

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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Lynsey Hillman-Gamble
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Shaping Central Bedfordshire Consultation
Central Bedfordshire Council
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Our Ref: PL07/LA

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Dear Ms Hillman-Gamble

North Hertfordshire District Council Response to the Shaping Central Bedfordshire consultation

Thank you for providing North Hertfordshire District Council the opportunity to comment on the 'Shaping Central Bedfordshire Consultation', which set out high level growth options across the authority area.

As you may be aware, North Hertfordshire is currently consulting on its Proposed Submission Local Plan (Regulation 19 stage). We would therefore welcome the opportunity to continue to work collaboratively with Central Bedfordshire in delivering the aims of both plans; and, in meeting the requirements of the Duty to Cooperate.

The Housing Market Area

As a neighbouring planning authority, we are specifically concerned with addressing cross-boundary issues, including housing. We acknowledge that the National Planning Practice Guidance (NPPG) at paragraph 10 of section 2a (2a-010) states that, "a housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work."

Our authorities have previously worked together to identify housing markets in Bedfordshire and the surrounding areas. As part of Central Bedfordshire and the majority of North Hertfordshire fall within the Stevenage Housing Market Area, we have been particularly interested in the Call for Sites undertaken by your authority earlier this year. This identified a significant number of potential development sites within close proximity to North Hertfordshire, some of which are significant in size, such as at Arlesey. Whilst we acknowledge that this process does not determine whether or not a site is suitable for allocating in the Local Plan, it is important to recognise the cross-boundary implications that could arise should these sites be brought forward through the plan.



In terms of existing demand for residential development along the North Hertfordshire/ Central Bedfordshire border, we note the number of recent residential permissions and completions (2011-2015), for instance at Stotfold and Fairfield Park.

We are keen to work with you proactively to ensure that any sites taken forward as allocations in the Central Bedfordshire Local Plan (following the Site Assessment Criteria analysis) are assessed in a robust way, addressing any cross-boundary impacts on infrastructure, services, transport networks and the environment.

Objectively Assessed Need (OAN)

We acknowledge that Central Bedfordshire currently estimates that sites are required to accommodate 20,000 new homes. Once a more accurate figure has been determined through the evidence base, your council will need to have satisfied itself that all possible options have been explored to meet the Objectively Assessed Need (OAN). Alongside this, the Strategic Housing Land Availability Assessment (SHLAA) should demonstrate that suitable, achievable and deliverable sites are allocated.

Specifically, in light of the emerging Luton HMA Growth Study, and updated SHMA it is anticipated that Central Bedfordshire will meet the Duty to Cooperate, in respect of development to cater for needs attributable to Luton. It is worth noting that North Hertfordshire is proposing to accommodate 1,950 homes towards the unmet need of Luton.

Post-2031 development / new settlements

Our own proposed submission Local Plan covers the period 2011-2031 and makes maximum use of reasonable and available development sites. Our plan recognises that, in the longer term, continual incremental additions to existing settlements may not be the best solution. This Council is committed to fully exploring new settlement options in the District.

This work is at an early stage. However we are already aware that:

- There is significant further housing growth projected in North Hertfordshire for the period beyond 2031;
- Any new settlement(s) will have a substantial lead time;
- Authorities adjoining North Hertfordshire, including Stevenage and Luton, are physically constrained to accommodate future growth; while
- Other authorities in the county as well as London have identified significant constraints in meeting future housing needs.

In this context, we would welcome opportunities to further explore the new settlement agenda with Central Bedfordshire to inform both your own plan and any future review of a local plan for North Hertfordshire that looks beyond 2031.



Growth across Central Bedfordshire

We note that 'Area B - East/A1 Corridor' is identified for all levels of potential growth, ranging from small scale growth of less than 50 homes up to strategic/new settlement scale growth of 1500 plus homes, and that 'Area D – Central Section' is identified for small and medium scale growth. It is therefore now important to await the findings of the forthcoming evidence base documents, comprising but not limited to: the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), Growth Options Studies, the Urban Capacity Study and the Settlement Capacity Study. These documents will collectively inform the Central Bedfordshire Proposed Submission Local Plan and should ensure that a justified approach is taken.

Employment and Jobs

Whilst the scope of this current consultation does not extend beyond strategic locations for residential development, it will be important in the draft Local Plan for Central Bedfordshire to demonstrate that employment and jobs projections are a reasonable estimate of future demand and establish a clear link between housing and jobs growth. Certainly, providing for jobs growth will be a key element in reducing out commuting and thus will aid in promoting sustainable development. We envisage that the Functional Economic Market Areas (FEMAs) and Employment Land Review (ELR) will be key documents in assessing employment and jobs growth over the plan period for Central Bedfordshire.

Built and natural environment

Given the proximity of many of sites emerging from the recent Call for Sites to the North Hertfordshire border (namely at Arlesey, Stondon, Stotfold, Henlow, Shefford and Shillington), it will be important that the character and unique qualities of existing settlements, and the broad spatial relationships between them, are not unduly eroded as a result of growth. This includes relationships with nearby settlements within North Hertfordshire (including our own proposals for their future growth).

We welcome the opportunity to create a new Country Park for Arlesey and Stotfold given the potential benefits it may bring to residents in North Hertfordshire.

Transport

North Hertfordshire largely agrees with the proposed approach to base growth around existing and planned transport corridors. Nonetheless, of key importance to North Hertfordshire will be, amongst other issues, the potential impact of growth on the A1, and other routes including the A505, A600 (Bedford Road), Stotfold Road and Arlesey Road which are all links eastwards and southwards towards Hitchin and Letchworth Garden City. In this regard, there is a need for Central Bedfordshire to take into account planned growth in surrounding authority areas and the associated transport modelling undertaken.



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In North Hertfordshire, AECOM have undertaken "Preferred Local Plan Model Testing – Problem Locations" in July 2016. This testing was based on the existing SATURN model which covers Welwyn Hatfield and Stevenage, Hitchin (WHaSH). The model was extended to include the towns of Baldock and Letchworth (WHASH-BL) as they were included in the periphery of the existing model. Hertfordshire County Council's County wide transport model (COMET) has produced an assessment of problem junctions which will also likely be of relevance to Central Bedfordshire.

We agree that 'Area B - East/A1 Corridor' which runs between Arlesey to Sandy has strong transport connections, including by both road (A1) and rail (East Coast railway). We are pleased to see that the consultation material identifies the potential for significant upgrades to these transport networks and will encourage ongoing work to promote such improvements for both residents within Central Bedfordshire and in surrounding areas, including in North Hertfordshire.

Infrastructure delivery

We would support future discussion with your authority as well as relevant service providers regarding infrastructure delivery. This will ensure that the scale of development proposed is supported by the required infrastructure and that the proposed delivery mechanisms are suitable, as set out in the forthcoming Infrastructure Delivery Plan (IDP).

Next steps

We note that the consultation materials state that the draft Local Plan will identify broad locations for new jobs and housing. We would now urge you to provide as much detail on the scale and locations for growth as possible at this stage, underpinned by the wide range of evidence base studies currently being prepared.

North Hertfordshire is firmly committed to meaningful cooperation between our authorities to enable our respective plans to be developed in a coordinated and positive manner. We look forward to ongoing engagement and the opportunity to comment once again during your Regulation 18 consultation at the end of this year.

Yours sincerely,

A handwritten signature in cursive script that reads "Louise Symes".

Louise Symes
Strategic Planning & Projects Manager