North Hertfordshire District Local Plan Examination

01/18

Written Statement on behalf of Beechwood Homes

Matter 10



Chells Manor, Chells Lane, Stevenage, Herts, SG2 7AA e-mail info@jbplanning.com url www.jbplanning.com tel 01438 312130 fax 01438 312131

Matter 10 - Hearing Statement

Introduction

- 1 This Hearing Statement has been produced on behalf of Beechwood Homes (Beechwood), which are the site promoters of the land identified as proposed allocation HT2 in the North Hertfordshire Proposed Submission Local Plan 2011-2031.
- 2 The site is currently an arable field, and is located to the south of Hitchin town centre within the St Ippolyts area and to the east of London Road. The London Road provides a route towards Hitchin town centre to the north and south towards Codicote and Welwyn. Stevenage and the A1(M) are also close and accessible.
- Beechwood welcomes the opportunity to engage with the examination process, especially in relation to Matter 10 – The housing allocations and the settlement boundaries: the Towns (Hitchin).

Proposed Allocation HT2

- 4 Below we set out our client's brief responses to the Inspector's questions relating to proposed allocation site HT2 Land north of Pound Farm (St Ippolyts Parish) for an estimated 84 dwellings.
 - 10.6 Are all of the proposed housing allocations deliverable? In particular, are they:

a) confirmed by all of the landowners involved as being available for the use proposed?

5 Please see the attached letter (Appendix 1) from Big Box Company Services Ltd (the landowner), which confirms that it and Beechwood Homes (its sister company) are fully committed to ensuring that the proposed housing allocation site is delivered early on in the Plan period.

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

- 6 Two vehicular access points have been considered into the site; one to the north of Mill Lane's junction with London Road, and another to the south. The preferred site access location off London Road is immediately to the south of the junction with Mill Lane. This is principally because this location provides superior visibility splays, and is also likely to be able to provide a better internal site layout going forward than the other identified site access point.
- 7 A standard T-junction is appropriate to facilitate access into and out of the site from London Road, which is subject to a 30mph speed limit in the vicinity of the site. The proposed access junction location meets the Roads in Hertfordshire requirement of providing a minimum 20 metre offset from the Mill Lane junction. Likewise, the width of the access will be at least 5.5 metres wide, with an additional 2 metres for footpaths either side of the access road, in accordance with Roads in Hertfordshire requirements. Visibility splays of 4.5m x 43m can be provided from the proposed access junction, looking both to the north and the south.
- 8 The highway proposals for the site reflect the content and findings of a Technical Note issued by Beechwoods' transport consultants (iTransport) in July 2017. The two options demonstrate the access can be located on either side of Mill Road and provide appropriate visibility in both directions.
- 9 Capacity testing has shown that the junction will operate with no queuing and minimal delay. It has been tested for 84 new homes and demonstrates the junction will operate well within capacity.
- 10 HCC Highway Operations and Strategy confirmed by email on 5 January 2018 that our client's submitted technical note that included drawing number ITL9262-GA-008 (see Appendix 2) with its revised site access location and design, is acceptable as part of the pre-application process.
- 11 Nearby bus stops provide access to two local services and are directly accessible from the footway on the western side of London Road.

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

- 12 In our representations to the Submission Draft Local Plan we referred to the stated delivery rates set out in the Infrastructure Delivery Plan (Submission Document: T/1) which indicated that site HT2 would deliver 34 dwellings within the period 2022-26 and 50 dwellings between 2027-31.
- **13** Beechwood has held a pre-application meeting with the Council and HCC Highways in November 2017. Subject to satisfactory negotiations with NHDC on matters of detail, is keen to ensure that housing delivery on the site occurs ahead of the above mentioned timescales.
- 14 In relation to the proposed allocation figure of 84 dwellings, Beechwood considers that it can deliver the site in its entirety within 5 years of receiving planning permission.

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

15 Beechwood has provided detailed site specific technical evidence to the District Council which demonstrates that the proposed housing allocation HT2 is both justified and appropriate, and that it will not result in any significant adverse impacts arising.

Regulation 19 Objections

- **16** The Regulation 19 stage consultation presented an opportunity for the public to comment upon the draft Local Plan's content. Below we both highlight and respond to the key points raised in the representations submitted in relation to proposed housing allocation HT2.
 - The site boundary should be amended to exclude land at The Pound;
 - 84 dwellings is too high a figure for the site, and why has it been raised from
 67 dwellings in the previous consultation;
 - What types of dwellings will be provided, and for whom;
 - Concern that site access may be via the Broadmeadow Ride Estate;

- Concern about the need to protect trees by ensuring that new housing does not encroach closely to the existing treeline;
- The need for planting and landscaping along site boundaries;
- Impact on local roads, GP's and schools; and
- Water and sewage management concerns;

a) Allocation Site Boundaries

- **17** A representation has been submitted which states that the boundary line of the HT2 site allocation encroaches onto land which forms part of an adjoining property.
- 18 The Land Registry details for the allocation site have been checked and this confirms that the site boundary identified for HT2 allocation is incorrect. The boundary change is minor and will have no consequences for the delivery of the allocation including the overall capacity of the site
- **19** A small sliver of land running along the southern boundary has been shown as forming part of the allocation. Beechwood agree with the Regulation 19 representation from the owner of the adjoining property 'The Pound', that that particular narrow strip of land is under the legal ownership of 'The Pound' and that the site boundary should be amended to exclude that part, on its southern edge. An amended site plan is provided at Appendix 3). Given the minor nature of this change we consider that this can be dealt with via a Minor Amendment advanced by the Council and is not a soundness matter.
- 20 The precise number of dwellings to be delivered from site HT2 will ultimately be determined by a future planning application that will take account of a whole range of different factors. However, given the size of the site, together with the technical work undertaken so far, Beechwood considers that a figure of 84 dwellings to be appropriate in relation to the proposed housing site allocation.

b) Site Capacity

21 Given the pressure to deliver its housing requirement, and in order to accord with the NPPF, it is important that sites are developed at an appropriate density in order to ensure an effective use of land. A development of only 67 dwellings would represent

a poor and inefficient use of available land as acknowledged by the Council in allocating the site for 84 dwellings.

c) Housing Mix

22 The allocation will make provision for a mixture of dwellings, sizes and tenures, including affordable housing.

d) Access

23 No vehicular site access will go through the Broadmeadow Ride Estate. This is not feasible given that Beechwood does not own or control the land upon which any such vehicular access to the site would pass. As indicated above, vehicular access will instead be provided directly off of London Road. Detailed transport evidence demonstrates that the scale of the proposed development will not jeopardise the capacity of the local road network.

e) Landscape and Planting

- **24** The landscape proposals for the site envisage that all existing trees and hedgerows will be retained. There are no public footpaths or bridleways running through the site.
- 25 An illustrative site layout has been submitted to the District Council as part of Beechwood's Pre-application Submission. This layout demonstrates how the full quantum of housing could be provided at the site, including the required amount of open space 0.665 ha (6,650sqm), within a site developable area of 2.41 ha (24,100sqm).
- 26 With regard to tree protection, Beechwood has commissioned an Arboricultural Report which has defined all root protection zones for on-site, boundary and significant off-site trees which may be affected. These have informed the design of the layout, which ensures that such zones are avoided.
- 27 The western boundary (along London Road) will be enhanced with a wider green boundary and native trees to assist in the screening of the proposed housing from the transient view from the road and footpath. Development will be set back along London Road, so as to ensure that the setting of nearby heritage assets is preserved.

- 28 The southern boundary will be subject to more native tree and hedge planting to screen the view from the Pound Farm buildings and a green edge that includes enhancing the existing ornamental hedge to provide a native edge to the development.
- **29** The Eastern boundary is a dense screen and will be protected from encroachment of the development of the site.
- 30 The northern boundary adjacent the existing housing shows careful design to enhance the public open space /green route, provide screening of the proposals from the existing housing whilst maintaining surveillance of the area. Additional public open space is to be provided in this location to give greater distance and a natural break from the development proposals to reduce the immediate impact. Mature trees in this area would mean that there is existing screening along much of this boundary and further enhancement of this would reduce the visibility of the site.

f) Infrastructure

- **31** Beechwood will provide appropriate financial contributions required as a direct result of the development for education, health and / or other such community facilities through Section 106 obligations at the planning application stage.
- **32** Paragraph 13.147 of the Submission Draft Local Plan (LP1) refers to the possible need identified by Anglian Water for certain upgrade schemes in relation to development at Hitchin, notably HT2. It states that such upgrades will be determined at the planning application stage when Anglian Water is approached by the developer. Beechwood will liaise with Anglian Water and other key organisations to ensure that all water and sewage management concerns are fully addressed.
- 33 SDP Consulting Engineers have been liaising on our client's behalf with Anglian Water with regard to capacity within the foul sewer infrastructure. In relation to the current situation and how the new development will affect the sewers and pump station, Anglian Water has confirmed the easement width required is 3m either side of the sewer from the centre line. There is currently capacity to treat the flows from the proposed development, although it is acknowledged that capacity cannot be reserved.

- In terms of drainage impact, and how the foul flows from the site can be managed, the hydraulic assessment indicates an increase in surcharge level at the St Ippolyts-Pound Farm pumping station. There is also a potential problem with the sewer crossing the site surcharging due to the pump station serving the properties on Sycamore Close, but this is considered low risk due to the short duration of the pump event. However, there is an identified solution to the potential problems of the existing sewage infrastructure, which have been costed and detailed by Anglian Water. These will provide an adequate drainage solution, subject to detailed design. The identified solution is to provide 34 cubic metres of additional storage at the pump station located in the compound.
- 35 Surface water attenuation is proposed in the south eastern corner of the site, to maintain the buffer zone required in this location in emerging allocation HT2, and because this is the lowest-lying part of the site. The site lies within Flood Zone 1, where flooding events are assessed as having a less than 1 in 1,000 probability of flooding (less than 0.1%). The surface water attenuation feature is therefore considered to be suitable for open space as part of the open space requirements arising from the proposed development. The surface water drainage strategy will be based on SuDS to be incorporated at detailed design stage.
- **36** Beechwood have held extensive and detailed dialogue with utility providers. All of the key services can be provided through engineering solutions or via upgrades to existing infrastructure or facilities.

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

- **37** Our client considers that proposed allocation HT2 is the most appropriate option given the reasonable alternatives. It is a sustainable site on the edge of the urban area, which is located within good proximity of Hitchin town centre and its range of facilities and services.
 - 10.9 Sites HT1, HT2, HT3, HT5 and HT6 comprise of land in the Green Belt. For each:

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

- Yes. In preparing a new Local Plan, the District Council has had to take account of the very high need for new housing (both market and affordable) that currently exists in North Hertfordshire. It has also sought to address unmet need from a neighbouring local authority (Luton Borough). In these circumstances, the exceptional circumstances to release land from the Green Belt exists. In relation to HT2 the site relates well to the existing urban area and as stated previously will deliver sustainable development and given the circumstances of lack of urban capacity and the level of objectively assessed housing need, there are exceptional circumstances to justify the release of the HT2 site from the Green Belt.
- **39** Proposed allocation HT2 is a relatively small site on the southern edges of Hitchin, which can make a contribution of approximately 84 dwellings towards meeting that need.

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

The North Hertfordshire Landscape Study (Character, Sensitivity and Capacity) Part
 2 Study [CG16a] evaluated Area 214 – Langley Valley, in which site HT2 sits. It
 states on p.95:

"...Overall, Langley Valley is considered to be of moderate low landscape value. Aspects of particular value within Langley Valley are the sense of openness, but there is also a less memorable landform, lack of remoteness and general human influence on the landscape that detracts from it"...

- 41 A more detailed assessment is contained within the North Hertfordshire Green Belt Review [CG1]. Its conclusions in respect of site 98 – Land north of Pound Farm are set out on p.119 and include the following:
 - "...Hedgerow boundaries exist on all sides;
 - Site makes a moderate contribution to Green Belt;

- Site adjoins development on one side. St Ippolyts is located to the south, although as this is not a town it is not significant from a Green Belt perspective;
- Site is flat and well contained; and
- Site does not impact on historic towns..."
- **42** Accordingly, we do not believe that there is any evidence to suggest that the Green Belt will be harmed by removing proposed housing site HT2 from it.

c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

43 Beechwood is committed to ensuring that a detailed landscape planting scheme is implemented which will result in the creation of a new Green Belt boundary which is capable of enduring over the long-term.

d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?

44 Yes. The Green Belt would continue to serve two of the five purposes: 'to check the unrestricted sprawl of large built-up areas' and 'to assist in safeguarding the countryside from encroachment'.

e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?

45 The current Green Belt boundary is defensible and follows the south-eastern edge of the urban Hitchin area. The proposed new Green Belt boundary will continue exactly the same approach, but incorporate the land at Pound Farm site. The new southern urban boundary line pass go along the boundary with 'The Pound'. Whereas, to the east of the HT2 site is the dense Ippollitts Brook woods. We see no reason why the new Green Belt boundary would need to be amended in this locality at the end of the new Plan period.

f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?

46 Yes. The site is located on the outer edges of Hitchin, which together with Letchworth Garden City constitute by far the two largest and most sustainable settlements within North Hertfordshire District. Hitchin town centre with its range of facilities and services (including its railway station) are easily accessible.

g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?

47 Yes. The revised Green Belt boundary is both logical and appropriate (see also our response to (e) above) and the alternative Green Belt boundary is defensible and capable of enduring in the long term meeting the requirements of paragraphs 83 and 85 of the NPPF. The minor amendment to the site boundary will maintain this consistency with the requirements of the NPPF when altering Green Belt boundaries.

10.10 Is the proposed settlement boundary:

a) consistent with the methodology for identifying the settlement boundaries?

48 Yes. The new settlement boundary incorporates Beechwood's land north of Pound Farm site, which immediately abuts the existing settlement boundary. The proposed revised boundaries follow easily recognisable physical boundaries, which are capable of enduring over the longer term.

b) appropriate and justified?

49 Yes. The Council has stated in the Draft Plan (paragraph 4.11) that it wishes to focus the majority of new development on the towns (including urban extensions to existing towns) in order to make maximum use of existing facilities, social networks and infrastructure, and maximise opportunities to deliver new infrastructure. Such an

approach is both sensible and sustainable. It is also entirely in keeping with the NPPF.

Proposed Change

50 Beechwood proposes that a minor modification be made to the boundaries of proposed housing allocation HT2 and to the Green Belt boundary, as shown on the Policies Map (Sheet 1, Side A) to accurately reflect its site boundaries, as proposed in Appendix 3). It recognises that this is a minor change matter for the District Council rather than the Examination Inspector to address.

PC/898/JB 12 January 2018



Appendix %



Big Box Company Services Ltd Beechwood House 5 Arlington Court Whittle Way Stevenage HERTS SG1 2 FS

North Hertfordshire District Council Planning Policy Team Council Offices Gernon Road Letchworth Garden City SG6 3JF

10 January 2018

Dear Sirs

RE: Letter of intent regarding development of Pound Fields, Hitchin (proposed site allocation HT2)

We are the land owners of the proposed housing allocation site to the south of Hitchin (HT2 - Pound Fields) in the North Hertfordshire Submission Draft Local Plan.

We wish to confirm in writing our intention to commence development of the Pound Fields site in the near future, subject to it being confirmed in the Local Plan and released from the Green Belt.

It will be our sister company Beechwood Homes Ltd who will be responsible for making any planning application and constructing the new dwellings.

We envisage that Beechwood will fully build out the 84 dwellings within 5 years of being granted planning permission for residential development.

Yours faithfully

on Namis

Sean Harries On behalf of Big Box Company Services Ltd



Appendix^{*}&

	ALINA de de la companya de la company	- \$P=2;
4.5m x 164m MAXIN ACHIEVABLE VISIBILI SPLAY		φ~s, , , , , ,
		\$2.00 \$2.17 \$4.17 \$2.000 \$2.0000 \$2.0000 \$2
		FOOT
		OR FIRST 15m
		10.00m
Working Drawing/CA/TI12422_64-008_doug		
KEY: SITE BOUNDARY REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAIESTY'S STATIONERY	NING PURPOSES ONLY. DRAWING CEPT NO RESPONSIBILITY FOR MEASUBEMENTS SHOULD BE	
OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED. TAKEN FROM FIGURED DIMENSIONS ONLY. CDM REQUIREMEN STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY	ATS CONSIDERED AT FEASIBILITY DETAILED DESIGN TEAM. 0 5 10 25	50 TITLE: PROPOS
4 Lombard Street, London, EC3V 9HD Tel: 020 7190 2820 Fax: 020 7190 2821 www.i-transport.co.uk	REV DATE BY DESCRIPTION STATUS:	CHK APD PROJECT: POUNDS FIELD, HITCHIN

* * * * * * * * * * * * * * * * * * *	A.Sm x 145r ACHIEVABLE VISION	m MAXIMUM BILITY SPLAY	
POSED PRIORITY JUNCTION & ASSOCIATED VISIBILITY SPLAYS	A.5m x 145r ACHIEVABLE VISI	m MAXIMUM IBILITY SPLAY	APPROVED: GM DATE: 08.12.17
BEECHWOOD HOMES	UKAWING NO: PROJECT No:	ITL9262-GA-008 ITL9262	REV:



Appendix '



metres 60

© JB Planning Associates, 2017

14.12.2017

120

town planning and development consultants

T 01438 312130

info@jbplanning.com www.jbplanning.com

jb planning associates Chells Manor, Chells Lane, Stevenage, Herts, SG2 7AA e-mail info@jbplanning.com url www.jbplanning.com tel 01438 312130 fax 01438 312131