



**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](mailto: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"/>
First Name	Miles	<input type="text"/>
Last Name	Maxwell	<input type="text"/>
Job Title <i>(Where relevant)</i>	Chairman	<input type="text"/>
Organisation <i>(Where relevant)</i>	Ickleford Parish Council	<input type="text"/>
Address Line 1	c/o 1 Freewaters Close	<input type="text"/>
Line 2	Ickleford	<input type="text"/>
Line3	Hitchin	<input type="text"/>
Line 4	Herts	<input type="text"/>
Post Code	SG5 3TQ	<input type="text"/>
Telephone Number	07920 568928	<input type="text"/>
Email Address <i>(Where relevant)</i>	miles.maxwell@icklefordpc.com	<input type="text"/>

**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:**

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

Paragraph(s)  Policy  Site

2. Do you Consider the Local Plan is:

(Please tick as appropriate)

i)	Legally Compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
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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3. 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.

**Development on Green Belt**

The Parish Council believes that inclusion of this site, which is located on Green Belt land, means that the Local Plan is not consistent with national policy for the following reasons:

- The Local Plan proposes development on Green Belt around Ickleford at three sites; IC1, IC2 and IC3. NPPF Section 80 states the Green Belt aims 'to check the unrestricted sprawl of large built-up areas', 'to prevent neighbouring towns merging into one another' and 'to assist in safeguarding the countryside from encroachment'. NPPF Section 87 states 'Inappropriate development is, by definition, harmful to the



Green Belt and should not be approved except in very special circumstances.'

NPPF Section 89 states exceptions to building on Green Belt might exist, such as 'limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan'. We do not believe that the overall proposals for building on Green Belt in Ickleford are either 'limited' or 'infilling', nor has NHDC provided a compelling case to suggest that these are exceptional circumstances.

2. The letter (attached) from the Minister of State for Housing and Planning dated 7<sup>th</sup> June 2016 is unequivocal on the subject of the Green Belt: 'Government has put in place strongest protection for Green Belt ... boundaries should be adjusted only in exceptional circumstances, through the Local Plan process *and with the support of local people*' (our italics). As representatives of the residents of Ickleford we are confident in stating that these incursions into the Green Belt do not have the support of local people.

We believe that inclusion of this site, which is located on Green Belt land, means that the Local Plan has not been positively prepared for the following reasons:

1. North Hertfordshire Green Belt Review (July 2016) misrepresents the value of the Ickleford Green Belt in preventing the merging of neighbouring towns; this is given a low ranking of 1. However, the Ickleford Green Belt plays an important role in preventing the merger of Hitchin and Letchworth, and also that of Hitchin and Henlow/ Stondon.
2. Ickleford is listed as an 'Excluded' village in policy 5 of the North Hertfordshire District Local Plan No.2 with Alterations. Within this policy, it is noted that that the Council will normally permit development for housing "only if the development is compatible with the maintenance and enhancement of village character, and the maintenance of Green Belt boundaries". The proposed developments at IC1, IC2 and IC3 fail the above test.



### **Environmental Objectives**

The Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan cites a number of Environmental Objectives:

- ENV1 - Direct development towards the most sustainable locations which seek to maintain the existing settlement pattern
- ENV2 – Protect and enhance the historic character of North Hertfordshire villages
- ENV3 – Protect, maintain and enhance the historic and natural environment, its network of open spaces and rural landscapes

The Parish Council believes the Local Plan has not been positively prepared in relation to the following environmental objectives:

1. To increase the housing stock of a village by 40% (the net effect of IC1, IC2, IC3 and LS1), with minimal local resources and poor public transport links contravenes ENV1; this is not sustainable and does not maintain the existing settlement pattern.
2. Ickleford Primary School is part of the historic core of the village. Along with the Grade 1 Church with which it is aligned as a Church of England Voluntary Controlled school, and the Village Hall, it forms the 'golden triangle' focus for the village. The proposed relocation of the school as part of the Local Plan therefore contravenes ENV2.

We consider that the Local Plan has not been positively prepared and is not justified in relation to the following environmental objective:

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1. The excessive development proposed for Ickleford damages our historic and natural environment and our open and rural spaces, and therefore contravenes ENV3.



### **Sewerage and drainage**

The Parish Council believes that the Local Plan has not been positively prepared for the following reason:

1. 13.163 of the Local Plan cites Anglian Water as indicating ‘that there is capacity at the relevant treatment works to support the level of growth proposed’ in Ickleford. However, the critical issue of sewerage pipe capacity has not been addressed. Over the past decade, there has been an increasing incidence of flooding and sewerage overflow in IC1 and surrounding streets. Discussions initiated by Ickleford Parish Council with Anglian Water have indicated that the main sewer through the village, into which both IC1 and IC3 would feed, cannot cope with current demand. In addition, the increased likelihood of severe rainfall associated with climate change will escalate the frequency and severity of flooding already experienced in IC1.

The Parish Council believes that the Local Plan is not consistent with national policy for the following reasons:

1. The NPPF Planning Guidelines are clear that sites for development should be ‘as far as reasonably possible, located where the risk of flooding (from all sources) is lowest’. This is clearly not the case for IC1.
2. The Royal Town Planning Institute lists capacity of physical infrastructure, e.g. in the public drainage systems as a material planning consideration. This has been disregarded in the Local Plan for IC1 and IC3.
3. NPPF Sections 99 and 100 state ‘Local Plans should take account of climate change over the longer term, including factors such as flood risk’ and ‘Inappropriate development in areas at risk of flooding should be avoided’. These objectives have been disregarded in respect of IC1.



### Traffic

Traffic throughout the District is acknowledged as being already problematic. Table 17 of the Draft Sustainability Appraisal states: 'The density of traffic on the principal road network is high and increasing but the rural nature of the District makes the provision of sustainable travel modes more challenging'.

We consider that the Local Plan has not been positively prepared for the following reasons:

1. 13.158 of the Local Plan indicates no specific mitigation works required for the Ickleford road network according to NHDC transport modelling. We believe this to be flawed. Extensive current and proposed development is planned within the neighbouring authority of Central Bedfordshire, against which Ickleford abuts. For example, the town of Arlesey (4 km north of Ickleford) is earmarked for approximately 1,000 new dwellings, and the site at RAF Henlow (2km north of Ickleford) will close by 2020 with 780 new dwellings being proposed for the site. The attached Department for Transport National Travel Survey NTS9902 indicates 1.31 vehicles per household in the East of England in 2014/15, and a rural town/ fringe figure 19% higher than the average. For just these two sites, an additional 2774 additional vehicles ( $1.31 + 19\% = 1.56$  per household  $\times 1780$ ) can reasonably be predicted. A significant number of these will flow through Ickleford (A600 and Arlesey Road/ Turnpike Lane), adding to an already-strained road network.

We believe that the definition of traffic problems used by NHDC is too conservative. Thus, the Local Plan Transport Modelling Report - Draft July 2016 states: 'A problem with network operation was defined as a location where the model shows there are still more than 100 vehicles queuing at the end of the AM or PM peak hour.' A more realistic definition would identify more traffic problem sites, possibly including some in Ickleford.

2. In addition, Central Bedfordshire has yet to publish its Local Plan, but it is inevitable that the latter will recommend yet further housing, traffic from which will affect Ickleford. Moreover, Table 34 of the Draft Sustainability Appraisal acknowledges



this: 'Given the early stage of the [Central Bedfordshire] Plan preparation process, it is not possible to identify specific cumulative impacts'. This is particularly problematic for a village such as Ickleford which is adjacent to the county/ authority boundary.

These major traffic factors have been overlooked, and therefore, we believe NHDC transport modelling to be fundamentally flawed.

IC2 and IC3 are unsound because developments of that size could not be justified on these sites due to the adverse impact of the additional traffic on the road system when combined with traffic from Central Bedfordshire.

3. The Appraisal Framework of the Draft Sustainability Appraisal suggests that developments should 'avoid exacerbating local traffic congestion'. The traffic modelling prepared by AECOM in the North Hertfordshire Local Plan Model Testing document attempts to quantify the increase in traffic resulting from the Local Plan. We do not believe these figures are credible. For example, for IC3 the proposed 150 additional dwellings are projected to lead to an additional 63 trips in the morning and an additional 33 trips in the afternoon – see above data on projected vehicles per household based on Department for Transport NTS9902. Therefore, we do not believe the objective of the Draft Sustainability Appraisal can be met.

**Air and noise pollution associated with increased traffic**

The Parish Council believes that the Local Plan has not been positively prepared for the following reasons:

1. A 40% increase in the population of Ickleford will lead to a similar rise in car journeys. This will be dwarfed by the overall increases in traffic associated with the wider NHDC Local Plan, and the likely increases associated with the embryonic Central Bedfordshire Local Plan. The majority of Ickleford residents live within 25 metres of the two village thoroughfares (A600 and Arlesey Road/ Turnpike Lane), and will be subject to likely environmental health impacts due to traffic pollutants.



2. NHDC Policy D4 on air quality requires consideration to be given to potential impact on local air quality. This does not appear to have been done, and even if it had, it would likely be based on the flawed transport modelling mentioned above.
3. The Appraisal Framework of the Draft Sustainability Appraisal suggests that developments should achieve good air quality and reduce ambient noise, especially from traffic. We do not believe either of these objectives can be met. Importantly, Table 17 of the Draft Sustainability Appraisal supports our assertion: 'Noise from air and road transport has a significant effect on quality of life in the District. Proposed developments will have significant additional impacts'.

We consider that the Local Plan is not consistent with national policy for the following reason:

1. The NPPF (Para 124) states 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the cumulative impacts on air quality from individual sites in local areas.'

**Lack of prior consultation**

1. The Parish Council believes the Local Plan is not legally compliant as sites IC3 and LS1 were added to the Proposed Submission Local Plan at a very late stage. Therefore, there was no opportunity for public consultation on these sites.

**Summary of key points for online submission:**

- Development on Green Belt
- Environmental objectives
- Sewerage and drainage
- Traffic
- Air and noise pollution associated with increased traffic
- Lack of prior consultation

*(Continue on a separate sheet if necessary)*

3. 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*



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*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.

Should this site remain in the Proposed Local Plan, Ickleford Parish Council would need a guarantee from Anglian Water for an upgrade to the main sewer or its replacement with a sewer with greater capacity. This is to address the critical issue of pipe capacity for the main sewer that runs through the village as there has been an increasing incidence of flooding and sewerage overflow in IC1 and surrounding streets over the past decade. The proposed housing on this site would feed in to the main sewer and the Parish Council is concerned about the adverse impact an increase in housing would have on this overburdened sewer pipe.

As noted in the supporting letter, the Parish Council would like to propose a reduced number of houses for site IC3 which would only be located on the South side of BR15 to help make the Local Plan sound. This proposal would be subject to the satisfactory resolution of the sewerage problem in Ickleford, as mentioned above, and would remove the land that is currently being farmed from the Plan. A smaller development on IC3 might help address some of the concerns listed with respect to Environmental objectives ENV1, ENV2 and ENV3.

Additionally, as NHDC has not accounted for any impact associated with the Central Bedfordshire Local Plan, we believe a 50% reduction in the number of houses proposed for site IC3 would cause a significant reduction in the number of cars from this site. This would allow for an increase in the capacity of the Hitchin highway system, currently recognised as being under stress, to cope better with traffic coming from any new developments in Central Bedfordshire, and also from site LS1 should this be developed.

*(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.**

4. 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

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

**NORTH HERTFORDSHIRE  
DISTRICT COUNCIL**



To provide greater context to our objections and observations, and allow the inspector to seek clarification on any points.

***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.*

6. 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

7. Signature:

Date: