

FAO Simon Berkeley for the Examination of North Hertfordshire District Council's (NHDC) Local Plan 2011-2031 – further MIQ's for hearing in March 2020

Representation/Statement by:
Hayley Ward

Addressing:

- **Matter 23 – the Green Belt Review work and the site selection process**
- **Matter 25 – new land proposed for allocation through the main modifications**
- **Matter 26 – villages 'for growth'**

I do not believe that the Green Belt Review and site selection process has been properly carried out. The review work in 2018 afforded Site WY1 with more significant contribution to the purposes of green belt, and yet NHDC are still including it in the plan and further, now seek to increase the size of the development site.

On Matter 23, you asked: "Should the change in the assessment of these parcels of land lead to their allocation for development in the Local Plan being rejected?"

I believe that Site WY1 (and others) absolutely should be rejected from the Local Plan.

I wonder if NHDC have made you aware of the Wymondley Parish Neighbourhood Plan, and their adoption of this plan? I am assuming they have not, especially regarding the agenda items for the Examination in Public of March 2020, where one item is to consider the proposal to make site WY1 bigger (Matter 25). I am concerned that they haven't told you about this.

The Wymondley Parish Neighbourhood Plan was 'made' by NHDC in September 2019 following a referendum where the overwhelming majority of voters supported it. Despite this, the NHDC Local Plan does not take the Wymondley Parish Neighbourhood Plan into account at all, despite NHDC's own Statement of Public Community Involvement, stating in Paragraph 2.5 "*Once a neighbourhood plan has been successfully prepared it becomes part of the local plan for the District*".

The Wymondley Parish Neighbourhood Plan (adopted by NHDC some 6 months ago) recommends 50 houses or less as appropriate to the sustainable development of the Parish, due to the following issues:

- Site WY1 is in green belt which serves several purposes, including preventing the merging of Stevenage and Hitchin.
- There are issues with flooding in Little Wymondley, which has seen a huge increase in frequency in late 2019 early 2020. Prior to this, the previous flood event was in February 2014. The flooding traps residents of Bladon Close and Priory Lane in their homes, as well as the residents of the Plume of Feathers public house, as the water can be sufficiently deep

to prevent cars leaving the affected roads. As the flooding is caused by water run-off from the fields, I fear that losing the green belt would make flooding even worse, especially as we find ourselves in a state of climate emergency.

- Inadequate road infrastructure and the cumulative effects of developing site WY1 and other sites in the immediate locality, not just by NHDC but also by a neighbouring authority Stevenage Borough Council (SBC).

I believe that green belt also serves a purpose in providing literally “breathing space” between settlements – towns, villages, and cities. At the moment, the main mode of transport in the Parish is the motor vehicle, due to a lack of public transport – there is no train station and the bus service is infrequent. Cycling is an option for some, however the Parish is surrounded by country lanes and dual carriageways/motorways – none of which have cycle paths/lanes and all of which are quite dangerous to cycle along, so it is not considered a viable alternative for everyone, especially as the nearest towns are 2-4 miles away.

Ironically, the A602 was built so that traffic could bypass the parish of Wymondley, and alleviate the chronic congestion along the main roads in and out of the parish, and yet today, NHDC are proposing to reverse the positive effects of this bypass by doubling the number of dwellings in the village of Little Wymondley and thus creating this chronic congestion again – all at a time when NHDC themselves have declared a “climate emergency” and should be seeking to reduce the amount of congestion in their jurisdiction. It may also interest you to know that air quality monitoring carried out by Wymondley Parish Council for 12 months along the A602 (following the DEFRA model and using the same laboratory that NHDC uses for it’s air quality monitoring – Gradko Laboratories) shows that the air pollution levels here breaches the EU safe limits.

And yet, building a number of dwellings that would double the number of dwellings in the existing settlement, and therefore has the potential to double the traffic in the parish, will not reduce carbon emissions. Indeed it will likely increase them by more than double, as the existing road infrastructure is already unable to cope with demand. This increase in local vehicles will lead to traffic queuing for longer periods of time, especially when you take into consideration the neighbouring proposed developments of 800 houses on the other side of the A1(M) roundabout (Stevenage Borough Council) and the adjacent development to that, of a further 900 homes (NHDC). Whilst we know electric vehicles are the future, it would be naive to assume that all cars will be electric in the next 10 years.

If you have ever tried to use the A1(M) Junction roundabout at peak times, you will know that to try to push another 3,000 cars onto this roundabout is absolutely ridiculous.

You may ask what this has to do with green belt – but it is intrinsically linked, as we are at the moment, with NHDC’s and SBC’s plans, set to lose large swathes of countryside/green belt from all around the Parish, which at the moment, contains trees etc., which clean the air. Also, you may not be aware that Network Rail cut down all the trees that bordered the railway line which runs through Wymondley Parish a couple of years ago – they removed ALL vegetation within 6.5 metres of the railway line, which included many, many trees and shrubs which not only cleaned the air but also protected residents to some degree from noise pollution.

You should also note that Wymondley Parish is also on the flight path of Luton airport – Luton Airport Authority is planning to double its capacity from 18 million passengers per year to 32 million – this will also lead to increased traffic along the A602 and A1(M), which will bring further air pollution to Wymondley parish in addition to the increased pollution from the doubling of the flights going over the parish.

The Wymondley Parish Neighbourhood Plan was created based on what residents said was important to them in a survey carried out in July 2015. *The survey results identified the below as the top 5 issues of importance to parishioners:*

1. **92% of respondents want to preserve the Green Belt in its current form.**
2. 72% of respondents are concerned about flooding in Little Wymondley.
3. 70% of respondents are concerned about traffic management.
4. 66% of respondents want to see improvements to IT communications.
5. 58% of respondents want appropriate housing for the community.

The Plan considers the parish's particular characteristics and the policies are designed to contribute to a sustainable quality of life in this rural community, while taking account of the character, heritage, and intrinsic beauty of the surrounding countryside and Green Belt.

Summary of the relevant policies to the MIQs in the Wymondley Parish Neighbourhood Plan:

To protect the natural and historic environment, and retain the rural character and intimate scale of Wymondley Parish any new development planning applications/ proposals should:

- **Comply with Government Green Belt policy and if possible, use brown-field sites;** *(RE: Matter 23 - Site WY1 clearly does not comply with the NPPF 2012, nor have NHDC demonstrated any very special circumstances to release this land from green belt)*
- **Not negatively impact on the openness of the Green Belt and its important contribution to the character of the villages/hamlets;** *(RE: Matter 23 - Site WY1 would very negatively impact the openness of green belt and cannot be compensated for locally. It would also completely alter the character and community of the existing parish)*
- **Be appropriately sited and of an appropriate scale, form and style;** *(RE: Matter 26 - Site WY1 is completely disproportionate in size and scale – it appears it was decided that the village of Little Wymondley – having previously been a protected village in the NHDC 2006 local plan – was declared to be a “category A” village simply because it has a school. That would appear very strange criteria. And to then also declare it a “Growth village” when there is totally inadequate road infrastructure, and no amenities such as a local shop or doctor’s surgery. It would appear NHDC have just labelled it a “village for growth” after you felt it odd that the distribution of development between many villages was so uneven. NHDC appear to have given no thought as to whether or not the village of Little Wymondley is actually suitable for major growth and I don’t believe it is for the reasons given above. Furthermore, even though it was not your intention in suggesting this change of labelling to allow an increase in development for these growth villages than already proposed, as you can clearly see, NHDC have taken this as a green light to push more development in, as they are now proposing to increase the size of WY1).*
- **Avoid visually intrusive locations such as upper ground, visible from the skyline;** *(RE: Matter 23: Site WY1 sits on very high ground above the village and would totally change the look and feel of the village and destroy the openness of the green belt)*

- Consider flood risk: **Proposals resulting in an increase in flood risk will not be supported.** Development within 12m of a watercourse should be supported by a Flood Risk Assessment and adequate information to assess the potential impact of the proposal on flood risk; *(RE: Matter 25 – this is an environmental issue in Little Wymondley that does not seem to have been taken into account at all in NHDC’s local plan and site allocation of WY1 – this is a huge oversight and potentially devastating for families living in the 82 houses on Stevenage Road that the Section 19 report that Hertfordshire Country Council commissioned after the flood event of 2014, stated are at high risk of flooding. The Local Plan is unsound when it seeks to develop land, without thought, consideration and due care, in relation to the detrimental effects of that development on existing dwellings and their occupiers).*
- Where appropriate, **be supported by a Travel Plan assessing the impact on the parish road infrastructure, including any mitigating measures. Development will be refused where the residual cumulative impacts of development are severe;** *(RE: Matter 25 - There doesn’t appear to have been any consideration of the cumulative impacts of all the proposed developments and their impact on flood risk, road infrastructure, congestion, pollution, climate change or air quality at all).*

The Wymondley Parish Neighbourhood Plan was independently examined and found to meet all the legal requirements and found to be sound when tested against the NPPF (2012).

On Matter 23:

Site WY1 is in green belt which serves several purposes, including preventing the merging of Stevenage and Hitchin – NHDC have not demonstrated any exceptional circumstances to justify the removal of this land from green belt, especially as this green belt serves a purpose of preventing urban sprawl, in preventing the towns of Hitchin and Stevenage from coalescence.

At a meeting in November 2013, David Levett of NHDC Planning went to great lengths to explain that North Hertfordshire would not be losing any green belt, as there was a wealth of green space in another area of North Hertfordshire which he would then give green belt protection to instead.

As it was unclear where this area of green space was, it was rather confusing as to how this land could compensate for the loss of strategic green belt which had already been protected and is supposed to be permanent to serve the specific purposes of green belt which site WY1 does serve.

It also begs the question, that if such a large area of non-green belt land really does exist in North Hertfordshire, why that is not being used to build a new town which could be built to be fully sustainable by design and include plenty of green infrastructure, instead of trying to cram thousands of homes into areas already at capacity and where the infrastructure and public services such as hospitals and doctors already cannot cope??

With the loss of green belt and trees, and the increase in standing traffic and more flights going over this area, one will have to assume that the NHS Services will become stretched to breaking point with the increases in respiratory illnesses in the current and future generations of North Hertfordshire.

Sadly, if this flawed plan goes ahead (and it is flawed, when the Councillors voted to take it forward to inspection at their meeting April 2017, they knew there were flaws but their to solution to that

problem was simply stating “the Inspector will sort them out”), I fear that the opening statement of NHDC’s Local Plan, where they state the district is one of the best places to live in the country will become a mere memory – with no green spaces, hideously congested traffic, exceptionally poor air quality and shortened life expectancy:

“North Hertfordshire is one of the best places to live in the country and with that comes a unique set of challenges to keep it that way.

People want to move here to enjoy our lifestyle, those of us who are lucky enough to live here want to stay and our children and grandchildren want to make their homes here too. Couple all that with the fact that people are living longer and the result is a rapidly growing population in the District, which inevitably leads to the need for more homes, more jobs and the infrastructure, shops, schools, medical and leisure facilities to meet that growth.

That growth needs to be managed and controlled in a way that will protect and enhance the area in which we live and keep it one of the best places to live.”

NHDC have recognised the true OAN for the local plan is 14,000 and have stated “*Due to the delays in the examination, and based upon current information, the Council regrets that around 2,000 homes originally intended to be delivered within the Plan period under the trajectory submitted in June 2017 are now unlikely to be brought forward by 2031.*” If NHDC intends to reduce the overall housing units in their Local Plan by 2,000 it makes sense to omit the unsustainable site of WY1 from the Local Plan.

Please consider the above and ensure that the NHDC plan does protect and enhance the area in which we live, as our Wymondley Neighbourhood Parish Plan does, and that NHDC’s ill-thought out plan does not destroy the area and turn it into an urbanised, concrete mess.

I’m sure I echo the concerns of residents across the entire NHDC Local Plan area, not just Wymondley Parish. We know we need more homes, but we do need them to be planned sensibly and sustainably – a new town in the district would be ideal as could be built with all the infrastructure it needs and green infrastructure at that, and could be an example for other local authorities to follow.

Thank you for taking the time to read this.

Best regards,

Hayley Ward