



Representations to North Hertfordshire Local Plan 2011-2031:

Proposed Submission – November 2016

On behalf of Beck Developments Ltd

1. The representations here are written on behalf of our client, Beck Developments Ltd, in response to the Proposed Submission consultation begun in October 2016. Our submission follows a letter in March 2016 to the Council proposing a site allocation in Ashwell, albeit the letter was sent outside of the formal consultation period.
2. We support Policy SP1: Sustainable Development in North Hertfordshire, which will provide the policy basis on which future planning applications are determined and provides a positive approach to the development consistent with national guidance.
3. Policy SP2: Settlement Hierarchy states that general development will be allowed within the defined settlement boundaries of the Category A villages. Paragraphs 4.7-4.9 just prior to this policy outlines that local based changes to the village settlement boundaries may come forward and be subject to change through the Neighbourhood Planning system, by supplementing the policies in the plan. For such an approach, it would appear prudent to include reference within the policy that follows itself, that local changes to settlement boundaries may come forward, without being in conflict with the policy itself. Indeed, the policy identifies the towns and villages which are sustainable locations for new development and Policy SP1 encourages new sustainable development. Constraining development to be only within the settlement boundaries in the main towns and Category A villages could be

contrary to national policy and place limits on the potential scope of Neighbourhood Plans to plan and for future sustainable developments coming forward. Although the plan seeks to allocate new sites to meet the minimum assessed need and extend settlement boundaries around them, a more flexible approach within this policy to permit new allocations in neighbourhood plans or through planning consents at sustainable locations on the edge of the existing boundaries would be more consistent with the presumption in favour of sustainable development in national policy and the positive approach to new sustainable development in Policy SP1.

4. The distinction between Category A villages and Category B villages in Policy SP2 requires more detail in the policy itself to distinguish between the sustainable credentials of the villages in the settlement hierarchy. Although Category B villages are explicitly restricted to infilling development which does not extend the built core of the village, the wording for Category A villages allowing general development within the defined settlement is effectively the same approach. Allowing for sustainable development at Category A villages as outlined above would be a more proactive approach that meets the needs and strategy of the Local Plan.
5. The Rural Areas beyond the Green Belt policy also needs to be consistent with the approach above otherwise there is a considerable conflict that would render the plan unsound. Paragraph 4.52 states that restraint on unsustainable development in rural areas is a well-established policy. Allowing a less restrained approach to development at Category A villages would not be inconsistent with this statement, provided the sustainable credentials of a site and its proposed development are assessed and found to be satisfactory.
6. In addition, paragraph 4.60 of the Local Plan states that the inner boundaries of the Rural Areas have been drawn around settlements using strong features that provide clear, defensible boundaries. We would support such an approach, provided this provides for sufficient development sites in the local villages, both to meet borough-wide need for housing and the need to sustain local services and improve facilities. The site presented at Station Road in Ashwell below contains a very defensible natural wooded boundary, but the settlement boundary as proposed is drawn only around existing houses. We would

propose that the settlement boundary is drawn up to the landscape border across the site, which matches the traffic calming approach to the village that exists along Station Road, signalling the entrance to the village. This would also provide for a new development site to be built during the plan period integrating the land within the village and creating a more defensible boundary in the long term.

7. In relation to Policy CGB1: Rural Areas Beyond the Green Belt, we object to this policy on the basis that it would restrict development adjacent to the settlement boundaries of Category A villages that may be in a sustainable location and suitable for new residential development consistent with the general approach of the Local Plan and national policy. We would seek an additional bullet point to allow for proven sustainable development sites to come forward adjacent to existing settlement boundaries of the Category A villages in the Local Plan. Such an amendment would also ensure that any Neighbourhood Plan proposals to extend settlement boundaries or allocate development sites would not be in conflict with the Local Plan.

8. The site presented here was not assessed as part of the SHLAA. For comparison with the sites considered in the SHLAA we have undertaken the three tests below:
 - The site is **SUITABLE** for development. It can be accessed directly off Station Road and is a flat and open piece of land, with a natural boundary to the east. Services and infrastructure can be easily provided to the site which lies immediately adjacent existing houses and recreational facilities. Assessments have been made that demonstrate there are no constraints to development.
 - The site is **AVAILBLE** as the landowner is willing to release the site for development.
 - Development would be **ACHIEVABLE**, being financially viable and with a willing developer.

9. We have proposed a new amended settlement boundary for the village of Ashwell related to the proposed development site at Station Road, which is below.

