

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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22 February 2018

Local Plan
Regeneration and Business
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 Central Bedfordshire Draft Local Plan (Regulation 19) consultation

Thank you for providing North Hertfordshire District Council (NHDC) the opportunity to comment on the Central Bedfordshire Pre-Submission Local Plan (Regulation 19) consultation.

As you will be aware, North Hertfordshire submitted its Local Plan to the Secretary of State for Examination on 9 June 2017. As stated in the Memorandum of Understanding (MoU) prepared between us for the North Hertfordshire Local Plan Examination, we have worked closely in developing our Local Plan and look forward to a continued constructive and proactive working relationship as your own Local Plan progresses towards examination.

Our plans share a range of evidence which has either been jointly prepared, or prepared to common principles. Both authorities can demonstrate a range of interactions under the statutory Duty to Co-operate and we are satisfied that, to date, this key legal test has been met.

Due to our ongoing Local Plan examination, NHDC's own planning resources are currently significantly stretched. This means we have simply not been able to analyse your plan and associated evidence base in the depth we would like at this stage in the process.

However, under the relevant statutory provisions, we are conscious that only those who make representations within the defined consultation period are entitled to appear at any future examination of the plan and then only on the issues raised in those representations.

In this context, NHDC needs to safeguard its position and ensure its ability to participate appropriately in any future examination. We are confident that, with further exploration of the evidence and / or joint working, the issues identified below can be resolved prior to, or through, the Examination process and are not intended as an obstacle to your desire to achieve a 'sound' plan. We are committed to ongoing liaison and maintaining the working relationship between our two authorities.



We would ask that the comments below are received and understood in this context.

The comments below all relate to the key tests of **justification** and **effectiveness** as set out in paragraph 182 of the NPPF in relation to the examination of local plans.

Housing market areas and Luton's unmet housing need

The NPPF identifies Housing Market Areas as the geographical basis for meeting housing needs. North Hertfordshire and Central Bedfordshire both contain parts of the Stevenage Housing Market Area and Luton Housing Market Area. These geographical areas were identified following completion of a joint study along with a number of other authorities.

Following the examination and adoption of Luton's local plan, the unmet housing need arising over their plan period of 2011-2031 has been quantified at 9,300 homes. North Hertfordshire's Local Plan, which covers the same period, is currently undergoing its own examination. The proposals in the plan include a strategic land allocation to the east of Luton for 2,100 homes, of which 1,950 would be a contribution towards these unmet needs.

Subject to this allocation being found sound, this would leave a residual of 7,350 homes if these unmet needs are to be met in full. The Housing Implementation Strategy identifies that your plan makes a contribution of 7,350 homes. These are to be delivered over the plan period to 2035.

Stevenage's Local Plan has recently been found sound and also covers the period 2011-2031.

NHDC has no objection in principle to the plan period of 2015-2035 identified by Central Bedfordshire. However, NHDC would welcome clarity within the plan and / or its evidence base as to the level of anticipated housing delivery within those parts of Central Bedfordshire in the Stevenage and Luton Housing Market Areas over the period 2011-2031 to enable the proposed delivery of new homes to be consistently understood and any remaining shortfalls to be appropriately considered.

Employment

The draft plan includes a range of proposed employment allocations. Previous joint work has identified economic linkages between our two authorities.

Both NHDC and Central Bedfordshire have previously committed to undertakings with Stevenage Borough Council to ensure their own shortfall in future employment provision can be addressed. Stevenage's employment requirements are driven, in part, by in-commuting from our two authorities.

NHDC's own plan includes a proposed employment allocation at Baldock which would meet Stevenage's unmet needs in full in relatively close proximity to the town. It is anticipated that, by the time of any future examination of the Central Bedfordshire Plan, there will be greater clarity on this issue. Dependent on the outcome of the NHDC examination, it may be necessary to make alterations to the



proposed employment strategy to ensure an appropriate balance between homes and jobs across the wider sub-region.

Transport / proposed site allocations

NHDC considers that further work may be required to ensure that the potential transport impacts of the Plan have been adequately assessed and that an appropriate strategy for mitigation has been identified. A number of sites and allocations are proposed close to our shared administrative boundary. This includes, but is not necessarily limited to, proposed strategic scale development east of Arlesey, at RAF Henlow and around Biggleswade.

Given the general nature of travel work patterns in the sub-region – where many people live to the north and travel south to work – the scale of development proposed within Central Bedfordshire will impact upon the road network within North Hertfordshire.

The plan is supported by updated transport modelling of proposed growth in Central Bedfordshire and contains some consideration of cross-border impacts on towns such as Hitchin.

Hitchin is identified in NHDC's own evidence as a town that is anticipated to be subject to highway stress over the period to 2031. Two Air Quality Management Areas have been declared within the town associated with highway junctions on key through routes.

Your updated evidence appears to use general growth assumptions for future development North Hertfordshire. This approach can 'smooth' the distribution of anticipated future vehicle traffic growth across the district rather than focussing it on the locations where it is actually anticipated to occur.

Significant development is planned within the District at Hitchin, Letchworth and Baldock, all of which lie close to the boundary with Central Bedfordshire. This plan is at a more advanced stage of preparation than Central Bedfordshire's and we would therefore expect this to be more realistically reflected in your modelling work to ensure the impacts of the additional growth proposed in your plan, and any necessary mitigations are correctly identified. This includes measures to encourage 'modal shift' away from car journeys to more sustainable modes of transport.

Similarly, the cumulative impacts of proposed development within and around Luton may require refined consideration.

In the above context, we would welcome a continuation of discussions with Central Bedfordshire and other parties regarding the A1/A1(M) corridor as well as a potential study looking at issues in and around the A505 corridor.

Green Belt

NHDC's local plan suggests the allocation of land to the north of Letchworth for development. This will leave a relatively narrow strip of Green Belt to the north and

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north-west of Letchworth towards Stotfold as far as the administrative / County boundary which also forms the outer limit of the Metropolitan Green Belt in this area.

It is recognised that the area to the south of Stotfold within Central Bedfordshire is identified as a gap of strategic importance with an associated policy designation. NHDC does not object to the principle of the approach. However, we now consider allocating this land instead as an extension of the Green Belt might better reflect the strategic functions of Green Belt and development proposals in this cross-border area.

Built and natural environment

Given the proximity of many major sites to the North Hertfordshire border, it will be important to ensure the character 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).

This may require amendments to relevant site-specific policies and / or supporting text to ensure (for example), appropriate separation or landscaping. We would additionally welcome the opportunity for further discussions to ensure the delivery of joined up green infrastructure and / or (off-road) sustainable transport routes.

Next steps

Following completion of our scheduled examination hearings and / or publication of any proposed Main Modifications and / or receipt of any (interim) Inspector's report, NHDC will be able to provide further clarity on our own plan insofar as it relates to the issues above. This will help to inform any future examination of your own plan.

It will also provide the opportunity for NHDC to consider the contents of your plan and its associated evidence base in further detail and determine the extent to which it is necessary to pursue the issues above through the examination process. At this stage we would wish to participate in the examination hearings.

As set out above, NHDC remains firmly committed to meaningful cooperation between our authorities and working together to ensure the issues raised in this letter are appropriately resolved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Levett', with a long horizontal flourish extending to the right.

Councillor David Levett

Executive Member for Planning and Enterprise
North Hertfordshire District Council