

**Introductory remarks**

By way of setting the scene, we want to emphasise that Ickleford Parish Council acknowledges that new housing is needed in North Hertfordshire, appreciate the challenge which NHDC is facing in meetings its Objectively Assessed Need for housing, and accept that Ickleford should take a fair share of these new homes. Indeed, we know from our recently-conducted Housing Needs Survey that there is local demand for affordable homes, especially for younger residents and those on lower incomes.

Our objections to the Local Plan stem from the extent of the housing increase proposed for Ickleford, the impacts that this will have on our village and the lack of adequate mitigation thereof, and concerns about the quality of the evidence base NHDC has used to formulate its proposals.

**11.28 and 11.47 Are all of the proposed housing allocations deliverable? In particular, are they:**

**a) confirmed by all of the landowners involved as being available for the use proposed?**

We have no comment to make on this Matter.

**b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**

We are sceptical that access to sites leading on to/ from the A600 is as safe as the Local Plan suggests. However, we acknowledge that the NPPF sets a very high hurdle to be surmounted for Highways to object to a planning application, with this being achievable only if residual cumulative impacts are severe. In the past few weeks (Friday 26<sup>th</sup> January, approx. 08:30), there has been another serious accident on this road at the junction for Holwell. Herts Highways had to undertake significant, costly and disruptive road safety improvements in 2017 to create an adequate junction for the new North Herts Crematorium on this road. This facility will generate fewer vehicle movements than sites LS1 and IC3, yet the Local Plan identifies no specific remedial work for safe entry and exit for either LS1 or IC3. Access at site LS1 will be particularly problematic due to its location in a 'dip' in the A600, with limited visibility in both directions. Vehicles will be travelling quickly over the brow of the hills either side of this site, with those approaching from the south travelling at up to 60mph – the speed limit up to a point 200m from the LS1 access. These issues are included in submissions from Ickleford residents near the LS1 site. It is also worth mentioning that some of the benign Highways assessments elsewhere in the Local Plan have been challenged by independent traffic consultants, for example, as raised by Barkway Parish Council at the Hearing on 8<sup>th</sup> February.

With regard to IC1, we would like to note that there is no pavement in Duncots Close and no space to add one as the road is already narrow. Residents have expressed concerns to the Parish Council about pedestrian safety in this road.

We have profound reservations about the proposal submitted by Vincent & Gorbing on behalf of HCC (Property), ID 14046, which proposes (section 1.9, p2) secondary access to the 'education zone' of site IC3 via Chambers Lane. Cllr. Thurstance has provided a comprehensive critique of this, but in

summary, the proposals will generate significant road traffic and pedestrian movements to serve a 2FE entry school (420 pupils plus approx. 50 staff) during peak times. SHLAA site 329 (Arnold's Farm) is off Chambers Lane, and was ruled out as a possible site due, in part, to the access issues on Chambers Lane – a narrow road which cannot accommodate two-way traffic in parts, and with no footpath in places. It seems negligent for HCC to propose channelling significant school vehicular and pedestrian traffic along this narrow, dangerous route. This option is not mentioned in the Proposed Submission Local Plan document (LP1), and therefore cannot have been assessed for safety and suitability by Herts Highways. It is negligent in the extreme for HCC to allow this suggestion to be put forward under these circumstances. Consequently, we would strongly oppose this route.

**c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

Ickleford Parish Council does not believe that the proposed developments at IC1, IC2, IC3 and LS1 are deliverable with respect to the necessary infrastructure and services, and any environmental or other constraints. Our objections fall in to six categories, as detailed in our Submission and Appendices.

**Sewerage flooding:** The NPPF para 100 requires Local Plans to be supported by a Strategic Flood Risk Assessment and to develop policies to manage flood risk from all sources; we emphasise the phrase '*from all sources*'. NHDC will no doubt assert that the SFRA does support the Local Plan; however, we have found no evidence that the risks of sewerage overflow in parts of Ickleford have been appropriately acknowledged or adequately addressed in the Local Plan. Section 7 and Appendix IPC8 provide details of the issues we face, but in summary, residents in low-lying parts of Ickleford suffer frequent overflow of raw effluent and sewerage into their properties; the three residents who have kept the most assiduous records have noted 19 such incidents over recent years. This issue is acknowledged by Anglian Water in correspondence with the Parish Council, and also in their contribution to the pre-planning assessment report for the Bowman's Mill development, which is separate to the Local Plan. Anglian Water state, in reference to this location in Ickleford that, and I quote: 'there is insufficient capacity in this sewer'. End of quote. Development of IC1 is in this sewerage flooding high-risk area, and sewerage from IC3 would feed directly into the under-capacity, Victorian-era sewer 250m north of the flood-prone area. The net effect of these developments must be to increase the frequency and severity of the sewerage discharge suffered by residents.

The Local Plan talks about adequate sewerage treatment capacity to accommodate developments which arise from the Plan; this is, frankly, of secondary importance to the residents of Ickleford, as the sewerage from our village cannot be guaranteed to reach the treatment plant. The SFRA does not adequately address this, and NHDC has not developed policies to manage flood risk from this source. The Plan for these two sites fails to adhere to NPPF requirements.

1.13 of the HCC's written submission to this Hearing, via Vincent and Gorbing, regarding IC3 has the following statement: 'Foul Water Drainage impact assessment (Anglia Water) – has identified and specified the requirement for upsizing foul water sewers to accommodate flows from the development which is achievable.' We have requested our contact at Anglian Water – the Customer Liaison Manager – to provide details of this assessment, and await his response. We believe that there might be some confusion on this matter. It is likely that Anglian Water have agreed that foul water drainage off site IC3 is achievable; we don't disagree with that. What remains problematic, however, is the fate of that foul water once it is off the site, and enters the main village sewer,

where Anglian Water – as mentioned – acknowledge there to be insufficient capacity. We do not believe Anglian Water has the financial capability to invest in the replacement of the current central sewerage pipe which would be needed to accommodate the additional sewerage arising from these proposed developments. Moreover, as we will discuss shortly, developers' contributions to infrastructure will likely be wholly inadequate in funding an expensive upgrade to our sewers.

**Traffic:** Present-day vehicle movements through Ickleford are not trivial. Our Appendix IPC4 shows the number of vehicles passing through the village in two one-hour slots (morning and evening) on a weekday in February 2017. This builds on a Herts Highways survey data from 2010 showing 4746 vehicle movements each week day passing in one direction through the centre of the village (i.e. not on the A600). It is a significant oversight of the Transport Strategy (ED14, 3.44, p39) that while it lists some village locations where motorists use unsuitable roads to avoid delays on congested main routes, it fails to mention the 'rat-run' through Ickleford in this category. Despite the Local Plan's aspirations for sustainable transport, additional housing will inevitably be associated with an increase in cars and vehicle movements.

The NPPF para 32 requires cumulative traffic impacts of developments to be factored in to decisions, and the Local Plan fails to do this for Ickleford or, more broadly, for Hitchin to and through which many of our residents travel. NHDC will have based many of their Local Plan decisions on the Infrastructure Delivery Plan (TI1), and the more recently produced Transport Strategy (ED14). These are highly flawed, error-strewn, contradictory documents, as detailed in Section 4 of our Submission and in our Appendices IPC1 and IPC6, and as such cannot be relied upon as the basis for decision making. We will address the short-comings of these documents shortly.

Of course, only a minority of the vehicle movements through Ickleford are associated with residents of the village. Many arise from elsewhere in North Herts, but due to our proximity to Central Bedfordshire much through traffic comes from that District. Everyone will be aware of the development pressures in Central Beds; in the CBC settlements adjacent to Ickleford, planning permission for 2,331 new homes has been granted, permission is pending on a further 494, and the CBC pre-submission Local Plan, published in January 2018, proposes 2,965 additional dwellings. This equates to up to 5,790 new homes in the villages near to us. Based on 1.45 vehicles per household, this will add a further 8,400 vehicles to congested roads, many of which will pass through Ickleford; this is not sustainable. NHDC's Transport Strategy simply acknowledges this (5.6 p49), but proposes doing nothing to address it – a manifest dereliction of responsibility.

**Pollution:** Of course, increased traffic is not simply just an inconvenience and road safety hazard for our residents; it comes with an impact on air quality and pollution which we have raised in our Submission. The DEFRA website on UK ambient air quality (<https://uk-air.defra.gov.uk/data/gis-mapping>) shows the most recent NO<sub>2</sub> and NO<sub>x</sub> data; Ickleford is a clear 'hot spot' for both of these pollutants, with mean average values of 20-30 µg/ m<sup>3</sup> and 40-60 µg/ m<sup>3</sup> respectively – the highest in the area. The cumulative effect of all the new developments in and around Ickleford will be to exacerbate the already-high pollution levels identified by DEFRA, with the inevitable knock-on consequences to residents' health.

Government supplementary guidance on the role of local plans with respect to air quality is clear: the plan should consider the 'potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments.' This Local Plan does not do so for Ickleford. The NPPF (paras 120 and 124) requires the cumulative effects of developments on pollution and air quality to be considered; it appears that NHDC has singularly failed to do so.

**Education:** The Local Plan proposes relocating Ickleford Primary School from its current, central village location, and creating a new 2FE school on site IC3. Our Submission and Appendix IPC13, and the matters raised by Cllr. Thurstance show this to be neither warranted nor justified. But this section of the Examination in Public focuses on deliverability, and the Local Plan proposals fail in this respect. There is a multi-million pound mismatch between the funds available from developers via S106 and the cost of a new school.

- Section 6.62 (p89) of the updated Infrastructure Delivery Plan (ED73) quotes the cost of a new 2FE primary school – as proposed for Ickleford in the Local Plan – as £7.64 million.
- Section 6.63 notes that this excludes land costs.
- The total windfall and Local Plan houses for Ickleford is 419.
- HCC has provided us with their current planning obligations contributions table.

**Table 2: Hertfordshire County Council Services planning obligations contributions table**

Bedrooms*	1	2	3	4	5+	1	2	3
	<b>HOUSES Market &amp; other</b>					<b>FLATS Market &amp; other</b>		
Primary education	£231	£1,036	£2,469	£3,721	£4,692	£93	£816	£1,392
Secondary education	£263	£802	£2,561	£4,423	£5,662	£47	£444	£1,677
Youth facilities	£6	£16	£50	£82	£105	£3	£13	£41
Library facilities	£98	£147	£198	£241	£265	£77	£129	£164
	<b>HOUSES Social Rent</b>					<b>FLATS Social Rent</b>		
Primary education	£247	£2,391	£3,860	£5,048	£5,673	£44	£1,167	£2,524
Secondary education	£62	£450	£1,676	£2,669	£2,405	£14	£261	£1,084
Youth facilities	£2	£8	£31	£51	£55	£1	£6	£21
Library facilities	£48	£91	£130	£156	£155	£38	£82	£107

\*uses an assumed relationship between bedrooms and habitable rooms

- Taking the above figure of 419 homes, and taking, as an average, 3-bedroom houses (an overestimate – the LP target is 50% 1-2 bed, 50% 3+), we can calculate developers' contributions based on the social rent figure of £3,860 per dwelling (another overestimate); this gives a maximum total contribution of £1.62 million.

Therefore, with your permission, Sir, we would like to seek clarification from NHDC or HCC Education representatives on the following:

1. From where will this £6 million shortfall in building a new 2FE primary school in Ickleford come?

Clearly, it is highly unlikely that this new infrastructure could be delivered due to the funding shortfall. We believe this exemplifies the suboptimal funding stream for all infrastructure needs - not just education – which would be required to mitigate the effects of the Local Plan

**Heritage Assets:** Our Submission (Section 7) details our concerns about the less-than-adequate Heritage Assessment conducted for Ickleford in the Local Plan. We find it particularly surprising that the Heritage Assessment for Ickleford (NHE5) and the Ickleford section of the Local Plan document itself (LP1, p169-171) completely omit mention of the Icknield Way footpath. This ancient thoroughfare, sometimes referred to as 'the oldest road in Britain' – predating Roman times – is a

vital heritage asset; indeed, it gives our village its name. Moreover, it passes close to sites IC1 and IC2. Failure of these two documents to reference the Icknield Way in Ickleford suggests incomplete appreciation of our historical and heritage environment. It is also unfortunate that NHE5 omits mention of sites IC2 and IC3 altogether in its assessment; this despite IC2 being within 100m of the location of the Icknield Way footpath. Furthermore, Bridleway 15, which is located within IC3, is also part of the ancient Icknield Way Path.

We would like to draw attention to the recent case of *Steer vs the Secretary of State for Communities and Local Government and Ors (2017)* on the setting of heritage assets. This case broadens the definition of 'setting' in this context. There are 37 listed buildings in Ickleford, including the:

- Grade II\* Old Ramerick Manor in the setting of LS1; there are also several non-designated heritage assets in this location, which are also of potential relevance to the Steer case
- Grade I St. Katharine's Church, and a further 21 Grade II-listed assets in the setting of IC1
- Four Grade II buildings at Old Westmill Farm in the setting of IC2
- Grade II Sycamore Cottage in the setting of IC3

The Steer judgement, raised in Hearing submissions by Ickleford residents, brings in to question whether LS1, IC1, IC2 and IC3 are affected by the new definition of 'setting'. If they are, then inclusion would seem to contravene NPPF paras 65, 126, 128, 129, 132 and 133. We would be grateful, Sir, if you would confirm via the District Council the following:

2. Does NHDC believe that the Steer judgement means that inclusion of the four Ickleford sites contravenes the NPPF paragraphs on Heritage Assets?

**Protected species:** As mentioned in our Appendix IPC2, the NHDC Sustainability Appraisal (LP4) Appendix 6 p76: 3a notes the proximity of site IC2 to a wildlife site (along the River Oughton) containing protected species. The IC2 development will be 50-60m from the river, and the disruption associated with the construction phase, plus the inevitable noise/ light pollution from those homes once built will impact on this wildlife site. The Submission from Cala Homes in respect of IC2 mentions a local wildlife site centred on Westmill Lane, on which a *preliminary* ecological assessment has been undertaken. The latter suggests certain mitigation could be undertaken to secure bats' habitat. We are not certain what Cala are referring to – we don't know of a wildlife site centred on Westmill Lane. It appears that Cala has ignored the bigger issue of the protected species at the River Oughton and Oughtonhead Common Local Nature Reserve. The disruption caused by building on IC2 will be much greater than any 'background' impact of established dwellings (e.g. on Burford Way in Hitchin), to which wildlife will have become accustomed. Moreover, the homes at IC2 will be an additional burden to the protected wildlife identified in this area. It's inevitable that development of IC2 will affect these protected species. If Cala's assessment is of the Local Nature Reserve, it seriously underestimates the value and sensitivity of the Local Nature Reserve. We would like to draw everyone's attention to Appendix IPC14 which clearly shows the importance of the Local Nature Reserve. Additionally, the Herts Environmental Record Centre notes all species of flora and fauna within the Oughtonhead Common Local Nature Reserve and within the surrounding 500m margin of the Reserve (onto which IC2 will encroach). Para 117 of the NPPF specifies the need to protect priority species populations, and para 118 says that planning permission should be refused when significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. Neither NHDC nor Cala have provided robust proposals to avoid harm, mitigate or compensate for the impact to protected species in this location.

**General issues with the Infrastructure Delivery Plan (TI1) and the Transport Strategy (ED14):** Our Submission and Appendices provide a critical assessment on the robustness and rigor of these documents, with our concerns on the IDP focussed on traffic.

We believe both to be speculative, wishful documents which provide little evidence that they can ameliorate the issues which will arise from the Local Plan developments. The Transport Strategy, in particular, contradicts itself. For example:

7.5 (p85) states: ‘The extent of growth planned, while consisting of many homes, will represent a relatively small increase in overall travel.’ This is contradicted by section 3.39 (p37): ‘in North Hertfordshire, a total of 17% growth in car traffic [is] predicted between 2015 and 2031’.

5.40 (p59) states ‘The roads within Hitchin are generally within capacity’, while p5 acknowledges ‘Hitchin has no bypass ... which results in more congestion. There are junctions in all towns which experience delays. Growth in travel will continue to affect how the NHDC networks operate, particularly through Hitchin’.

Neither document can get its core facts right. In support of its approach to sustainable transport, the IDP (5.8, p29) quotes the North Herts section of the Hertfordshire Travel Survey as showing 24% of residents walk to work. Anyone engaging their critical faculties would have seen this to be wrong – it is simply incredible that one-quarter of the population would walk to work. The actual figure – taken directly from the source – is 4%, which is much more believable. The Transport Strategy, likewise, presents 2011 census data showing 7.8% take the bus to work (Table 3.5, p41); the actual figure from the census is 1.9%.

We won’t, in the interests of time, go through all the mistakes in both documents – frankly, there are so many omissions and errors that just this would take much of the morning. But we would like to mention just a few to give this Hearing a flavour of their poor quality. First, from the IDP:

- Sections 5.107 and 5.108, (p47-49) propose a number of schemes to alleviate traffic problems in Hitchin. The first one mentioned is for a signalled-controlled system at Woolgrove Road/ Cambridge Road; traffic lights are already in place in this location to no material effect. We need to note that the 700 dwellings proposed at HT1 – which will generate an additional 1,000 cars – will seriously exacerbate this problem area.
- Similarly, two proposed signal-controlled junctions (5.108 items 2 and 4) are on the same road 0.25km apart, with an already-existing pelican crossing in between. Moreover, these new signals are preceded on the Hitchin one-way system with a set of traffic lights and a further pelican crossing. Therefore, under the IDP proposals we will have 5 sets of traffic lights over a distance of 500m; this seems likely to generate gridlock rather than remedy congestion.
- The IDP makes the case that sustainable transport via rail should play a significant role in delivering the Plan. Hitchin’s location on the rail network makes it more popular than other stations in North Herts. There has already been a 48% increase in use of Hitchin station over the past 9 years, as the IDP notes (5.12, p30). Vehicular access to the station at peak times is already challenging, with roads leading to the station congested, and the short-stay car park small and tortuous to navigate. The station’s long-stay car park is routinely full and cannot be expanded, and parking on nearby roads is limited by residents’ permits. Therefore, accommodating further passenger numbers from Hitchin station will be problematic. None of this is even acknowledged in the IDP.

- Delivery of the vision within the IDP is unrealistically dependent on the aspiration to effect cultural changes around car ownership (see 5.103, p46); this is laudable but the IDP provides no substantive guidance on how we will be weaned off our cars. Therefore, the likelihood of delivery is low.

And from the Transport Strategy:

- The credibility of the cycling proposals (Policy 3) is undermined by some basic errors. For example, 3.10 (p24) states: 'Royston is within 20 mins cycling of Letchworth and Baldock.'. Royston and Letchworth town centres are 18.1km apart, requiring a cycling speed of 54.3km/ h (33.7mph) to cover this in 20 min. However, half of this is on the A505 dual carriageway, which no sane cyclist would use. The shortest, non-dual carriageway route is 25.1km, requiring a cycling speed of 75.3km/ h or 46.8mph to cover it in 20 mins.
- Fig 3.11 (p44) attempts to show traffic flows to and from the main towns in our area, but is wilfully misleading. As the graphic shows, there is a significant volume of traffic from Central Beds and Luton which goes to Stevenage and Welwyn. However, the diagram suggest that this will somehow bypass Hitchin, whereas the reality is that this traffic comes directly through Hitchin to join the A1(M) at Junction 8. Clearly, the traffic impact on Hitchin is, therefore, much greater than implied in the figure.
- The 'Traffic Management' section of Table 5.2 (p63) is manifestly incorrect. For example, this says, in respect of one potential traffic mitigation strategy, the 'Aim [is] to reduce through traffic through Payne's Park and A602/B656 junctions. Options difficult, but possible potential in considering using Carters Lane, Willow Lane or other links, with some options also significantly reducing flows on Pirton Road, diverting these to the A505.' End of quote. Let us deconstruct this suggestion: Carters Lane is a narrow, twisting country lane which is only wide enough for one vehicle (but with occasional passing points); it is totally unsuited to take additional traffic. Even if it could be used to move traffic from Pirton Road to the A505, that simply adds more vehicles to an already-congested pinch point, into which Pirton Road feeds a few hundred metres further. Willow Lane is already used as a 'rat run' between the A602 and A505 avoiding Payne's Park, is subject to severe congestion now, and accesses the A602 at a dangerous junction. There are no 'other links' between these roads. These suggestions cannot have been proposed by anyone with local knowledge. The options are not 'difficult' – they are impossible and futile.

Some of the issues in these two important documents are profound. We are sure that the Inspector will consider in his deliberations whether the mistakes which we have highlighted mean that the IDP and Transport Strategy cannot be considered as a proportionate evidence base, and therefore whether any conclusions which NHDC has reached founded on these documents are irredeemably flawed.

We find the quality of the IDP and Transport Strategy to be profoundly depressing, so with your permission, Sir, we would request that you clarify the following with NHDC:

3. Considering what Ickleford Parish Council has pointed out in its Submission and Appendices, do you believe that the quality and accuracy of the IDP and Transport Strategy has been sufficient for them to be in the public domain, and for NHDC to use the data they contain in their Local Plan decision making?

**11.29 and 11.48 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?**

Ickleford Parish Council does not accept that the proposed housing allocations are justified, nor are they appropriate in terms of the likely impacts.

A key document underpinning many of NHDC's justification on sites for inclusion in the Local Plan is their Sustainability Appraisal (LP4). This document, amongst other things, rates each site against a wide range of criteria to assess site suitability. We agree that this is a reasonable approach. However, it is completely unacceptable for such a pivotal document to have been so poorly prepared, and for the criteria on which NHDC based their site selection to be littered with so many mistakes. Our Submission (Section 3) and Appendix IPC2 provide ample evidence to undermine the robustness of the Sustainability Appraisal with respect to the Ickleford sites. In the interests of time, we will not go through each of the errors as the Inspector, NHDC and others will have read these. But in summary, for those present who have not reviewed our documents, the Sustainability Appraisal:

- Provides three inappropriate criteria on which to filter site selection
- Lists IC1 as providing a positive benefit for social housing when it is too small to be required to do so
- Incorrectly assigns a positive impact for reduced car usage
- Simultaneously records sites as having positive and negative impacts on greenhouse emissions
- Incorrectly implies that our local services are at risk
- Incorrectly suggests that village developments can promote sustainable urban living
- Incorrectly states that our residents predominantly work in Hitchin
- Saying that residents from IC2 or IC3 will likely use facilities in Central Beds, when both sites are much nearer Ickleford village centre and Hitchin than Central Beds
- Lists IC2 as being both brownfield and greenfield
- Ignores the impact on ecological assets, and minimises the effect on loss of agricultural land

We won't ask NHDC to respond to each of the roughly 20 mistakes and omissions in the Sustainability Appraisal for Ickleford – and we haven't included in this list the fact that the document twice refers to our village as 'Icklefield'. However, we would request you, Sir, to ask NHDC three related questions:

4. Do they agree that the points we have identified in Appendix IPC2 are mistakes or omissions in the Sustainability Appraisal?
5. If so, do they agree that these mistakes and omissions undermine, or at the very least question, their justification for including the four Ickleford sites
6. If they believe that their decision-making for Ickleford is justified despite all the errors in the Sustainability Appraisal, just how inaccurate would that document have to be for them to withdraw it and start afresh?

Our major concern in respect to this specific Matter relates to the overall impact of the Local Plan proposed developments on our village. We should start, however, by challenging NHDC's thought process for separating site LS1 from Ickleford, an approach supported by the Submission from Cala Homes. Unequivocally, the site termed LS1 is in the parish of Ickleford, and we are grateful that the Inspector has given implicit acknowledgement of this by allowing the IC and LS sites to be considered in the same session today. Cynics might suggest that this incorrect separation was done to make the



impact of new housing on Ickleford appear less catastrophic for our village than is the case. Both NHDC and Cala Homes have made a fundamental misinterpretation in wishing to separate LS1 from Ickleford. For example, Cala state that, and I quote 'while technically in Ickleford parish [LS1] is an extension of Lower Stondon and will look to services and facilities in Lower Stondon ... It should not be seen as part of Ickleford's housing provision.' End of quote. First, if anything, it is an extension of the Henlow Camp part of Henlow Parish, which LS1 abuts, rather than Lower Stondon. However, this is quite trivial, and simply reflects NHDC's own mistake. More importantly, we would be surprised if Cala could provide any actual evidence for their assertion that LS1 residents will 'look to services and facilities' in Henlow/ Stondon. Let's examine two critical examples: education and health. The legal obligation falls to HCC for schooling. Ickleford Primary School is in *The Times* top 250 primaries in the country, outperforming by far neighbouring schools – new residents at LS1 will likely be falling over themselves to get their children into Ickleford Primary School, and they will have every right to do so.

With regards to health, we have the following statement from the Lower Stondon GP Surgery, which is the practice serving Stondon and Henlow Camp, and I quote: 'I have objected to the LS1 application on the basis that there has been no consultation with the practice as to whether we have the capacity or whether LS1 is within our practice area.

LS1 is in Ickleford which is outside our practice area and we would have no obligation to register these residents. Due to the approved and pending planning applications in Lower Stondon presenting capacity issues it is likely that these [LS1] residents would need to seek health care in Hitchin.' End of quote.

Moreover, IPC is committed to ensuring any development that might take place in LS1 is integrated with the rest of Ickleford. This is a cornerstone of our Neighbourhood Planning objective, and we have recently co-opted a resident from that part of the village to fill a vacancy on Ickleford Parish Council, in part to show our commitment to that area of the village.

So, LS1 is absolutely part of Ickleford and its housing allocation must be included in the Ickleford housing provision. Cala Homes is wrong in asserting that residents at LS1 will look to Central Beds for services – and with all due respect to Cala Homes, we know our community rather better than they do.

Having established the above, we need to look at the total estimated numbers of the four Ickleford sites in the Local Plan – 319 new homes to add to the present number of 844. However, as our Submission makes clear a further 90 dwellings are likely to arise from two 'windfall' sites, bringing the total, along with 10 recently built homes, to 419 new homes. That increase of 50% in the village housing stock and population is unsustainable enough. I know this Examination in Public has to focus on the documentation which has been provided by NHDC in making its judgements. But it is important for the Inspector and others to get a picture of developers' true intentions. We know their ambitions for sites IC2 and IC3 based on their Submissions to this Hearing, and that for LS1 based on the planning application which is pending. Instead of the 40, 150 and 120 dwelling estimates respectively in the Local Plan, the developers wish to build 50, 190 and 185 homes; instead of an estimated total of 310 on these three sites, they want a total of 425 – an increase of 37% on the Local Plan estimate. If these three are in anyway representative of the rest of the District, NHDC will significantly overshoot its housing target.

If developers get their way, our village will increase from 844 to 1,378 homes or 63%. This is nobody's definition of 'sustainable' and inevitably will come with major detrimental impacts.

In their case for building on IC2, Cala Homes note (3.3.1) that the Local Plan makes it clear that the numbers are neither a target or a maximum, and the Plan also makes provision for windfalls of 1,100 throughout the District; this is true. However, taking their (and indeed, NHDC's) argument to its logical conclusion, there would be no upper limit to development in Ickleford – which is clearly absurd. The NPPF requires cumulative effects be taken into consideration for aspects such as transport, pollution and air quality (paras 32, 120, 124). All of these will be adversely affected by developments on this scale. During week 2 of the Examination in Public session, NHDC was asked why additional non-Green Belt sites which were available in Barkway had not been allocated in the Plan as an alternative to Green Belt allocations elsewhere in the District. Mr Smith was very clear: further development, on top of what is already proposed for Barkway was beyond the natural limit, would irrevocably alter the character of the village, and would not have been sustainable. Exactly the same principles hold true for Ickleford.

We do not believe that our County Council, as owners of site IC3 and custodians of primary school provision, is covering itself in glory in the way it is approaching the Local Plan. First, we find it perverse that Vincent and Gorbings, on behalf of HCC, announced in their written statement to the Hearing that they propose submitting a planning application for this site in the coming weeks. This, at best, seems disrespectful to the Inspector and the Examination process.

Additionally, in their submission to this Hearing with regards to Education, they state (point 6, p1) 'the quantum of development for Ickleford (and Lower Stondon) is insufficient to support a full form entry' to our primary school – a statement with which we agree. Their solution, however, is to allocate yet further housing to Ickleford in an attempt to justify an increase in school size. The demand for school places should be driven by housing numbers not the other way around. Ickleford Parish Council's solution of retaining a 1FE school in its current location, and allowing pupils of any new developments in Ickleford to gain admission (as per HCC criteria), in preference to those from outside the village, is more appropriate. In any case, the approach of allowing spare school places to dictate housing allocations is unjustified.

We have generally been sympathetic to the predicament in which NHDC find themselves in formulating this Local Plan – and have tried to reflect that in our proposed Statement of Common Ground (Appendix IPC11) submitted in October 2017, and to which we await their reply. However, in one respect, we believe that they have behaved in a truly outrageous manner; the revision to Policy SP2 which categorises Ickleford as a 'village identified for growth'. We believe this was a rushed, post-hoc attempt at justifying housing allocations based on the Inspector's questioning of their rationale. We believe that our Submission provides comprehensive and conclusive evidence that NHDC's approach to housing allocations in the revised SP2, and their alleged reasons, are irretrievably flawed. In the interests of time we won't reiterate Section 8 of our Submission. Suffice to say, that there is ample evidence that the housing allocations for Ickleford in the Plan are neither justified nor appropriate.

### **11.30 and 11.49 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?**

I think we can reasonably conclude that the proposed allocations were not the most appropriate option considering the reasonable alternatives. The case of the two 'windfall' sites in Ickleford provides clear evidence for this. The sites at Bowman's Mill and Ickleford Manor are clearly better options than the four Ickleford sites in the Local Plan – they are post-industrial, brownfield sites

which do not encroach further onto Green Belt. Therefore, they must be better sites than IC1, IC2 and IC3 which are on Green Belt. The Planning Application for Ickleford Manor was initially submitted in May 2016, and the closure of Bowman's Mill was formally announced in June 2016; a decision, for a business that had been part of Ickleford for 160 years, which would have been months in the making. Therefore, for both of these sites, their availability is well within the timeframe of the Local Plan. It is inconceivable, had the owners of these sites been made aware of the Local Plan via a proactive approach from NHDC, that they would have foregone the opportunity of submitting them. It is, of course, possible that, had they come forward in the 'call for sites', we might have faced having six locations for development instead of four. But that is not the point at this juncture; the omission of these two prime sites from the Local Plan is proof that the four proposed allocations in Ickleford cannot be the most appropriate.

Our Submission raises a more general concern about the NHDC 'call for sites', and this has been raised by others in previous Hearings, notably the Save Our Green Belt group and CPRE. It is possible that NHDC did the best it could, although they have not given a very convincing account of timelines and process for the formal 'call for sites'. However, we believe that this procedure was not as good as it could or should have been for such a fundamental part of the Local Plan process. This belief was reinforced during the Examination in Public Hearing on 8<sup>th</sup> February. In discussion of the Category A villages of Barley and Hexton, the Inspector asked: why have no homes been proposed for these villages? Ms Leitch, for NHDC, responded by saying: No sites came forward for these villages. This exemplifies NHDC's approach – purely passive; let's emphasise the key phrase of 'came forward'. This Local Plan has been evolving over many years. A more effective approach, surely, would have been for NHDC to have been proactive in identifying the best sites for development, for example, in terms of colocation with pre-existing infrastructure, and then subsequently making an active approach to owners of those sites. We know that NHDC has not done this; in the autumn of 2017, the Chairman of Ickleford Parish Council and our District Councillor met with NHDC Cllr David Levett, the Executive Member for Planning and Enterprise, to discuss the Local Plan. Cllr Levett advised us that NHDC could have taken the approach of sitting down with a large map of the District to highlight the most appropriate sites for development, but did not have the resources to do so. Formulating a Local Plan is arguably the most important thing a council will ever do. And obtaining the best sites to enable sustainable development is the most important foundation of a Local Plan. We believe that NHDC has failed in this core duty, and it appears that we have been sacrificed on the altar of local council headcount limitations.

The neighbouring authority of Central Beds appear to have been much more effective at eliciting a greater number of sites for consideration, whereas NHDC, because they had fewer sites to choose from simply had to select a large proportion to meet their Objectively Assessed Need for housing. Document HOU9, (the SHLAA 2016 update, section 4.10) notes that 184 sites were considered by NHDC, whereas the CBC website tells us that they had 851 sites to review – 4.6 times as many. As NHDC does not have a comprehensive picture of the reasonable alternatives which did not materialise in their call for sites – these are a 'known unknown' – they cannot claim that the four sites in Ickleford are the most appropriate.

### **11.31 Sites IC1, IC2 and IC3 comprise of land in the Green Belt. For each:**

**a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

The short answer is 'no'; exceptional circumstances do not exist to warrant the allocation of sites IC1, IC2 and IC3, currently in Green Belt, for housing. In the various general Green Belt sessions of this Examination in Public, groups such as Save Our GreenBelt and CPRE have presented cogent arguments to undermine NHDC's claim of 'exceptional circumstances'. We believe that such circumstances can only exist if all suitable non-Green Belt options have been exhausted, and NHDC's assertion to have done so has been challenged in previous sessions. We agree; the non-Green Belt options throughout the District cannot be shown conclusively to have been exhausted, primarily due to the suboptimal 'call for sites'. NHDC has failed to show that it has comprehensively channelled development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary, as required by the NPPF.

However, let's not tackle this in general terms, but rather, look at NHDC's hearing statement for today. Point 41 (p7) tells us that sites IC1, IC2 and IC3 provide, and I quote: 'the only reasonable alternatives for expansion of Ickleford beyond its current built limits', end of quote. We provide a five-word rebuttal to this: 'Bowman's Mill and Ickleford Manor'. De facto, NHDC is wrong.

NHDC's Point 42 (p7) suggests that their housing need exceeds the level of opportunities which could be met by brownfield, urban and rural sites beyond the Green Belt. It is possible that some development on Green Belt might be valid because the District's full Objectively Assessed Need could not be met via brownfield, urban or beyond-the-Green Belt sites. However, it only requires there to be one suitable brownfield, urban or beyond the Green Belt site for the 'exceptional circumstances' argument to be holed below the water line. And clearly, in Ickleford, two brownfield sites do exist which are not in the Local Plan.

At the Hearing on 8<sup>th</sup> January, Ashwell Parish Council advised that they had identified three sites within their village which were suitable for development, within the current settlement boundary, and whose owners had agreed were available. Moreover, they advised NHDC of this in autumn 2015 – while the Local Plan was still in its pre-submission stage.

Likewise, representation from Breachwood Green on the same day, put forward an available alternative site to the one in the Local Plan; the alternative site being one which village residents – those with real local knowledge – consider to be better than the one suggested by NHDC.

These examples are unlikely to be isolated, and indicate that the District is littered with perfectly good and available sites. We believe that it is probable that some of these would be better than the Green Belt sites in Ickleford.

No doubt NHDC will suggest that the need for 'windfalls' is included in the Local Plan – but that is irrelevant to this specific Examination in Public Matter; their statements in points 41 and 42 are manifestly wrong.

NHDC's Hearing submission mentions (Points 45-47, p7) the proposed amendments to policy SP2 (document ED3) as further justification for inclusion of sites IC1, IC2 and IC3. We have already mentioned our concerns about this policy revision as detailed in Section 8 of the Ickleford Parish Council Submission. We request your permission, Sir, to take this opportunity to ask NHDC to clarify five points on the proposed revision to SP2:

7. How long has the NHDC Local Plan been in the making?
8. At what point in the Local Plan process did you decide to pursue a strategy of 'villages identified for growth'?

9. Why, unlike CBC, did you decide not to consult on this profound decision?
10. Why was the village of St Ippolyts – with access to the same sustainable transport options as Ickleford, and at a similar distance to Hitchin as Ickleford – not classified as a ‘village identified for growth’?
11. Why was the village of Ashwell – with its own train station and a far greater range of services and facilities than Ickleford – not classified as a ‘village identified for growth’?

On the 8<sup>th</sup> February Hearing Session, Barkway Parish Council asked NHDC to explain the disproportionate housing numbers being proposed for their village compared with many other Category A villages. Mr Smith’s response was that NHDC had two options; either ‘allocate housing numbers approximately equally amongst all settlements’ or ‘focus development on fewer settlements (the ‘villages identified for growth’), and thereby spare the majority of villages. We think it would be helpful to aid our understanding, Sir, for you to ask Mr Smith:

12. Could you share with us the assessments which led NHDC to choose ‘villages identified for growth’ as a better strategy than that of an equitable distribution amongst all larger villages, and direct us towards the Examination document which shows NHDC’s thought process in formulating this strategy?

We believe, the revision of policy SP2 and the creation of the idea of ‘villages identified for growth’ was a panic-stricken response by NHDC to justify the disproportionate impacts on five villages, which in itself was driven by what was offered by landowners in the sub-optimal ‘call for sites’. There are many definitions of the word ‘policy’, but the following is as good as any: ‘A policy is a deliberate system of principles to guide decisions and achieve rational outcomes.’ What NHDC has achieved with its revision to SP2 is to reverse this. They have achieved their outcomes (although they are clearly not rational), and then set their principles to justify their decisions. This is wholly nonsensical and unjustified, and a prime example of an authority trying to ride roughshod over its residents.

**b) What is the nature and extent of the harm to the Green Belt of removing the site from it?**

NHDC commissioned the Green Belt Review (CG1) to assist in their decision making, and the approach taken – of rating parcels, sub-parcels of Green Belt land, and potential sites for their contribution to Green Belt purposes is not unreasonable. However, as with many of the important documents on which NHDC has based the Local Plan, CG1 is deeply flawed as detailed in our Appendix IPC7. As the Inspector and others will have reviewed this, we won’t go through all of our concerns in full, but in summary, the main points are:

- Inconsistently applying its own criteria for defining the Green Belt parcels; ‘A’ roads and railway lines sometimes form the boundary, other times cut right through the parcel.
- A significant effect of this is to under-represent the size, and therefore contribution, of the Ickleford Green Belt parcel compared with the adjacent one. The latter is termed ‘Willian’, but large parts of it are much closer to Ickleford. Consequently, the overall contribution which the Ickleford parcel makes to Green Belt purposes is undervalued.
- Anomalies in the classification of other Parcels in the Hitchin area – specifically Parcels 10 (Wymondley) and 11 (Gosmore).
- Omitting to conduct a village analysis for Ickleford despite the Local Plan proposing to put 199 homes on our Green Belt.
- A disconnect between the Green Belt value assigned to Parcels and that of the sub-parcels which make up the former.
- Inconsistencies in the sub-parcel assessments.

- Having a scoring system in which the village sites are disadvantaged, as the maximum they can rate is 2, compared with 3 for town sites. And then misapplying that by scoring some village sites as 3.
- Using a 'tick box' approach which throws up spurious results, and because of the lack of any local knowledge being brought to bear on the process, not realising the absurdity of some of the answers.

However, there are two key aspects which are relevant to the determination of the nature and extent of the harm to the Green Belt of removing the site, which we need to consider in some detail.

The approach which NHDC has taken appears to be based on a misinterpretation of the NPPF section on the Green Belt (paras 79-92). Parcels, sub-parcels and sites are scored against four of the Green Belt purposes – preventing sprawl, preventing towns from merging, keeping the countryside open, and preserving the setting of historic towns. However, the NPPF does not require all four of these purposes to be attained for a parcel of land to be integral to the fundamental aim of the Green Belt, which is to prevent urban sprawl by keeping land permanently open. Therefore, land which plays a major role in the first of the four criteria against which NHDC has conducted its assessments – preventing sprawl – but which makes no contribution to the other three can still make a significant overall contribution to the Green Belt. This is not the approach which NHDC has taken, which questions the validity of their conclusions.

In this respect, it is important to note that each of the three Green Belt sites in Ickleford is rated as having a significant contribution to at least one of the four purposes against which they have been scored (see Table A of NHDC's written submission to this Hearing).

Of even greater concern is the way the overall evaluation and contribution to the Green Belt of parcels, sub-parcels and sites (Table 2.4, p18, Table 3.1 p34 and Table 5.3 p103, respectively) has been determined. For the purposes of this Examination in Public Matter, the most important of these is the site-specific assessment. The criteria used for assessing sites against the four Green Belt purposes are given in some detail (Table 5.2 p100-101). What appears to be missing, however, is the most important information; how the final assessment of overall contribution to Green Belt was made. While section 63 (p99) of the Green Belt Review mentions that its conclusion does not constitute a recommendation for release or retention, the 'overall contribution to Green Belt' must have informed NHDC's decision on whether specific sites within the Green Belt should be included in the Local Plan – otherwise conducting the review would have been a redundant exercise. It is reasonable to assume that NHDC viewed sites playing a limited role as being preferable to those with a moderate role, and these in turn would be better sites than those whose Green Belt contribution was significant. At the supplementary Green Belt hearing on 24<sup>th</sup> of January, the methodology for arriving at the 'overall contribution' rating was questioned. Ms Ormsby suggested that it had not been achieved by aggregating the scores for the four individual assessments, but rather, it was a subjective assessment. Mr Deanwood, whose organisation was responsible for the Green Belt Review, agreed that this was the case. We believe this fatally undermines the whole process. In the absence of any pre-defined criteria for making this essential assessment, nobody can be sure whether the categorisation of any site is fair, accurate or justified. We do not know whether only one person made all of the site-specific assessments, or whether one individual did some while others were tasked with reviewing remaining sites. If it was a team effort, individuals could have used quite different subjective judgements in reaching their conclusions. We, would be grateful, Sir, if you would seek clarification from NHDC on the following Green Belt-related questions:

13. Does NHDC agree that the NPPF does not require all four of the listed criteria to be fulfilled for a site to have a significant overall role in the Green Belt?
14. Do you agree that a purely subjective determination of overall contribution to Green Belt purposes make it impossible for anyone to know whether the categorisation is fair, accurate and justified?
15. On the basis of our criticisms of the Green Belt Review, do you agree that any conclusions which you reached on the nature and extent of harm to the Green Belt of removing the site from it, is questionable?

Our own assessments – based on in-depth local knowledge of these sites – are as follow:

IC1 – Significant overall contribution to Green Belt: part of the Green Belt arc which prevents merger of Hitchin and Letchworth, and significantly safeguarding countryside towards the River Hiz and the Voluntary Conservation Area at Gerry’s Hole.

IC2 – Significant overall contribution to Green Belt: essential role in preventing sprawl between Hitchin and Ickleford, and significantly safeguarding countryside towards the River Oughton/Oughtonhead Local Nature Reserve.

IC3 – Moderate overall contribution to Green Belt: a role in safeguarding countryside and a role in preventing sprawl towards Holwell and Henlow Camp.

**c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?**

It will be clear, from what we have just said, that the best answer which anyone, including NHDC and developers, can give is ‘we have no idea’. As we cannot guarantee that the determinations in the Green Belt Review are accurate, we cannot know what the true impacts of developing these sites would be, and therefore cannot determine what mitigation might be possible. Ickleford Parish Council’s assertion is that development on any of the three of our Green Belt sites will be impactful, and mitigation will be challenging.

We believe that our proposal to allow the southern part of IC3 to remain in the Local Plan could be justifiable on Green Belt grounds, as the retention of the portion north of Bridleway 15 as Green Belt will ensure sprawl is prevented and the countryside remains open.

However, we have significant concerns about site IC2 which make amelioration of the Green Belt impacts impossible to achieve. In particular, we challenge the assertion made by Cala Homes on this site. They quote in 3.4.1 of their submission Appendix 2 of NHDC’s document HOU1 which says of IC2: ‘Site-specific criteria allow for appropriate mitigation of potential impacts’ of removal of this site from the Green Belt. First, as mentioned above, NHDC’s whole decision-making on Green Belt is questionable based on the flaws in the Green Belt Review. Moreover, building on IC2 will reduce the housing boundary between Hitchin and Ickleford to **140m**. Preventing urban sprawl is a key attribute of Green Belt. We do not believe that such a narrow boundary is compatible with preventing urban sprawl. It was notable, at the Hitchin-specific Hearing of the Examination in Public, that concerns were raised about an insufficient gap between Hitchin and Letchworth at the top of the proposed site HT1. At that point, the gap between the two settlements narrows to approx. 650m – more than four times the distance that would exist between Ickleford and Hitchin were IC2 to be accepted.

We think it would be useful, Sir, to seek the opinion of both NHDC and Cala Homes on this. Specifically:

16. Do NHDC and Cala Homes believe a gap of 140m is sufficient as a barrier to urban sprawl, and if so, could you suggest what the narrowest distance between settlements should be to ensure NPPF requirements on sprawl remain intact?

In addition, there is no possible mitigation which could surmount this; the gap to prevent sprawl, once gone is gone for ever. It's important to remember that the NPPF does not require all of the five Green Belt purposes to be fulfilled for land to be integral to the Green Belt; if a plot plays an essential role in preventing urban sprawl, but has no impact on the other four purposes, it is still pivotal to the Green Belt.

**d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?**

We believe that development of IC2 would completely undermine Green Belt function, development of IC1 would challenge Green Belt function in the extreme, but development of IC3 (south) could be acceptable as the remainder of IC3 would protect against sprawl and ensure the countryside remained open.

**e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?**

We do not believe that NHDC can give any guarantees on this. They have attempted to 'soften the blow' of removing parts of the Green Belt in the current review by replacing it with parts elsewhere (although none in Ickleford). We do not believe residents of North Herts are comforted by the additional assignments to Green Belt; if the 'permanence' of Green Belt is only temporary until boundaries are redrawn, it provides nobody with any real protection.

**f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?**

We have no comment to make on this Matter.

**g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?**

We have no comment to make on this Matter.

**11.32 and 11.50 Is the proposed settlement boundary: a) consistent with the methodology for identifying the settlement boundaries? b) appropriate and justified?**



As mentioned in our Submission, there is an element of NHDC 'marking their own homework' on settlement boundaries:

- NHDC chooses four sites in the village for development;
- NHDC draws the settlement boundaries to include those sites;
- NHDC concludes that development of those sites is acceptable because they are within the settlement boundaries which they have just defined.

NHDC's approach might be consistent with the right methodology, but whether it is appropriate or justified is another matter; if it were important for these areas to be within settlement boundaries, why were they not so previously?

Specifically, we think the settlement boundaries should be reset to their current locations to exclude sites IC1, IC2 and the section of IC3 north of Bridleway 15. As Ickleford Manor (SHLAA ref 328) and Arnold's Farm (SHLAA ref 329) have been deemed inappropriate sites for development, there is no justification for their inclusion in the settlement boundary, and they should also, therefore, be removed.

Conversely, the western (developed) end of Ickleford Manor, nearest to Bedford Road, should be included in the settlement boundary, particularly the section which has planning permission for 19 dwellings.

#### **Concluding statement:**

We believe that the critical flaws detailed in Ickleford Parish Council's Submission to the Examination in Public and its Appendices, and presented here today, render the NHDC Local Plan, as it currently stands, unsound. Our request to the Inspector is given in our Submission document. But in summary, we propose the following changes to make the Plan sound.

- Remove sites IC1, IC2 and IC3 north of Bridleway 15 from the Local Plan in lieu of the more appropriate, brownfield sites at Ickleford Manor and Bowman's Mill (see Appendix IPC12).
- Our recommended site changes would mean that Ickleford could receive 270 new homes. This figure is similar to the estimate for Ickleford in the Local Plan, and greater than the allocation in 15 of the 19 larger villages in North Herts.
- Remove mention of relocating Ickleford Primary School from the Plan. We have shown that this relocation will not be necessary, and is unlikely to be deliverable.
- NHDC should assess the impact of known (and likely) developments in CBC on traffic and pollution in Ickleford and Hitchin, and provide realistic mitigation of these.
- NHDC should provide appropriate modelling of proposed traffic mitigation in Hitchin to determine its effectiveness, provide more realistic assessments of sources of funding of infrastructure proposals, and provide likely route, costings and funding options of the Hitchin southern bypass to remedy some of the capacity issues.
- Amend the proposed settlement boundary to exclude sites IC1, IC2, IC3 north of Bridleway 15, and SHLAA sites 328 and 329, but to include the western part of Ickleford Manor.
- We are also concerned about the northward expansion of the Hitchin settlement boundary, adjacent to The Priory School. This can be seen in the Appendix B map on p16 of NHDC's Matter 11 written submission for Ickleford. We are sympathetic to the need for additional secondary school provision in Hitchin associated with the Local Plan. However, the associated extension of the Hitchin settlement boundary onto Green Belt land in this

location reduces by more than half the already-narrow gap between Ickleford and Hitchin. This would be exacerbated on the Bedford Road side by the proposed southern extension of the Ickleford settlement boundary at IC2, creating a pincer-movement which all-but eliminates the gap between the two settlements.