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NHDC EMERGING LOCAL PLAN
CONSULTATION ON MAIN MODIFICATIONS MIQs
OBJECTIONS AND COMMENTS

I am writing in response to the Planning Inspector's recent MIQ's and would be grateful if you would forward this letter to him.

I am writing both as a long term resident of Codicote village and as a member of the team involved in the generation of the Codicote Neighbourhood Plan. This letter relates not only to issues concerning Codicote, but also to wider concerns across the whole North Hertfordshire District.

Matter 21 The OAN

I do not believe that NHDC have taken a balanced and indeed fair account of the 2016 based population and household projections. Furthermore it is, I understand, still the government's intention to significantly reduce immigration to this country following departure from the EU. This constitutes a meaningful change in the housing situation and, as required by the National Policy Planning Framework NPPF, its impact should be reflected in the NHDC Local Plan.

Matter 23 Green Belt

The Emerging Local Plan (including Main Modifications) does still not explain or identify sound reasons justifying the removal of sites from the Green Belt, and that genuinely meet the "exceptional circumstances" or "very special circumstances" requirement. It is stipulated in NPPF 2012 that housing need alone does not justify removing Green Belt classification.

The impact of the development of the 4 Green Belt sites around Codicote will have a profound effect on the character of the village. An increase in population

of over 30% will exacerbate the existing traffic problems and put further strain on the already stretched village infrastructure. Given the most recent figures produced by the Office for National Statistics, development of the four Green Belt sites around Codicote, as identified in the Emerging Local Plan, cannot be rightly justified.

Development of site CD1 in particular will have a detrimental impact upon the openness of the area by encouraging urban sprawl towards the nearby village of Welwyn.

Development of Site CD5, because of its elevated position, will have significant visual impact west of the village. Justification for the development of this site to satisfy the urgently required school expansion is also misguided, as further school expansion will be completely impossible. The school should be moved in its entirety to Site CD2.

Matter 26 Villages for Growth

I am not aware of any evidence provided by NHDC to justify the reclassification of the village of Codicote, along with Graveley, Ickleford, Knebworth and Little Wymondley as a "Growth Village". This presumably means they have been deemed capable of supporting greater growth than the other villages not so classified. The significant traffic congestion and parking problems in Codicote High Street are already evidence enough that this is simply not the case. Furthermore, the historic and on going issues with sewerage, surface water drainage, and electricity supply must, unless significant infrastructure upgrade is proposed, bring into question whether classification of Codicote as a "growth village" is justified.

I am not aware that the impact of increased traffic congestion on air pollution in the "growth villages" and Codicote and Knebworth in particular, has been scientifically assessed by NHDC. Such an assessment conducted recently by the Codicote Neighbourhood Plan Forum using detectors provided by Gradko Environmental revealed that 7 detectors sited along the length of Codicote High Street recorded levels of NO₂ consistently above 30ug/m³ with a maximum of 35.86 ug/m³. Development of the four sites in Codicote plus the impact of the recently approved Concrete Batching Plant just two miles north of Codicote on the B656, with its proposed annual movement of some 14000 HGV/HDVs, will almost certainly take levels of pollution in Codicote High Street above the EU Air Quality Directive of 40 ug/m³ for NO₂.

Summary

The NHDC Emerging Local Plan does not provide sound or justifiable reasons for the housing numbers proposed.

The NHDC Emerging Local Plan does not provide sound or justifiable reasons for the development of Growth Villages on sites currently classified as Green Belt. These sites should be removed from the Local Plan.

The reasons provided by NHDC for declassifying areas of Green Belt around growth villages do not truly satisfy the "exceptional circumstances" or "very special circumstances" requirement.

The NHDC Emerging Local Plan does not provide sound or justifiable reasons as to why particular villages can be classified as "suitable for growth"

Given that NHDC has now declared a "Climate Emergency" the Local Plan should be reassessed in the light of its impact on the environment, including the value and benefit of the Green Belt to the well being of the community.

Yours sincerely



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