

Ickleford Parish Council – Submission to the NHDC Local Plan Examination in Public

Ickleford Parish Council believes that there are significant flaws in the NHDC Local Plan as it relates to our village and its immediate surroundings. This submission builds on the issues raised in our response to the initial consultation, bringing to the Inspector's attention related, additional material which has become evident. Detailed associated data and information can be found in Appendices IPC1 – IPC14; these are referenced in this submission.

Section 1 – Windfall sites (Matters 7.1d, 9.4, 11.30, 11.49)

Two windfall sites (Ickleford Manor, planning permission granted July 2017, Bowman's Mill, planning application submitted October 2017) will provide 90 dwellings. These are both brownfield sites. If they and all four sites in the Plan are accepted, up to 474 dwellings will be added to a village currently with 854. This is not a sustainable pattern of development.

The windfall sites, had they been known as the Local Plan was being drafted, would have been included, likely instead of one or more of the four Ickleford sites. It is our assertion that the windfalls are better options – they will replace industrial/ commercial properties and be more in keeping with the village environment. Importantly, and unlike sites IC1, 2 and 3, they will not encroach further on the Green Belt. In various communications with NHDC over recent months, we have been advised that changes to the Plan – e.g. substituting one or more of the current Ickleford allocation for the windfall sites – should not be done prior to the Examination, but during the Examination process itself. We hope to have the chance to do so.

Contravenes NPPF 79, 80, 84, 157, 158

Section 2 – Flaws in NHDC's 'call for sites' (Matters 7.1d, 11.30, 11.49)

The 'call for sites' was not as comprehensive as it should have been for an exercise of this importance. Despite NHDC acknowledging the existence of their contact database, including landowners, there appears to have been an excessive reliance on landowners responding to adverts in the media. Little attempt appears to have been made to identify 'best' sites – e.g. those near pre-existing infrastructure, or not in the Green Belt. In Ickleford specifically, owners of the brownfield, windfall sites were neither approached by NHDC nor aware of the possibility of submitting their land for consideration in the Plan.

Additionally, a comparison with the approach taken by Central Bedfordshire Council is illuminating. CBC's 'call for sites' yielded 851 sites, while NHDC long-listed only 184 for consideration (HOU9, 4.10). Accepting that CBC covers twice the area and has twice the population of NHDC, these figures show that CBC identified 2.3 times as many sites per capita as did NHDC. Had NHDC been as effective in their 'call for sites' they would have been able to review 425 sites, almost certainly reducing their reliance on development on Green Belt. This raises the question whether exceptional circumstances for reviewing the Green Belt have been proven.

Consequently, we believe that suboptimal sites in Ickleford have been proposed.

Contravenes NPPF 79, 80, 84, 157, 158

Section 3 – Flaws in the Sustainability Appraisal (SA) – including environmental impacts (Matters 9.2, 9.4 11.29, 11.30, 11.48, 11.49)

The SA lists three alleged benefits of the proposed Ickleford sites (Appendix 6, p11/ 17): i) provision of social housing, ii) access to green space, and iii) near a regular bus service.

Provision of social housing – any site providing 11 or more dwellings could provide social housing. Therefore, this is not a robust criterion on which to base selection.

Access to green space – All village plots, and all urban plots on the edge of towns, provide access to green space; such sites comprise the vast majority of those considered by NHDC. Therefore, this is also an invalid filter for site selection. Additionally, there is a fundamental paradox; by building on green space, access thereto is, de facto, reduced for new and current residents where that land was previously open to the public (e.g. IC3).

Near a regular bus service - citing access to buses is, we assume, to imply that the Plan is promoting sustainable transport and therefore in compliance with the NPPF. We would argue that the proximity to a bus service is much less relevant than the likelihood of residents of the new developments using the bus service. The Herts Country Travel Survey 2015 data for North Herts has 2% using buses to get to work (Appendix IPC1). The percentage of residents of the Plan's new developments using buses is likely to be equally small; most (68% - Appendix IPC1) will rely on private vehicles, adding to congestion and pollution.

The alleged benefits of the Ickleford sites are outweighed by the negative effects and uncertainties listed in Appendix 6, p11/ 17.

The SA Appendix 6, 2.7 and 2.12, on which key decisions were based, contains several factual errors and flaws. Details can be found in Appendix IPC2, but in summary:

- Listing IC1 as providing a positive benefit for social housing when it is too small to be required to do so
- Incorrectly assigning a positive impact for reduced car usage
- Sites cited simultaneously as having positive and negative impacts on greenhouse emissions
- Incorrectly suggesting that our local services are at risk
- Incorrectly suggesting that village developments promote sustainable urban living
- Incorrectly stating that our residents predominantly work in Hitchin
- Listing IC2 as being both brownfield and greenfield
- Ignoring the impact on ecological assets, and minimising the effect on agricultural land

It feels that these assessments have been done at a desk, in a distant location, by someone without knowledge of Ickleford, and who was rushed. There are too many errors and inaccuracies in these critical data, which have been used by NHDC to select sites, to indicate anything other than a flawed process.

The SA does correctly list numerous negative effects for each site – however, even where mitigation might be possible, these negative effects outweigh the supposed benefits.

The Plan is neither justified nor sound.

Contravenes NPPF 29, 30, 35, 158, 182.

Section 4 – Flaws in the Infrastructure Delivery Plan (IDP) – including traffic, pollution and environmental impacts (Matters 6.2, 11.28b, c, 11.47b, c, 16, 17)

Current traffic issues through Ickleford are profound. For example, on Monday 16 October 2017 at 08:30, the southbound queue of traffic on the A600 heading through Ickleford to Hitchin started northwards beyond the IC3 site – a distance of 3.3km to Hitchin town centre. Note: there were no exceptional circumstances (e.g. roadworks) which contributed to this congestion. The four Ickleford sites will generate additional vehicle journeys in the village. This will be exacerbated by other developments proposed in the Plan, particularly those in the north of Letchworth.

The impact of Central Bedfordshire developments (those with planning permission) will add 2,331 dwellings in the villages/ towns near to Ickleford. Additionally, CBC published its draft Local Plan in Summer 2017, and its pre-submission Local Plan in January 2018. The latter has yet to be approved by the Council, and will then be subject to consultation. Therefore, in this Submission we cite both the long-list and preferred sites. Even using the more conservative numbers in CBC's pre-submission Plan, it is apparent that the CBC settlements near Ickleford will be subject to further development. For example, Arlesey (approx. 5km north of Ickleford) is listed as one of the four town expansion options, with an additional 2,087 dwellings proposed in the pre-submission Plan. There will be cumulative traffic increases through Ickleford on A600 and/ or Arlesey Road from these new homes. NHDC's Draft Sustainability Assessment (Table 34, p71) acknowledges that the cumulative impact of the CBC Plan has not been determined in the NHDC Plan.

We believe that there is now sufficient, robust data from CBC to provide reasonable estimates of developments near to North Herts. NHDC should, therefore, include the increases in traffic from those developments in its calculations. Appendix IPC3 lists known (outline or full permission granted) and possible further CBC developments (data from CBC and the relevant town and parish councils). Current peak traffic volumes in Ickleford are in Appendix IPC4. Traffic flows from those CBC settlements (and NHDC Plan proposals in north Letchworth) through Ickleford are shown in Appendix IPC5a. Additionally, CBC traffic modelling acknowledges major increases in traffic flows through Ickleford (see Appendix IPC5b) with an additional 500-1000 passenger car unit per hour (pcu/hr) on Arlesey Road and 200-500 pcu/hr on the A600 at peak times – the second and third highest categories of traffic increases respectively.

The consequent rises in traffic through Ickleford will have inevitable impacts on air and noise pollution, affecting the health of residents and our environment.

Additionally, the density of traffic on the general road network in North Herts is high and increasing, as acknowledged in the Draft Sustainability Appraisal (Table 17, p17-18), and many of residents are impacted by the present-day congestion in Hitchin. To users of the Hitchin road network the issue seems obvious: there is insufficient road capacity. These matters are acknowledged in the IDP with reference to the need to deal with existing network issues (5.26, p32) with a theoretical (and expensive) solution in the form of the Hitchin southern by-pass (5.59, p39). The latter does not appear to form part of the infrastructure mitigation for the Plan.

We feel that the IDP seriously underestimates the impact of the Plan on Hitchin traffic. Local Plan developments within a 5km radius of Hitchin will add about 3,600 additional vehicles (2,468 new homes at 1.45 vehicles/ home – based on 2011 Census data), and anyone who experiences Hitchin

congestion will suggest that the proposed schemes (5.107/8, p47-49) will not alleviate the current problems, let alone those which will be exacerbated by the additional traffic. For example, in 5.108 the first scheme is for a signalled controlled system at Woolgrove Road/ Cambridge Road; traffic lights are already in place in this location to no material effect. Two proposed signal controlled junctions (5.108 items 2 and 4) are on the same road 0.25km apart, with a pelican crossing in between; this seems likely to generate gridlock rather than remedy congestion. 5.102 (p46) implies that the modelling to date has been only strategic, and local modelling will be required to review these key problem junctions. Therefore, NHDC has no evidence for effectiveness of any of their schemes, and we believe it is negligent for the IDP to suggest that this only be done when development is forthcoming.

Sustainable transport via rail should play an important role in delivering the Plan. Hitchin's location on the rail network before the branch to either Cambridge or Peterborough, with increased options for trains to London, 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 (5.12, p30). Vehicular access to the station at peak times is already challenging. The station car park is routinely full and cannot be expanded, with parking on nearby roads limited by residents' permits. Therefore, accommodating further passenger numbers from Hitchin will be problematic. None of this is acknowledged in the IDP.

The aspiration (5.103, p46) to effect cultural changes around car ownership is laudable but delivery cannot be guaranteed.

Even if the IDP proposals were comprehensive and to be effective, we have no confidence in their deliverability due, primarily, to lack of funding. 5.105 (p47) mentions the apportionment of costs between parties; with all Councils experiencing on-going fiscal challenges agreement is unlikely. Section 13 (p125-132) acknowledges the difficulty in identifying sources of funding for infrastructure, and indulges in interesting but purely speculative scenarios (e.g. driverless cars and virtual GP surgeries/ classrooms) to minimise costs. NHDC should calculate the CIL/ s106 funds likely to be received via the Plan's current developments, and compare that with all the costs in IDP proposals. The shortfall will be indicative of the likelihood of deliverability of infrastructure and services.

Importantly, none of the above issues has been properly addressed in NHDC's recent Transport Strategy (ED14). We believe the latter to be a flawed document due to errors, omissions and misunderstanding of local factors. It is highly ambitious in its aims, but lacks substance, and fails to provide evidence that it will be successful in achieving its stated objectives (Appendix IPC6).

Contravenes NPPF 29-32, 34-37, 39, 41, 120, 124, 157, 173.

Section 5 – The proposed settlement boundary (Matters 11.32 and 11.50)

We feel there is some circularity in NHDC's approach to this.

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

Section 6 – Development in Green Belt (Matters 5.1f, 7, 11.31, 15)

Ickleford Parish Council is being represented by *Save Our Green Belt* on this matter.

The Green Belt Review (CG1), which will have informed many decisions within the Plan, is a flawed document. Most importantly, the delineation of the Green Belt ‘parcels’ – followed by the scoring of those parcels against the aims of the Green Belt – seriously and unjustifiably disadvantages Ickleford. This, and other criticisms of the Green Belt Review, are summarised in Appendix IPC7 which, we believe, indicates that the Green Belt Review has not been prepared with a proportionate evidence base.

Of further note, IC2 was given only a ‘priority 3’ ranking in the Feb. 2013 Housing Options Paper. The reason for this low ranking was given on p.41 of the Dec. 2012 Strategic Land Availability Assessment as its release for housing would ‘erode the narrow gap between Ickleford and Hitchin’. Were IC2 to be progressed the gap between housing in Ickleford and Hitchin at this location would be reduced to 140m. This exemplifies an obvious lack of consistency in NHDC’s approach to the Green Belt.

We do not believe that exceptional circumstances exist to warrant the allocation of sites IC1, 2 or 3, especially when the brownfield, windfall sites are considered as alternatives. Particularly for IC2 we think the Green Belt function would be undermined by its inclusion.

Contravenes NPPF 17, 79, 80, 84, 87, 88, 158, 182.

Section 7 – Environmental, historic and social impacts (Matters 11.28, 11.30, 11.49, 19, 20)

The scale and locations of the proposed sites in Ickleford will damage the environment, historical legacy and social fabric of our village. The proposed changes contravene NHDC’s own objectives of directing development towards the most sustainable locations (ENV1), and protecting, maintaining and enhancing the historic and natural environment, its network of open spaces and rural landscapes (ENV2).

Issues with surface water flooding are noted in the SA (Appendix 6, p11) for all four Ickleford sites. Moreover, there are endemic issues with flooding and sewerage in parts of Ickleford (see Appendix IPC8); IC1 is one of those locations, and sewerage from IC3 will add to the overburdened pipe system which is a root cause of the issues. The importance of physical infrastructure such as public drainage systems is widely acknowledged (e.g. Royal Town Planning Institute). The NPPF notes the importance of planning for increased flood risk due to climate change, and avoiding development in areas at risk of flooding. Inclusion of IC1 and IC3 in the Plan makes it unsound.

Ickleford Primary School is part of the historic core of the village. Along with the Grade 1 Church with which it is aligned as a Church of England Voluntary Controlled school, the Village Hall and Ickleford Stores, it forms the heart of the village (see Appendix IPC9). The Plan’s heritage assessment for Ickleford (13.156, p169) is flawed in omitting to mention that the school and its flint wall are Grade 2 Listed, and makes no reference to the additional 21 listed buildings in the Conservation Area in which the school sits. Such omissions, making it easier for those without local knowledge to propose relocating the school, indicate unsoundness.

The proposed relocation of the school as part of the Local Plan will rupture important social bonds built up over decades, and disrupt the historic core of the village. This contravenes NHDC’s own policy (ENV2).

Contravenes: NPPF 99, 100, 129, 169. LP4 ENV 1, 2 and 3.

Section 8 – Cumulative effects (Matters 2.2d, 5, 6.2, 11.28b, 11.29, 11.47b, 11.48)

The cumulative effects on our village of all the new housing – windfall and Local Plan – will be immense. Appendix IPC10 shows current and new housing numbers, and compares Ickleford with other large villages in the District. By whichever method of calculation, the numbers we have been apportioned place us near the top of the rankings. The impacts we will sustain include:

- traffic and pollution (see Section 4)
- environmental (see Sections 3, 4)
- social and historic (see Section 7)

NHDC has recently proposed amendments to two key policies, SP2 and SP8; the former places Ickleford and four other settlements into a new, separate category of ‘villages identified for growth’. We believe the implication here is that early in the formulation of the Local Plan, 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 for development in a disproportionate manner to the remaining Category A villages. Such a 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 CBC; in the latter’s draft Local Plan they have identified specific areas for growth, and consulted thereon
- As we have already asserted, the ‘call for sites’ was largely passive, rather than targeted as now implied by NHDC. Certainly, the owners of two obvious, brownfield plots in Ickleford would remember having been directly approached by NHDC to submit their land for consideration
- SP2 would not be subject to this 11th-hour amendment – the ‘super A’ category would have been specifically mentioned in the original document

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 have been raised by the Inspector.

Moreover, NHDC’s new classification in SP2 is fundamentally flawed:

- Example 1 – St Ippolyts 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 (4.13, p2) 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 (4.13) for a village with a range of services, including a station, yet is not a village identified for growth.

These obvious faults suggest a spurious and hasty attempt to justify the unbalanced distribution of housing between the larger villages in North Herts, are a further example of the lack of rigour deployed in creating the Local Plan, and reinforce our assessment that the Plan is unsound.

NHDC has previously recognised the sensitivity of Ickleford by their classification of ours as an ‘excluded village’, with development only permitted if it is compatible with the maintenance and enhancement of village character (Saved Policy 5). Their current recommendations upend their previous assessment without any evidence to justify the about turn, and without input from the community to the decision.

NPPF (158, 182) requires the Plan to be based on proportionate evidence taking account of social and environmental characteristics. By its very nature, an increase in dwellings and, therefore, population of between 50 and 57% (depending on method of calculation – see Appendix IPC10) over a 15-year period must impact the social and environmental character of a village. We do not believe NHDC has properly assessed the cumulative impacts of their proposals for Ickleford in this respect.

Contravenes NPPF 29-32, 120, 124, 158, 182.

Ickleford Parish Council’s request to the Inspector

As requested by the Inspector, we have attempted to reach a Statement of Common Ground with NHDC (see Appendix IPC11). At the time of submission of this representation, we await NHDC’s response.

We request the following options be considered to make the Plan sound.

- Ickleford Parish Council has not objected to the windfall development at Bowman’s Mill (BM), and Ickleford Manor (IM) has already received permission. These brownfield, windfall sites are better options than the four listed in the Local Plan, and should be substituted for IC1, IC2 and part of IC3 (see Appendix IPC12). The latter is divided by Bridleway 15, and the land south of this would provide natural ‘in-fill’ development of approximately 50 dwellings. The proposed Ickleford total would therefore be:

Windfall sites (BM and IM) – 90

IC3 (south) – 50

LS1 – 120 (not 185 as proposed in the current Planning Application)

Completed + planning permission granted since 2011 – 10

Total – 270

This figure of 270 is comparable to the Ickleford total of 319 in the Proposed Submission Local Plan.

Ickleford would still contribute more new dwellings than most large villages, placing us 4th out of 19 for absolute increase in housing numbers and 4th out of 19 by percentage increase (Appendix IPC10).

This will help address Sections 1, 2, 3, 6, 7 and 8 of our submission.

- Remove mention of relocating Ickleford Primary School from the Plan. Appendix IPC13 indicates that this might not be necessary. This will help address Section 7 of our submission.

- NHDC should assess the impact of known (and likely) developments in CBC on traffic and pollution in Ickleford and Hitchin.
This will help address Section 4 of our submission.
- 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 capacity issues.
This will help address Section 4 of our submission.

In conclusion, we believe that the critical flaws detailed in this submission and its Appendices render the Local Plan unsound. We therefore request the Inspector to return it to NHDC for revision to address these issues.

Miles Maxwell,
Chairman, Ickleford Parish Council

4 January 2018