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30<sup>th</sup> November 2016

Dear Sirs

### **Proposed Submission Local Plan Representation: Residential allocation of The Dower House, Princess Helena College Preston Road, Preston, SG4 7TZ**

These representations are submitted by Strutt & Parker LLP, acting on behalf of the owners of The Dower House, the Princess Helena College, who are seeking to promote the residential conversion of the building included within the land outlined in red on the enclosed plan. The site has not previously been put forward for residential development as part of North Hertfordshire District Councils (NHDC) plan-making process; however, it is submitted now to be considered as an allocated housing site.

#### **Site Context**

The Dower House sits at the northern tip of the Princess Helena College campus, fulfilling a role as a boarding house and study space for pupils at the school. The site is located within the Metropolitan Green Belt and within the Preston Conservation Area and benefits from mature landscaped boundaries that effectively enclose the site from the wider countryside. The site extends to approximately 0.77 hectares.

Preston is identified within the emerging North Herts Local Plan as a Category A village; the most sustainable form of village settlement within the district. The village benefits from a school, village hall, public house and Church, further to our client, the Princess Helena College. The nearby towns of Luton and Stevenage are major service centres that provides access to a variety of shops, healthcare facilities and secondary education. The village is served by bus links that afford opportunities for sustainable travel. This service includes the number 88 bus, which operates on a regular basis between Hitchin and Luton.

The Princess Helena College was formed in 1820 and has been based from Temple Disney, Preston for over 80 years, having relocated the school from central London. The school provides a positive contribution to life within the village, employing over 70 members of staff and providing community facilities.





## **Residential Allocation**

Following many years of use, The Dower House has fallen into an untenable position. It is poorly suited to its present dormitory/teaching use and does not meet modern day requirements. The building is reaching the end of its economic life in this function. It is therefore intended to undertake a sympathetic conversion of the building to provide 13 private residential units that respect and utilise the character of the building. In accordance with draft policy CGB4: Existing rural buildings; the conversion of the building to private residential units could be achieved without major extension or alteration to the external appearance of the building and would not materially alter the openness, character or purposes of the Green Belt. Furthermore, The Dower House benefits from a cart lodge out building which could further accommodate the development.

It is noted NHDC have proposed allocations for approximately 3000 new homes in the Green Belt surrounding Baldock, on the basis that development can be accommodated sites can come forward without significant harm. The proposal will allow for a sympathetic conversion within enclosed landscaped grounds, providing a defensible Green Belt boundary.

In accordance with paragraph 47 of the National Planning Policy Framework (NPPF), and in particular footnote 11, the site offers a suitable, achievable and deliverable location for residential development, that provides a realistic prospect of housing being delivered on site within the next five years, subject to this Local Plan process and any subsequent planning applications being considered by North Hertfordshire District Council (NHDC) in due time.

The residential development of the site is viable and can be achieved in the short term, within five years, thereby making a significant contribution to the Council's supply of housing land, including affordable housing. NHDC has openly acknowledged that they are currently not able to demonstrate a five year supply of deliverable housing land. Given the existing use of the building as a C2 residential institution, it is considered that there will be few/no constraints to the delivery of C3 residential development.

The allocation of the site for residential development would be consistent with the core principles of the NPPF, including through the delivery of housing within a sustainable location that is well related to the existing settlement boundary of Preston.

Consideration has been given to paragraph 182 of the NPPF, which is concerned with the 'soundness' of Local Plans. To question whether the emerging Local Plan is justified, paragraph 182 of the NPPF states that the Plan should be the most appropriate strategy, when considered against the reasonable alternatives. Given that sites BA1 – BA3 are currently situated within the Green Belt, and where paragraph 83 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan, it is considered that the local planning authority should also consider this site for development. The Dower House is a sustainable site, immediately adjacent to the existing settlement boundary, well related to facilities and services and not subject to any physical constraints that would prohibit its development.



In terms of the effectiveness of the plan, it is imperative that the strategy for meeting house need is flexible, deliverable and provides certainty, in respect of a five year supply of housing land across the Plan period. The emerging Local Plan is reliant on a number of large allocations that are unable to meet housing in the short-term, for example at Baldock. Furthermore, the proposed Local Plan does not provide sufficient flexibility to ensure housing needs can be met if the event larger sites are unable to come forward. The delivery of the site at Preston would be in the short term, in a sustainable location, to help ensure a consistent housing delivery across the Plan period.

With regard to the consistency of the draft Local Plan with the NPPF, as outlined above, sites BA1 – BA3 are currently situated within the Green Belt, which the NPPF seeks to protect (Section 9). The NPPF strongly indicates that non-Green Belt sites should be favoured ahead of Green Belt site in consideration for allocation, stating that Green Belt land should only be allocated for development in exceptional circumstances. Furthermore, the NPPF seeks to promote rural viability (paragraph 55). As currently drafted, the Local Plan would not. Further to the requirements of the NPPF, the National Planning Practice Guidance explains how local planning authorities should support sustainable rural communities. This states (at paragraph: 001 Reference ID: 50-001-20160519):

*“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements.”*

And

*“A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities**”.* (Emphasis added)

Further to the requirements of the NPPF, we are concerned with the low number of new homes proposed to be directed to Preston, and the negative social and economic impacts this will have on the community. The allocation of the Dower House would help address this current issue.

It is acknowledged that further work will be necessary to bring forward detailed proposals in a planning application, including landscaping details, and it is intended to work with the Council on the development of an appropriate scheme in due course. Taking the above into consideration, it is hoped that NHDC will be able to positively consider this site for housing allocation within the emerging Local Plan. Should the Council require any additional information, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D Fletcher'.

**David Fletcher MSc MRTPI**  
**Associate Partner**  
**Strutt & Parker**