

Hearing Statement on the modifications for the NHDC Local Plan:

On behalf of residents from Stevenage, Great Ashby, Halls Green – Saving North Herts Green Belt and as representative for Herts & Middx Badger Group, Herts Wildlife Monitors and Wildlife Welfare:

In relation to GA2: I have studied the modifications but am unable to find any mention of 'new land proposed' other than including further land around the original proposed access road (currently a play/exercise area) and incorporating a separate road to the northern part of the development which would mean removing a strip of important mixed deciduous woodland. I am aware that during the hearings – future land that had been proposed by Picture SRL as safeguarded was removed.

GA2 biodiversity:

*We can confirm that the ecological report submitted for site GA2 is indeed incomplete and incorrect. In regards to the badger setts at the location of the access road, one is indeed an outlier but the other is a main sett of a minimum of 6 active holes with fresh spoil/bedding and there is the likelihood of further holes underneath all the brambles, currently inaccessible. This was confirmed by a mammal recorder from Bedfordshire and territory latrines have been located between these setts and setts in Nine Acre Spring and the woodland running southeast from Brooches Wood. We have raised the situation with a Hertfordshire ecologist who has advised that Natural England will not give a licence to close a sett unless an artificial sett has been set up accordingly and it has been proven that the badgers are using the new sett. They also need to ensure the welfare of the badgers which means sufficient foraging ground in the localised area. We asked for her comments on the situation and she advised that if we were correct in our findings within GA2 and immediate surrounding area – she felt the only option would be to relocate the access road into GA2. This therefore raises further questions into the site's suitability for development. We have drafted a letter to Natural England, asking that permission is not approved to close the main sett and the reasons behind this as the welfare is of utmost importance. As already pointed out previously, the area north east of Stevenage has a high density of badgers, bats and other species – there has already been a negative impact on badgers when Great Ashby was originally built adjacent to two setts, resulting in numerous rta's and the sett at Hangbois Wood becoming obsolete. The area of GA2 alone boasts 10 setts with a large number of badgers inhabiting the area and a number of these are main and subsidiary/satellite setts – not outliers as Picture SRL's ecologist have reported.

*Picture SRL felt that the site would not cause a problem for protected species of bats within the area but recent studies have shown that roads being implemented in areas of bat flight (even with bat bridges) are showing bats have been driven away and ecologists have raised concerns of the 'worryingly low numbers' of bats seen on flight routes since roads have opened. GA2 is very well known for its numerous bat species due to the landscape and numerous priority habitat hedgerows bats need, so this is likely to have a serious impact on our bat populations that inhabit the area.

*As you are aware, GA2 is particularly unique in the fact it has a number of unique woodlands with interjected with mature hedgerows. A recent study carried out by NFFN has shown the importance of bushier hedgerows in not only facilitating an increase in bio diversity but helping to remove carbon and the NFU has confirmed that enhancing hedgerows can help to remove carbon dioxide. At a time when fighting climate change is so prevalent; each authority should be doing what it can to implement this. The ancient woodland and mature hedgerows would be impacted upon severely due to the pressures during build and after.

*As stated in a large habitat survey carried out on behalf of a number of authorities in Hertfordshire including NHDC; any development must ensure woodlands remain connected and that woodland should 'not' be encompassed on all sides. Evidence has proved that recent developments isolating woodlands have resulted in serious impacts on both the woodlands and biodiversity resulting in a negative impact and further isolation must be avoided. Although it has been suggested that open farmland ecology is of little importance and worth; this same report mentions brown hares suggesting the farmland is therefore of some interest in the area. It's also widely used as foraging for the badgers. In the same report it also states that there would inevitably be a loss of biodiversity

associated with such arable farmland.

*We therefore stand by our previous objections/hearing statements regarding the plan being unsound and unjustified as GA2 contravenes 109, 117 and 118 of Section 11 and as stated in the NPPF; if significant harm can not be avoided ... planning permission should not be given.

GA2 suitability - infrastructure:

As pointed out previously; there is huge opposition from residents in Great Ashby, Stevenage and Halls Green and this has been confirmed by online and manual petitions and a recent survey. This is due to a lack of infrastructure in Ashby and Stevenage; traffic/transport, health services, children's services, lack of jobs; impact on biodiversity; harming the landscape and removal of green belt. Thousands of residents use the proposed area for social and health benefits – if this was to be developed, it would result in an impact on physical and mental health and would consequently see more vehicles on the roads so that residents could access open countryside.

*As stated in SBC's representation in December 2016 regarding GA2 (GA1 & NH1): These are intended to provide 13.2% of all of the housing proposed in the Stevenage HMA within the District. This represents an extra 24% [1,830] on top of all the housing allocations [7,600 homes] made in Stevenage Borough in the SBLP. The two figures combined represent an expansion of 9,430 new homes [or 472dpa] within, and on the edge of, urban Stevenage – an increase in the number of dwellings of approximately 25% over 2011 levels. Given average house-building rates of 284dpa in the Borough over the twenty years to 2014, **it is reasonable to question whether the Stevenage housing market can support this level of house-building. It might reasonably be expected that there would be a scale of investigation and infrastructure provision commensurate with the scale of development being proposed in the NHLP. It is questionable whether that is the case. However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education and retailing] which was not designed to accommodate development in North Hertfordshire District.**

*Stevenage has met its housing need for the period for 7,600 homes and has met its 5 year land supply therefore NHDC do not need to build any homes for Stevenage to meet its housing numbers. It should also be taken into account regarding infrastructure, that Gresley Park with a further 600 homes has also been approved to the east.

*NHDC has suggested as one of their reasons for GA2 to remain in the plan is that cycle paths will contribute to the Stevenage Mobility Scheme but there are very few cycle paths in Great Ashby, some end abruptly making a cyclist join the busy Great Ashby Way and the pavement alongside the main road has now been designated for use by pedestrians and cyclists which is irresponsible and inconsiderate to pedestrians as the paths are of insufficient width. Stevenage does have a network of cycle paths as well as pedestrian paths (paths designated for both are of considerable widths) but the majority of underpasses in Stevenage contain broken glass which has resulted in most cyclists not actually using them. We therefore stand by our view that GA2 would generate considerably more traffic and therefore, further congestion through Great Ashby and Stevenage.

*A further reason for GA2 to remain in the plan even though it provides significant contribution to the green belt is the 'infrastructure provision' land for secondary education. Firstly, Picture SRL questioned the need for secondary education on the site and suggested reducing the ha and building a further 100 homes; it was then raised that any new secondary school provision would not rise until possibly even beyond the end of the current plan. It has also been noted that there was communication from HCC in 2016 questioning why NHDC felt there was no need for a new secondary school. It now materialises that a 'free' school has been approved by the Department of Education in June 2019 to be built by 2023 and sites are being considered including the original Collenswood School site situated in Stevenage so we are wondering why, NHDC are using secondary education land provision as a reason to keep this site within the local plan when they have already questioned it, Picture SRL have questioned it and the new school is likely to be located within Stevenage. This also raises concerns regarding even more traffic going through Great Ashby and Stevenage to get to the new school, particularly bearing in mind – Gresley Park's 600 new homes have already been approved on the eastern side.

GA2 – infrastructure and Green Belt:

*It was also recommended that NHDC had made a mistake when building Great Ashby due to the lack of infrastructure, its location, the lack of parking causing considerable congestion, impact on biodiversity (badgers of Hangbois Wood) and that this 'should not' be repeated. Great Ashby has a considerable number of HMO's which have also resulted in parking problems and access to breakdown vehicles and emergency vehicles. It has been suggested in regards to GA2 that the bridleway could be used as emergency access. This highlights the seriousness of the problem in regards to traffic within Great Ashby.

*NHDC's reasoning for continuing to put GA2 forward even though the land provides a significant contribution in the latest green belt review, is that it is located next to the largest town in North Hertfordshire so that it is a 'sustainable location'. We object to this statement; as we have previously advised; Stevenage's infrastructure is under a huge amount of pressure – the A1M is often at stand still, trains are at their full capacity, unemployment and homeless figures have risen and when you look at Stevenage's housing plans for the last period and current period, it highlights just how many businesses and organisations have relocated or closed down which has enabled a large percentage of SBC's housing numbers; the Vista tower, Six Hills House, Brickdale House, Icon building, Dixons site, Dupont site – all have been refurbished or become new sites such as Chrysalis Park and there has been no extra infrastructure such as new employment areas. The Lister Hospital is at breaking point and patients are often sent to the New QEII in Welwyn, waiting times for doctor's appointments have increased ten fold. Just because Stevenage is the largest town in North Hertfordshire, it does not mean that we have sufficient infrastructure to facilitate the new housing in Stevenage, let alone extra housing put in by EHDC and NHDC.

*We would also like to point out that Stephen McPartland, MP has called in the application NS1 with the Secretary of State due to lack of consideration for our health services, the pressure on our road infrastructure and the complete disregard to the damaging impact on our environment which he believes in our current climate, should be given the utmost consideration and a balance needs to be struck between sustainable development and the adequate protection of our local environment.

GA2 – Green Belt:

*We stand by our previous hearing statements/objections that we felt the plan to be unsound and unjustified in regards to SP5/SP18 and not in line with the NPPF in regards to exceptional circumstances, empowering local people, reflecting visions of local community and a shared vision if GA2 remains within the plan and draw the Inspector's attention back to our maps that we originally submitted showing the loss of Green Belt around Stevenage.

*At a previous hearing it was asked whether the adjacent green belt would be undermined by the site's allocation – we believe it to be undermined as stated in amec's report, the segment E2 boasts significant woodland blocks close to the urban edge and makes an overall significant contribution to the purposes of green belt, in regards to protecting countryside, its openness and checking sprawl. The absence of clear internal boundaries (once development is allowed to pass the other side of the woodland blocks) makes the area problematic and we feel that a devoid of any natural boundaries would result in further green belt being at risk.

*Other reasons they have given for GA2 inclusion is its critical to overall numbers achievable and also represents an opportunity to contribute to housing land supply within five-years of plan adoption – this is purely the need for housing and is not an exceptional circumstance.

*A further reason given is that GA2 would allow for a development that can deliver a coherent new neighbourhood (rather than isolated development) to the north-east of existing tree belts around Great Ashby – we disagree with this statement. GA2 could not be classed as a coherent new neighbourhood; it would be totally isolated to the north-east of the area as can be seen by the attached map, fragmented would be a better description with the only link to Great Ashby being via an access road and a bridleway. The map attached shows how all other developments by SBC, NHDC, EHDC could be classed as coherent neighbourhoods.

*All authorities have to carry out assessments to look at sites on an individual basis so that they can remove sites that have the 'least' impact. Not only does GA2 offer huge health and social benefits to

all the residents in Ashby, Stevenage, Halls Green but is of huge importance in regarding its openness, landscape, woodland value and biodiversity but it does offer a significant contribution to the green belt purposes.

*Many authorities around the country are now trying to protect the green belt that gives this level of contribution and only recently, councillors of Welwyn/Hatfield voted to protect the green belt offering significant contributions to the purposes and have removed all sites from their local plan that could cause high harm to the green belt.

We believe that the reasons given by NHDC to include GA2 within the Local Plan are questionable at the very least and are not sufficient to remove this parcel of land from the green belt and are therefore asking that the Planning Inspector/NHDC remove GA2 from the plan and allow residents to apply for a community asset on the area. We fully support the view of CPRE Hertfordshire, who have asked for small sites that have a harmful effect on the purposes of green belt and that the sites that make a significant contribution be removed from the plan – we request that these sites are reconsidered.

Submitted by N Hamilton

27/02/2020