

Appendix IPC1 – Mode of transport used by North Herts residents to get to work, and location of work

| Mode of transport | Percentage of North Herts residents |
|--------------------------|--|
| Car driver | 66% |
| Train | 22% |
| Walk | 4% |
| Car passenger | 2% |
| Cycle | 2% |
| Bus | 2% |
| Motorbike | 1% |
| Tube | 1% |

The clear majority take cars to get to work. Note: although it has not been possible to find the source data, we believe that a significant number listing ‘train’ as their mode of transport to get to work will travel to/ from the station via private vehicle. Therefore, the number cited for using cars is an underestimate.

Data taken from section 4.2 of the North Herts profile of the Herts County Travel Survey 2015:

<https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/county-travel-survey/north-herts-district-profile.pdf>

Note: NHDC’s IDP lists incorrect data. See 5.8, p29 of <https://www.north-herts.gov.uk/sites/northherts-cms/files/TI1%20Infrastructure%20Delivery%20Plan.pdf>

| Location of work | Percentage of North Herts residents |
|-------------------------|--|
| North Herts | 31% |
| London | 24% |
| Adjacent counties | 21% |
| Welwyn Hatfield | 7% |
| Stevenage | 6% |
| East Herts | 4% |
| Other | 7% |

Data taken from section 4.1 of the North Herts profile of the Herts County Travel Survey 2015:

<https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/county-travel-survey/north-herts-district-profile.pdf>

Appendix IPC2 – Errors and omissions in the Sustainability Assessment Appendix 6, 2.7 and 2.12

The following critical mistakes, in a document used by NHDC to select Ickleford sites for inclusion in the Local Plan, render the assessment fundamentally flawed.

- Appendix 6 p74: 2c suggests a positive impact for sustainable locations/ reduced use of cars, implying that access to buses (and possibly trains) and encouraging use of alternative transportation will achieve this. See Section 3 of our submission document for our analyses on ‘buses’; see Section 4 of our submission document for our analyses on ‘trains’; and NHDC provides no evidence to indicate how residents will be weaned off the use of private vehicles. Simply wishing it without means of achievability shows a lack of intellectual rigour. Additionally, this is contradicted by section 7 (p75) which acknowledges that people are likely to be reliant on private transport. The document omits to mention that none of the bus routes through the village provide direct access to Hitchin station. At best, the impact of developments on this objective is neutral, but more likely negative. [The same applies to IC2, 3 and LS1 assessments]
- Appendix 6 p75: 2.7 for IC1 suggests a positive benefit for social housing (5b), but then states the ‘Site is too small to be required to provide affordable housing’. The latter is correct for a development of this size.
- Appendix 6 p75: 4a suggests simultaneously negative and positive impacts on reduced greenhouse gas emissions. Logic suggest it cannot be both. [The same applies to IC2 and 3 assessments; LS1 is correctly assessed as negative – p116, 4a]
- Appendix 6 p75: 5a – Ickleford Parish Council does not accept that our local services are ‘at risk’ in relation to IC1 and IC2. The notes for IC3 5a state that it is not within a deprived area, and therefore unlikely to contribute to sharing prosperity. IC3 is in the same village as IC1 and IC2, so one of these categorisations must be incorrect.
- Appendix 6 p75: 7 – Development in a village cannot promote sustainable urban living. To promote sustainable urban living, one must build in towns, and therefore building in villages has a net negative effect on sustainable urban living. The neutral assessment in the SA is incorrect. [The same applies to IC2, 3 and LS1 assessments]
- Appendix 6 p76: 2c states those living in Ickleford are likely to commute into Hitchin for employment. This is not supported by any evidence. Data (for North Herts as a whole – see Appendix IPC1) shows only about one-third of those who work have as their destination other locations in North Herts (including, but not exclusively, Hitchin). Additionally, significant numbers of our residents commute by train (22% for North Herts – Appendix IPC1) mainly into London.
- Appendix 6 p76: lists site IC2 as being both a greenfield site (2a) and an existing brownfield site (3a).
- Appendix 6 p76: 3a notes the proximity of 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 impact on biodiversity therefore must be negative, not unknown (See Appendix IPC14 for detailed analysis).
- Appendix 6 p77 contains a note between the assessments for sites IC2 and IC3 – it is not clear to which of these sites the comment refers: ‘Scored based on facilities in North Hertfordshire – although it is recognised that residents will likely use facilities in Central Bedfordshire and surrounding areas’. This is an error in the SA – it likely should refer to site LS1. Even if it is meant to refer to LS1, it is an imprecise statement; one of the core services residents in LS1 will need is schooling. As they are in Hertfordshire, the legal obligation for provision of children’s education falls to Hertfordshire, and because schools in Hertfordshire have such a strong reputation, residents are likely to avail themselves of this right.
- Appendix 6 p78: 3a suggests a neutral effect on biodiversity for IC3. It is inconceivable that building over what is now agricultural land with hedgerows can have only a neutral impact. The assessment takes no

account of a 0.6ha natural wildlife habitat on this site which is a haven for a range of animals; this will be lost. The impact on biodiversity for this site must be negative, irrespective of any mitigation measures. [The same applies to IC2 and LS1 assessments]

- The agricultural value of all four sites is acknowledged in Appendix 6 (the sites being classified as Grade 2 or 3 agricultural land), but the impact of the loss of such land is underplayed, and therefore does not adhere to NPPF para 112.

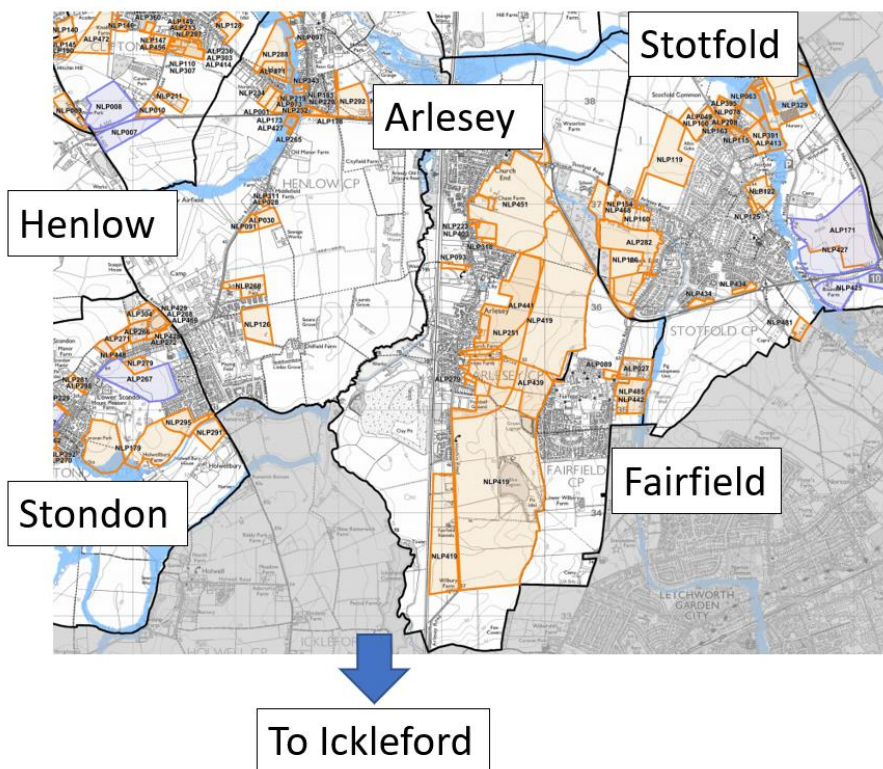
Appendix IPC3 – Developments in Central Bedfordshire

| | Arlesey | Fairfield | Henlow | Stondon | Stotfold | Total |
|--|---------|-----------|--------|---------|----------|-------|
| Homes: Planning - approved | 1,400 | 333 | 21 | 567 | 10 | 2,331 |
| Homes: Planning – pending | 0 | 6 | 78 | 180 | 230 | 494 |
| Draft Local Plan – number of sites | 11 | 4 | 27 | 21 | 25 | 88 |
| Draft Local Plan – approx. size (hectares) | 465 | 23 | 86 | 169 | 250 | 993 |

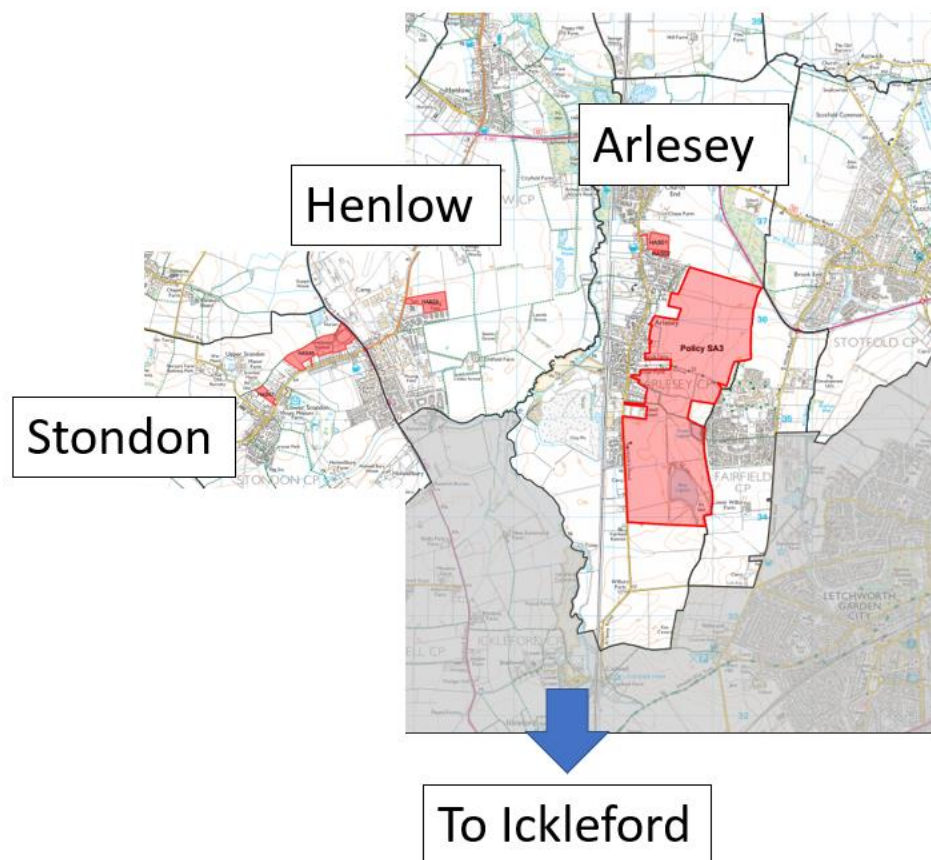
The CBC Draft Local Plan (http://www.centralbedfordshire.gov.uk/Images/draft-local-plan_tcm3-23964.pdf) targets 20-30,000 new homes. Arlesey is one of the growth locations being considered in the A1 Corridor – see 7.6.9 (p63) – with 2,000 additional dwellings proposed.

Site numbers and sizes can be found at <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/call-for-sites/list-of-sites.aspx>

CBC Draft Local Plan sites - demarcated with blue or orange lines – in settlements near Ickleford



CBC Pre-Submission Local Plan sites - demarcated with blue or orange lines – in settlements near Ickleford



In January 2018, CBC published its pre-submission Local Plan (<http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/pre-submission.aspx>), which will only be ratified after the 12 January 2018 deadline for our Submission to the NHDC Local Plan EiP. If CBC accepts the preferred sites (above), their Local Plan will add the following dwellings to the settlements adjacent to Ickleford:

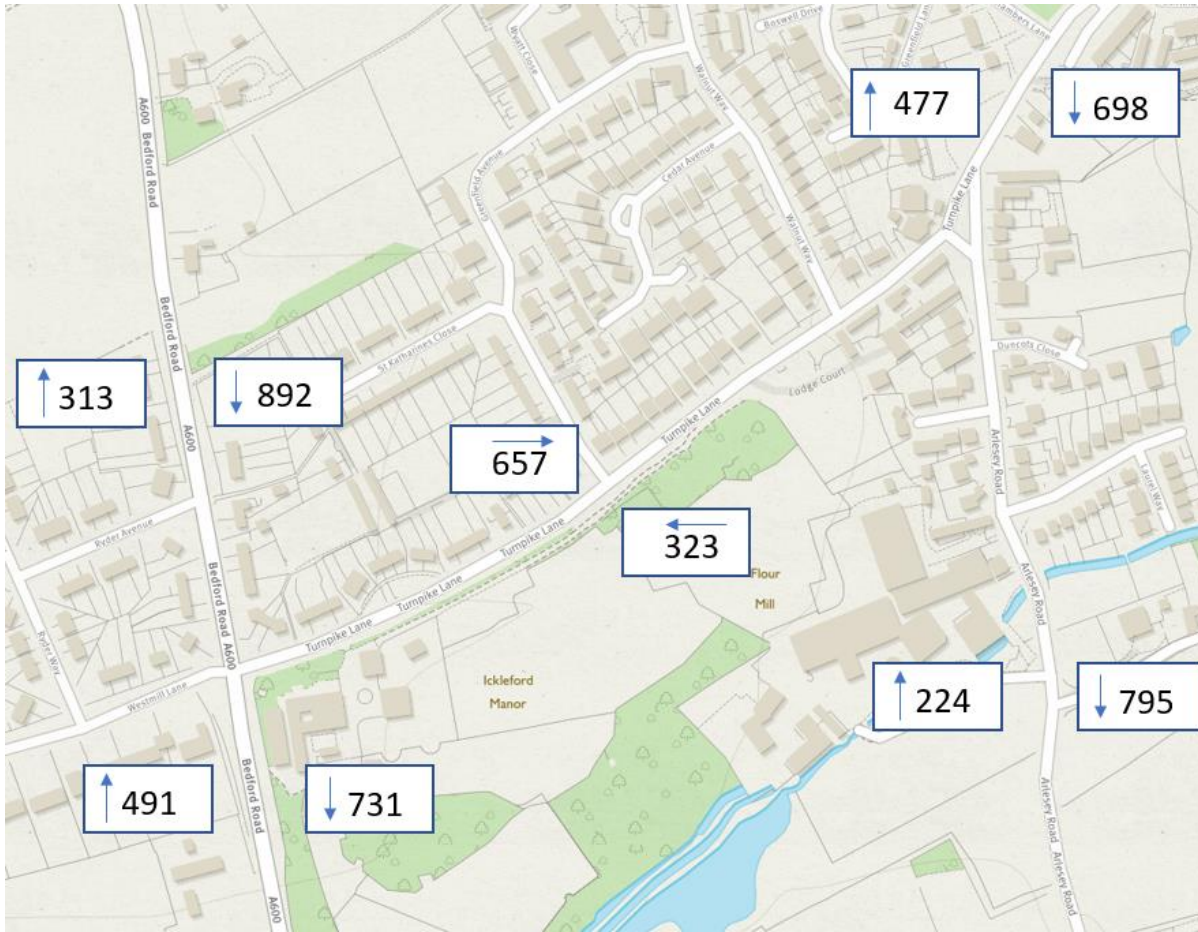
Arlesey – 2,087

Henlow – 101

Stondon – 277

Total – 2,465

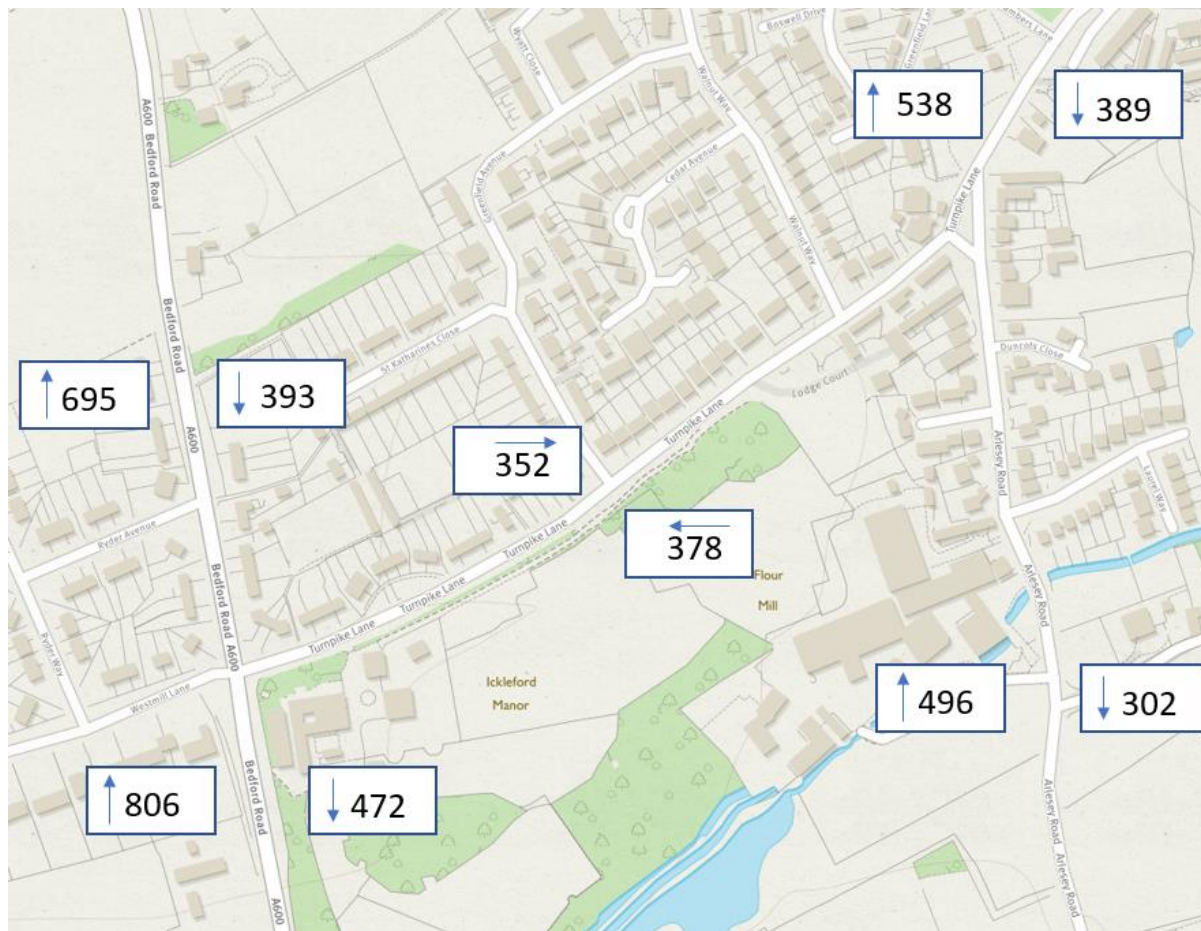
Appendix IPC4a – Ickleford traffic survey – Morning



Manual classified traffic count data collected from three locations in Ickleford on Tuesday 21 February 2017, 08:00-09:00.

Values are numbers of vehicles per hour; arrows show direction of travel of vehicles.

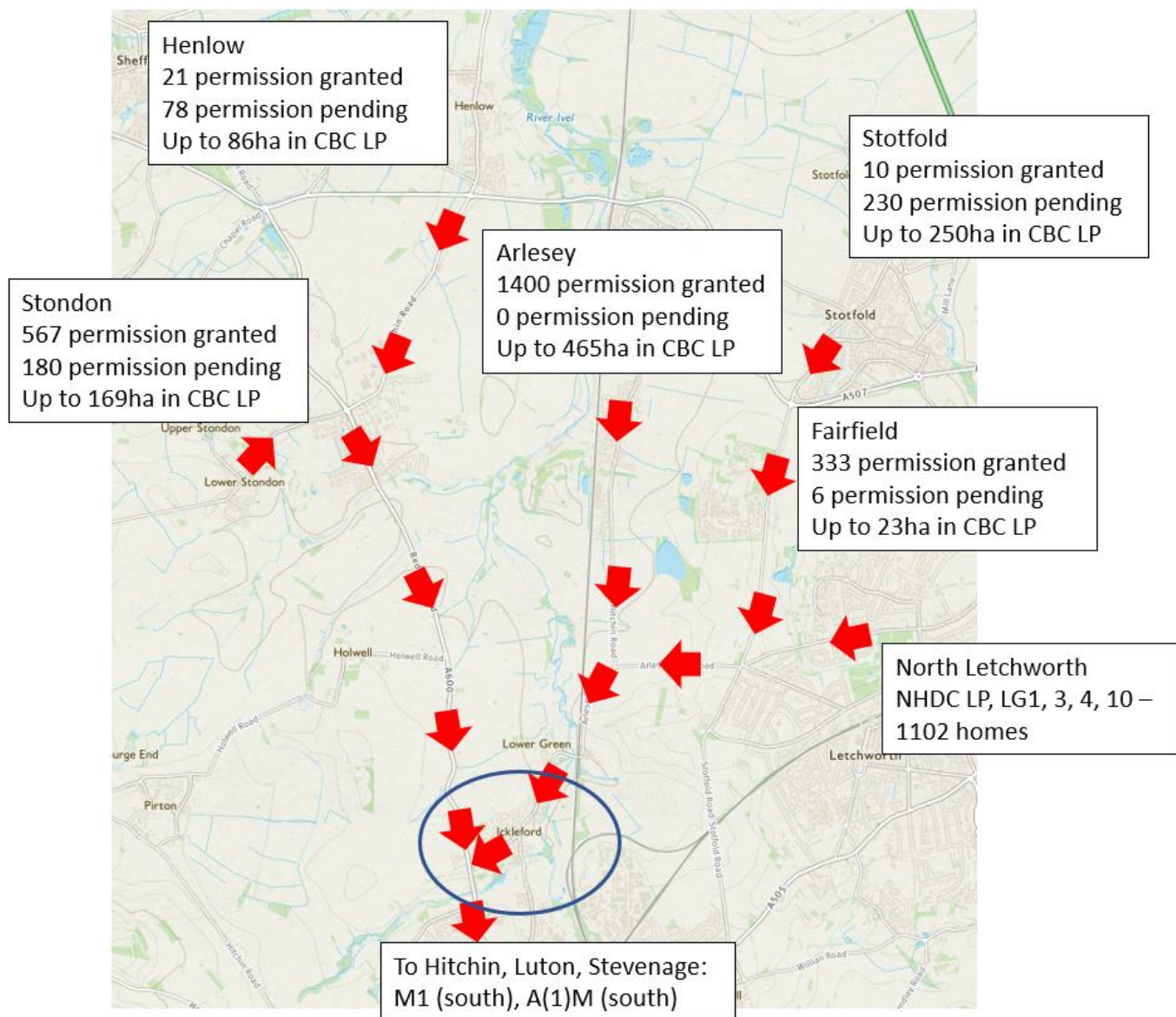
Appendix IPC4b – Ickleford traffic survey – Evening



Manual classified traffic count data collected from three locations in Ickleford on Tuesday 21 February 2017, 17:00-18:00.

Values are numbers of vehicles per hour; arrows show direction of travel of vehicles.

Appendix IPC5a – Traffic flows from CBC developments and north Letchworth developments (NHDC Local Plan)



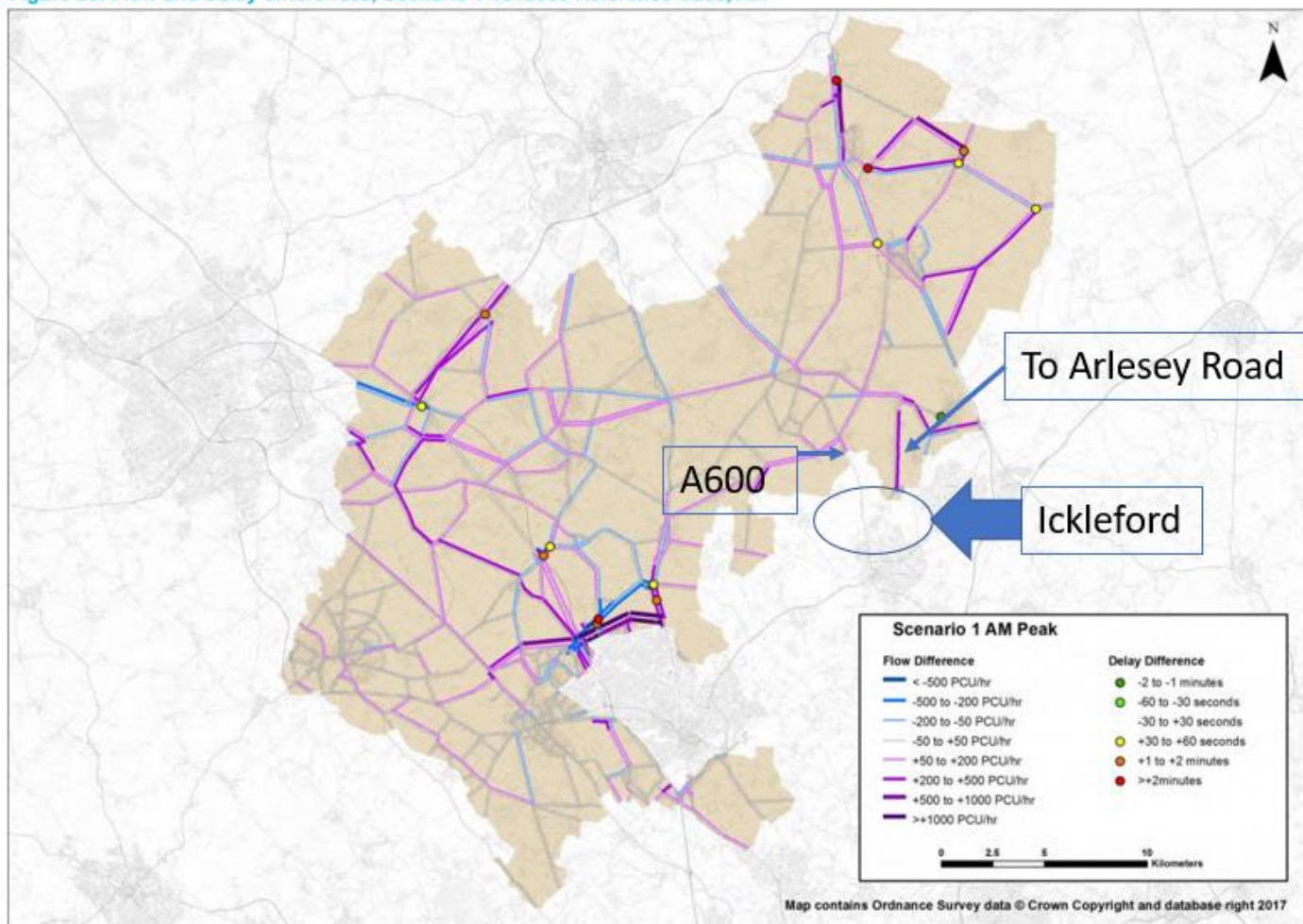
Increased traffic from new developments will funnel through Ickleford, exacerbating existing traffic and pollution issues.

For CBC, figures cited are for the numbers of homes with planning permission granted or where planning decisions are pending. The CBC Local Plan (LP) figures are potential total areas (in hectares) from their draft Local Plan.

For north Letchworth, the figures from the NHDC LP are proposed dwellings in that location.

Appendix IPC5b – CBC transport modelling: impacts on Ickleford road network

Figure 26: Flow and Delay differences, Scenario 1 vs. 2035 Reference Case, AM



Data from Central Bedfordshire Local Plan – Stage 1a Transport Modelling (p54):

https://centralbedfordshire.jdi-consult.net/documents/pdfs_12/cblp_stage_1a_transport_modelling.pdf

Appendix IPC6 – Flaws in the NHDC Transport Strategy (ED14)

The Strategy identifies some of the key issues

‘Car ownership and use in the towns is high, many people live in nearby villages with little alternative to the car, and cycle and bus use is low’ (p5).

‘Hitchin has no bypass and strategic radial routes to the centre, which results in more congestion. There are junctions in all towns which experience delays, but much of the ‘through’ traffic in the area is outside of NHDC control, as growth in travel to/from Central -Bedfordshire, Luton, Stevenage and other locations will continue to affect how the NHDC networks operate, particularly through Hitchin’ (p5).

‘Hitchin does not have a bypass, and congestion is apparent where the key radial routes approach the town, in particular the A602 from Stevenage and the A505 Pirton Road to/from Luton.’ (3.36, p37)

‘Between 2015 and 2021, car traffic growth in North Hertfordshire will increase by 6.7%, with a total of 17% growth predicted between 2015 and 2031’ (3.39, p37)

‘The higher reliance on car use and greater distance travelled in North Herts is due to the large rural nature of the District’ (3.57, p45)

There are many flaws which undermine the Strategy

- One of the principles of the strategy is to ‘reduce carbon emissions and the impacts on air quality management areas’ (p6) – Particulates and NO₂ are increasingly acknowledged as being as least as important as carbon emissions and should be include specifically as a target for reduction. Impacts on air quality should be addressed in all areas, not just the AQMAs.
- Another principle is to ‘reduce the demand for travel by encouraging sustainable travel (on foot, by bicycle, by public transport, or via shared mobility) as an alternative to the private car’ (p6) – One cannot reduce demand by encouraging sustainable travel; one must effect sustainable travel, i.e. people have to take up these modes in lieu of their cars, to achieve this aim. There is little evidence in the Transport Strategy that there will be a behavioural shift away from private vehicle usage.
- Policy 4 (p6) targets better bus services only in the towns. However, the SA and revised SP2 place great weight on bus services in Ickleford when attempting to justify the developments within our village.
- The credibility of the cycling proposals (Policy 3) is undermined by fundamental 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 A505 dual carriageway, which no sane cyclist would use. The shortest, non-dual carriageway route (via Bassingbourn, Morden, Ashwell, Baldock) is 25.1km, requiring a cycling speed of 75.3km/ h or 46.8mph.
- The aim to increase take-up of the bus as an alternative to the car, particularly in rural areas, is wishful. The document rightly points out that Hertfordshire is both a complex and difficult area in which to provide viable and sustainable bus services (2.39, p21), HCC has over the last few years reduced subsidies for bus services, which has affected rural areas in particular (3.13, p29), and the bus may not present a viable alternative to the car and other modes (3.17, p29). In the Hitchin area (Fig 3.5, p30), all bus services are designated in the Strategy as ‘infrequent’. The soundness of the strategy is again undermined by inaccuracy; Fig 3.6 (p31) – titled ‘Walking access (5 min) to bus services in Hitchin’ actually presents a map of Letchworth. Additionally, the ‘5 min to a bus service’ criterion doesn’t obviously reflect those potential bus users with mobility issues – i.e. whose 5-min walking time?

Bus use outside of London is in long-term decline – a 37% decrease in the past 30 years (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485296/annual-bus-statistics-year-ending-march-2015.pdf). Little in the Strategy suggests this will change in North Herts during the lifetime of the Plan.

- Table 3-1 (p23) identifies the expansion in Central Beds (20-30,000 in their Local Plan, plus 23,000 allocated or with planning permission), but then ignores the traffic consequences for Ickleford and Hitchin.
- 3.36 (p37) omits mention of congestion on A600 into Hitchin; Fig 3.10 (p38) correctly identifies this as a route prone to peak time congestion, and it contains ‘congested junctions on a key network’.
- 3.44 (p39) lists locations where motorists use unsuitable roads to avoid delays on congested routes, but fails to mention Ickleford in this category. Herts Highways data from 2010 showed there were 4746 vehicle movements each week day passing in one direction through the centre of the village on Arlesey Road. These data suggest that Ickleford is used as a ‘rat-run’ by thousands of motorists each day, and yet is ignored in the Transport Strategy.
- Table 3-5 (p41) – The Travel to Work data is incorrect (right-hand panel; the actual raw data and correct percentages from the 2011 Census are shown in the left-hand panel):

| Data from 2011 Census Excel file | | | | Table 3.5 NHDC Transport Strategy | |
|--|--------|-------|-------------|-----------------------------------|--|
| All categories: Method of travel to work | 91,510 | | | | |
| Work mainly at or from home | 4,422 | | | | |
| Underground, metro, light rail, tram | 221 | 0.4% | Underground | 0.3% | |
| Train | 7,794 | 12.9% | Train | 6.2% | |
| Bus, minibus or coach | 1,117 | 1.8% | Bus | 7.8% | |
| Taxi | 167 | 0.3% | Taxi | 1.2% | |
| Motorcycle, scooter or moped | 400 | 0.7% | Motorcycle | 0.5% | |
| Driving a car or van | 40,153 | 66.3% | Driving | 59.9% | |
| Passenger in a car or van | 2,809 | 4.6% | Passenger | 8.9% | |
| Bicycle | 1,240 | 2.0% | Cycling | 1.4% | |
| On foot | 6,364 | 10.5% | Walking | 13.8% | |
| Other method of travel to work | 303 | | | | |
| Not in employment | 26,520 | | | | |
| Total of those who travel to work | 60,568 | | | | |

- It is misleading to state that 14% use public transport (3.50, p41), because a significant proportion of those who travel by train will get to the station by car.
- Fig 3.11 (p44) is misleading – much of the Central Beds and Luton to Stevenage and Welwyn commuting routes will go through Hitchin, not bypassing it as the diagram implies. The traffic impact on Hitchin is, therefore, much greater than shown.
- 5.6 (p49) states ‘much of the ‘through’ traffic in the area is outside of NHDC control, as growth in travel to/from Central Bedfordshire, Luton, Stevenage and other locations will continue to affect how the NHDC networks operate, particularly through Hitchin.’ While factually correct, it seeks to absolve NHDC of any responsibility, as it suggests that no remedial actions will be deployed to address the inevitable increases in traffic through Hitchin; North Herts residents will just have to live with the additional congestion from these other areas.
- The Principles 5.13 and Policies 5.14 (p51) are wishful, nebulous and lack substance. For example, encouraging sustainable travel as an alternative to the car does not suggest how this might be achieved. No indication is provided on how to change behaviour to increase cycling and walking.
- 5.40 (p59) states ‘The roads within Hitchin are generally within capacity, probably partly due to the ‘gating’ of traffic on the radial approach roads’. First, Hitchin roads being within capacity is not a description most

residents would recognise. All the key roads (A600, A602 and A505) are heavily congested, especially at peak times, as is recognised earlier in the document: ‘congestion is apparent where the key radial routes approach the town’ (3.36, p37). Second, this is obliquely acknowledged in the use of the benign word ‘gating’, which presumably means that congestion starts long before the town centre, limiting the rate at which traffic arrives at the latter. However, the overall traffic burden in and through Hitchin is high at peak times.

- 5.41 (p59) states ‘About a quarter of commuting trips originating in Hitchin are to destinations within the town’. The only information relating to this which we have been able to identify is from the Herts County Travel Survey, which suggests North Herts (not Hitchin) is the destination for 31% of work travel (whole District data), and that 22% of work trips from North Herts are less than 5 miles.
- 5.45 (p60) states ‘an increase in highway capacity into and through the town [Hitchin] is not recommended’, but Fig 5.4 (p62) and 5.47 (p64) then highlight a possible southern bypass to provide improved connection. The latter is a) contradictory with the former, b) uncosted, and c) does not address congestion from the north on A600 or the east on A505.
- Table 5.2 (p63) is another wish list with no guarantees that any of the proposals will be effective. The ‘Traffic Management’ section is manifestly incorrect:
‘Aim 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.’
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 currently used as a ‘rat run’ between A602 and A505 avoiding Payne’s Park, is already subject to severe congestion, and accesses 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.
- Table 5-6 (p74) is poorly prepared; it should state that the figures are ,000s; the total should be £23.3 million not £23,308. Additionally, it omits very expensive (potential) schemes mentioned elsewhere in the document (e.g. the ‘improved connections’/ bypasses in Hitchin and Baldock, Figs 5.4 (p62) and 5.5 (p66))
- 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 not supported by any evidence, is likely based on the optimistic assumption that all the initiatives in the Strategy will be funded and fully effective, and is contradicted by section 3.39 (p37): ‘in North Hertfordshire, a total of 17% growth in car traffic [is] predicted between 2015 and 2031’.
- The largely speculative nature of the Strategy of the document can be seen by the number of times certain words have been used within the document: Encourage = 43; Aim = 31; Could = 38; May = 54; Potential = 65; Possible = 14.

Conclusions

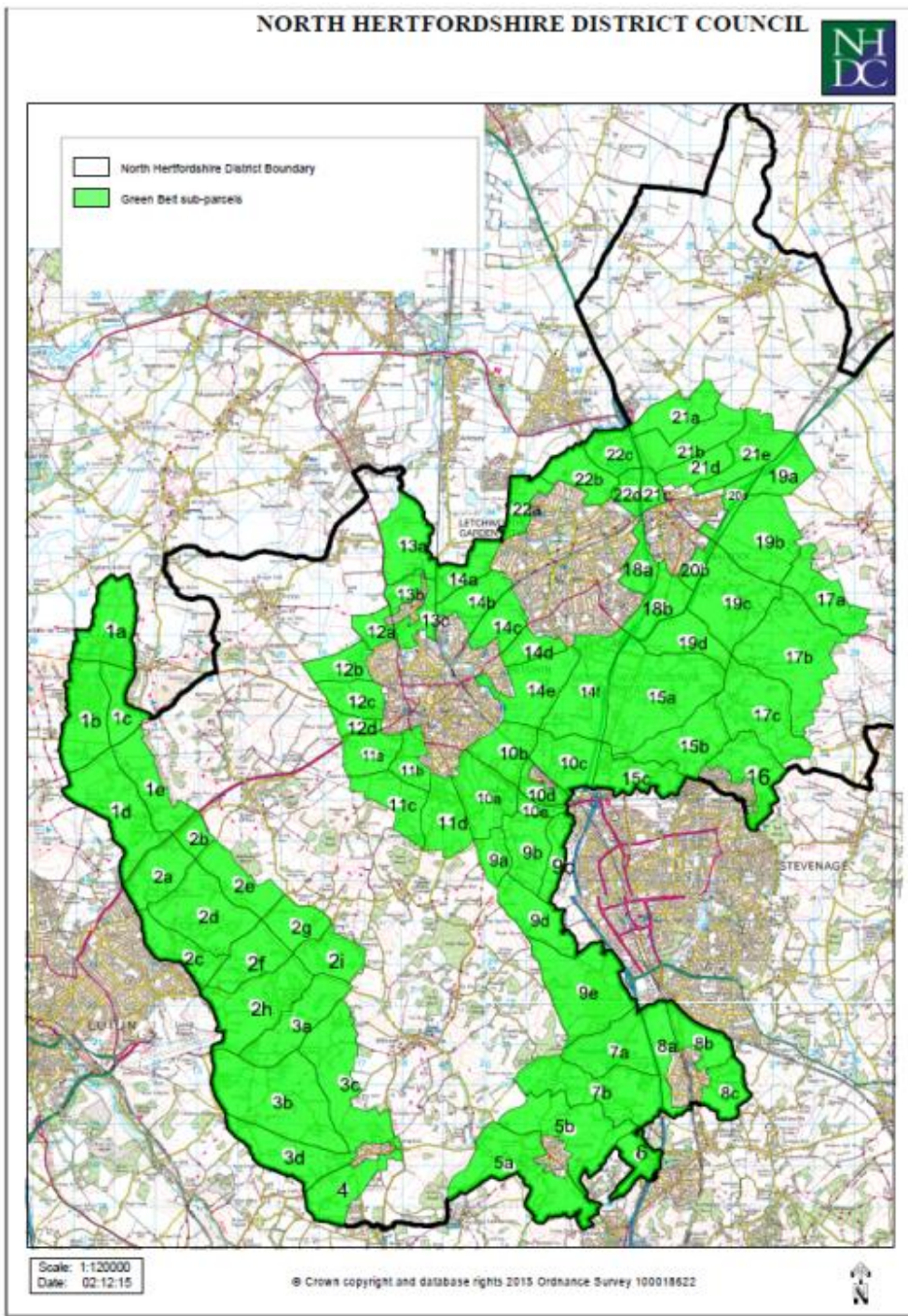
Key mistakes and omissions, and misunderstanding local conditions undermine the credibility of the document. The Strategy is likely to fail to deliver two of its three aims: contribute to vibrant, **attractive** and **sustainable** places; and support people to live safe, **healthy** and fulfilling lives. By itself, it will fail to reduce carbon emissions (although technological changes might assist), and provides no evidence that simply **encouraging** sustainable travel will reduce the demand for travel by private vehicle. Behavioural change is notoriously difficult to achieve, and provision of services and facilities is no guarantee of uptake by the public. In addition to failing to meet its own objectives, the Strategy contravenes elements of the NPPF.

Appendix IPC7 – Flaws in NHDC Green Belt Review (CG1)

The Review takes a reasonable approach to determining the contribution of the designated Green Belt (GB) land in North Herts to the various purposes of GB. However, the way the parcels of land have been divided to allow these assessments is deeply flawed, with unjustified, adverse consequences for Ickleford.

Fig 3.1 on p33 identifies the sub-parcels which are aggregated to form the parcels. ‘Ickleford’ is determined as being parcel 13, and is adjacent to parcel 14 (Willian).

Figure 3.1: Sub-parcels for Review



Ickleford is a large village with a population of 1,833; Willian is a small village with a population of 326, but the size of the Willian parcel is about three times that of Ickleford. Moreover, the Willian parcel has been drawn to encompass all the Green Belt between Hitchin and Letchworth, despite Willian village (situated south of Letchworth) being some distance from much of its parcel. Importantly, sub-Parcels 14a and 14b about the Parish of Ickleford, and are significantly closer to Ickleford (0.51 and 0.49 km respectively; village centre to the sub-parcel's closest boundary) than they are from Willian (3.01 and 2.43km respectively).

This is not an academic issue; this flawed drawing of boundaries is then used to suggest in Table 2.4 (p22) that 'Ickleford' makes only a moderate overall contribution to GB purposes, whereas the contribution of 'Willian' is significant. This evaluation is defective. As indicated above, a strong case can be made for 14a and b being aligned to Ickleford, and reclassified as 13d and e. This reasonable and appropriate adjustment significantly alters the GB assessments for the parcels. For example, the 'new' Ickleford GB parcel includes an arc which separates north Hitchin from west Letchworth, and, de facto, plays an important role in preventing merger of neighbouring towns (see 14a and b, Table 3.1, p51). We contest that the real contribution which the Ickleford GB makes to overall GB purposes is significant, and as such placing 199 new dwellings on such land is detrimental. **In any case, the GB review of the NHDC Local Plan cannot be said to have been prepared with a proportionate evidence base.**

Table 3.1 (p50) evaluates, and Fig 3.6 (p66) shows the overall contribution of the sub-parcels to GB purposes. Two key sub-parcels in and around Ickleford, 12a and 13c, are correctly determined as making a significant overall contribution to the Green Belt, and yet NHDC proposes building IC2 and IC1 respectively on these.

The importance of maintaining the narrow boundary between Ickleford and Hitchin is acknowledged elsewhere by NHDC. On p36 of the SHLAA (HOU9), plot 325 (Ickleford Bury) was considered not suitable:

'Given the relatively narrow gap between Hitchin and Ickleford, the River Oughton provides a clear defensible Green Belt boundary to the southern edge of Ickleford which has not been breached and would be undesirable in policy terms to do so with a residential allocation and site considered unsuitable on these grounds'.

It seems perverse, therefore, for the Local Plan to include IC2 for development as it sits in a very similar 'narrow gap' on the southern edge of Ickleford.

It seems remiss that a village analysis for Ickleford has not been completed in section 4 (p67-97). This is particularly the case when the Local Plan proposes adding 319 dwellings to our village, with 199 on GB land.

Other issues with the Green Belt Review.

Para 30 (p16): 'The Green Belt was sub-divided into 22 parcels for analysis. The boundaries of the parcels are defined by roads, other clearly visible physical features in the landscape and the existing Green Belt boundary. These 22 areas were each assessed against the first four of the five purposes of Green Belt.'

However, the Review does not state specifically on what basis the subdivisions were made. For example, the East Coast Main Line is used to delineate 13 (Ickleford), but cuts through the middle of 10 (Wymondley). Likewise, 'A' Roads are sometimes used as boundaries. For example, A505 separating 11 (Gosmore) and 12 (Oughtonhead), and 1 (Lilley) and 2 (Lilley Bottom), while A602 runs through 10 (Wymondley) and A505 runs through 14 (Willian). These examples can be clearly seen in Fig 2.3 on p15.

In addition to the lack of logic in the definition of the 'Ickleford' and 'Willian' parcels mentioned above, there are other anomalies in the classifications around Hitchin, namely 10 (Wymondley) and 11 (Gosmore). Parcel 10 includes St Ippolyts which has no real connection with Wymondley – being separated by the A602. Conversely, St Ippolyts and Gosmore are in the same parish yet are in different parcels in the GB Review. Sub-parcels 10a and 11d should,

therefore, have been considered, in a single, additional parcel, with the remainder of parcel 11 considered separately as ‘Charlton’. It is apparent that local knowledge has not been brought to bear in this Review.

Para 31 (p16): ‘Within the Green Belt there are a number of settlements. The largest of these are the excluded settlements of Codicote, Ickleford, Kimpton, Knebworth and Little Wymondley. Development within these settlement boundaries may be possible without impacting on Green Belt purposes.’

However, the LP has had to modify the settlement boundaries – i.e. ‘cannibalise’ the Green Belt – to accommodate the developments proposed in the Local Plan.

Para 35 and Table 2.4 (p17-25) set out the assessment of the existing Green Belt by purposes, and provide an overall evaluation of their contribution based on these purposes.

However, the GB Review does not detail how the ‘overall evaluation’ was determined. It is unclear whether this is subjective, or achieved by summing the assessment ‘scores’ (1 = limited; 2 = moderate; 3 = significant) against the first four NPPF GB criteria. This is of major importance, as the overall value which the parcels of GB provide should have been used by NHDC to determine whether developments on those parcels could be justified against GB purposes.

Para 49 (p32): ‘The areas which contribute most to the purposes of Green Belt are those around the periphery of, and between, the existing settlements of Hitchin, Letchworth and Baldock, as well as in the south of the district around Stevenage, Knebworth and Welwyn.’

This is a reasonable conclusion – but NHDC seems to have ignored this in their choice of developments in key settlements around the periphery of, and between, those towns.

Para 51 (p33): ‘In order to help provide a more detailed context for the evaluation of proposed development sites and the Green Belt more generally, a refined assessment of the strategic parcels has been undertaken.’

Para 52 (p33): ‘Each of the 22 parcels of land in the current Green Belt was subdivided into sub-parcels and each sub-parcel (Figure 3.1) assessed in the same way as the original larger parcel and assigned a score depending on the degree to which it met each of the Green Belt purposes. An assessment of the contribution of the sub-parcels to Green Belt purposes was then made (Table 3.1).’

It appears that the GB Review has been a two-stage process: first, divide the North Herts GB into 22 parcels (arbitrarily, as mentioned above) and second, further subdivide those 22 parcels into sub-parcels and re-score those. It would have made more sense to do the latter first, and then use the scores thus generated to define the contributions of the larger parcels.

Moreover, there are numerous anomalies in the classifications within Table 3.1 (p34-61). For example:

- Codicote comprises two sub-parcels, 5a and 5b. Both sub-parcels score 2 (‘moderate contribution’) for ‘check unrestricted sprawl’, but the overall assessment for Codicote in this category is 1 (‘limited contribution’). The same holds true for ‘prevent merging of neighbouring towns’; the two sub-parcels are scored higher than Codicote as a whole. Likewise, both sub-parcels are rated 3 (‘significant contribution’) against ‘safeguard countryside from encroachment’, but the aggregate rating of Codicote in this category is only ‘moderate’. This is clearly flawed, and exemplifies the criticism made above that the sub-parcels should have been assessed first, and this used to determine the overall rating of the parcels of which the sub-parcels are formed.
- Two of the sub-parcels which make up parcel 12 (Oughtonhead) provide a limited contribution to ‘preserve setting and special character of historic towns’; the remaining two provide a moderate contribution. However, parcel 12 as a whole provides a significant contribution to this GB purpose.

- There are questionable determinations of ‘overall evaluation and contribution to Green Belt purposes’. Sub-parcel 11d has an aggregate score of 7 from the four categories, but is determined as providing ‘significant contribution’ overall. Other sub-parcels which also have an aggregate score of 7 (e.g. 13b) are only rated as having a ‘moderate contribution’ overall. Worse, some sub-parcels also only rated as having a ‘moderate contribution’ overall have higher aggregate scores (e.g. 8 for sub-parcels 5a, 5b, 19c, 19d, and 9 for sub-parcel 9c).
- Many of the sub-parcel assessments against individual GB purposes could be challenged. For example, 14f has a moderate contribution to the preservation of the setting of historic towns because it is ‘part of the southern context of Letchworth’. However, 22a and b, which are a similar distance, but to the north of Letchworth, make only a limited contribution to this category even though they could justifiably be determined as being part of the *northern* context of Letchworth. Conversely, the reason given for 22a and b only providing a limited contribution to the preservation of the setting of historic towns is ‘due to landform resulting in limited views of Letchworth to the south.’ However, 14f also has a landform which results in limited views of Letchworth, but, in this case, to the *north*.
22a and b make a moderate contribution to preventing merger of neighbouring towns because they contribute ‘to the separation of Letchworth and Stotfold which is beyond the Green Belt.’ However, 13a and b only make a limited contribution to this aspect of the GB despite contributing to the separation of Hitchin and Henlow/ Stondon which are beyond the Green Belt.
There is abundant evidence of lack of consistency in the ratings used in the GB Review which render it irretrievably flawed.

Para 70 and Table 5.3 (p103-124) set out the assessment of the contribution to Green Belt purposes of all sites within the Green Belt submitted to the Council.

As with the other assessments in the GB Review, it is not clear how the overall assessment of ‘Contribution to Green Belt’ has been determined. Additionally, there are issues with the way this has been conducted. For example:

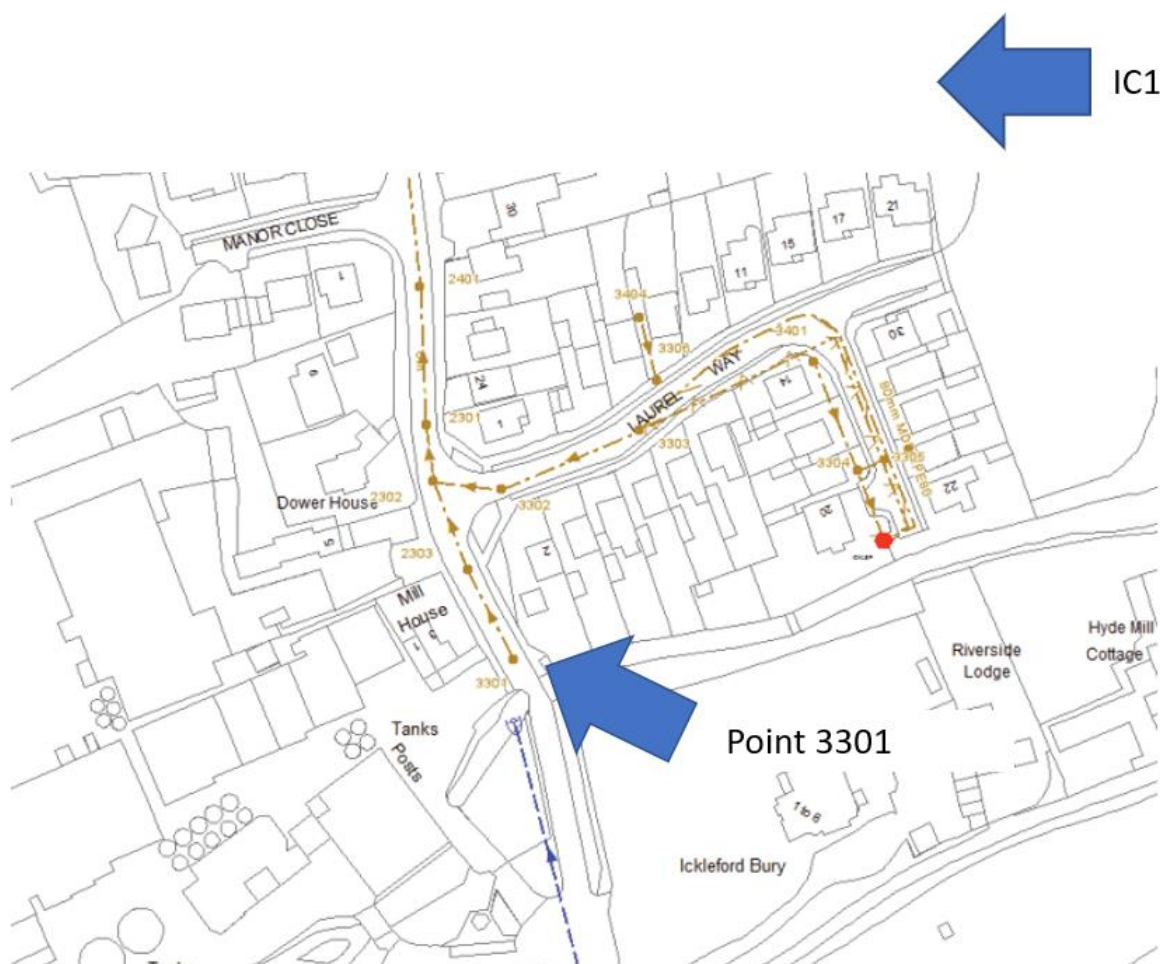
- The site assessment criteria scoring system in table 5.2 (p100-101) makes it impossible to compare the town and village sites. In the ‘Preventing neighbouring towns merging’ category, the maximum score for town sites is 3, but only 2 for village sites. This seems perverse, as many of the villages in North Herts sit between urban developments and, de facto, have a pivotal role in preventing the merger of towns. The villages are disadvantaged by the approach taken
- Accepting the above anomaly, the assessment has not applied this correctly. SHLAA references 54-56 (p115) are in the village of Knebworth, but these sites have been scored as 3 for ‘Preventing neighbouring towns merging’, whereas the maximum score that a village site can achieve according to the Review’s criteria is 2.
- There is a lack of internal consistency within the review which is highlighted in this site assessment. For example, sub-parcel 12a has a significant overall contribution to GB purposes (Figure 3.6), but SHLAA site 40 – which is a major component of sub-parcel 12a – is rated as providing only a moderate overall contribution (p112). One could argue that 12a needs to be considered ‘in the round’ to achieve a rating of ‘significant’, but one is then dependent on the size of arbitrarily-defined sub-parcels – which vary widely. Additionally, one could be in the absurd position, were the whole of 12a to be offered for development in several plots, that each of the latter would only provide a moderate GB contribution, but if 12a were to be developed as a single plot, it would play a significant GB contribution. This is illogical.
- The approach taken, while not wholly unreasonable, throws up spurious results. For example, SHLAA plots 59 and 60 (‘Green Belt Review Site Assessment – Baldock and Letchworth East’, p125 and Table 5.3, p117), adjacent to the Letchworth recycling centre, are felt to make a significant contribution to the GB primarily because they are within 2km of Baldock. The boundary between Letchworth and Baldock in this location is essentially defined only by the A1(M) and, to a lesser extent, the Kings Cross to Cambridge railway line.

Many would assert that development of plot 59 and/ or plot 60 would have only a minor impact on the GB and certainly not, in reality, a significant impact as determined by this assessment.

In conclusion, there are too many mistakes, misinterpretations, inconsistencies and flaws within the Green Belt Review. These make it a weak document on which to base important Local Plan decisions.

Appendix IPC8 – Flooding and sewerage issues in Ickleford

The Anglian Water pre-planning assessment report for the Bowman’s Mill development (document available from Ickleford Parish Council on request; mail@icklefordpc.com) states in Appendix L (page 37) that ‘there is insufficient capacity in this sewer to accommodate your site’ at point 3301 (diagram on p19 in Appendix F). This is the start/end point of the foul sewer on Arlesey Road to which Laurel Way and Duncots Close (IC1) connect. The sewer in this area in the village is therefore operating at maximum capacity according to Anglian Water. Note: Sewerage from IC3 will join the same sewer 250m further north on Arlesey Road.



Diary of flooding incidents in Laurel Way (data from 3 residents):

#8. 27/10/01; 1/2003; 18/4/05; 25/7/10; 4/8/10; 25/8/10; 26/8/10; 7/15; 13/6/16

#4. 7/2/14; 23/4/14; 25/6/14; 17/7/15; 15/8/15; 7/6/16

#7. 2007 – 4 events; 2009 – 2 events; 2010 – 2 events

Appendix IPC9 – Ickleford village centre – the school at the social and historic hub



Images are, clockwise from top left, Ickleford Primary School, Village Hall, Ickleford Stores, St Katharine's Church, and Upper Green.

Appendix IPC10 – Housing numbers in the large villages in North Herts

| Village | Current homes (2011 census) | Completed + Permission (since 2011) | Local Plan | Windfalls | New homes total since 2011 | Total number of homes | % increase | Ickleford ranking (new homes total) | Ickleford ranking (% increase) |
|---|-----------------------------|-------------------------------------|------------|-----------|----------------------------|-----------------------|------------|-------------------------------------|--------------------------------|
| Ashwell | 841 | 62 | 33 | | 95 | 936 | 11% | | |
| Barkway | 329 | 31 | 173 | | 204 | 533 | 62% | | |
| Barley | 287 | 4 | 0 | | 4 | 291 | 1% | | |
| Breachwood Green (King's Walden) | 410 | 1 | 16 | | 17 | 427 | 4% | | |
| Codicote (+ Oaklands) | 1496 | 49 | 315 | | 364 | 1860 | 24% | | |
| Hexton | 52 | 1 | 0 | | 1 | 53 | 2% | | |
| Kimpton | 884 | 32 | 13 | | 45 | 929 | 5% | | |
| Knebworth | 2002 | 65 | 598 | | 663 | 2665 | 33% | | |
| Little Wymondley | 480 | 16 | 300 | | 316 | 796 | 66% | | |
| Offley | 402 | 73 | 0 | | 73 | 475 | 18% | | |
| Pirton | 521 | 94 | 0 | | 94 | 615 | 18% | | |
| Preston | 158 | 17 | 21 | | 38 | 196 | 24% | | |
| Reed | 134 | 12 | 22 | | 34 | 168 | 25% | | |
| Sandon | 214 | 13 | 0 | | 13 | 227 | 6% | | |
| St Ippolyts | 799 | 34 | 52 | | 86 | 885 | 11% | | |
| Therfield | 217 | 10 | 12 | | 22 | 239 | 10% | | |
| Weston | 441 | 7 | 40 | | 47 | 488 | 11% | | |
| Whitwell (+ St Paul's Walden) | 537 | 9 | 41 | | 50 | 587 | 9% | | |
| Ickleford (including LS1) | 844 | 10 | 319 | | 329 | 1173 | 39% | 3 | 3 |
| Ickleford (including LS1 + windfalls) | 844 | 10 | 319 | 90 | 419 | 1263 | 50% | 2 | 3 |
| Ickleford (including LS1 [185] + windfalls)* | 844 | 10 | 384 | 90 | 484 | 1328 | 57% | 2 | 3 |
| Ickleford Parish Council recommendation | 844 | 10 | 170 | 90 | 270 | 1114 | 32% | 4 | 4 |

* The current planning application for LS1 is for 185 dwellings.

The Ickleford Parish Council recommendation includes the lower number (120) cited in the proposed submission. Local Plan.

Cockenhoe and Graveley are not included as their data are affected by Luton and Stevenage developments respectively.

Appendix IPC11 – Ickleford Parish Council proposed Statement of Common Ground with NHDC

Submitted to NHDC on 10/10/17

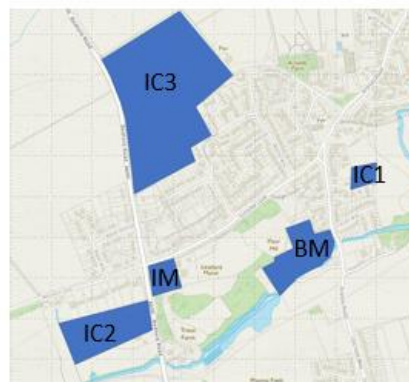
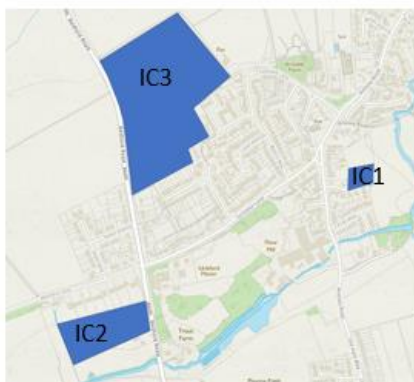
- Ickleford Parish Council accepts the need for additional housing in North Hertfordshire, and that Ickleford should contribute to this.
- NHDC was unaware of the two windfall sites when the allocated sites were first included in the Plan.
- The windfalls could have been included in the Plan had NHDC been so aware.
- Ickleford Parish Council has no objection in principle to the development of the windfall sites.
- The windfall sites' owners were not approached as individuals as part of the 'call for sites'.
- NHDC has no objection in principle to the suggestion that some sites in Ickleford in the Plan, or parts thereof, be excluded in view of the emergence of the windfall sites.

Appendix IPC12 – Ickleford proposed sites in the Plan, proposed sites in the Plan plus windfalls, and Ickleford Parish Council’s proposed compromise

Local Plan



Local Plan + windfalls



Ickleford Parish Council’s proposed compromise



IM = Ickleford Manor site – 19 dwellings, planning permission granted. BM = Bowman’s Mill site – 71 dwellings, planning permission pending. Ickleford Parish Council has not objected to this development.

Appendix IPC13 – Ickleford Primary School; options for retaining in its current location

One proposal within the Local Plan has caused more anxiety amongst Ickleford residents than any single other item – the relocation of Ickleford Primary School from its present position at the heart of the village to site IC3 off the A600. We do not believe this to be necessary even if all four Local Plan sites plus windfalls were to be developed.

1. Ickleford Primary School has 211 pupils on its roll of whom only 99 are from Ickleford (October 2017)
2. The Local Plan proposals plus windfalls would add 419 new dwellings in Ickleford. Using NHDC’s preferred method of calculating pupil yield (25 per hundred dwellings – IDP 6.77, p70), these new homes would add 105 children to the school roll – the new total being within the school capacity.
3. The Hertfordshire primary schools’ admissions criteria give high priority to children for whom a particular school is their nearest – this will be the case for children living in the village with respect to Ickleford Primary School.
4. Therefore, over time, children of the new developments in Ickleford will attain places at our school in preference to children from further afield.
5. Due to the cumulative numbers of new dwellings in the NHDC Local Plan as a whole, new school provision (primary and secondary) will be required in North Herts; this might be better placed elsewhere in the District. This is acknowledged within the Local Plan:
13.139: ‘The cumulative demand arising from the remaining sites within Hitchin will create further demand for additional school places.’
13.140: ‘Land at Bearton Green ... could be used to facilitate expansion of other existing primary schools by providing detached playing fields.’
Although these statements refer to Hitchin, it is appropriate to consider Ickleford Primary School within this context as 75 of our pupils live in Hitchin (October 2017).
6. Hertfordshire Education Authority should look at the best sites for expansion via a review once new housing numbers and locations throughout North Herts are known, as proposed in 13.141 of the Local Plan: ‘Hertfordshire County Council will need to undertake further work to understand the dynamics of school place allocations within Hitchin and to identify the most appropriate location(s) to make any additional primary school provision.’
7. Even if Ickleford is chosen as a site for additional primary school provision after this review, the options for expanding on the site have not been fully explored. The western borders of the school are adjacent to fields onto which it could be extended. Such an approach has been considered for Codicote (6.54 of the Infrastructure Delivery Plan): ‘Additional land to be sought to enable expansion of the current primary school’. Additionally, there are small areas of land at Ickleford Primary School which are currently unused, and these could be deployed to accommodate expansion.
8. Retaining the school in its current location will ensure the historical and social bonds of the village are unbroken, and the school remains core to the heart of Ickleford.

Appendix IPC14 – Impact of IC2 on the River Oughton, Oughtonhead Common and surrounding area

Background information about the area

The River Oughton rises from a series of springs in the chalk aquifer approximately 1km west of Oughtonhead Common.

From where the river appears above ground it forms the northern boundary of Oughtonhead Common, passing the main common and the adjacent Westmill Farm (site of a 17th-century grain mill). It then runs through Burford Ray (a thin strip of woodland), under the Bedford Road, through the Bowman's Mill site, eventually to join the River Hiz in Ickleford, which flows to the River Ivel.

Chalk rivers like the River Oughton are rare in global terms. There are fewer than 200 such rivers in the world, most of them occurring in the South East of England. They host a special type of flora and fauna due to lively flowing alkaline water at an even temperature.

Areas of bare gravel in the river bed provide spawning grounds for young fish and invertebrates, overhanging and fallen trees provide refuges, and vegetated river banks allow shelter for insects, amphibians and small mammals.

Oughtonhead Common is owned and managed by North Herts District Council. It is a designated Local Nature Reserve.

Oughtonhead qualified for this status in recognition of its wildlife value and the dedication of the local community to its continued positive management.

A Local Nature Reserve can be given protection against damaging operations. It has protection against development on and around it. The protection is usually given via the Local Plan and often supplemented by local by-laws.

Oughtonhead Common is one of the premier wetland sites in Hertfordshire. It is the largest base-rich marsh on chalk in Hertfordshire and many of its features are priority habitat types in the Hertfordshire Biodiversity Action Plan.

It is part of the Chilterns Area of Outstanding Natural Beauty, and the area is recorded as a Grade A site by the Herts Biological Records Centre.

Oughtonhead Common is one of the larger fen woodlands in Hertfordshire. It has wet and dry woodland, water margin areas and several spring-fed ditches that are important for certain fen species. It hosts more than 200 different types of plants, many species of birds, butterflies, dragonflies, moths, insects, amphibians and mammals.

Since medieval times the Common has been primarily used for the grazing of livestock, the growing of willow for basket-making, and reed and sedges for thatching.

There continue to be sedge beds and reed beds, and wet grassland which is grazed by Longhorn cattle. These cattle are used as they eat coarse vegetation, and this enables conservation management of the main part of the grassland and increased species of plants.

It is an important habitat for birds and waterfowl including Water Rail, Kingfisher, Woodcock, Reed Bunting, Siskin, Redwing, Fieldfare, Linnet, Corn Bunting, Reed Warbler, Sedge Warbler; mammals including Water Shrew, Harvest Mouse, Water Vole, European Hare; amphibians such as frogs and newts; reptiles including Grass Snake; bony fish such as Bullhead, Trout.

This report has been compiled with information from the Countryside Management Service, North Herts District Council, Herts & Middlesex Wildlife Trust, Herts Environmental Record Centre (part of the Herts & Middlesex Trust), and the Friends of Oughtonhead Common. Visits to the site have included conversations with volunteers, walkers, dog-walkers, and cyclists.

The Country Management Service in partnership with North Herts District Council has issued the current Greenspace Action Plan (2017 – 2022) for the site. It is reviewed annually to ensure it is effective and relevant.

The Plan includes the Local Wildlife Site Survey conducted by the Herts & Middlesex Wildlife Trust in 2016. The survey provides details on the ecological condition of the site and the vegetation.

The possible threat of IC2 to the River Oughton, Oughtonhead Common and surrounding area

The Herts Environmental Record Centre keeps records of all species of flora and fauna within the Oughtonhead Common Local Nature Reserve and also records the flora and fauna in the surrounding area within 500m of the Reserve. *When looking at the development of IC2 we should be aware of the importance of this 500m margin around the site.*

The IC2 (Burford Grange) site would encroach into the 'green corridor' of land between Ickleford and Hitchin.

In the area that would be closest to IC2, at Burford Ray, work is underway for the restoration of the River Oughton downstream of the Mill. The silted river bed is being cleaned up to allow fish to spawn in the clean gravel areas and to provide suitable habitat for all types of animals that live within the river's surroundings. There has already been a large increase in trout and other fish numbers recorded by the Environment Agency in their 2016 survey.

The period of actual construction of site IC2 could have serious effects on this finely balanced, scientifically important area.

The IC2 site could threaten the long-term ecology of the River Oughton and Oughtonhead Common with pollution from surface water drainage, plus air, noise and light pollution from vehicles and human habitation in such close proximity.