



LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM

North Hertfordshire Proposed Submission Local Plan

Please return this form to North Hertfordshire District Council either by email to : local.plans@north-herts.gov.uk or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Colin"/>	<input type="text" value="Rosanna"/>
Last Name	<input type="text" value="Campbell"/>	<input type="text" value="Metcalfe"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Hill Residential"/>	<input type="text" value="Savills (UK) Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Unex House"/>
Line 2	<input type="text"/>	<input type="text" value="132-134 Hills Road"/>
Line3	<input type="text"/>	<input type="text" value="Cambridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CB2 8PA"/>
Telephone Number	<input type="text"/>	<input type="text" value="01223 347235"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="rmetcalfe@savills.com"/>

Part B - Please use a separate sheet for each representation

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Site

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i)	Legally Compliant	Yes	<input type="text"/>	No	<input type="text"/>
ii)	Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>

If No, which of the Soundness tests does it fail?

Positively prepared	<input type="text" value="X"/>
Justified	<input type="text" value="X"/>
Effective	<input type="text"/>
Consistent with National Policy	<input type="text" value="X"/>

iii)	Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

On behalf of our client, Hill Residential Limited, Savills (UK) Limited have been instructed to respond to general matters raised within the North Hertfordshire Proposed Submission Local Plan including responding to issues in respect of their land interests at Lucas Lane, Hitchin (allocated housing site HT5 and omission site "Land adjacent to Site HT5").

Whilst we support the allocation of HT5 (please note we have made a formal representation of support to this allocation), we object to the omission of adjacent land to the allocated site which we consider should form part of the allocation. Please see enclosed Location Plan for further details. As noted within our response to Policy SP8, it is not considered that the District has met its objectively assessed needs as identified in the Stevenage and North Hertfordshire Strategic Housing Market Assessment (SHMA) Update 2015. Furthermore, the stepped approach to housing delivery proposed at paragraph 4.99 of the plan is not consistent with national planning policy. The Council should look to meet its housing needs across the plan and identify suitable



and deliverable sites within the next 1-5 years.

Hitchin is identified at the top of the settlement hierarchy (Policy SP2: Settlement Hierarchy) as one of four main towns in the District. It is proposed that these four towns, in addition to land on the edge of Stevenage and Luton, is where the majority of development will be located. Despite this, as noted at paragraph 13.126 of the Submission Plan, provision is made for just 1,009 new homes in and around Hitchin. The towns of Baldock, Letchworth Garden City and Royston are proposed to deliver 3,136, 2,000 and 1,663 dwellings respectively over the plan period.

In order to address the housing shortfall, additional housing sites should be identified. As minimal growth is currently proposed at Hitchin, it is considered this shortfall could be met here. One such site is land adjacent to Site HT5 (HT5 is a site allocated within the Submission plan for housing development within the control of our client. A separate representation has been submitted to support the allocation of this site). The land adjacent to Site HT5 extends to approximately 0.16 hectares and comprises low quality dense scrub which is within private ownership and underutilised. This site should be considered as an “omission site” in the context of this submitted representation.

In the context of the Council undertaking a comprehensive review of the Green Belt (North Hertfordshire Green Belt Review (2016)) it is clear that the Council does not consider that the omission site has any Green Belt function. In the consideration of the Green Belt in this part of Hitchin, the boundary is proposed around the western edge of the land. This leaves an area of “white land” west and north of two housing allocations. In our view there is no reason to consider why such an area should not be available for development. We cannot see any reason why the Council should not allocate this area for new housing to form a comprehensive residential area in this part of Hitchin. This is particularly relevant in the context where housing levels have not been set sufficiently high enough to address housing needs given recent SHMA and the 2014 household projections.

In support of this response, the following technical reports are enclosed which demonstrate that land adjacent to HT5, in conjunction with Site HT5, is suitable, available and achievable within in the next 1-5 years:

- Plan of land under Hill's control
- Plan of omission site
- Plan showing extent of allocation as it should appear in final plan
- Preliminary Site Layout Plan;
- Access Appraisal (submitted in two parts);
- Preliminary Ecological Appraisal;
- Reptile Survey;
- Tree Survey;
- An Historic Environment Desk Based Assessment;
- Flood Risk and Drainage Assessment;
- Ground Investigation Report; and
- Utilities Statement.

The above reports and other planning and technical matters are discussed in greater detail



below.

Principle of development

Located on the western periphery of the main town of Hitchin, the site is located in a highly sustainable location in close proximity to key local services and facilities.

The site currently comprises dense low quality scrub. As discussed in further detail below, there is no ecological or arboricultural reason why this site cannot be developed for housing. The site is proposed for release from the Green Belt and no reference is made within the Green Belt Review (July 2016) to the trees contribution to the setting of the Green Belt.

The Illustrative Masterplan submitted in support of this response demonstrates how the site, in conjunction with allocated Site HT5, can deliver 24 dwellings.

Highways and access

An Access Appraisal has been submitted in support of this response which demonstrates that access can be achieved into the site.

Vehicular access into the site can be achieved through a modification to the southern end of Lucas Lane where it meets Grays Lane. By forming a junction with Grays Lane, the first 30 metres of Lucas Lane may be upgraded to facilitate two-way vehicle movements. Lucas Lane, a designated Byway, is within the control of our client.

The preliminary design for the access, as shown in the Access Appraisal, ensures the movement of refuse vehicles entering and exiting the site.

The site is well connected to the existing pedestrian and cycle network and is linked to Hitchin town centre and railway station by well lit 2 metres wide footways. A Bridleway runs to the south of the site providing access to the countryside to the west. The closest bus stop to the site is located approximately 550 metres (8 minute walk) east of the site. Buses from this stop run to the Primary School, Hitchin Railway Station and the town centre. Wider connections to key employment, leisure and retail centres are also available.

The nearest Primary School is located approximately 0.4 miles from the site (7 minute walk). With regards to secondary schools, Hitchin Boys' School is located 0.7 miles from the site (13 minute walk) and Hitchin Girls' Secondary School is located 1.2 miles from the site (25 minute walk).

Hitchin Railway Station is located approximately 2.5km east of the site which connects the settlement with key destinations including London Kings Cross, Cambridge, Stevenage and Letchworth Garden City.

Whilst the bus stop and train station are both over the Council's preferred distances (400m and 800m respectively) both are still considered to be within easy walking and cycling distance along pedestrian suitable roads.

Ecology and Trees



A Preliminary Ecological Appraisal and Reptile Survey have been submitted in support of this response. The Reptile Survey found that reptiles are likely to be absent from the site but a Common Toad was sited. Recommendations are provided within the reports to safeguard any common toads potentially found on the site during the construction phase. There are no ecological reasons why the site will not be able to come forward.

An Arboricultural Impact Assessment has been submitted in support of this response. This confirms that no trees are subject to Tree Preservation Orders on the site. The majority of the trees on the site will be retained. The Tree Report notes that the majority of the works required will be of low landscape significance and can be adequately mitigated as part of the overall landscaping of the site.

Heritage and Archaeology

The site is not within the vicinity of any listed buildings and it is not considered that residential development of the site will have any impact on the town's Conservation Area.

The Historic Environment Desk-Based Assessment undertaken has established that the site has a moderate potential for pre-historic, Anglo-Saxon, medieval and post medieval activity and a moderate-high potential for Iron Age and Roman activity. Subject to planning, it is anticipated that a programme of archaeological fieldwork is carried out prior to the commencement of development in order to assess any surviving archaeological resource.

Flood Risk, Drainage and Utilities

The site is located in Flood Zone 1.

Surface water from the development can be managed through a combination of soakaways, rainwater harvesting, permeable paving with attenuation and infiltration properties, swales and an attenuation feature.

Foul water from the site will be discharged into an existing foul sewer under agreement with the adopting authority, Anglian Water. A pre-development enquiry search has revealed that there is sufficient capacity within the existing public foul sewers to be able to accommodate the predicted residential development flows.

A Utilities and Services Report has been prepared which confirms there is a range of existing utility and service infrastructure within the vicinity of the development site. Along Grays Lane and Lucas Lane there are existing power lines and a pressure gas main meaning there is an opportunity to connect to the local supply network and provide domestic gas connections. Local clean water infrastructure within the vicinity of the site provides the ability for the site to be connected to the mains water network. The report also confirms that assets and opportunities have been identified to ensure that the site can be covered in terms of telecommunications connections. The findings of this report conclude that the proposed development has the potential to connect to the required range of domestic utilities and services.

Ground Conditions

A Ground Investigation Report has been submitted in support of this response. Whilst further investigation following the clearance of the trees will be required, the report does not suggest

**NORTH HERTFORDSHIRE
DISTRICT COUNCIL**



any reason for the site not being able to come forward for development.

(Continue on a separate sheet if necessary)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).* You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site HT5 should be extended to include land adjacent to HT5 (as shown on the enclosed maps) for the provision of up to 24 dwellings.

(Continue on a separate sheet if necessary)

Please note your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To enable a full discussion and investigation of the matters at hand.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Do you wish to be notified when the Local Plan is submitted?

Yes, I do wish to be notified

No, I do not wish to be notified

10. Signature:

R. Metcalf

Date:

30/11/2016