

Ickleford Parish Council – Submission to the NHDC Local Plan Examination in Public (Air Quality)

Ickleford is already profoundly affected by high levels of through traffic and the resultant impact on air quality in our village.

Hertfordshire Highways conducted traffic surveys in Ickleford in October 2010 (data available on request from mail@icklefordpc.com). These showed the following:

- Bedford Road (south direction)
Mean weekday vehicle volume (24h period) – 6,343
Mean weekday vehicle volume (08:00-09:00) – 803
- Arlesey Road (southwest direction)
Mean weekday vehicle volume (24h period) – 4,746
Mean weekday vehicle volume (08:00-09:00) – 629

A further traffic survey was conducted on behalf of the proposed Bowman's Mill development on Tuesday 21 February 2017 (data shown in Appendix IPC4a of Ickleford Parish Council's submission to Matter 11). These showed the following:

- Bedford Road (south direction)
Vehicle volume (08:00-09:00) – 892
- Arlesey Road (southwest direction)
Vehicle volume (08:00-09:00) – 698

Therefore, between October 2010 and February 2017 there was an 11% increase in traffic on both Bedford Road and Arlesey Road between 08:00 and 09:00 on weekdays. It is reasonable to assume that this 11% increase in vehicle volume during the one-hour time slot during which the February 2017 survey was conducted is representative of a general rise in traffic through Ickleford. Therefore, we predict that, as of February 2017, the total weekday mean vehicle volumes **in one direction only** on two of the key thoroughfares in the village were:

- Bedford Road (south direction) – 7,041
- Arlesey Road (southwest direction) – 5,268

Bedford Road is an 'A' road (A600); over 14,000 vehicles travelling on it during each weekday is, perhaps, not surprising, and it affects relatively few residents (albeit, for those who live on Bedford Road, the impact is high). However, Arlesey Road is a narrow road which traverses the centre of the village passing the school, the Village Hall, the Church and the local store. There are many houses on Arlesey Road itself, with some fronting the road directly, and others with only small front gardens. Additionally, many of the village's side-streets 'give' on to Arlesey Road. Thus, the majority of Ickleford will be impacted by the more-than **10,500 vehicles using Arlesey Road, through the heart of Ickleford, every week day.**

It is perhaps not surprising, therefore, that the centre of Ickleford has been identified as prone to air-quality issues. The DEFRA website on UK ambient air quality (<https://uk-air.defra.gov.uk/data/gis-mapping>) shows the most recent NO₂ and NO_x data; Ickleford is a clear 'hot spot' for both of these pollutants, with mean average values of 20-30 µg/ m³ and 40-60 µg/ m³ respectively – the highest in the area.

NHDC appears manifestly unaware of any of these traffic and air quality issues in Ickleford. They have placed nine documents relating to this Matter on to the Examination Documents website (ED62-70); **Ickleford is not mentioned once in any of them.** In addition to showing negligence on the

part of NHDC, we believe this to be further evidence that the Local Plan has not been created using a proportionate evidence base of the environmental characteristics of the District. Moreover, and rather obviously, as NHDC is unaware of the existing issues of air quality in Ickleford, nothing is proposed in the Local Plan which might mitigate against these problems.

Our current predicament with air quality, likely largely due to the volume of traffic through the village, will be exacerbated by the addition of housing (and, therefore, cars) in Ickleford and some other parts of the District associated with the NHDC Local Plan (particularly the Strategic Housing Site LG1 in north Letchworth for an estimated 900 dwellings). The Transport Strategy (ED14, section 3.39, p37) tries to address the likely impacts on traffic: ‘in North Hertfordshire, a total of 17% growth in car traffic [is] predicted between 2015 and 2031’. This rate of growth – marginally over 1% per annum (non-compound) – is less than the 1.7% per annum average real increase in traffic which we have detailed above. Thus, NHDC’s projection of car traffic growth is likely to be an underestimate.

In addition to the existing problems we face, and the additional burden associated with the NHDC Local Plan, Ickleford will be profoundly adversely affected by growth in Central Bedfordshire (CBC). Full details of the new homes arising in CBC can be found in Appendix IPC3 of Ickleford Parish Council’s submission to Matter 11.

NHDC has tried to absolve itself completely of responsibility to consider the further increases in road traffic through Ickleford associated with CBC developments. For example, section 5.6 (p49) of the Transport Strategy (ED14) 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.’ However, no remedial actions will be deployed to address the inevitable increases in traffic through Ickleford (or Hitchin); our residents will just have to live with the additional congestion and associated air pollution from these other areas.

Specifically, NHDC will have been fully aware that CBC has granted permission for 1,100 homes in Arlesey, approx. 5km north of Ickleford. In addition, NHDC will have known that CBC has identified Arlesey as an area for expansion in both their draft and pre-submission Local Plans. The latter confirms this, with a further 2,087 homes proposed for Arlesey. Thus, this settlement adjacent to Ickleford could increase by 3,200 over the coming years, adding a further 4,600 vehicles to the road network. It is, of course, impossible to know how many additional car journeys through Ickleford will be generated by the expansion of Arlesey. However, any of those residents wanting to travel to Hitchin, Luton or the M1 southbound are practically obliged to go via Ickleford. Moreover, the same is true for many travelling to Stevenage or Welwyn Garden City, especially if they wish to avoid the peak-times congestion on the A1(M).

Additionally, the CBC Local Plan proposes 601 dwellings around the RAF Henlow site and 277 in Stondon – other settlements immediately north of Ickleford. Some of the additional traffic arising from these – and the 750 homes in Stondon with planning permission granted or pending – will come through Ickleford on the A600.

There are many aspects to the Local Plan concept of ‘duty to cooperate’ between neighbouring authorities, and the memoranda of understanding associated with this. It is inconceivable that NHDC were unaware of the housing developments in the towns and villages of CBC which border our District. However, it is abundantly clear that NHDC has done very little, if anything, to factor the inevitable consequences of CBC’s proposals on residents of North Herts in the formulation of the NHDC Local Plan.

Government supplementary guidance on the role of local plans with respect to air quality is clear (<https://www.gov.uk/guidance/air-quality--3#what-is-the-role-of-local-plans-with-regard-to-air-quality>): the plan should consider the ‘potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments.’ This Local Plan does not do so for Ickleford. The NPPF (paras 120 and 124) requires the cumulative effects of developments on pollution and air quality to be considered; it appears that NHDC has singularly failed to do so. We believe these facts, and the lack of proportionate evidence base, render the NHDC Local Plan unsound in respect of air quality in Ickleford.

Contravenes NPPF 120, 124, 158