

Representation to Planning Inspector

26th March 2018

Introduction

The Local Plan proposes to increase the population of Baldock by more than 80%. This will place an unsupportable burden on the transport infrastructure of a small and very old town, and I'm going to talk briefly about that. It will also do irreparable damage to some beautiful countryside that is supposed to be protected by the Green Belt, so I want to talk about that as well.

Transport

In my presentation to the last Baldock hearing, I spoke about the serious traffic problems that already exist at the "Baldock Bottleneck", which extends from the railway bridge over Station Road to the traffic lights. I want to start this time by talking about how these same problems will be compounded by the development of Sites BA2, BA3, BA4 and BA10.

The Baldock Link Road Testing document that was produced by Aecom for NHDC confirms that the problem junction near the station "*performs slightly better*" as a result of adding the two link roads, but this slight improvement comes at a very heavy price:

"The models show large increases in trips along Clothall Road and Station Road as well as large flows on the new link roads"¹.

Based on the current situation in Station Road, a "*large increase*" in traffic is likely to create a large increase in traffic congestion and dangerous air pollution in the Baldock bottleneck. Furthermore, the "*large flows*" shown by the models on the new link roads could create new air pollution problems in parts of Baldock that they wish to develop.

For obvious reasons, NHDC have stated² that it is essential for Heavy Goods Vehicles travelling to and from the employment area on Site BA10 to use the A505 rather than going through Baldock. This should be possible to achieve for traffic arriving from the South and East, but how can they possibly do it for traffic arriving from the North and West? This traffic will take the new Northern Link Road because it is roughly half the distance of the alternative route via the A1 and the Baldock bypass. Unless some way can be found to prevent this from happening, the Northern Link Road will become a classic "rat run" that will attract traffic away from the A1 and the Baldock bypass.

HCC's "New Neighbourhoods for Baldock" public consultation on 6-7 October 2017 had an artist's impression of the link roads as tree-lined residential streets where pedestrians have priority over cars³. This attractive vision is completely incompatible with a link road that provides a short cut between two extremely busy, dual carriageway A roads. It will make a mockery of the council's stated wish to keep traffic for the employment area on the A505. Building new roads that migrate heavy traffic off the trunk network into residential areas is exactly the WRONG thing to be doing.

¹ Author's underlining.

² "About the Local Plan", NHDC, July 2016.

³ Baldock-consultation-boards-6-7-oct-2017.pdf



The construction of 3,436 new houses in Baldock will generate a huge amount of construction traffic. It is reasonable to assume that a high proportion of this traffic will have to pass through the town centre, thereby exacerbating already-serious congestion and air pollution problems. Furthermore, many of these heavy vehicles will end up at the massively-congested traffic light junction in the Baldock bottleneck. The prospect of even more large lorries idling at the traffic lights is genuinely frightening, and this is not a temporary problem – they will still be building BA1 in 2031. Not surprisingly, the planners do not seem keen to address these issues. Instead, they try to wish them away with a combination of carefully-chosen words, wishful thinking and pretty pictures.

Planning should be about enabling the town to expand in a sustainable way, but adding approximately 4,300 extra cars into a small town that is already congested will simply lead to gridlock and will further exacerbate the existing air pollution problem. Objective 2(c) of the Sustainability Appraisal Framework includes the sub-objective: “*avoid exacerbating local traffic congestion*”, but it appears that this requirement has simply been ignored.

As I stated earlier, the Local Plan wants Baldock to grow by over 80%. Clearly, such a massive rate of growth cannot be accommodated by employment opportunities within the town, so residents of these new developments will have to travel further afield to find employment. The distances involved mean that cycling or walking will not be an option for most people, so the choice seems to be between driving, taking the bus or taking the train.

As already discussed, driving through Baldock is extremely challenging in the rush hour if your route takes you through the Baldock bottleneck (as most routes do). Drivers who try to avoid this by getting on the A1 at either Junction 9 or Junction 10 will find that the A1 Southbound is virtually at a standstill by 7:30am. Since busses use the same roads as cars, and very few roads have room for a bus lane, the bus will be an equally bad choice.

This suggests that many of the new residents of Baldock will have to travel to work by train. Unfortunately, the position of the station in the middle of the Baldock bottleneck, and the chronic lack of suitable parking near the station, will mean that taking the train during the rush hour will simply not be a viable option for many people. However, the planners are keen on walking to the station, so what will be in store for those people who are able and willing to get there on foot?

Page 9 of HCC’s Transport Assessment states that

“Changes to the timetable and new trains operating on the line which will be implemented from May 2018 by Govia Thameslink Railway will significantly improve the frequency of

services from Baldock to London and also represent a step change in overall capacity on the line.”

The East Coast Main Line is one of the busiest lines on the British rail network. The line drops down from four tracks to two at Welwyn North as a result of the Digswell Viaduct and the Welwyn tunnels (known collectively as the “Welwyn Viaduct”), and this is now the most serious bottleneck on the whole East Coast Main Line. As a result of this bottleneck, there is insufficient capacity available to satisfy all the requirements of the passenger and freight operators that use the line. Amazingly, Network Rail’s methodology for planning the capacity of the East Coast Main Line between London and Edinburgh is based on optimising the capacity available on the Welwyn Viaduct and then making trade-offs between High-Speed Long Distance services and Govia Thameslink services.

Since the timetable is already designed to use the Welwyn Viaduct as efficiently as possible, the only way that new capacity can be found from Baldock to London is by taking it from somewhere else. In their 2018 timetable consultation, Govia Thameslink tried to do this by removing semi-fast off-peak services from Baldock in order to free-up capacity for services to other places further up the line with even more pressing needs.

The Transport Assessment simply ignores this problem (or is possibly unaware of it), so its bland assurances about additional services from Baldock and *“a step change in overall capacity on the line”* are almost certainly wrong. In reality, an increase in the population of Baldock will lead directly to an increase in the overcrowding on existing trains.

Paragraph 31 of the National Planning Policy Framework (NPPF) states that:

“Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development”.

Sadly, we are already suffering from chronic capacity restrictions on both the East Coast Main Line and also on the 2-lane section of the A1. To the best of my knowledge, the engineering challenges of both are such that there is no prospect of any new capacity being created in the foreseeable future, so Baldock residents will have to choose between standing in crowded trains or queuing in long traffic jams. It is impossible to deny that these developments will significantly degrade the quality of life in Baldock. The signs of trouble are all around us, but the council seems unwilling to face up to the consequences of what they are proposing.

Green Belt

It is interesting to consider why so much of the housing proposed in the Local Plan has been allocated to sites in the Green Belt. In the case of Baldock, I understand that sites BA1, BA2, BA3, and BA4 are all in the Green Belt, and all of them belong to Hertfordshire County Council. At the council meeting on 20th July 2016, Cllr Leavitt stated that the new development had to be on HCC land because no other land was made available. However, we were subsequently told by a farmer during a meeting of the Baldock, Bygrave and Clothall Planning Group that no farmers were ever asked!

At the Hearing on 6th February, Cllr McNally proposed a better alternative to BA1, and confirmed that the owners of the land were prepared to work with NHDC to develop the site sympathetically. The fact that this option was not considered suggests that the normal planning process was bypassed for reasons of political expediency. HCC owned land that they were keen to develop, so

the planners were encouraged to focus on these sites rather than looking for more suitable land that might be available. This unusual approach to planning helps to explain why sites such as BA1 have so many problems.

Question 10.4 from the Planning Inspector attempts to establish whether there are any “exceptional circumstances” that could justify development on the Green Belt. The response from HCC (Property) to Sections a - f of Question 10.4 was *"We leave this for NHDC to answer"* or words to that effect. Interestingly, their response to Section g was slightly more forthcoming, and included the following statement:

"The planning application for development at BA2 to the southeast of Baldock shows development is proposed beyond the Green Belt boundary as it is currently proposed in the Local Plan, into the adjoining field".

This may read like gobbledygook, but it means that HCC want to develop even more Green Belt land than was proposed in the Local Plan. They justify this further encroachment into the Green Belt by saying:

"We consider a Green Belt boundary drawn further south-east excluding this field from the Green Belt would be more appropriate, as it would utilise the strong and permanent boundary features of the A505 dual carriageway and a public right of way" ... "which would be more effective in meeting the requirements for new Green Belt boundaries."

This raises at least two questions in my mind:

1. If a railway line on an embankment is not a sufficiently defensible boundary to prevent the planners from encroaching massively into the Green Belt to the north of Baldock, why should we believe that a dual carriageway and a public right of way will provide any better defence to the south-east?
2. The Local Plan is already claiming that it will create an *"appropriate, defensible Green Belt boundary along the south-western perimeter of the site"*, but HCC's planning application is trying to push that boundary back even further.

According to HCC's Horizons magazine,

"this year will see the launch of our new property company Herts Living Ltd". "Herts Living Ltd will partner with a property developer, creating a joint venture company to build 6,000 homes over the next 15 years."

The article goes on to point out that the profits from this venture (or, more correctly, the share of the profits that do not go to HCC's joint venture partner) will be invested into services and infrastructure improvements to benefit Hertfordshire residents. That is a good thing, but it should not blind us to the fact that HCC's pursuit of profit is every bit as relentless as that of the property developer that they will be partnering with. Clearly, HCC's sense of social responsibility does not extend as far as protecting the Green Belt.

NHDC have claimed that they have no alternative to developing Green Belt land, yet there are sites in the Baldock that are not in the Green Belt but have been rejected or placed on the reserve list. I'm not aware of the reasons for rejection, but it was stated at a public meeting on 12th July 2016 that some sites in Baldock were rejected because of air quality issues. Since air quality issues typically occur in town centres and near major roads, it is reasonable to assume that these sites are not in the Green Belt. This raises some interesting questions about site selection, because no monitoring at all

has been carried out in Baldock to measure particulates, which are one of the most dangerous components of air pollution. Fine particulate matter can travel deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases. Long-term exposure to particulates has been linked to cancer.

Whilst some monitoring of Nitrogen Dioxide has been carried out in Baldock, and levels of Nitrogen Dioxide in excess of the Air Quality Objective of 40mg/m³ have been found in several locations, no monitoring has taken place in Station Road which is likely to be one of the most seriously polluted locations in the town. Based on NHDC's very superficial approach to air quality monitoring, it is hard to explain how a sufficiently-convincing body of evidence was assembled to cause these sites to be rejected, while the mass of evidence against Green Belt sites goes largely unheeded. Perhaps it has something to do with site ownership.

The council have also tried to use a scoring system to downplay the value of the Green Belt land that they want to build on. For example, Sites BA2 to BA4 all scored as Significant under the "Safeguarding Countryside from Encroachment" criterion, while BA3 and BA4 were also rated as Significant in terms of "Checking Unrestricted Sprawl of Large Built-Up Areas", yet all three sites were declared to be making no more than a Moderate overall contribution to the purposes of the Green Belt. As the CPRE pointed out last time in relation to BA1, this methodology is flawed – if a site is Significant for any of the Green Belt purposes, then it is Significant. If we used the council's methodology, then the importance of Stonehenge would be downgraded to Moderate because it does not include any Tudor or Victorian remains. For the avoidance of doubt, sites BA1 – BA4 all make Significant contributions to the Green Belt.

It was stated at the meeting of North Herts District Council on 27th November 2014 that the council has no option but to develop on the Green Belt because they are required to meet housing targets set by the government. The same argument was used more recently in NHDC's response to Question 10.4 from the Planning Inspector, which stated that:

"Exceptional circumstances exist to warrant the allocation of land for housing in the Green Belt at BA1, BA2, BA3 and BA4. The sites provide the only reasonable alternatives for the expansion of Baldock beyond its current limits."

However, the ministerial guidance on development in the Green Belt, published on 6th October 2014, makes it very clear that councils are NOT required to build on the Green Belt just so that they can meet housing targets. Subsequent ministerial statements that I have been able to find have reinforced this interpretation of the NPPF. As the CPRE's submission to the Planning Inspector states:

"Government policy is not so detailed or forthright now, but ministers have repeatedly stated that the Green Belt policy is effectively unchanged, and that in the local plan context 'exceptional circumstances' must exist for land to be taken out of the Green Belt. North Hertfordshire District Council has failed to demonstrate such circumstances."

So far, NHDC have not explained why clear government guidelines do not apply to them. Whilst councillors keep saying that they are being forced to develop on the Green Belt, it seems to me that they are specifically PREVENTED from doing this.

At the council meeting on 27th November 2014, the council also claimed that they can get around the Green Belt problem by removing the Green Belt designation from land where they want to build and applying it instead to land in other places where they do not want to build. This is clearly not a reasonable interpretation of the rules; if it was, then the Green Belt would become completely

pointless because it could simply be shifted whenever it gets in the way of development. Maps of the Green Belt in the area indicate very clearly that it was specifically intended to protect the countryside around Baldock and the other local towns – not somewhere else.

It is therefore clear that NHDC and HCC are doing everything in their power to bend the rules. And this isn't just a minor infringement – they are proposing to drive a coach and horses through current planning policy. One of the reasons for the original creation of the Green Belt was to encourage brownfield infill within existing town boundaries rather than urban sprawl across open countryside. If this massive incursion into the Green Belt is allowed to stand, then it will be quoted by every subsequent developer who is more interested in profits than in the local environment.

Paragraph 79 of the National Planning Policy Framework states that

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

In spite of this, a large proportion of the development proposed in the Local Plan is on Green Belt land, suggesting that the Green Belt in North Hertfordshire is not permanent at all. It may be a fundamental government aim *“to prevent urban sprawl by keeping land permanently open”*, but it is clearly not an aim shared by NHDC. How can we have any faith in a planning system that allows councils to ignore long-established environmental protections as soon as they become inconvenient?

Wildlife

Turning now to wildlife, Paragraph 4.18256 of NHDC's response to the Planning Inspector's questions says:

“The site [BA1] and surrounding area has been specifically identified as (potentially) hosting a variety of habitats and species protected by legislation. This includes the corn bunting. Appropriate measures will be required as part of any application. This may range from the localised retention of habitats on-site to biodiversity offsetting.”

Now, “biodiversity offsetting” is not a phrase that I'm familiar with, but it apparently means providing similar habitats somewhere else. How on earth are the corn buntings going to be persuaded to move, and why are corn buntings still an endangered species if they can be managed as easily as that? The answer, of course, is that corn bunting habitats are rare and precious, and they cannot be easily manufactured by council planners. So what will be done if the corn buntings decide to leave the area altogether? I imagine that the council will put out a carefully-worded statement regretting the loss of this endangered species – and then carry on spreading the concrete.

And it's not just the corn bunting that is threatened. Of the RSPB's top ten farmland birds in decline, eight have been spotted in this area. In addition to the corn bunting, grey partridges, skylarks, lapwings, yellow wagtails, linnets, yellowhammers and reed buntings will all require relocating – or *“biodiversity offsetting”* if you prefer. Turtle doves are often seen in Bygrave and the tree sparrow is making a comeback. All of these farmland birds have shown significant, long term decline – grey partridges are down by 56% in the last 17 years, skylarks by 24% and corn bunting by 39%. The loss of Green Belt will have consequences that go much deeper than the loss of attractive countryside.

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