

Ickleford Parish Council – Submission to the NHDC Local Plan: Main Modifications

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Ickleford Parish Council acknowledges that the Main Modifications improve the submission Local Plan; we list our observations below on those Main Modifications which impact our village. Several issues exist within the Main Modifications, and our primary residual concerns are:

- The revised Sustainability Appraisal (SA) continues to have significant errors and inappropriate assessments which render it a flawed document on which to base judgements. It cannot be considered as an adequate and proportionate evidence base, as required by the National Planning Policy Framework (NPPF) (section 31).
- The re-classification of Ickleford from 'Category A' to a 'village identified for growth' (MM010, MM012, MM035, MM266) is invalid. It is a post-hoc attempt by NHDC to justify the disproportionate allocation of housing to five villages which has been forced upon them by NHDC's suboptimal 'Call for Sites'. The rationale for inclusion as a 'village identified for growth' fits other villages which have not been included in this category. It cannot be considered as an adequate and proportionate evidence base, as required by the NPPF (section 31).
- The issues we highlighted during the Examination in Public in relation to flooding in parts of Ickleford are acknowledged by the requirement that a 'detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.' (MM 268, 269, 270) However, the issue residents face is not with 'delivery' but **removal** of foul water/ drainage water. Therefore, this Modification needs to be amended accordingly.
- The Main Modifications requiring transport assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane (MM269, 270, 272, 320 and 321) are welcome. However, this assessment must also include the impact of several thousand new homes in adjacent villages in Central Bedfordshire, which will add to the traffic volumes through Ickleford.

Sustainability Appraisal Addendum – Appendices and Proposed Main Modifications

Policies IC1, IC2, IC3 (in part) and LS1 (in part) – pages 81-87 and 121-123 of Appendix C in the Appendices

Some of the more egregious errors and inconsistencies in the original Sustainability Appraisal that we noted in our submissions to the Examination in Public have been addressed in these two documents. However, there remain misclassifications and incorrect assessments relating to the four Ickleford sites which undermine the quality of the evidence on which NHDC has based its suitability of those sites for inclusion in the Local Plan.

'2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles' (pages 82, 84, 85 and 122 of Appendix C in the Appendices) is given a positive assessment with the comments: 'Local bus service runs through the village connecting to the nearby towns. Bus stop location, with a regular service, is easily accessible within 400m of the entire site. Railway station is over 800m away from the site'.

The bus service is poor and poorly used. The SA uses the adjective 'regular' as a positive term: once a day is 'regular' but will not reduce car reliance or encourage bus use. Our bus services do not run directly to local railway stations. Recent timetable changes mean that children attending the Hitchin Boys' and Girls' School cannot use the bus service and still arrive in time for the start of the school

Ickleford Parish Council – Submission to the NHDC Local Plan: Main Modifications

day; they now have to be driven, and further developments can only increase car use. The railway station is indeed over 800m away – it is 2.7km from the centre of Ickleford; therefore, these developments do not meet the criteria laid out in the SA Framework*. The assessments should not be ‘positive’ but ‘negative’.

[*The SA Framework subobjective for 2 (c) (Table 1, page 4 of SA Addendum – Proposed Main Modifications) asks will the policy help to locate development so as to reduce the need to travel? • reduce car reliance, encourage walking, cycle, bus, and train use? • reduce road freight movements? • avoid exacerbating local traffic congestion? • provide affordable, accessible public transport in towns and in rural areas? We suggest that the answers to these questions for the four Ickleford sites must be ‘no’ or possibly ‘unknown’, leading to an overall assessment of ‘negative’]

The four environmental protection criteria - 3(a) Protect and enhance biodiversity; 3(b) Protect and enhance landscapes; 3(c) Conserve and where appropriate, enhance the historic environment; 3(d) Reduce pollution from any source – are all rated a ‘neutral’ for these sites (pages 82, 84, 86 and 122 of Appendix C in the Appendices). Building on Green Belt or greenfield sites cannot conceivably ‘protect habitats and species’, ‘protect and enhance landscapes’, ‘achieve good air quality’, ‘reduce ambient noise, especially from traffic’ or ‘reduce light pollution’ as required in the SA Framework. The assessments should not be ‘neutral’ but ‘negative’.

‘4(a) Reduce greenhouse gas emissions and Improve the District’s ability to adapt to climate change’ is given a ‘neutral’ assessment (pages 82, 84, 86 and 122 of Appendices). As discussed above, the paucity and poor quality of public transport options, along with the dangers of cycling on, for example, the A600, and the distance to train stations effectively precluding sustainable modes of transport. Inevitably, this means that nearly all residents of new developments will use cars for business, school and social purposes. The increase in pollution and emissions must have a negative impact on the criteria on which this SA assessment is made. The assessments should not be ‘neutral’ but ‘negative’.

There are systematic errors in ‘The Just Society’ section of the SA. These can be seen in the Table below; 5(a) is the same in both cases, but thereafter the criteria used to assess the Ickleford sites diverges from those proposed in the SA Framework.

SA Framework categories (pages 5-6 of the Main Modifications document)	Site-based assessment categories (pages 83-86 and 122-123 of Appendix C in the Appendices document)
5(a) Share benefits of prosperity fairly	5(a) Share benefits of prosperity fairly
5(b) Provide access to services and facilities for all	5(b) Increase access to decent and affordable housing
5(c) Promote community cohesion	5(c) Improve conditions and services that engender good health and reduce health inequalities
5(d) Increase access to decent and affordable housing	
5(e) Reduce crime rates and fear of crime	
5(f) Improve conditions and services that engender good health and reduce health inequalities	
5(g) Increase participation in education and life-long learning	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	

Ickleford Parish Council – Submission to the NHDC Local Plan: Main Modifications

It is not clear which set of categories, if either, is correct. If the Framework categories are the ones on which judgements should have been based, it is not clear why only three have been used for the Ickleford sites in the SA.

This lack of accuracy and attention to detail in a key document on which decisions are based undermines the concept of the 'proportionate evidence' base required by the NPPF.

Policy IC2

'5(a) Share benefits of prosperity fairly' (page 84 of Appendix C in the Appendices) is assessed as having a positive effect, with the comment that 'the proposed development of this site could aid in retaining local services within the area.' The implication in this comment is that the local services are at risk; they are not. We noted this clearly in our original submission; it is disappointing that those responsible for the SA have ignored local expert opinion. Moreover, this alleged positive effect of development is irrelevant to the SA Framework criteria for 5(a): reduce disparities in income levels; contribute to regeneration of deprived areas (estates in Letchworth and Hitchin); provide employment and other opportunities for unemployed, especially long term unemployed and the disabled; encourage entrepreneurial activity in deprived areas. The assessment should not be 'positive' but 'neutral'.

'5(c) Improve conditions and services that engender good health and reduce health inequalities' (pages 84-85 of Appendix C in the Appendices) notes that 'there are no houses immediately adjacent' to site IC2. Apart from the relevance of this statement to good health or health inequalities, it is factually incorrect; the houses of Westmill Lane are adjacent to this site.

Policy IC3

It is unclear (page 85 of Appendix C in the Appendices) why '2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles' impacts are classified as 'unknown' when the equivalent for IC1 and IC2 are (admittedly, incorrectly) listed as 'positive'. This lack of consistency in the categorisation of sites within the same village calls into question the accuracy of the assessments in the SA.

It is encouraging that the SA gives an accurate (albeit negative) assessment in section 3(b) 'Protect and enhance landscapes' (page 86 of Appendix C in the Appendices). This is in contrast to the 'neutral' assessments for sites IC1 and IC2, and reinforces our point (above) that the impacts on these latter two sites should also be negative. However, in the absence of evidence that the proposed mitigation at site IC3 will be effective, the long-term assessment of this criterion should also be 'negative' and not 'unknown' as proposed in the SA.

'5(a) Share benefits of prosperity fairly' (page 86 of Appendix C in the Appendices) – see comments above on this criterion in Site/ Policy IC2.

'5(c) Improve conditions and services that engender good health and reduce health inequalities' (page 86 of Appendix C in the Appendices) notes that the site 'appears' to be in a residential area. If the assessors were unable to determine whether this is or is not the case, it does not provide confidence that they have been able to assess accurately other significant factors. If, as is correctly stated for IC3 'initial construction phase would be disruptive for surrounding local residential areas', this should also be noted for sites IC1 and IC2 where the same issue exists.

Policy LS1

‘2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles’ (page 122 of Appendix C in the Appendices) notes that the site is ‘more than 800m to station’. As with sites IC1-3, this is factually correct, but (perhaps deliberately) misleading: it is 6.9km to Hitchin station and 5.3km to Arlesey station. In neither case is there a direct bus route.

This criterion also notes this site is adjacent to Lower Stondon ‘which has a number of services and facilities’. The local lower school and GP surgery are already at capacity with very limited ability or no ability or aspiration (respectively) to expand; both are barely walking distance from the site. Development at this site cannot be considered ‘sustainable’, nor will it reduce the use of motor vehicles. As with the assessment for sites IC1-3, the assessment should not be ‘positive’ but ‘negative’.

5(c) (page 123 of Appendix C in the Appendices) notes that the site ‘appears’ to be in a residential area – see comments above in reference to Site/ Policy IC3.

Proposed Changes to Polices Map

MM391 (pages 23-24 of Proposed Changes to Policies Map) relating to the Hitchin settlement boundary, proposes the removal of land east of Bedford Road that is not part of The Priory School. Ickleford Parish Council supports this Main Modification.

Schedule of Proposed Main Modifications

MM010 (Changes to Policy SP2, pages 6-7), MM012 (page 8), MM035 (Changes to Policy SP8, pages 19-21), MM266 (page 128)

These Main Modifications effect a change of designation of Ickleford from a ‘Category A village’ to a ‘village identified for growth’. Ickleford Parish Council objects to these Main Modifications on the grounds that it fails the requirements of the NPPF for an adequate and proportionate evidence base, (NPPF section 31).

We believe the implication here is that NHDC reviewed all its Category A villages for their services, and proximity to adjacent towns and transport connections. Having done so, NHDC then actively targeted those villages with good quality services and/ or proximity to towns for development in a disproportionate manner to the remaining Category A villages. Such an alleged strategic approach by NHDC is not supported by the evidence:

- There was no consultation on the ‘villages identified for growth’ category. Compare this absence with the approach taken by neighbouring Central Bedfordshire Council; in the latter’s draft Local Plan they have identified specific areas for growth, and consulted thereon
- The ‘call for sites’ was largely passive, rather than targeted as now implied by NHDC. If the latter approach had been taken by NHDC, the owners of two obvious, brownfield plots in Ickleford (which have now become available for development) would have been directly approached by NHDC to submit their land for consideration – they were not
- Changes to SP2 and SP8 would not be subject to this 11th-hour consideration – the ‘villages identified for growth’ category would have been specifically mentioned in the original document

Ickleford Parish Council – Submission to the NHDC Local Plan: Main Modifications

It appears that NHDC is engaged in post-hoc justification of the sites which they have been obliged to accept to meet their housing need due to the suboptimal call for sites, and is a defensive response to Matters and Issues which were raised by the Inspector.

MM010 suggest that ‘infrastructure and facilities will be delivered’ to the villages identified for growth – but fails to detail what these might be.

Moreover, NHDC’s new classification, as detailed in MM012 – Ickleford ‘provide(s) opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections’ – is fundamentally flawed:

- Example 1 – St Ipployts is 2.4km from Hitchin Market Square and 3.5km from Hitchin Station. The equivalent figures for Ickleford are 3.2 and 2.7km. (All distances are from the nominal centre of the villages, via road.) Both villages are served by bus routes. St Ippolyts clearly meets the criteria in the revised SP2 of proximity to a neighbouring town and sustainable transport connections, yet is not a village identified for growth.
- Example 2 – Ashwell has many facilities which Ickleford lacks – e.g. garage, post office, pharmacy, osteopathic clinic, butcher, dentist, doctor’s surgery, estate agent, coffee shop. Moreover, it has its own station (3.3km from the village centre). Ashwell clearly meets the criteria in the revised SP2 for a village with a range of services, including a station, yet is not a village identified for growth.

At no point has NHDC presented the criteria it used or the assessments which led NHDC to choose ‘villages identified for growth’, nor has it shown how Ickleford compares with the remaining Category A villages when ranked against those villages.

MM267 (page 128)

This states that ‘11 further new homes have been built or granted planning permission since 2011’ – the figure in the original document being 10. Planning Permission was granted by NHDC for 19 dwellings at Ickleford Manor, Turnpike Lane, Ickleford (Ref: 16/02012/1). The construction of these homes is near completion. Therefore, NHDC’s amended number in MM267 is incorrect.

MM268 (Policy IC1 – pages 128-9)

‘Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts’ – Ickleford Parish Council supports this Main Modification.

‘Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.’ There is ambiguity in this sentence; ‘delivery’ could mean ‘delivery of infrastructure’ or ‘delivery of water’. The issue residents face is not with ‘delivery’ of water but removal of foul water/ drainage water. While this might be implicit in the word ‘infrastructure’ we believe it needs to be cited specifically to avoid ambiguity, and therefore, this Modification needs to be amended accordingly.

MM269 (Policy IC2 – page 129)

‘Provision of a pedestrian crossing point over the A600 to connect to the existing footpath network and ensure safe access’. Ickleford Parish Council supports this Main Modification.

‘Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement

Ickleford Parish Council – Submission to the NHDC Local Plan: Main Modifications

measures’. While supportive of the principle underpinning this Main Modification, Ickleford Parish Council believes it to be wholly inadequate. The NPPF (section 102d) states that transport issues should be considered from the earliest stages of plan-making, so that the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account. The NPPF (section 181) also requires opportunities to improve air quality or mitigate impacts to be identified, such as through traffic and travel management. Moreover, it suggests that ‘these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.’ Sites IC2, IC3 and LS1 are minor compared with the developments (being built, approved, pending planning approval or within the Central Beds emerging Local Plan) to the immediate north of Ickleford. In the settlements of Meppershall, Shillington, Lower Stondon, RAF Henlow/ Henlow, Arlesey, Fairfield and Stotfold more than 5,000 new dwellings are possible. With poor-to-limited public transport options in most of these locations, new residents will rely on private vehicles, and a significant proportion will come through Ickleford on either the A600 or Arlesey Road. All these developments, in addition to the three listed, must be included in the assessment of cumulative impact, and through the heart of the village, not just on the A600. Additionally, if the ‘necessary mitigation or improvement measures’ required in this Main Modification cannot be achieved, we would require assurances that NHDC has a ‘Plan B’.

There remains a significant omission in this policy: the line ‘Consider and mitigate against any adverse impacts upon key features of interest of adjoining local wildlife site (Westmill Lane)’ must also refer to the adjoining Local Nature Reserve at Oughtonhead Common.

‘Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery’. See comment on MM268.

‘Retention of planting at south and west of the site to ensure integrity of revised Green Belt boundary’. Ickleford Parish Council supports this Main Modification.

‘Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism’. Ickleford Parish Council has no comment on this Main Modification.

MM270 (Policy IC3 – pages 129-30)

‘Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures’. See comments on MM269

‘Approximately two hectares of land secured as a reserve site for a primary school’. Ickleford Parish Council acknowledges the rationale for this Main Modification.

‘Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery’. See comment on MM268

‘Development should prevent unnecessary mineral sterilisation by taking into account the mineral resource block and any subsequent mineral safeguarding mechanism’. Ickleford Parish Council has no comment on this Main Modification.

For consistency with MM 268 and 269, we request that ‘Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts’ be added to this Main Modification.

MM271 (page 130)

The figures for new homes are incorrect – see comments in MM267.

MM272 (page 130)

‘Any transport assessments for sites in Ickleford should also consider the junction of the A600 and Turnpike Lane, where improved facilities for pedestrians and cyclists may mitigate higher traffic volumes.’ See comments on MM269.

MM273 (page 131)

Removal of the wording: ‘and regularly fills most of its available places from the local area’. Ickleford Parish Council supports this Main Modification.

‘but the advantages of keeping the school at the historic centre of the village are recognised in both functional and heritage terms.’ Ickleford Parish Council supports this Main Modification.

MM274 (page 131)

‘As well as serving Ickleford, the school also admits pupils from northern Hitchin as well as outlying rural areas and settlements. The amount of development proposed for Ickleford may result in a need for additional primary school provision. However, it is not possible to say at this point exactly how or when this provision might be needed. The additional demand created by new development in Ickleford may be offset, either in whole or in part, by changes to school admission patterns outside of the village.’ Ickleford Parish Council supports this Main Modification.

MM275 (page 131)

‘Site IC3 reserves sufficient land to provide a new primary school of up to 2FE should this prove necessary. This would allow for the relocation of the existing school and / or additional provision to meet requirements arising from new development if this is determined to be the most appropriate solution. The Council will work with the school, Hertfordshire County Council and other stakeholders as required to monitor the demand for school places. All options for the retention of the existing school in its current form, its expansion within or adjoining its existing site or splitting provision across the two sites will be fully explored before any decision is taken to relocate Ickleford Primary to the reserve site within IC3.’ Ickleford Parish Council supports most of this Main Modification, and acknowledges the rationale for retaining a reserve site should relocation of Ickleford Primary School be required.

MM276 (page 131)

‘There have been local incidents of sewer flooding and all sites will be required to robustly assess wastewater drainage requirements.’ Ickleford Parish Council supports this Main Modification.

MM277 (pages 131-2)

‘Hertfordshire County Council, as minerals planning authority, has identified a potential resource block (and associated buffer) to the north of Hitchin. Sites IC2 and IC3 lie within these areas. These sites will be subject to consultation with the mineral planning authority to determine whether prior extraction (or any other relevant measure) is necessary to avoid sterilisation of any minerals resource.’ Ickleford Parish Council requests assurances on mitigation of the impact of mineral extraction on the local environment and residents be added to this Main Modification.

MM318 (page 145)

Addition of ‘in Henlow parish.’ Ickleford Parish Council supports this Main Modification.

MM319 (page 145)

Amendment of ‘Proposals’ to ‘Policies’. Ickleford Parish Council supports this Main Modification.

MM320 (Policy LS1 – page 145-6)

‘Appropriate junction access arrangements to Bedford Road having regard to the likely impacts of development on the A600’. ‘Transport Assessment to consider the cumulative impacts of sites IC2, IC3 and LS1 on the junction of the A600 and Turnpike Lane for all users and secure necessary mitigation or improvement measures’. See comments on MM269.

‘Development proposals to be informed by site-specific landscape and heritage assessment which determines the likely impacts on Old Ramerick Manor and its surroundings;’ Ickleford Parish Council supports this Main Modification.

MM321 (page 146)

‘Any transport assessment should also consider the traffic implications for the A600, and the junction of the A600 and Turnpike Lane, where improved facilities for pedestrians and cyclists may mitigate higher traffic volumes.’ See comments on MM269.

Main Modifications Track Changes Version

The proposed Submission Local Plan incorporating the proposed Main Modifications, section 4.127 currently states: ‘Some Local Housing Allocations will also result in new school places being provided, including at Ickleford, Codicote and Knebworth.’ With the Main Modifications MM273-5, this should now be changed to ‘Some Local Housing Allocations may also result in new school places being provided, including at Ickleford, Codicote and Knebworth.’

References

Sustainability Appraisal Addendum – Appendices

<https://www.north-herts.gov.uk/sites/northherts-cms/files/N%20Herts%20SA%20Report%20Addendum%20-%20appendices.pdf>

Sustainability Appraisal Addendum – Proposed Main Modifications

<https://www.north-herts.gov.uk/sites/northherts-cms/files/N%20Herts%20SA%20Report%20Addendum.pdf>

Proposed Changes to Policies Map

<https://www.north-herts.gov.uk/sites/northherts-cms/files/Proposed%20changes%20to%20Policies%20Map%20%28Compressed%29.pdf>

Schedule of Proposed Main Modifications

<https://www.north-herts.gov.uk/sites/northherts-cms/files/Schedule%20of%20proposed%20Main%20Modifications.pdf>

Main Modifications Track Changes Version

<https://www.north-herts.gov.uk/sites/northherts-cms/files/Local%20Plan%20-%20Main%20Mods%20track%20change%20version.pdf>

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