



## **Gladman Developments Ltd**

### **Examination of North Hertfordshire Local Plan 2011- 2031**

#### **Matter 2 – Sustainable Development: The Settlement Hierarchy (Policy SP2)**

**2.2 Through Policy SP2, the *“the majority of the District’s development”* is directed to the Towns. *“General development”* is allowed within the defined boundaries of Category A Villages. *“Infilling development which does not extend the built core of the village”* is allowed in Category B Villages. *“Only***

***limited affordable housing and facilities for local community needs” are allowed in Category C Settlements.***

**a) Should Policy SP2 be more specific about the amount of different types of development that is anticipated in each tier of the hierarchy, or even in each settlement?**

**b) Should Policy SP2 be more specific about the distribution of the “majority of the District’s development” between the Towns?**

**c) What is the general development that will be allowed in Category A Villages - should the policy be more explicit, for effectiveness?**

**d) Paragraph 89 of the National Planning Policy Framework says that limited infilling in villages in the Green Belt is not inappropriate development. Is the approach to development in Category C settlements more stringent than this? If so, what is the justification for this?**

2.2.1 Paragraph 2.1 of the Council’s Housing and Green Belt Background Paper explains that the Settlement Hierarchy contained in Policy SP2 is to a large extent derived from a Housing and Settlement Hierarchy Background Paper (H & SHBP) prepared by the Council in 2014 in support of the Local Plan – Preferred Options Consultation.

2.2.2 Examination of the H & SHBP reveals that for the District’s villages, an analysis of each in terms of the provision of 5 types of facility was undertaken, namely food shop, public house, school, hall and surgery, the results of which are set out in Figure 10 of the H&SHBP. Gladman considers that the assessment of only 5 facilities was unduly limited and other facilities and services such as library, places of worship, recreation facilities, petrol filling station, local employment facilities, and regular bus services might have also been taken into account.

2.2.3 Notwithstanding the provision or otherwise of facilities, the Council decided<sup>1</sup> that only those villages with a school would be included as Category A villages on the basis that “*there is a clear social and economic case for allowing further growth in those villages with schools*”.

2.2.4 The Council’s decision has accordingly resulted in some anomalies within those villages included within Category A. For example, whilst larger villages with a wide range of facilities are understandably included such as Knebworth (population 4,496), a number of very much

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<sup>1</sup> H&SHBP paragraph 5.41

smaller villages with limited facilities are also included such as Hexton (population 133), Reed (population 310) and Preston (population 420). None of these villages has a food shop or a surgery. Whilst Gladman does not disagree that there is a case for a degree of housing growth in these smaller villages, in order to achieve sustainable patterns of development, there should be a strong correlation between the range of facilities in a village and the scale of housing growth proposed unless there are identified constraints that indicate otherwise.

- 2.2.5 In this regard, the NPPF at paragraph 55, seeks to promote a strong rural economy and advises that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby”*. Similarly the NPPG (ref ID: 50-001-20160519) states that *“it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements... A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these facilities.”*
- 2.2.6 Gladman has concerns that the Plan does not have due regard to the range of services and facilities in settlements in the proposed distribution of development. For example, the Policy states that general development will be allowed within the settlement boundaries of Category A villages, however both Offley (population 1,398) and Pirton (population 1,274) are defined as Category A villages yet neither village has housing allocations proposed either within the defined settlement boundary or on land immediately adjacent to the defined settlement boundary. Offley has a primary school, post office/shop, two public houses, a community centre and church. It is served by the 101 bus service between Luton and Stevenage which runs half hourly throughout the day. Pirton also has a number of services and facilities including a primary school, pre-school, village shop/post office, two public houses, playing fields, recreation ground, village hall and two places of worship. Pirton is served by an hourly bus service to Hitchin.
- 2.2.7 Conversely the Local Plan proposes significant growth in a number of smaller villages with a more limited range of facilities and services, for example Graveley (population 487) where

allocations for 908 dwellings are proposed and Barkway (population 775) where allocations for 173 dwellings are proposed.

- 2.2.8 Gladman is not aware of any justification for this approach in the Local Plan and considers that the defined settlement boundaries of Offley and Pirton should be amended to allow flexibility and capacity for housing growth.
- 2.2.9 The Policy states that “general development” will be allowed within the defined settlement boundaries of these villages, however the boundaries are drawn tightly around the built up area, thus effectively limiting development opportunities to small infill plots or redevelopment. There is thus little discernible difference in the Local Plan as to what development will be acceptable between Category A and B Villages.
- 2.2.10 It is clear therefore that there are wide degrees of disparity between the various settlements considered as category A villages. Knebworth for example has a population of over 4,000 a railway station and a range of shops and services including primary education, post office, library and a surgery. It is the most sustainable of the category A settlements and is rightly therefore considered an attractive and sustainable location for further growth.
- 2.2.11 Gladman consider that there may be benefit in creating a sub category within the Category A settlements to highlight that some settlements within this category are considerably more sustainable than others. Gladman would certainly consider that Knebworth, Pirton, and Offley ought to be separate in classification to settlements such as Preston, Reed, or Therfield for example. In deed there would be considerable merit in considering Knebworth, and the improved sustainability of the settlement through the proposed provision of new secondary education, above all other settlements in this category. Such an approach would better highlight how the distribution of housing development could be derived amongst these settlements.
- 2.2.12 The Non -Technical Summary of the North Hertfordshire Local Plan Sustainability Appraisal states at Para 4.3.2. that *“the Council has chosen to identify villages which may take further development based on the level of facilities in the village. The Housing and Green Belt Background Paper and Policy SP2 define a list of villages based on those which have schools and appropriate services.”* Clearly that is not the case; the villages which have been identified are those which have schools. The level of services has not been taken into account. Also not all villages in Category A are proposed for further development; the settlement boundaries for

Pirton and Offley are drawn tightly around the built up area and no sites are allocated for housing development.

2.2.13 The Sustainability Appraisal should be a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all **reasonable alternatives**. There is no evidence in the Sustainability Appraisal or elsewhere in the Council's evidence base, however, that reasonable alternatives to the Settlement Strategy as set out in Policy SP2 have been considered.

2.2.14 Overall Gladman considers that the settlement strategy as set out in Policy SP2 is not;

- Positively prepared, as it is not consistent with achieving sustainable development
- Justified, as the strategy is not the most appropriate when considered against reasonable alternatives; and
- Consistent with national policy, as the plan would not accord with the NPPF objective of maintaining the viability of rural communities.