes the following matters into consideration in preparing draft strategic policies and land allocations for inclusion in the Local Plan.

**Housing Need**

Paragraph 17 (Core planning principles) of the NPPF should be the Council's starting point for all key aspects of the Local Plan. These principles should underpin plan making at all levels.

Whilst it is a core principle (bullet 3) that *'every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and to set out a clear strategy for allocating sufficient land which is suitable for development in their area'*, it is also a core principle (bullet 5) that planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas, *'protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside'*. This principle also extends to the protection of Areas of Outstanding Natural Beauty which have *'the highest status of protection in relation to landscape and scenic beauty'* under paragraph 115 of the NPPF.

In this context we consider that the Consultation Paper presents a flawed interpretation of the relationship between the requirement to 'objectively assess' development needs, and the requirement to take proper account of the strategic policy constraints affecting North Hertfordshire in determining the extent to which those development needs can and should be accommodated.

Hence, while the Council should use its evidence base to ensure (NPPF paragraph 47) that the Local Plan *'meets the full, objectively assessed needs for market and affordable housing'*, NPPF paragraph 47 continues *'as far as is consistent with the policies set out in this Framework'*.

The Consultation Paper states in its conclusion that a total of 10,700 houses ‘could be the appropriate level of growth for the period 2011 to 2031.’ This is over 50% higher than the number (7,000) consulted on by the Council last year, and 80% higher than the number then proposed by CPRE Hertfordshire.

At the present time we do not consider that any growth option should be selected that would require the allocation of land in the countryside beyond established settlements in the period to 2021. Furthermore, a far more robust and reasoned justification for longer term development to 2031, is needed from the Council as part of a draft Local Plan, based on recent changes in Planning policy, forecast economic and social changes, and household forecasts using the findings of the 2011 Census, rather than projections based on increasingly invalid mid-year estimates dating back to the 2001 Census that are likely to overstate the need for new housing.

We are therefore very disappointed that the Council has failed to recognise that the identification of an appropriate level of housing growth is not (as listed in paragraph 1.13 of the Consultation Paper) determined solely by market assessments and population and housing forecasts, but by a sustainable balance between ‘objectively assessed’ needs and other national policy principles, including the protection of Green Belt and the countryside. Such constraints have been accepted at core strategy examination elsewhere in Hertfordshire as a basis for setting targets.

Where that balance should fall is a fundamental issue that the Council will need to address in preparing a draft Local Plan, but the Consultation Paper is misleading in implying that it has to meet a housing target based solely on which population forecast is selected.

### **Location of Housing**

In considering potential strategic housing locations, insufficient account has been taken of the importance attached to protection of Green Belts in the NPPF and of the elaboration of this principle in the specific purposes of Green Belts set out in NPPF paragraph 80). The loss of large swathes of Green Belt in North Hertfordshire would therefore not be in accordance with national policy as set out in the NPPF.

Development in the strategic option areas set out in the Consultation Paper would mean that some of the most congested areas of the District would be put under even greater pressure. Narrow gaps between settlements represent some of the most fragile areas of Green Belt in the County as well as in the District. The NPPF recognises the sensitivity of such ‘gaps’ and their great importance in preventing neighbouring settlements merging into one another, the second of the five stated Green Belt purposes in paragraph 80. In particular, the separation between Hitchin and Stevenage, and between Hitchin and nearby villages/hamlets, is under threat from the Strategic Housing Options being considered.

Using the Strategic Option of South West of Hitchin as an example, in the Landscape Sensitivity Study, the countryside around Hitchin is highlighted as being particularly sensitive to encroachment by virtue of its attractiveness and the open undulating character of the valley, with small villages and isolated farms. Encroachment outside the ridge line that defines the western and southern boundaries of the Town would be virtually impossible to mitigate through tree planting. Housing development in this Strategic Option location would conflict with the third purpose of Green Belts: To assist in safeguarding the countryside from encroachment, as well as resulting in settlement coalescence.

Hitchin is also recognised as a nationally important town with a close relationship between its medieval core and the surrounding countryside, to which the fourth purpose of the Green Belt in paragraph 80 applies, to preserve the setting and special character of the town. A 7,000 dwelling expansion of the town could not be achieved without compromising Hitchin's special character and its setting, and thus would be contrary to national policy.

This example seeks to explain our major misgivings about the process followed by NHDC in compiling the Housing Options for consultation, when there is no sound basis yet for determining the scale of provision that should be made in the Local Plan, as pointed out above.

Furthermore, there appears to have been insufficient assessment of the submissions from landowners and developers when they identified their own proposed sites for housing development. The sites put forward appear to have been based solely on land ownerships rather than identification of potentially 'planned' development areas, and they do not appear to have been assessed by the Council, using sound planning principles and taking into account areas of sensitivity, in order to present potential strategic land allocations.

Although the consultation asks for an order of preference for development of the various site options and reasons for this preference, this is neither practical nor reasonable in current circumstances. The volume and nature of information provided by NHDC, on which to base such decisions is impenetrable, and CPRE Hertfordshire considers that the likely response will be based on an entirely local perspective rather than reasoned planning argument. The Council has in effect set up a 'beauty contest' that is likely to 'won' by the site with the fewest neighbours.

This consultation should not in our view be considered an appropriate basis on which to decide which housing sites should be included as strategic allocations or preferred areas in the draft Local Plan.

CPRE Hertfordshire also wishes to point out that it has previously opposed and successfully campaigned with local action groups and others, against major development proposals West, North and North-east of Stevenage, and East of Luton, and is likely to do so again in future if those developments re-appear as planning applications or as Local Plan proposals without full demonstration of exceptional circumstances sufficient to outweigh the substantial harm that they would cause individually, and the even greater harm that they

would cause in combination. It remains our current view that it will not be possible to demonstrate such exceptional circumstances in the context of current national policy.

Thank you again for consulting CPRE Hertfordshire, and please contact this office if further explanation of our comments would be helpful to you.

Yours Sincerely,



Steve Baker  
Planning Manager, CPRE Hertfordshire.