

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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25 August 2017

Lynsey Hillman-Gamble
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Local Plan
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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 18) consultation

Thank you for providing North Hertfordshire District Council the opportunity to comment on the Central Bedfordshire Draft Local Plan (Regulation 18) 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 constructive and proactive working relationship as preparation of your Local Plan progresses.

Housing Market Areas

Our authorities have previously worked together to identify agreed housing markets in Bedfordshire and the surrounding areas. This has resulted in the production of the Housing Market Areas in Bedfordshire and surrounding areas (ORS, December 2015) study, which identifies the Luton Housing Market Area to cover the whole of Luton and a significant proportion of Central Bedfordshire, as well as smaller parts of Aylesbury Vale and North Hertfordshire Districts.

The study also identifies a Stevenage Housing Market covering the majority of North Hertfordshire and the south-east of Central Bedfordshire along with the whole of Stevenage Borough and parts of East Hertfordshire District and Welwyn Hatfield Borough. Consequently, we support your approach to identifying the geography of functional housing market areas.

Objectively Assessed Need (OAN)



We acknowledge that emerging Policy SP1 Growth Strategy currently estimates that Central Bedfordshire has a need to accommodate 20,000-30,000 dwellings, in addition to the 23,000 homes that have planning permission or are already allocated over the plan period.

Given that the Government is anticipated to introduce a new methodology for calculating housing need, we would request the opportunity to be kept updated on the implications for your Local Plan once this is published. This is particularly vital given the vast scale of development proposed in your administrative area and the resulting impacts this may have on North Hertfordshire.

Luton's unmet housing need

In the MoU recently signed between our authorities, our authorities have stated that we agree that there is a significant level of unmet housing need arising from the Luton Borough Council (LBC) authority area and that this has been quantified as approximately 9,300 dwellings following an update of the Luton SHLAA (2016).

North Hertfordshire is proposing to accommodate 1,950 homes towards the unmet need of Luton as informed by the Luton HMA Growth Study and updated SHMA. It is unclear in the draft Local Plan the number of homes that would be provided by Central Bedfordshire towards Luton's unmet need, and how this is factored into the overall housing figures of 20,000- 30,000 in emerging Policy SP1 Growth Strategy. We would expect that these homes would be provided within the Luton HMA and in as close proximity as reasonable in planning terms to Luton to address their needs.

Green Belt

We note your authority is proposing limited Green Belt release as supported by the Central Bedfordshire and Luton Green Belt Study (July 2017), including delivering residential sites towards the unmet housing need of Luton (as outlined at paragraphs and 2.3.1 and 7.5.1 of the draft Local Plan). We request to be kept informed on your preferred location(s) to accommodate the unmet need of Luton to understand the scale of Green Belt release required to meet this need and the impact on Green Belt of any other further allocations.

Broad locations for growth

We consider that Central Bedfordshire is taking a high level approach for this consultation given that only broad locations for potential growth are currently identified. We therefore request to be involved as site allocations are considered and preferred sites are taken forward. This will ensure that decisions can be made in a collaborative way that best meets the needs of Central Bedfordshire and surrounding authorities, including North Hertfordshire, and seeks to address any concerns raised over housing numbers, location and infrastructure requirements.

The broad locations of growth identified in this consultation of relevance to North Hertfordshire are Area B, and to a lesser extent Area D.



Area B

We note that the draft Local Plan at paragraph 4.6.7 acknowledges that Area B is the best performing of the four areas to accommodate large scale growth. As identified in the document, the area could accommodate for all levels of potential growth in Area B ranging from small scale growth of less than 50 homes up to strategic/new settlement scale growth of 1,500 plus homes. Nonetheless, given that this growth will be largely dependent on the delivery of infrastructure, this will need to be carefully managed in terms of the consequential environmental and highways impacts.

Settlement specific comments are outlined below, however we urge your authority to ensure that the cumulative impacts are fully taken into account given the number of sites currently under consideration for Central Bedfordshire and within neighbouring authorities, including North Hertfordshire.

Biggleswade

We acknowledge that the Settlements Capacity: Initial Study July 2017 concludes that Biggleswade has medium to high capacity and that the consultation document at page 123 identifies Biggleswade as a Major Service Centre in the settlement hierarchy.

It is anticipated that four villages to the east of Biggleswade could be developed, that would enable the provision of 3,000 dwellings and 4.6 hectares of employment land. We note that of the nine sites to be considered as part of the Local Plan¹ (constituting 500 hectares in total), the largest if these is West of Sunderland Farm, which in itself is 379.72 hectares.

Given the scale of this potential growth, we are concerned that as recognised in the consultation document, such development is dependent on highway improvements, including to the A1. We would ask therefore that you consider the wider transport impacts arising beyond the A1, and in relation to planned growth in North Hertfordshire and other Authorities along the A1 corridor.

We support the aims at page 93 of the draft Local Plan to deliver sustainable transport measures, such as to maximise public transport connectivity to Biggleswade train station. In light of this, we recommend that you work with the relevant rail and public transport bodies to ensure this is deliverable.

We support your Council's commitment at page 94 to develop a comprehensive scheme for highway improvements and public transport improvements to deal with the anticipated pressures on the A1 (please also see 'Transport' below) and ask that you work with us and other relevant organisations in taking this forward.

Arlesey

¹ Site Assessment Technical Document Appendix D: Preliminary Site Assessment Results (July 2017)



We note that Arlesey is categorised as a Minor Service Centre in the settlement hierarchy in your draft Local Plan. It is identified as having the potential for medium to high capacity in the Settlements Capacity: Initial Study (July 2017) and could accommodate 2,000 dwellings and 3ha employment land.

From reviewing the Site Assessment Technical Document Appendix D: Preliminary Site Assessment Results (July 2017), the combined site sizes (across seven sites) to be considered further equate to 59 hectares.

Due to this, and given the proximity to the North Hertfordshire borders, we urge you to ensure full consideration of the cumulative impacts on roads, in particular the A507 and Stotfold Road. This assessment should include the cumulative highways impacts arising from proposed developments within North Hertfordshire, specifically the North of Letchworth and Highover Farm allocations, along with the proposed level of growth at Biggleswade to the north, and Fairfield and Stotfold to the south within Central Bedfordshire.

We are keen to be involved as plans develop for a north/south relief road to support the development to the east of Arlesey and the proposed public transport links to both Arlesey and Letchworth Garden City train stations, especially given the latter is situated in our authority area. It will therefore be essential that rail capacity constraints are taken into account and rail operators are involved to ensure that adequate levels of service can be maintained to minimise any negative impacts for rail users in North Hertfordshire.

Fairfield

The Settlements Capacity: Initial Study (July 2017) identifies Fairfield as having medium capacity for development, however we are concerned that it is equally acknowledged in the evidence base that there is a lack of easily accessible services and facilities (particularly educational, healthcare and retail), which would place significant impacts on social infrastructure demands within our administrative area. We would therefore expect Central Bedfordshire to satisfy itself that the required facilities, services and infrastructure can be provided on-site to meet the needs of the development. Our authorities would need to work together on any outstanding cross-boundary impacts.

In addition to these matters raised, we are concerned that further development at Fairfield would place increasing reliance on the use of private vehicles and create highways impacts, in particular on the A507 and Stotfold Road. These impacts should be considered cumulatively, taking into account proposed developments in North Hertfordshire, specifically North of Letchworth and Highover Farm, in conjunction with emerging allocations in your Local Plan.

Development at Fairfield would also place additional pressure on Letchworth Garden City train station and the surrounding area, particularly with regard to on street parking. We therefore expect that Central Bedfordshire will work together with



Hertfordshire County Council's transport team to address cumulative impacts and to facilitate the use of sustainable modes of transport.

Henlow

Given that the Settlements Capacity: Initial Study (July 2017) identifies Henlow as having low capacity for development, we are concerned to see the scale of development proposed at the RAF Henlow site without the supporting text around the required infrastructure. The Site Assessment Technical Document Appendix D: Preliminary Site Assessment Results (July 2017) identifies that eight sites at Henlow comprising 244.01 hectares (of which 222.68 hectares are at RAF Henlow) are to be considered as part of the Local Plan. It is important that there is sufficient consideration of the balance between the suitability of the site for growth and the wider implications for infrastructure given that the settlement is identified as having a low capacity for growth.

Stotfold

The Settlements Capacity: Initial Study (July 2017) states that there is already considerable pressure on existing services, facilities and infrastructure due to the level of development already planned and underway in Stotfold. The Site Assessment Technical Document Appendix D: Preliminary Site Assessment Results (July 2017) identifies that three sites comprising 20.86 hectares are to be considered in Stotfold as part of the Local Plan. We are concerned about the capacity of existing services and facilities and will expect Central Bedfordshire to satisfy themselves that sufficient provision for services, facilities and infrastructure is made on-site or within Stotfold without placing pressure on neighbouring towns.

Area D

We note that Area D is identified for small and medium scale growth given the settlement pattern and constrained infrastructure on p.65 of the consultation document.

We can see from the Site Assessment Technical Document Appendix D: Preliminary Site Assessment Results (July 2017) that Stondon has 14 sites (total 87.78 hectares) and Langford has 11 sites (total 32.68 hectares) that are to be considered as part of the Local Plan following this Regulation 18 consultation. We request that you will continue to work constructively with North Hertfordshire in considering these potential allocations given the likely impacts on both infrastructure and highways.

Employment and Jobs

As set out in the MoU recently signed between our authorities, we have worked together to identify the geography of the Functional Economic Market Area (FEMA)



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(2015) and agree that the shortfall of employment land arising from Stevenage should be delivered within this geographic area.

We acknowledge that the draft Local Plan makes provision for 24,000-30,000 jobs over the plan period in the Spatial Strategy Approach at paragraph 7.5.1 of the draft Local Plan. We understand that there is an allowance within this range for the unmet employment land need arising from Stevenage, should this not be achieved within the North Hertfordshire authority area. We are satisfied with this approach as it reflects both of the MoUs signed between each of our authorities with Stevenage Borough Council, and provides flexibility in addressing this shortfall.

We understand that this provision, if required, would be met at the Biggleswade South Roundabout on the A1, however we consider that it is vital that the resulting traffic impacts are fully taken into account given the level of proposed development in this wider area (see also 'Transport' below).

We understand that the Functional Economic Market Assessment and Employment Land Review (May 2016) identifies good economic potential across Central Bedfordshire and that existing employment sites should be safeguarded in the short to medium term until new sites are brought forward.

We note that a number of employment sites are under consideration for the Local Plan, including the RAF Henlow, land west of the A1 Biggleswade and East of Biggleswade, West Sunderland Farm. We would welcome opportunity to discuss these allocations, along with the Biggleswade South Roundabout on the A1 site, further with yourselves following the outcomes of this consultation on highways and infrastructure grounds.

In terms strategic level projects, as noted on p.53 of the draft Local Plan, we recognise the importance of the opportunities arising from the Oxford to Cambridge Corridor, which has great potential to act as a catalyst for economic growth and investment. Nonetheless, maximising the benefits equally, of such strategic projects will be challenging and we therefore consider that close working between our authorities as well as other relevant authorities and infrastructure bodies will be critical to the success of these schemes.

Built and natural environment

Given the proximity of many major sites to the North Hertfordshire border (namely at Arlesey, Stondon, Stotfold and Henlow), it will be important that 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).

We support your approach to create physical separation and visual buffering using soft landscaping to ensure separation between the envisaged extension to Arlesey and neighbouring settlements to prevent coalescence; and, consider it critical that



this consideration is also made of the need to prevent coalescence with Letchworth Garden City.

We support the proposed creation of a new Country Park for Arlesey and Stotfold as this has potential to deliver a number of green infrastructure benefits to both Central Bedfordshire and North Hertfordshire residents, as well as strengthening the green infrastructure network on a more strategic level. We therefore urge you to work together with us and Hertfordshire County Council (who are at the initial stages of developing a new Green Infrastructure Plan), to ensure that the benefits of the wider green infrastructure network can be maximised.

Transport

As set out in the MoU recently signed between our authorities in support of the North Hertfordshire Local Plan, and the representation we made to the 'Shaping Central Bedfordshire' consultation in November 2016, we largely support your approach to directing development to existing and planned transport corridors. However, there are a number of significant highway impacts resulting from the level of growth envisaged in your emerging Plan, which require comprehensive consideration.

As set out above in relation to potential growth at specific settlements there are likely to be significant impacts on the A1. Further routes of importance in terms of impacts on our authority area comprise the A505, A507/A600, Stotfold Road and Arlesey Road, which are all links eastwards and southwards towards Hitchin, Baldock and Letchworth Garden City.

We note that the transport modelling indicates that certain hotspots reoccur and that mitigation measures would need to be put in place. Of relevance to us is the identification of worsening or neutral conditions on the A507 that would have a high impact on road users.

It is imperative that these impacts are considered in relation to planned growth in North Hertfordshire, including but not limited to, strategic allocations at Letchworth Garden City, Baldock and Hitchin. Due to this, we ask that your authority shares the results of the next stage of transport modelling so that this can be evaluated in conjunction with the Hertfordshire County Council COMET transport model update.

It is also worth noting that there needs to be adequate consideration of the impact of the level of growth on the rail network, which is referred to at p.188 of the draft Local Plan in stating that all mainline stations are seeing a steady growth in passenger numbers and is set to continue during the plan period.

Given these identified issues, we support your approach to secure investment in road and rail networks. In particular, we support the aims of proposed Policy T6 Strategic Transport Improvements to support the delivery of strategic transport schemes including enhancements to the A1, East West Rail and supporting infrastructure, the Oxford to Cambridge Expressway and the A6 to M1 link road.

We would therefore request that you work in collaboration with ourselves, as well as other relevant organisations, including Highways England, Network Rail and

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Hertfordshire County Council as you finalise the site allocations to be taken forward and any required mitigation measures.

Infrastructure delivery

We welcome the recognition in your consultation document at paragraph 5.3.2 of the draft Local Plan that there are a number of potential large strategic sites across the area that would require significant developer contributions. Nonetheless, the absence of an Infrastructure Development Plan (IDP), even if at draft report stage, prevents full consideration of the infrastructure implications arising from the level of growth envisaged. Due to this, we recommend that a draft IDP is produced at the earliest opportunity to inform site selection as well as on-going discussions with ourselves and other infrastructure providers. This will ensure that any cross-boundary impacts are assessed in a robust manner and mechanisms for the capture of developer contributions can be put in place in a timely manner.

Next steps

We understand that a high level approach has been taken to this Regulation 18 consultation and request to be kept informed as further work is undertaken to establish allocations, plans and policies in greater detail.

We would encourage close working over the coming months in light of the likely infrastructure and transport implications arising from the scale of development proposed.

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 19 consultation.

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