

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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12 December 2016

Planning Policy
East Hertfordshire District Council

Our Ref:
Your Ref:

By email

Contact Officer: Nigel Smith
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Dear Sir / Madam,

North Hertfordshire District Council Response to Pre-submission East Hertfordshire Local Plan (2011-2031)

Thank-you for consulting North Hertfordshire District Council on the draft Local Plan for East Hertfordshire. We welcome the publication of your draft plan as a clear expression of the District Council's ambitions and priorities. The aim to produce a new local plan that meets Government expectations is supported.

I appreciate that significant efforts have been expended in bringing the plan to this stage of preparedness. Our authorities have worked to common principles in a number of areas meaning that, insofar as they affect our two authorities, strategic matters crossing administrative boundaries have on the whole been consistently addressed.

Our two authorities share an extensive common administrative boundary. This is largely rural in nature and our evidence bases show limited overlap in terms of housing and economic market areas. Our respective plans do not propose significant development along or across much of this border.

I accept that, in broad terms, East Hertfordshire's strongest relationships are with the west Essex authorities whilst North Hertfordshire looks more towards Stevenage and Bedfordshire. However, there are areas of our respective plans where we do need to be mindful of potential cross-border effects.

In particular, both our pre-submission plans:

- Recognise that parts of our authorities lie with a shared functional housing market area centred on Stevenage and the A1(M) corridor;
- Include proposals for urban extensions adjoining Stevenage; and
- Anticipate development along the A10 corridor which connects Royston to Hertford and other settlements where growth is proposed or occurring.

In that context, we would welcome the opportunity to explore the production of a Memorandum of Understanding (or equivalent) to demonstrate compliance with the Duty to Cooperate. This would set out to a Planning Inspector and other interested parties those areas where our authorities are in agreement.

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To aid understanding of matters which might be considered of common strategic interest under the Duty, this Council broadly supports East Hertfordshire's draft plan insofar as it relates to a range of issues including, but not necessarily limited to:

- The use of a range of data to identify functional housing market area linkages which cross administrative boundaries and which complement the boundaries identified in evidence underpinning our own plan;
- The subsequent identification of a 'best fit' geography as a basis for evidence gathering which again complements that identified in our own plan;
- The analysis of Objectively Assessed Needs (OAN) using the 2012-based Government population projections as the 'starting point' with the application of 10-year migration trends;
- The acknowledgement in the plan of the influence of the latest (2014-based) Government population and household projections upon this OAN;
- The principle of seeking to accommodate all of East Hertfordshire's objectively assessed needs at district-level within your authority;
- The principle that well-planned extensions to existing settlements within and adjoining the district form part of an appropriate strategy for development;
- The identification of sites and areas that provide opportunity for further development beyond the plan period;
- The conclusion that *exceptional circumstances* exist to justify a 'roll back' of inner Green Belt boundaries in order to release land for development;
- The provision of a broadly consistent planning framework for rural northern Hertfordshire across our respective plans by virtue of:
 - The approach to categorisation of villages and the types of development appropriate within them; and
 - The policy approach to rural areas beyond the Green Belt;
- The identification of infrastructure improvements to the A10;
- Transport modelling work supporting the proposed allocation east of Stevenage which includes allowances for development in North Hertfordshire; and
- A policy approach to the Rye Meads Wastewater Treatment works which provides appropriate environmental safeguards for the surrounding area.

It is noted that your draft plan proposes an early review which would extend the time horizon of the plan and address recently recent population and household projections which indicate that higher levels of growth than currently planned may be required. This approach is supported.

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;

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- 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 our recent response to Hertfordshire County Council's Local Transport Plan consultation we have highlighted the need for them to consider how future transport proposals, beyond those currently proposed, might support or 'unlock' directions of growth over the long-term.

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

Beyond these issues, we do have one technical concern relating to the way in which housing market areas, and needs and supply within them, are expressed in your draft plan. I have instructed officers to prepare a detailed representation on this matter.

In submitting this representation, I should be clear that North Hertfordshire District Council fully supports East Hertfordshire Council's ambition to achieve a 'sound' and legally compliant plan.

I understand that officers have agreed, in principle, a way forward which will allow this one issue to be addressed in a Memorandum of Understanding. I therefore consider that the attached objection can be resolved prior to any future examination of your plan.

If you would like to discuss these comments in more detail, or arrange a meeting to progress the issues raised, please contact the Strategic Planning & Enterprise team at North Hertfordshire District Council using the details provided.

Yours faithfully

Cllr David Levett
Portfolio Holder for Planning and Enterprise