

North Hertfordshire District Council Local Plan 2011 – 2031

Regulation 18 Statement of Consultation

September 2016

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1. Introduction

This document sets out how North Hertfordshire District Council has undertaken consultation in preparing its Local Plan, gives a summary of the main issues raised and how the Local Plan Proposed Submission version has been prepared in light of those representations. The key stages in preparing the Proposed Submission Draft of the Local Plan are set out below: Housing Growth Targets and Locations – February 2013; Housing Additional Location Options – July 2013; and Local Plan Preferred Options – December 2014.

This consultation statement provides an overview of:
Who was invited to make representations;
How those people and organisations were invited to do so;
A summary of the main issues raised by the representations; and
How these have been addressed in the Local Plan.

This consultation statement complies with the Town and Country Planning (Local Planning)(England) Regulations and North Hertfordshire's Statement of Community Involvement (SCI). The SCI sets out how the District Council undertakes public consultation using a variety of consultation methods to ensure that the community is effectively engaged with the plan making process. At the time of the consultations listed above, the SCI in effect was the 2012 version. The SCI was reviewed in 2015 to bring it up to date and set out clearly the Council's position in respect of on-line petitions and the increased use of social media. The revised SCI is available on the Council's website: <http://www.north-herts.gov.uk/home/planning/planning-policy/local-plan-emerging-policy/statement-community-involvement-sci>

The Local Plan will include planning policies and land allocations which will guide the development and use of land in North Hertfordshire during the plan period, 2011 – 2031. The North Hertfordshire Local Plan 2011 – 2031 will review and replace the adopted local plan, District Local Plan No 2 with Alterations.

On adoption of this plan, the statutory development plan for North Hertfordshire will comprise:
North Hertfordshire Local Plan;
Minerals Plan;
Waste Local Plan; and
Any made neighbourhood plan.

There will be consequential changes to the proposals map accompanying District Local Plan No 2 with Alterations.

2. Consultation Stages for the Local Plan

Public consultation has been an integral part of preparing the Local Plan. This statement sets out the consultation arrangements that have been carried out to date by the Council in the preparation of the North Hertfordshire Local Plan.

The timetable below shows the stages that the Council followed in the preparation of the Local Plan.

Stage	Date
1. Local Plan Housing Growth Targets and Locations	February 2013
2. Local Plan Housing Additional Locations and Options	July 2013
3. Local Plan Preferred Options consultation	December 2014
4. Local Plan Proposed Submission consultation	October – November 2016
5. Submission of Local Plan to Secretary of State	March 2017
6. Public examination of Local Plan	August 2017
7. Receipt of Inspector's report	December 2017
8. Adoption of the Local Plan	March 2018

3. Housing Growth Targets and Locations, February 2013

The publication of the Local Plan Housing Growth Targets and Locations consultation paper in February 2013 was the first stage in the local plan process following the publication of the National Planning Policy Framework, (NPPF) in March 2012.

The Local Plan Housing Growth Targets and Locations consultation paper set out details of the findings from the first Strategic Housing Market Assessment, (SHMA), 2012 which set out a range of possible housing targets for the District. At this stage, the Council decided to consult on a housing growth target of 10,700 dwellings and the possible locations to accommodate that amount of growth. The consultation document was divided into three parts: housing numbers, strategic and non-strategic housing sites and comments invited.

How public consultation was carried out

Consultation on the Housing Growth Options and Locations consultation document was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI) at the time. The consultation period ran between Monday 11th February 2013 and Thursday 28th March 2013. The consultation arrangements included:

- emails or letters sent to inform all consultees on the database at the time of the consultation period;
- how and where to view the consultation documents and how to make comments;
- the consultation documents and supporting evidence were all made available on the Council's website and in the local libraries across North Hertfordshire;
- advertisements were placed in local newspapers including The Comet, The Royston Crow, The Welwyn Hatfield Times and The Mercury;
- an evening with representatives from the Parish Councils in advance of the consultation period; and
- a series of public exhibitions.

The Council has a contact database of approximately 12,500 consultees, including statutory consultees, Parish Councils, community organisations, business interests, landowners, developers and residents. Residents make up approximately 11,500 of these consultees.

A number of exhibitions were held across the District during the consultation period. Officers from the Planning Policy team were available at all of the exhibitions to answer questions about the consultation. Exhibitions were held in the following locations:

Knebworth – Village Hall	February 12 th 2013
Royston – Town Hall	February 14 th 2013
Great Ashby – Community Centre	February 20 th 2013
Letchworth Garden City – Grange Community Centre	February 25 th 2013
Cockernhoe – Village Hall	February 27 th 2013
Hitchin – Church House	March 2 nd 2013

Baldock – Baldock Community Centre	March 4 th 2013
St Ippolyts – Village Hall	March 6 th 2013

In response to requests from members of the public, the Council subsequently arranged two additional exhibitions:

Wymondley – Wymondley JMI School	March 12 th 2013
Hitchin – British Schools	March 21 st 2013

In total it is estimated that in excess of 1,000 people attended the exhibitions.

4. Housing Additional Location Options – July 2013

Following the earlier consultation in 2013, the Council received representations which put forward additional or amended sites for development. The Council considered that it would be appropriate to consult on these additional and revised sites before compiling a list of sites to include in the Local Plan Preferred Options.

Consultation on the Housing Additional Location Options consultation document was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI) at the time. The consultation period ran between Friday 5th July 2013 and Friday 2nd August 2013. The consultation arrangements included:

- emails or letters sent to inform all consultees on the database at the time of the consultation period;
- how and where to view the consultation documents and how to make comments;
- the consultation documents and supporting evidence were all made available on the Council's website and in the local libraries across North Hertfordshire;
- the consultation documents were also placed in the Old and New Town libraries in Stevenage and in the Wigmore and Central libraries in Luton;
- advertisements were placed in local newspapers including The Comet, The Royston Crow, The Welwyn Hatfield Times and The Mercury;
- a letter was sent to all Parish Councils informing them that the consultation documents would be available on the Council's website in advance of the formal consultation period as part of the Cabinet report papers; and
- two public exhibitions.

Two exhibitions were held in the District during the consultation period. Officers from the Planning Policy team were available at both of the events to answer questions about the consultation. Exhibitions were held in the following locations:

Little Wymondley – JMI School	July 8 th 2013
Baldock – Knights Templar School	July 16 th 2013

Both of these consultations dealt with potential land allocations to meet the District's objectively assessed housing need. A summary of the issues raised and an indication of the level of responses made to each site are included in the summary in Section 7 of this document. The Council did not make a formal response to these consultations, instead detailed work was undertaken on all of the sites that had been consulted upon to determine which were the most suitable to include in the Local Plan Preferred Options. Where sites were included in these two consultation documents but were not taken forward into the Local Plan Preferred Options, a summary of the representations has not been included in this statement.

5. Local Plan Preferred Options 2014

Full Council approved the Local Plan Preferred Options consultation document at a meeting on 27th November 2014. The public consultation period started on 18th December 2014 and continued until 6th February 2015. The consultation was undertaken in accordance with the 2012 Statement of Community Involvement and included:

- letters or emails sent to inform all consultees on the local plan database at the time of the consultation;
- how and where to view the consultation documents and how to make comments;
- copies of the consultation documents were placed in local libraries and on the website;
- hard copies of the Local Plan Preferred Options consultation document were sent to all Parish Councils; and
- adverts were placed in local newspapers.

In total, some 8,620 individual representations were received from 4660 landowners, developers, community organisations, business interests and individuals. From the representations received, more than 7,400 representations were made in respect of the proposed land allocations and the settlements in the District (Chapter 12 in the Local Plan Preferred Options). The remainder (more than 1,100 representations) were made in respect of the policy chapters.

Representations received in respect of the Local Plan Preferred Options were evenly spread throughout the District of North Hertfordshire and beyond. Representors from Hitchin, Luton, Baldock and Letchworth Garden City submitted a large proportion of the overall number of representations. Representors with addresses in Hitchin provided 20% of the overall number, followed by Luton (11.7%), Baldock (10.3%) and Letchworth Garden City (8.8%). A detailed summary of all the representations submitted in response to this consultation has been prepared and is available on request.

The following sections set out a summary of the key issues raised during the consultation periods. The Council considers that in the interest of delivering sustainable development in North Hertfordshire that a robust and sound Local Plan is adopted as quickly as practicable, consistent with government advice. The Preferred Options, with amendments as a result of analysing the representations, evidently provides a robust starting point for the way in which this can happen.

6. Summary of Responses to Planning Policies in the Local Plan Preferred Options 2014

The following section sets out a summary of the numbers of representations received, a summary of the issues raised and a summary of how the policies have or have not been amended in the Proposed Submission Draft Local Plan. Due to the volume of representations received in response to the Preferred Options consultation a collective response has been prepared, setting out the Council's response to the issues raised.

Introduction – Introductory Paragraphs (Pages 5 and 6 – including paragraphs 1.1 to 1.10)

North Hertfordshire Local Plan 2011-2031 Preferred Options December 2014

Number of Respondents	36	Number of Objections	21
Number of General Comments	12	Number of Supports	3

Summary of comments

- The Plan has missed key points of the NPPF.
- The Plan does not represent the best interests of the District.
- The Plan lacks transparency.

1 Introduction

Number of Respondents	20	Number of Objections	6
Number of General Comments	13	Number of Supports	1

Summary of comments

- Concerns were raised over the Plan's evidence base.
- It is considered that the plan has been positively prepared and is based on robust and credible evidence.
- The housing number is unfounded.
- There is not enough employment land proposed in North Hertfordshire.

NHDC Response

The Local Plan must be drafted in accordance with provisions of the National Planning Policy Framework. A significant amount of work has been undertaken to prepare the evidence base which underpins the planning policies and the proposed land allocations in the Proposed Submission Draft of the Local Plan 2011 – 2031.

Vision and Objectives (Pages 7 to 9 – including paragraphs 2.1 to 2.7)

2 Visions and Objectives

Number of Respondents	37	Number of Objections	14
Number of General Comments	17	Number of Supports	6

Summary of comments

- The Plan lacks a clear Vision statement.
- The NPPF is misinterpreted.
- The Vision and Objectives fail to recognise the distinctiveness of the different towns in North Hertfordshire.
- There is no reference to the wider cross district/regional impacts of the Plan.
- The objectives fail to mention the historic environment in Figure 1.
- The infrastructure provision for transport, waste management and water supply has not been fully thought out.
- The objectives for landscape (Figure 1) should be strengthened to reflect the delivery of local character and 'sense of place', green infrastructure, high quality design, public health, a thriving economy, climate change mitigation and adaptation and the provision of ecosystem services.

Policy SD1 – Presumption in favour of sustainable development (Pages 8 and 9 – including paragraphs 2.8)

Policy SD1: Presumption in favour of sustainable development

Number of Respondents	17	Number of Objections	2
Number of General Comments	11	Number of Supports	4

Summary of comments

- The Policy does not refer to the historic environment.
- There is no clarification of sustainable development in the Preferred Options and what it means for the District.

NHDC Response

The proposed submission version of the Local Plan for North Hertfordshire has been re-drafted to include new and revised sections.

The first section, *Introduction and Context*, provides explanatory and factual information on the planning system with clear relevance to the NPPF and other planning guidance. It places North Hertfordshire in context in terms of its wider area. This includes identification of the District's administrative area, as well as the wider cross-boundary housing and employment market geographies that the Plan needs to address. This part of the Plan also identifies the key challenges facing the District over the plan period.

A second section, *Spatial Strategy and Spatial Vision* has been added to the Plan, which sets out the spatial strategy and vision for the future of the District and links this to the strategic policies which provide the guidance on the main issues that the Plan seeks to address. It sets out the overall approach to topics such as sustainable development, housing, employment, Green Belt and countryside. It also contains separate policies for each of the Strategic Housing Sites (defined as sites of 500 or more homes) which will make a substantial contribution towards housing requirements over the plan period.

The Plan now contains a spatial vision and list of Strategic Objectives. The spatial vision is a statement of what North Hertfordshire will be like in 2031. The objectives are divided into environmental, economic and social aspects and provide the link between the vision and the strategic policies.

The objectives include reference to the historic environment, promoting good design that creates a distinctive sense of place, seeking to protect and enhance the natural environment, increasing biodiversity, mitigate the effects on climate change as well as amongst others promoting a diverse and competitive local economy, ensuring development is supported by the necessary provision of and improvements to infrastructure services and facilities to support the local community.

Section two of the Proposed Submission document sets out the overall approach for sustainable development and growth and how this will be distributed across the District. This section comprises a number of strategic policies.

Policy SP1: Sustainable Development in North Hertfordshire remains as the first policy in the Plan and has been re-drafted to ensure that it clearly sets out the Council's intentions in supporting the principles of sustainable development over the period to 2031 together with its supporting text. Reference to protecting heritage assets is included in the policy.

Economy & Town Centres (Page 10 – including paragraphs 3.1 to 3.6)

3 Economy & Town Centres

Number of Respondents	30	Number of Objections	12
Number of General Comments	17	Number of Supports	1

Summary of comments

- There are no details with regard to regeneration opportunities.
- More independent shops are needed.
- Businesses should be encouraged.
- Town centres should encourage greater range of community, cultural and leisure uses as well as shopping.
- Plan should give proper consideration to how the residents will access shops and retail stores.

NHDC Response

Strategic Policies SP3: Employment and SP4: Town and Local Centres set out strategies for both employment and town centre development uses in North Herefordshire up to 2031.

Development management policies within the Economy and Town Centres Chapter set out specifics about the mix of uses and delivery.

Additional sites are identified for both employment and town centre uses in the Communities chapter of the plan.

Policy ETC1 – Provision and distribution of employment land (Pages 10 to 12 - including paragraphs 3.7 to 3.14)

Policy ETC1: Provision and distribution of employment land

Number of Respondents	18	Number of Objections	6
Number of General Comments	10	Number of Supports	2

Summary of comments

- There should be more recognition of Royston's contribution to the Cambridge sub-region.
- The policy fails to recognise Luton as a key employment centre.
- More of the employment land should be allocated for housing.
- Will this policy lead to an increase in out-commuting?

NHDC Response

Policy ETC1 has been replaced by Strategic Policy SP3: Employment. This policy sets out the strategic approach to employment development in North Hertfordshire and identifies the quantum of employment land to meet locally identified need and requirements of the labour market up to 2031. The rationale for this policy is set out in the Employment background Paper.

Policy ETC2 – Promoting the knowledge economy (Pages 12 and 13 – including paragraphs 3.15 and 3.16)

Policy ETC2: Promoting the knowledge economy

Number of Respondents	6	Number of Objections	1
Number of General Comments	2	Number of Supports	3

Summary of comments

- General support.
- The policy is not specific enough.
- There needs to be recognition of the environmental impacts associated with the IT industry.

NHDC Response

Policy ETC2: Employment has been replaced by Strategic Policy SP3: Employment. This policy includes potential sector specific development and identifies strengths in the North Hertfordshire economy.

Policy ETC3 – Appropriate uses in employment areas (Pages 13 to 15 – including paragraphs 3.17 to 3.23)

Policy ETC3: Appropriate uses in employment areas

Number of Respondents	10	Number of Objections	0
Number of General Comments	6	Number of Supports	4

Summary of comments

- Uncertainty over whether travel plans will be delivered.
- Amending the word 'resist' to 'refuse' would bring the policy in line with the NPPF.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy enables protection of employment areas in line with the NPPF and provides the circumstances where non-employment uses may be appropriate. The considerations for judging such applications have been moved to the supporting text.

This policy is now numbered as ETC1 in the Proposed Submission Plan.

Policy ETC 4 - Employment development outside employment areas (Pages 15 and 16 – including paragraphs 3.24 to 3.26)

Policy ETC4: Employment development outside employment areas

Number of Respondents	6	Number of Objections	0
Number of General Comments	3	Number of Supports	3

Summary of comments

- Support for the policy, particularly the flexible approach.
- Employment generating opportunities should be more actively encouraged.
- This policy needs far greater work to clarify what it means in reference to rural development.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy seeks to encourage employment development outside employment areas where appropriate but also sets out the circumstances where it may be appropriate for uses to be lost. The policy is more definitive and uses less ambiguous language.

This policy is now numbered as ETC2 in the Proposed Submission Local Plan

Policy ETC5 – Tourism (Pages 16 and 17 – including paragraphs 3.27 to 3.32)

Policy ETC5: Tourism

Number of Respondents	14	Number of Objections	1
Number of General Comments	12	Number of Supports	1

Summary of comments

- Tourism is under invested in North Hertfordshire.
- Sustainability in terms of access should not be used as a reason to depress rural tourist destinations.
- Reference should be made to the impact on rural communities from any proposed developments.
- Sites LG1 and LG3 jeopardise the tourism appeal of Letchworth Garden City.
- There is no reference to the historic environment despite noting that several historic assets are important attractions for visitors to the district.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy is positive as it is encouraging tourism development. The considerations for assessing proposals are incorporated in the supporting text as is much of the detail relating to the extent of the current tourism industry in North Hertfordshire. The policy is now much more focussed.

This policy is now ETC8 in the Proposed Submission Local Plan

Policy ETC6 - Town and Local Centres (Pages 17 to 19 – including paragraphs 3.33 to 3.38)

Policy ETC6: Town and Local Centres

Number of Respondents	9	Number of Objections	1
Number of General Comments	5	Number of Supports	3

Summary of comments

- This chapter lacks detail of any regeneration opportunities within the town centres relating to retail, leisure and/or commercial activities. There is an opportunity to conserve, enhance and restore the historic environment.
- Churchgate shopping centre would provide a key opportunity to reinforce and repair the historic character of the town centre.
- It would be useful to clarify the town centre uses permitted which would be in accordance with the NPPF.
- Recognition of the four town centres distinctiveness and character needs to be clarified within the policy.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Policy ETC6 has been replaced by Strategic Policy SP4: Town and Local Centres. This policy sets out a strategy for town centre uses in North Hertfordshire up to 2031. Policies within the Economy and Town Centres Chapter set out specifics about the mix of uses and delivery. Additional sites are identified for town centre uses in the Communities chapter of the plan.

Policy ETC7 - Additional retail floorspace (Pages 19 and 20 – including paragraphs 3.39 to 3.45)

Policy ETC7: Additional retail floorspace

Number of Respondents	5	Number of Objections	1
Number of General Comments	3	Number of Supports	1

Summary of comments

- Satisfied with the Council's priority on filling vacant shops.
- Policy has no detail with regards to regeneration opportunities.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Policy ETC7 has been replaced by Strategic Policy SP4: Town and Local Centres. This policy sets out a strategy for town centre uses in North Hertfordshire up to 2031. Policies within the Economy and Town Centres Chapter set out specifics about the mix of uses and delivery. Additional sites are identified for town centre uses in the Communities chapter of the plan.

Policy ETC8 - New retail, leisure and other town centre development (Pages 21 and 22 – including paragraphs 3.46 to 3.51)

Policy ETC8: New retail, leisure and other town centre development

Number of Respondents	4	Number of Objections	1
Number of General Comments	3	Number of Supports	0

Summary of comments

- There are a number of roads in Hitchin and Letchworth town centres with a higher proportion of vacant properties. These roads could be taken out of the town centre zoning with long-term empty properties brought back into use for the community.
- The policy failed to mention community uses or facilities.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy is specifically concerned with the location of retail, leisure and other town centre development. Other policies in the Economy and Town Centre Chapter deal with mix of uses.

This policy is now numbered as ETC3 in the Proposed Submission Local Plan.

Policy ETC9 - Primary and secondary shopping frontages (Pages 22 to 24 – including paragraphs 3.52 to 3.57)

Policy ETC9: Primary and secondary shopping frontages

Number of Respondents	5	Number of Objections	0
Number of General Comments	3	Number of Supports	2

Summary of comments

- Support for the policy as it reflects what has been happening in recent years and will allow for greater flexibility of use.
- Lack of primary frontage in Baldock which makes it not suitable for expansion.
- The stance on Class A3 (restaurants) is queried. There should be greater flexibility with respect to restaurant uses.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF

This policy has been split into ETC 4: Primary Shopping Frontages and ETC5: Secondary Frontages, which provide specific guidance for each of the designations.

The policy offers sufficient flexibility to allow non-retail uses to come forward where appropriate and where criteria are met.

Policy ETC10 – Local Centres (Pages 24 and 25 – including paragraphs 3.58 to 3.64)

Policy ETC10: Local centres

Number of Respondents	7	Number of Objections	1
Number of General Comments	5	Number of Supports	1

Summary of comments

- Ashwell should not be categorised as a Local Centre when compared with Knebworth and Codicote.
- Clothall Common has no local centre and should be considered for future expansion.
- There is a lack of clarity regarding the provision of community and health facilities.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF

This policy specifically relates to Local Centres as identified in strategic policy SP4: Towns and Local Centres. Additional local and neighbourhood centres are planned as part of the Strategic Sites (SP14 – see policies SP19). Where local in scale this policy will apply. Community and health facilities are dealt with in the Healthy Communities chapter of the Proposed Submission Local Plan.

This policy is now numbered as ETC6 in the Proposed Submission Local Plan.

Policy ETC11 - Scattered local shops, services and facilities in towns and villages (Pages 25 and 26 – including paragraphs 3.65 to 3.69)

Policy ETC11: Scattered local shops, services and facilities in towns and villages

Number of Respondents	4	Number of Objections	0
Number of General Comments	2	Number of Supports	2

Summary of comments

- The policy should go further and offer business rate relief to shops serving a community of less than 500 houses.
- Policy ETC11 is clear, and welcomed.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF

The approach to this policy has not changed and seeks to protect facilities in towns, villages and rural areas where possible.

This policy is now numbered as ETC7 in the Proposed Submission Local Plan.

Countryside and Green Belt (Page 27 – including paragraphs 4.1 to 4.2)

4 Countryside and Green Belt

Number of Respondents	34	Number of Objections	21
Number of General Comments	12	Number of Supports	1

Summary of comments

- Support the recognition that future development needs to provide the exceptional circumstances required by Paragraph 83 of the NPPF to review the Green Belt and set new boundaries through the local plan process.
- There is no mention of the importance of the countryside as a habitat for wildlife and the need to protect and enhance biodiversity.
- Support the recognition of the needs of the rural population and rural economy.
- The wording of paragraph 4.2 is too general and could be potentially challenged.

NHDC Response

Commentary on Green Belt issues is now incorporated within the supporting text of Policy SP5: Countryside & Green Belt (see response to Preferred Options Policy CGB1 below).

Green Belt is a policy designation and discussion of associated opportunities or benefits appropriate to, or derived from the countryside are discussed under relevant sections and policies. These include sections of the plan relating to the economy and natural environment.

Policy CGB1 – Green Belt (Page 27 – including paragraphs 4.3 to 4.4)

Policy CGB1: Green Belt

Number of Respondents	68	Number of Objections	31
Number of General Comments	26	Number of Supports	11

Summary of comments

- Hertfordshire County Council supports the amendment of the Green belt boundary on the northern side of Hitchin.
- The policy makes a mockery of the Green Belt.
- Para 4.17 definition of ‘harm’ needs expanding to include negative impacts on local character and amenity. Policy should acknowledge that the NPPF encourages planning positively for beneficial use of Green Belt – landscapes, biodiversity, visual amenity
- More effort needs to be made to find non green belt sites.

- The policy is not consistent with the NPPF.
- There is confusion where the Green Belt is being amended.
- A distinction between countryside and Green Belt needs to be made.

NHDC Response

The Council's approach to Green Belt is now set out in Policy SP5 of the local plan.

Since the Preferred Options, a critical re-appraisal of the Green Belt Review (NHDC, 2016) has been undertaken to ensure that its methodology and findings are robust and consistent (both internally and with other similar reviews carried out by other councils).

At a strategic level, it concludes that parcels of Green Belt around Hitchin, Letchworth Garden City and Knebworth make the most significant contribution to Green Belt purposes. Other areas of existing Green Belt generally make a moderate contribution. Only one parcel of land, to the east of Weston is considered to only make a limited contribution to Green Belt purposes.

The Housing and Green Belt Background Paper (NHDC, 2016) sets out in further detail what the Council considers to be the appropriate tests of *exceptional circumstances*. Although there is no definition of this term within Government guidance, this matter has been considered by the courts. Our evidence considers the approach that has been recommended. On balance it is considered that the necessary circumstances do exist to continue pursuing a strategy which makes use of existing Green Belt land to meet housing requirements and that this approach *is* consistent with the requirements of national policy.

The proposed submission draft of the Plan now includes site-specific criteria to guide the development of all new land allocations. Where appropriate, these include consideration of Green Belt issues including the mitigating of potential harms and requirements for landscaping treatments to help establish firm, defensible boundaries.

In reviewing the housing evidence supporting the plan, the Council has pro-actively sought opportunities to identify additional sites on previously developed land (see response to housing policies for further information).

Policy CGB2 – Rural Areas Beyond the Green Belt (Pages 27 and 28 – including paragraph 4.5)

Policy CGB2: Rural Areas Beyond the Green Belt

Number of Respondents	14	Number of Objections	5
Number of General Comments	6	Number of Supports	3

Summary of comments

- This policy uses the same wording as CGB1 and seeks to apply this to non green belt areas undermining the effect of green belt policy and is therefore unsound. The

policy needs to reflect the difference between green belt and other rural/countryside areas.

- The policy is too broad brush and should deal with the specifics of visual amenity, biodiversity, agricultural quality and heritage.

NHDC Response

The Council's overarching approach to Rural Areas Beyond the Green Belt is now set out in Policy SP5 of the plan with detailed requirements in Policy CGB1.

The supporting text of SP5 reiterates that, in terms of intrinsic character and beauty, the Rural Area contains some of the highest quality of countryside in the District. Although it does not meet the necessary criteria for designation as Green Belt, due primarily to the sparser pattern of development, it is considered appropriate to exercise a similar level of restraint to ensure this character and beauty is preserved.

The introductory sections of the Plan now make clear that its policies are to be read as a whole, thereby preventing the need for extensive cross-referencing of other relevant policies.

Policy CGB3 - Exception sites in the rural area (Pages 28 and 29 – including paragraphs 4.6 to 4.9)

Policy CGB3: Exception sites in the rural area

Number of Respondents	10	Number of Objections	1
Number of General Comments	7	Number of Supports	2

Summary of comments

- Policy duplicates the NPPF and should be deleted.
- There are no references to Neighbourhood Plans.

NHDC Response

Exception sites are now considered by Policy CGB2 of the plan. This policy has been significantly redrafted to set out clear criteria.

The NPPF establishes that exceptions policies should be set out in the Local Plan. This is a non-strategic policy and Policy SP1 and the introductory sections of the plan now clearly set out the role of neighbourhood plans and their ability to supplement or supercede the detailed policies of the local plan.

Policy CGB4 – Rural Workers’ Dwellings (Pages 29 and 30 – including paragraphs 4.10 to 4.15)

Policy CGB4: Rural Workers' Dwellings

Number of Respondents	5	Number of Objections	1
Number of General Comments	4	Number of Supports	0

Summary of comments

- Policy needs strengthening to avoid these dwellings leaking onto the open market, potentially requiring them to be converted to affordable housing if no longer needed.
- Policy duplicates the NPPF and should be deleted.

NHDC Response

Workers’ dwellings are now considered by Policy CGB3 of the plan.

It is considered that this policy aids in interpreting relevant advice in the NPPF and is appropriate. A clear expectation that occupancy conditions will be used is set out within the policy along with clear criteria that must be met if these are to be relaxed.

Policy CGB5 – Existing Rural buildings (Pages 30 and 31 – including paragraphs 4.16 to 4.19)

Policy CGB5: Existing Rural buildings

Number of Respondents	12	Number of Objections	4
Number of General Comments	8	Number of Supports	0

Summary of comments

- No references to neighbourhood plans.
- The policy title is misleading as rural buildings are not usually taken to include dwellings.
- While Policy CGB5 is sensible for single buildings any such development must take into account sustainability. If not, this policy could lead to substantial new housing without the concomitant infrastructure.
- Policy duplicates the NPPF and should be deleted.

NHDC Response

These issues are now considered by Policy CGB4 of the plan. It is considered that the policy clearly relates to buildings in the rural area (geographically) rather than just buildings of a rural (e.g. agricultural) type.

This is a non-strategic policy and Policy SP1 and the introductory sections of the plan now clearly set out the role of neighbourhood plans and their ability to supplement or supercede the detailed policies of the local plan.

The introductory sections of the Plan now make clear that its policies are to be read as a whole, thereby preventing the need for extensive cross-referencing of other relevant policies or requirements.

Transport (Page 32 – including paragraphs 5.1 to 5.6)

5 Transport

Number of Respondents	28	Number of Objections	18
Number of General Comments	10	Number of Supports	0

Summary of comments

- NHDC need to address the growth at Samuel Lucas School and the residential developments in Hitchin.
- There is a need to look at the wider and traffic implications of the Hitchin sites.
- Traffic in Hitchin already high at peak times and will increase with new housing in West of Hitchin.
- Policy needs to take into account sustainable transport, shift away from motorised vehicular transport such as shared car use through car clubs.
- There is a need to look at local traffic movement.
- The transport policy is vague and woolly.
- Policy needs to look at public transport / train service issues for the towns such as Baldock.
- There is a need to sort out the transport issues on the A1(M) otherwise development isn't going to be sustainable.
- The policy needs to be clear as to what sustainable transport is.

NHDC Response

Since completing the consultation, the Council has undertaken an additional piece of transport modelling work to provide evidence on the traffic implications and mitigation measures of the Hitchin and the Local Plan sites. The Local Plan Model Testing (AECOM, 2016) has been prepared and published, which addresses highway concerns that have been raised and provides a greater level of detail on the evaluation of the Preferred Local Plan Scenario as identified at the time of testing, including a range of potential development sites across the North Herts District area. It concluded that there will be highway impacts across the network when the developments are in place. This work is available on the Councils website; <http://www.north-herts.gov.uk/home/planning/planning-policy/emerging-local-plan/proposed-submission-local-plan-2011-2031>.

The Council does support and takes into account the importance of sustainable transport in reducing the number of car journeys made. Amendments have been made to the policy in the Proposed Submission Local Plan, for example the policy now states that we will “*Seek the early implementation of sustainable travel infrastructure on Strategic Housing Sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage*”. Furthermore the policy now states that we will ensure that a “*range of sustainable transport options are available to all potential occupants or users*”.

The Council acknowledges the importance of providing appropriate supporting infrastructure alongside development. The Council has produced an updated Infrastructure Delivery Plan which looks at these issues in more detail in the accompanying schedules. Furthermore, the communities chapter now includes infrastructure and mitigation in relation to sites. Master-planning will also be needed, alongside active engagement with site promoters to develop scheme mitigation.

The council's revised evidence base including the transport modelling and the updated Infrastructure Delivery Plan address the key issues on the A1(M) and appropriate mitigation needed. Highways England (HE) is responsible for the strategic road network which includes the A1 (M). Therefore the Council will work with its partners in developing appropriate mitigation measures for the Local Plan.

Specific issues referred to in the representations will be looked at as part of a wider exercise by the Council in terms of its use of on –street parking availability as it updates the Parking Strategy.

Policy T1 – Sustainable Transport (Pages 32 and 33 – including paragraphs 5.7)

Policy T1: Sustainable transport

Number of Respondents	27	Number of Objections	11
Number of General Comments	16	Number of Supports	0

Summary of comments

- The commitment to sustainable transport (T1) is supported.
- The term 'sustainable journeys' is not clear.

NHDC Response

Support is welcomed.

Policy T2 – Parking (Pages 33 and 34 – including paragraphs 5.8 to 5.12)

Policy T2: Parking

Number of Respondents	15	Number of Objections	3
Number of General Comments	10	Number of Supports	2

Summary of comments

- Time has proven that lack of parking provision is not effective in reducing the quantity of private cars.

NHDC Response

Parking standards are set by having regard to the local circumstances and without trying to control car ownership. The minimum parking standards seek to provide a balance between reasonable expectations of car ownership, efficient use of land and the need to encourage a more sustainable approach to meeting all future transport needs.

Housing and development strategy (Page 35 – including paragraphs 6.1 and 6.2)

6 Housing and development strategy

Number of Respondents	36	Number of Objections	15
Number of General Comments	15	Number of Supports	6

Summary of comments

- Support the aim to protect the largely rural character of the remainder of the District however protection in itself is not enough. The means to maintain the management that creates and sustains this character is equally important if the quality of the rural character is to be conserved.

NHDC Response

It is considered that these points are addressed through the inclusion of specific policies relating to the countryside. The introductory sections of the Plan now make clear that its policies are to be read as a whole, thereby preventing the need for extensive cross-referencing of other relevant policies.

Policy HDS1 - Housing targets 2011-2031 (Pages 35 to 37 – including paragraphs 6.3 to 6.16)

Policy HDS1: Housing targets 2011-2031

Number of Respondents	64	Number of Objections	31
Number of General Comments	28	Number of Supports	5

Summary of comments

- The policy would be enhanced by a reference that reflects the cross boundary nature of the plan.
- There should be an acknowledgement that West of Stevenage would not just be about meeting housing need but also about the economic prosperity of the town.
- The source of the housing figure is unclear.
- There needs to be more information on housing mix and how existing housing stock could be improved.
- How is North Hertfordshire District Council addressing the issue of persistent under delivery?

NHDC Response

The overall housing strategy of the plan is now set out in Policy SP8.

Since publication of the Preferred Options, the Council's evidence relating to objectively assessed needs has been updated and forms the basis of the strategy in the plan. This evidence is considered to be consistent with the requirements of Government advice and also with similar assessments carried out by other authorities in the area.

The strategic policy and introductory sections of the plan have been extensively rewritten and now include references to wider housing market areas and issues faced by authorities such as Stevenage and Luton.

The plan acknowledges that the plan's strategy will require delivery rates to markedly increase. However, it similarly sets out the NPPF requirement for a "significant boost" in housing land supply and that past delivery has been constrained by the lack of an up-to-date plan.

Policy HDS2 - Settlement hierarchy (Pages 37 to 39 – including paragraphs 6.17 to 6.25)

Policy HDS2: Settlement hierarchy

Number of Respondents	57	Number of Objections	19
Number of General Comments	25	Number of Supports	13

Summary of comments

- Both category A and B villages should be given village boundaries.
- The policy is not clear enough with regard to the Category A villages and what will be allowed where.
- Uncertainty over the criteria for the categorisation of villages and the consequent effects that this may have on the villages and settlements that are not permitted to grow and the consequent loss of facilities and community.
- The boundaries around the Category A villages have been drawn too tightly to allow for this policy to have effect, i.e. there is nowhere for general development to take place.

NHDC Response

The settlement hierarchy is now established in Policy SP2 of the plan.

The settlement hierarchy proposed in the Preferred Options version of the plan has been reviewed to take account of new sites submitted or otherwise identified for consideration and also to better reflect NPPF guidance on Green Belt and the updated Green Belt review. The rationale for the settlement hierarchy is set out in the Housing & Green Belt Background Paper (NHDC, 2016).

Consideration has been given to establishing boundaries for Category B villages. This has not been pursued but the supporting text to the policy recognises that this may be an issue which individual communities seek to pursue through the neighbourhood planning process.

Almost all Category A villages have allocated development sites identified within or adjoining them allowing for growth (and / or have already permitted such schemes since 2011). Beyond this, general development will be expected to occur within the defined boundaries.

Policy HDS3 - Affordable Housing (Pages 40 and 41 – including paragraphs 6.26 to 6.34)

Policy HDS3: Affordable Housing

Number of Respondents	35	Number of Objections	6
Number of General Comments	22	Number of Supports	7

Summary of comments

- Concerned that the relative affordability of each town has not been taken into account in the distribution of development.
- Policy wording is too strict.
- The policy needs to be more closely related to paragraph 50 of the NPPF regarding onsite and offsite affordable housing.
- Uncertainty regarding the source of the affordable housing figure.
- The supporting text allows for viability to be considered but the wording of the policy does not.
- The policy should be reworded to reflect that the figure is a target and not a requirement.
- The policy fails to mention sheltered housing provision.

NHDC Response

Affordable housing is now considered in Policy HS2 of the plan. A new policy relating to supported, sheltered and older persons housing is now included as Policy HS4.

Since completion of the Preferred Options, the relevant evidence has been updated.

The Strategic Housing Market Assessment: Volume Two (ORS, 2016) provides evidence of affordable housing need.

The Local Plan Viability Assessment (DSP, 2016) has been updated to inform affordable housing delivery and continues to demonstrate that development sites within North Hertfordshire can generally afford to support the provision of up to 40% affordable housing. It recognised that some flexibility may be required for certain development types or in certain locations.

The policy has been redrafted to include affordable housing requirements as targets. Policy SP7 of the plan has been expanded to set out the Council's approach where viability is considered to be an issue.

Applying these broad assumptions to the sites identified to date suggest that the Council could reasonably anticipate in the order of one-third of all new homes being delivered as affordable housing over the plan period if all sites were developed. This would tend to suggest that an additional uplift would not be required.

Policy HDS4 – Density (Pages 41 and 42 – including paragraphs 6.35 to 6.36)

Policy HDS4: Density

Number of Respondents	16	Number of Objections	2
Number of General Comments	11	Number of Supports	3

Summary of comments

- 'Lower', 'high' and 'very high' need to be defined.
- The policy wording needs to be reviewed.

NHDC Response

The Local Plan sets out a design-led approach to (the assessment of) development and prescriptive density targets have not been established. The Council's approach to density is now absorbed within the supporting text to Policy HS3 and the general design policies of the plan.

Policy HDS5 - Relatives' and dependants' accommodation (Pages 42 – including paragraphs 6.37 and 6.38)

Policy HDS5: Relatives' and dependants' accommodation

Number of Respondents	3	Number of Objections	0
Number of General Comments	1	Number of Supports	2

Summary of comments

- Support for the policy but question the need for point 4.

NHDC Response

Relatives' and dependants' accommodation is now covered by Policy HS6 of the Plan. Support for the Preferred Options approach is noted. The relevant criterion of the policy has been amended.

Policy HDS6 - Gypsies, Travellers and Travelling Showpeople (Pages 43 and 44 – including paragraphs 6.39 to 6.43)

Policy HDS6: Gypsies, Travellers and Travelling Showpeople

Number of Respondents	7	Number of Objections	0
Number of General Comments	7	Number of Supports	0

Summary of comments

- The Gypsy & Traveller strategy is unclear. It appears to only make provision up to 2028.
- It is unclear whether the policy refers to mains sewers or to any form of foul drainage including non-mains.
- The policy is too specific.
- Point 2 specifies that residents must have access to local shops but this restriction is not being applied to other types of development.

NHDC Response

The Council's approach to Gypsies, Travellers and Travelling Showpeople is now set out in Policy HS7 of the plan.

It is considered that the strategy will meet requirements over the whole plan period and sets out an appropriate level of detail as required by national guidance.

Design (Page 45 – including paragraphs 7.1 and 7.2)

7 Design

Number of Respondents	13	Number of Objections	5
Number of General Comments	7	Number of Supports	1

Summary of comments

- In line with NPPF paragraph 62, there is an opportunity to also reference the Hertfordshire Design Review Panel within this chapter, alongside the existing reference to Building Futures and the Sustainable Design Toolkit.
- Consistent standards will be required where development sites lie across the administrative boundary or abut the existing urban area
- Support the emphasis on ensuring designs to improve the character and quality of an area as a means of minimising impacts on the environment. The character and quality of a given area should also include its ecological characteristics both past and present, as these too contribute to a sense of place and local distinctiveness.

NHDC Response

These points have been addressed when the policies were developed for the Proposed Submission Local Plan. Representations in support of this section of the Preferred Options is welcomed.

Policy D1 – Design and Sustainability (Pages 45 to 47 – including paragraphs 7.3 to 7.15)

Policy D1: Design and Sustainability

Number of Respondents	24	Number of Objections	5
Number of General Comments	18	Number of Supports	1

Summary of comments

- Consistent standards will be required where development sites lie across the administrative boundary or abut the existing urban area.
- It should be ensured that policies in this section are not undermined by prevailing permitted development and prior approval rights and processes.
- 7.12 Secured by Design principles have been removed from the SBD website (www.securedbydesign.com) due to confusion with adoption of principles rather than the standards.

- In line with NPPF paragraph 62, there is an opportunity to also reference the Hertfordshire Design Review Panel within this chapter, alongside the existing reference to Building Futures and the Sustainable Design Toolkit.
- Policy wording is vague. Policy wording amendments required.
- Remove reference to SPD.
- No clear analysis of the towns and proposals to suit their individual problems, characters and needs.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy has been split into two separate policies: Strategic Policy SP9: Design and Sustainability; and Policy D1: Sustainable Design.

The supporting text has been updated to reflect changes in relevant documentation and the inclusion of Hertfordshire Design Review Panel and Building Futures toolkit. Further guidance on local context is provided in separate documents.

Policy D2 - House Extensions and Replacement Dwellings (Pages 47 and 48 – including paragraphs 7.16 and 7.17)

Policy D2: House Extensions and Replacement Dwellings

Number of Respondents	8	Number of Objections	1
Number of General Comments	7	Number of Supports	0

Summary of comments

- Design criteria should also apply to house extensions and replacement buildings.
- Policy wording needs to be amended to strengthen policy.
- Paragraph 7.17 is unrealistic.

NHDC Response

Policies and supporting text in this Plan are interrelated and need to be read together when considering a specific proposal.

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Additional wording to paragraph 7.17 (now (.16) is included.

Policy D3 – Protecting living conditions (Page 48 – including paragraphs 7.18 to 7.21)

Policy D3: Protecting living conditions

Number of Respondents	11	Number of Objections	0
Number of General Comments	8	Number of Supports	3

Summary of comments

- Noise during construction should also be included.
- Suggest including protection of sunlight to photovoltaic and solar hot water installations, protection of those sites from overshadowing.
- Policy wording needs to be amended.

NHDC Response

The policy covers noise generally. Protection of sunlight for solar panels is not within the living conditions policy remit.

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Policy D4 - Air quality (Pages 49 to 51 – including paragraphs 7.22 to 7.31)

Policy D4: Air quality

Number of Respondents	10	Number of Objections	2
Number of General Comments	6	Number of Supports	2

Summary of comments

- In the context of paragraph 193 of the NPPF, Policy D4 is vague in terms of the 'relevant' types of development proposals that will be required to produce air pollution impact assessments, and as such, should be amended.
- Furthermore, the policy is limiting and should be revised to allow for both the outcome of the air pollution impact assessment and 'other relevant, up-to-date evidence' to be considered in the determining of an application.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Reference to air quality assessments are covered in the supporting text.

Healthy Communities (Page 52 – including paragraphs 8.1)

8 Healthy Communities

Number of Respondents	15	Number of Objections	9
Number of General Comments	6	Number of Supports	0

Summary of comments

- Support in principle the provision of on-site community, leisure, recreation & cultural facilities.
- Need to ensure that there is a common sense approach to the provision of open space in developments adjacent to the Stevenage Borough boundary.
- There is no consideration of the overall needs of the community, no identification of the gaps in provision and no specific proposals.
- Sports and recreation facilities in Baldock are inadequate.
- The policy fails to refer to the role of walking and cycling in promoting healthy living and well being.

NHDC Response

Support for the policy is welcomed.

Provision of open space in developments adjacent to the Stevenage Borough boundary will be determined through masterplans for each of the sites and therefore will be undertaken in consultation with Stevenage Borough Council.

The Council will require open space to be provided for relevant developments or financial contributions where specific circumstances are demonstrated. This is set out in Policy NE4, Protecting open space in the Proposed Submission draft.

The policy does not refer to the role of walking and cycling as these are considered to be modes of travel. As such measures to improve routes for walking and cycling are the referred to in Policy SP6: Sustainable Transport.

Policy HC1 – Healthy communities (Page 52 – paragraphs 8.2 to 8.4)

Policy HC1: Healthy communities

Number of Respondents	26	Number of Objections	7
Number of General Comments	15	Number of Supports	4

Summary of comments

- Sports facilities should be incorporated into Policy HC1.
- No provision is made for the allocation of any sites to meet any identified community sports needs.
- The policy relating to the loss of sports facilities does not make provision for development in line with para 74 of the NPPF.
- Policy is supported as it seeks to protect and enhance existing facilities as well as encouraging new ones.
- Part 4 of the policy should be amended to align this with para 61 of the NPPF.
- Planning conditions and obligations should not impose unnecessary delays to prevent planned development – as stated in paras 204 – 206 in the NPPF.
- Consideration should be given to the future provision of community spaces within Hitchin.
- Health improvement should be a key objective of Policy HC1.

NHDC Response

The policy has been amended to set out clear criteria which will be applied for proposals which might result in the loss of community facilities. A list of types of community facilities is given in the supporting paragraphs.

The policy sets out criteria against which proposals for new community facilities will be assessed against. New community facilities provided in conjunction with new development are most likely to occur in the allocated strategic sites and would be subject to detailed masterplanning in the context of the development as a whole.

Studies undertaken in support of the Local Plan have not identified a need to make provision for additional community sports facilities apart from sports halls, no allocations have been made in the Local Plan but opportunities will be investigated. It is anticipated that new community facilities will be provided as part of the strategic housing sites and these will be incorporated into the masterplan for each of those sites.

Policy HC2 – Green Space (Pages 53 and 55 – paragraphs 8.5 to 8.10)

Policy HC2: Green Space

Number of Respondents	24	Number of Objections	4
Number of General Comments	17	Number of Supports	3

Summary of comments

- Policy is too onerous.
- The Policy's wording also implies that provision must be 'in' all developments.
- The proposals for LG1 and LG3 will have a detrimental effect on the character, extent and structure of the green space pattern for existing residents.

- No reference has been made to the Accessible Natural Greenspace Standard (ANGSt).
- Further clarity is needed regarding the relevance of this 0.20 hectare figure.

NHDC Response

The policy has now been re-drafted to ensure it is concise yet comprehensive.

Policy NE5: New and improved public open space and biodiversity in the Proposed Submission document now outlines the specific circumstances in which open space provision would be required from development proposals. The circumstances in which financial contributions towards new or existing open spaces would be accepted is also set out.

Policy NE2: Green infrastructure and Policy NE4: Protecting open space in the Proposed Submission document will also protect the character, extent and structure of the green space network. A masterplan will also be developed for LG1 that will take into account the green infrastructure network.

Guidance on ANGSt has now been archived by Natural England and therefore has not been included in the policies to ensure they are up to date and meet the requirements outlined in the NPPF and PPG.

Reviewed open space standards will be set out in the Open Space Review, which will provide commentary on how the standards have been derived.

Natural Environment (Page 56 – including paragraphs 9.1 and 9.2)

9 Natural Environment

Number of Respondents	19	Number of Objections	7
Number of General Comments	11	Number of Supports	1

Summary of comments

- There is no relevance with this policy and new development proposed on Green Belt land.
- This section needs to be centred on a strategic policy to protect the natural environment and biodiversity. It needs to emphasise the importance of, and protect and enhance, the countryside as a habitat for wildlife and biodiversity.
- The policy should also refer to sites of geological interest.

NHDC Response

Publically accessible open space is dealt with in Proposed Submission policies Policy NE4: Protecting open space and Policy NE5: New and improved public open space and biodiversity. It is worth noting that Green Belt does not imply that there is public access to such open space.

A new strategic policy, Policy SP12: Green infrastructure, Biodiversity and Landscape has been included in the Proposed Submission which includes the need to protect, enhance and manage biodiversity networks including wetland and riverine habitats, Local Geological Sites and seek opportunities for net gains for biodiversity. Designated geological sites are now also covered by the development management Policy NE6: Designated biodiversity and geological sites in the Proposed Submission version.

Policy NE1 - Landscape and Environmental Protection (Pages 56 and 57 – paragraphs 9.3 to 9.9)

Policy NE1: Landscape and Environmental Protection

Number of Respondents	19	Number of Objections	3
Number of General Comments	13	Number of Supports	3

Summary of comments

- Policy wording should be amended.

- Policy concentrates on issues that arise when new development is proposed rather than providing an overall strategy for protection and improvement against which development can be assessed.
- Insufficient emphasis placed on Landscape Character Areas.
- Insufficient work done to assess impact of development proposals on surface water run-off, localised flood risk, water quality, air pollution, ecology and water flows.

NHDC Response

This policy has been developed into two separate policies, Strategic Policy SP12: Green Infrastructure, Biodiversity and Landscape and Development Management Policy NE1: Landscape in the Proposed Submission document.

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy wording has been amended to ensure landscape character areas are taken into consideration and the strategic policy provides for protection and improvement.

Issues relating to water, air and ecology are covered in other policies.

Policy NE2 - Green Infrastructure (Pages 57 and 58 – paragraphs 9.10 to 9.18)

Policy NE2: Green Infrastructure

Number of Respondents	22	Number of Objections	3
Number of General Comments	16	Number of Supports	3

Summary of comments

- Supporting text should recognise role of agriculture in supporting management of GI.
- Policy needs to be more specific.
- No mention of 'natural greenspace' or ANGSt

NHDC Response

This policy has been developed into two separate policies, Strategic Policy SP12: Green Infrastructure, Biodiversity and Landscape and Development Management Policy NE2: Green Infrastructure in the Proposed Submission document.

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF and be more detailed in its requirements.

All types of management are important in supporting Green Infrastructure.

The Open Space Review will include an assessment of natural and semi-natural open space. Where development is required to provide on-site open space, the type of open space (which could include natural or semi-natural open space) will then be determined based on need for that type of open space.

Guidance on ANGSt has now been archived by Natural England and therefore has not been included in the policies to ensure they are up to date and meet the requirements outlined in the NPPF and PPG.

Policy NE3 - Biodiversity (Pages 58 and 59 – paragraphs 9.19 to 9.22)

Policy NE3: Biodiversity

Number of Respondents	18	Number of Objections	2
Number of General Comments	14	Number of Supports	2

Summary of comments

- Policy needs to be reworded.
- Policy does not conform to paragraph 113 of NPPF.
- Clarity needed as to Local Wildlife Sites being managed.
- The policy lacks specific policy statements that promote biodiversity.

NHDC Response

This policy has now been developed into strategic Policy SP12: Green infrastructure, Biodiversity and Landscape and the development management policies Policy NE5: New and improved public open space and biodiversity and Policy NE6: Designated biodiversity and geological sites in the Proposed Submission document.

Criteria for any proposal affecting a protected site, the hierarchy of sites and their corresponding level of importance are now set out in Policy NE6: Designated biodiversity and geological sites in the Proposed Submission document. This policy now meets the requirements of paragraph 113 of the NPPF.

The Hertfordshire Environmental Records Centre maintains a record of Wildlife Sites and updates this on a regular basis.

Policy NE5: New and improved public open space and biodiversity in the Proposed Submission document now includes provisions for net gains for biodiversity and ecological networks.

Policy NE4 - Renewable energy development (Pages 59 and 60 – paragraphs 9.23 to 9.25)

Policy NE4: Renewable energy development

Number of Respondents	11	Number of Objections	2
Number of General Comments	8	Number of Supports	1

Summary of comments

- Renewable energy proposals that have a detrimental impact on the countryside (such as wind and solar farms) should be resisted, despite the energy benefits.
- The policy needs clarification.
- There should be reference to environmental, archaeological and heritage assets.
- The policy should be strengthened to encourage the building of integrated renewables, not just standalone installations.

NHDC Response

The NPPF is clear that policies should maximise renewable and low carbon energy development whilst ensuring adverse impacts are addressed satisfactorily. The policy wording has been amended to reflect this more positive approach.

The policy has also been amended to include reference to the impact of proposals on the historic environment and the supporting text has been amended to reflect the importance of the energy hierarchy and include a specific link to the design policies.

There may be instances where the provision of decentralised energy schemes may be appropriate, particularly in association with the larger development schemes – the policy has been amended to lend support to these types of scheme – subject to an assessment of the impacts.

This policy is now Policy NE12 in the Proposed Submission Local Plan.

Policy NE5 - Delivering sustainable water supply (Pages 60 and 61 – paragraphs 9.26 to 9.30)

Policy NE5: Delivering sustainable water supply

Number of Respondents	15	Number of Objections	3
Number of General Comments	11	Number of Supports	1

Summary of comments

- Policy should be strengthened with reference to the NPPF.
- No development should reduce the water table.
- Renewable energy plants utilising waste should be encouraged.
- There is an opportunity to emphasise that SuDS should deliver multiple benefits for biodiversity and amenity.
- Support the aims of the policy in seeking to reduce and manage water consumption.
- The policy does not state how water be sustainably sourced.

NHDC Response

This policy has been incorporated into Strategic Policy 11: Natural Resources and Sustainability. Other issues are adequately covered by other policies in the Natural Environment Chapter.

Policy NE6 - Reducing Flood Risk (Pages 61 to 63 – paragraphs 9.31 to 9.37)

Policy NE6: Reducing Flood Risk

Number of Respondents	20	Number of Objections	3
Number of General Comments	15	Number of Supports	2

Summary of comments

- Policy wording should be amended.
- The policy is unnecessarily onerous and not justified.
- The policy unnecessarily duplicates the NPPF.
- Policy NE6 relates to flooding and the supporting text makes reference to sewer flooding. However, it is considered that the wording of the policy could be adjusted to make it clear that it relates to all forms of flooding including sewer flooding.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy has been produced in consultation with the Environment Agency and does not directly quote the NPPF/ PPG but reflects the local situation with regard to flood risk management.

This policy has been split into two separate policies in the Proposed Submission Local Plan: NE8 Reducing Flood Risk and NE9 Sustainable Drainage Systems. This makes it easier to read and covers both issues more clearly.

Policy NE7 - Water quality and environment (Pages 63 and 64 – including paragraphs 9.38 to 9.41)

Policy NE7: Water quality and environment

Number of Respondents	8	Number of Objections	1
Number of General Comments	4	Number of Supports	3

Summary of comments

- The policy unnecessarily duplicates the NPPF.
- General support.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy has been produced in consultation with the Environment Agency and does not directly quote the NPPF/ PPG but reflects the local situation with regard to the local water environment.

This policy is now numbered as NE10 in the Proposed Submission Local Plan.

Policy NE8 - Water Framework Directive and wastewater infrastructure (Pages 64 and 65 – including paragraphs 9.42 to 9.49)

Policy NE8: Water Framework Directive and wastewater infrastructure

Number of Respondents	12	Number of Objections	0
Number of General Comments	10	Number of Supports	2

Summary of comments

- The policy unnecessarily duplicates the NPPF.
- The policy does not fully reflect 9.49 and should be amended to do so. Also, the policy should apply to all developments, not merely the larger sites.
- The policy is welcomed.
- Policy only suggests a drainage strategy for large sites, but all sites will require connection to foul sewer network which may include improvements.
- No definition of “large” sites.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy has been produced in consultation with the Environment Agency and does not directly quote the NPPF/ PPG but reflects the local situation with regard to wastewater infrastructure and the local water environment. The policy is less ambiguous and identifies requirements for drainage strategies where there are identified issues.

This policy is now numbered as NE11 in the Proposed Submission Local Plan.

Policy NE9 - Contaminated land (Pages 65 and 66 – including paragraphs 9.50 to 9.54)

Policy NE9: Contaminated land

Number of Respondents	8	Number of Objections	1
Number of General Comments	6	Number of Supports	1

Summary of comments

- All development proposals must be accompanied by an assessment by a suitably qualified person on the potential or actual impact of land contamination on surrounding receptors, otherwise the proposal will be refused.
- Contaminated land should be brought back into use.

NHDC Response

The policy wording has been amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

The policy makes it clear when permission for development affecting contaminated land will be permitted and when an assessment will be required.

This policy is now numbered as NE12 in the Proposed Submission Local Plan.

Historic Environment (Page 67 – including paragraphs 10.1 to 10.4)

10. Historic Environment

Number of Respondents	16	Number of Objections	7
Number of General Comments	9	Number of Supports	0

Summary of comments

- Chapter 10 is unclear, confusing and not compliant with the NPPF and guidance.
- The policy should be amended.
- This chapter is very thin.
- The Plan does not address or give any protection to undesignated heritage assets with archaeological interest. – suggest that Chapter 10 is redrafted to address this omission.

NHDC Response

The Historic Environment chapter has been redrafted taking into consideration the representations received.

Strategic Policy SP13: Historic Environment and the four new policies in the Historic Environment chapter (Chapter 12), together with the supporting text, in the Proposed Submission Draft set out the Council's heritage strategy which provides a positive approach for the conservation and enjoyment of the historic environment and makes reference to the relevant national policy and other legislative guidance.

A new policy, Policy HE4: Archaeology, together with its supporting text sets out clear criteria and guidance which will be applied for proposals affecting heritage assets with archaeological interest.

Policy HE1 - Heritage Strategy (Pages 67 to 70 – including paragraphs 10.5 to 10.14)

Policy HE1: Heritage Strategy

Number of Respondents	18	Number of Objections	4
Number of General Comments	14	Number of Supports	0

Summary of comments

- The policy should be amended.

- The heritage strategy must be enforced.
- The Council should do more to protect the principles and original plans of the Garden City.
- Recognition of Baldock's heritage should be more prominent.
- The chapter fails to provide a clear and concise strategy for conserving and enhancing the historic environment in North Hertfordshire.
- The justification for harm to heritage assets should be noted that where the setting of a heritage asset is part of its significance, harm should also be carefully assessed and weighed against public benefit.
- The criteria for assessing proposals to demolish non-listed buildings are extremely unclear.

NHDC Response

Policy HE1 has been deleted and is now superseded by strategic policy SP13: Historic Environment and by four new development management policies in Chapter 12 under Section 3 of the Proposed Submission Draft. The wording in these policies have amended to provide a more positive approach, reflecting Paragraph 182 of the NPPF.

Both the re-worded strategic policy and the four new development management policies in the Proposed Submission draft provide a clear strategy for conserving North Hertfordshire's historic environment. Development management policies now cover designated heritage assets, heritage assets at risk, buildings of local interest and archaeology.

The supporting text under new Policy HE1: Designated Heritage Assets includes reference to paragraph 132 of the NPPF and how proposals that will lead to less than substantial harm to a designated heritage asset are weighed against the public benefits test.

Recognition of Garden City Principles would be covered within the criteria set out under the Strategic policy SP13. Garden City principles are also covered under the Design policies. The policies and supporting text in the Proposed Submission Draft are interrelated and need to be read together when considering a specific proposal. More detail is provided with regard to Letchworth Garden City under the Communities Chapter, Chapter 13, under Section 4 of the Proposed Submission draft, where under the 'heritage section' the Plan clearly states that 'New development within Letchworth Garden City will need to demonstrate how it accords with Garden City principles'.

Reference to Baldock's heritage is covered in the Communities chapter, Chapter 13, under Section 4 of the Plan. It provides an overview of Baldock as a historic market town, as well as detailed site specific criteria for each of the allocations proposed for Baldock. Reference is made for heritage impact assessments and the need for sensitive design where development may impact on heritage assets or their setting. Strategic Policy SP14: Site BA1-North of Baldock also sets out specific measures to be addressed as part of developing this strategic housing site, where reference is made to the sensitive treatment of heritage assets and their setting including making reference to retaining framed views of St. Mary's Church from within and beyond the site and using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy.

Demolition of non-listed buildings is now covered in a separate policy, Policy HE3: Local Heritage, which sets out clear criteria which will be applied for proposals which might result in the loss of a building of local interest.

Infrastructure & Delivery (Pages 71 to 74 – including paragraphs 11.1 to 11.17)

11 Infrastructure & Delivery

Number of Respondents	31	Number of Objections	14
Number of General Comments	16	Number of Supports	1

Summary of comments

- The lack of capacity on the A1(M) is a key constraint.
- The plan acknowledges that the A1(M) is at capacity but doesn't acknowledge that the local road network/rail infrastructure is at capacity.
- Further work to be done on infrastructure.

NHDC Response

The Council acknowledges the importance of providing appropriate supporting infrastructure alongside the proposed developments. Further work has been undertaken with infrastructure providers and the Infrastructure Delivery Plan has been updated.

This further work demonstrates that the requirements placed upon development by the emerging Proposed Submission Plan should not prove a serious risk to its implementation. It shows there is scope for many of the sites identified in the emerging Plan to make significant contributions towards infrastructure and other policy objectives.

Policy ID1 - Infrastructure requirements and developer contributions (Pages 74 to 76 – including paragraphs 11.18 to 11.26)

Policy ID1: Infrastructure requirements and developer contributions

Number of Respondents	13	Number of Objections	1
Number of General Comments	11	Number of Supports	1

Summary of comments

- Generally supported.
- The potential for developer contributions to be applied to the conservation and enhancement of the historic environment should be referred to in the policy and supporting text, as part of a positive strategy for conservation and enhancement of the historic environment.
- The policy must make it very clear that development proposals will need to include provision of additional infrastructure resulting from that development.

- Viability calculations should be reassessed at the completion of a scheme as well as at planning.

Policy ID2 – Masterplans (Pages 76 and 77 – including paragraphs 11.27)

Policy ID2: Masterplans

Number of Respondents	15	Number of Objections	0
Number of General Comments	14	Number of Supports	1

Summary of comments

- The Environment Agency would like to see an amendment to the policy. The Environment Agency would like to see a further bullet point added at the end of policy ID2, such as ‘the protection and enhancement of the wider environment, dealing with land affected by contamination and the protection of controlled waters’.
- Much of the work identified as being delegated to masterplans needs to be addressed ahead of the local plan being finalised.

NHDC Response

The requirement for masterplanning is now incorporated within the new strategic policies that have been written for each of the Strategic Housing Sites in the plan (Policies SP14 to SP19 inclusive).

These policies now set out a wide range of additional criteria relating to design, layout, provision of facilities etc. that will inform the masterplanning process.

It is considered that the Plan sets out an appropriate level of detail and is supported by an appropriate level of information. The ‘balance’ between matters dealt with in, and by, the Plan and associated evidence base and matters to be addressed as detailed proposals are developed is considered correct.

7. Summary of Representations to Communities Parts I, II and III in the Local Plan Preferred Options 2014, Housing Growth Targets and Locations, 2013 and Housing Additional Location Options, 2013

This section of the consultation document includes a summary of the representations that were received in respect of the proposed development sites in the Housing Growth Levels and Options, February 2013 and the Housing Additional Location Options, July 2013 in addition to those representations received to the Local Plan Preferred Options 2014. Similar issues about the sites were raised in all three consultations and the Council has considered these as a whole in preparing the Proposed Submission Draft of the Local Plan.

The Council considered all of the representations received in response to the three consultation documents in determining the sites to be allocated in the Local Plan Proposed Submission Draft. The following pages include details of how many representations were received in respect of all three consultations. In many instances the issues raised across the three consultations were similar for all the sites and included:

- Access;
- Wildlife / biodiversity
- Congestion on the highway network / rail network;
- Safety;
- Loss of green belt / green space;
- Flooding;
- Impact on the historic environment;
- Loss of recreation opportunities;
- Lack of facilities to support additional development; and
- Shortage or pressure on education or health services.

To address the issues raised, the Council has undertaken significant further work on both the general principles supporting the housing strategy as well as all of the sites which have been included in the Plan. This has included:

- Strategic Housing Market Assessment update – to ensure the plan is informed by robust and up-to-date assessment of housing need;
- Strategic Housing Land Availability Assessment – including a critical reappraisal of the suitability and availability of all sites submitted for consideration as well as a more detailed approach to potential dwelling numbers which have been used to inform the plan;
- Housing and Green Belt Background Paper – including a broader consideration of how to balance the need for new development against those matters which can be used to restrict development (as defined in the NPPF); and
- New settlement study – to help determine whether a new settlement could make a substantive contribution to housing requirements in the current plan period to 2031.

These studies have been supplemented by further work and investigations to help ascertain whether sites can, either individually or cumulatively, be supported. These have helped to inform site-specific measures and include:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Traffic modelling;
- Infrastructure Delivery Plan
- Heritage and biodiversity assessments;
- Flood risk assessments;
- Town centre and retail study;
- Green Belt Review.

All of the evidence used to support the Local Plan can be found on the website:

<http://www.north-herts.gov.uk/home/planning/planning-policy/emerging-local-plan/proposed-submission-local-plan-2011-2031>. In addition, the Council has also worked positively with the promoters of the proposed sites to ensure deliverability.

The list of development sites in the Proposed Submission version of the Local Plan has been informed by all of this work. To try and address some of the issues raised for particular sites, each proposed allocation is supported by a list of mitigation measures that the Council would wish to see addressed as development proposals are brought forward. These are all set out in the Proposed Submission version of the Local Plan and are not duplicated here.

Representations for those sites which were included in the Housing Options Growth Levels and Locations 2011 – 2031 or the Housing Additional Location Options consultation papers but were then not included in the Local Plan Preferred Options are not summarised in this consultation statement.

Since the completion of the Preferred Options consultation, the following sites reported on in this document have been granted either outline or full planning permission. They have therefore been removed from the Plan as allocations but are still counted in the overall housing numbers as permissions:

- BA8 – Works, Station Road, Baldock
- BA9 – Adjoining Raban Court, Baldock
- HT4 – Land off Lucas Lane, Hitchin
- HT7 – John Barker Place, Hitchin
- HT9 – Centre for the Arts, William Road, Hitchin
- KM2 – Land off Lloyd Way, Kimpton
- LG2 – Former George W. King Site, Blackhorse Road, Letchworth Garden City (GC)
- LG7 – Former Gates Garage, Station Road, Letchworth GC
- LG11 – Garden Square Shopping Centre, Letchworth GC
- OF1 – Former Allotments, Luton Road, Offley
- PT2 – Holwell Turn, West Lane, Pirton
- RD2 – Farmyard, Brickyard Lane, Reed
- RY3 – Land off Burns Road, Royston

The following sites reported on in this document have not been included in the proposed submission draft of the Local Plan for other reasons:

- KM1 – Land off Hall Lane, Kimpton
- PT1 – Land east of Priors Hill, Pirton
- RY6 – Royston Football Club, Garden Walk, Royston
- SP1 – Land south of High Street, Whitwell
- TH2 – Land south of Kelshall Road, Therfield

Communities Part I: Development for North Hertfordshire's own needs (Page 78 – including paragraphs 12.1 to 12.2)

12 Communities Part I: Development for North Hertfordshire's own needs

Number of Respondents	10	Number of Objections	3
Number of General Comments	7	Number of Supports	0

Summary of comments

- Stevenage Borough Council notes that in the event that Stevenage is unable to accommodate its own development needs, they ask that North Hertfordshire properly consider the potential ability of all relevant sites and areas in this section of the plan to assist, not just those on the edge of the town.
- Historic England note that with a number of preferred sites it is difficult to ascertain the scale of possible impact on heritage assets given the vagueness of the proposed use and the lack of information on how each site might be developed.

NHDC Response

Many of the issues raised in these representations have been addressed through changes in the strategic and development policies or through the inclusion of mitigation measures for each of the proposed development sites.

Stevenage's own local plan has subsequently confirmed that the Borough can accommodate its own objectively assessed needs for housing within the administrative boundary. This issue has been discussed extensively under the Duty to Co-operate.

Specific heritage assessments have been carried out for a number of key sites and locations in the plan. The Housing and Green Belt Background Paper sets out how broader issues relating to heritage impact (and other possible harms) have been taken into consideration.

Ashwell (Pages 80 and 81 – including paragraphs 12.3 to 12.7)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Ashwell

Number of Respondents	18	Number of Objections	8
Number of General Comments	9	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

Ashwell

Number of Respondents	36	Number of Objections	32
Number of General Comments	4	Number of Supports	0

Summary of comments

- Ashwell is a small community. Development would change the character of the village.
- There has been little or no improvement to the infrastructure in spite of new development.
- There are problems with water supply, sewage capacity, electricity supply and road capacity.
- The village lacks a comprehensive public transport system.
- The village school has no capacity.
- The post office is due to close.

Where did the representations come from?

- 86% of the representations were from Ashwell residents.

AS1 Land west of Claybush Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

AS1 Land west of Claybush Road

Number of Respondents	43	Number of Objections	35
Number of General Comments	7	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

AS1 Land west of Claybush Road

Number of Respondents	144	Number of Objections	135
Number of General Comments	8	Number of Supports	1

Summary of comments

- Planning permission has been refused on four previous occasions.
- Development of the site conflicts with the emerging Neighbourhood Plan.
- The boundary of the site should exclude the water company land on Claybush Road.
- There is concern over loss of prime agricultural land.
- There are access issues on the site.
- The distance from the village means that more people would use their cars for short journeys.
- Natural England note the site is in close proximity to Ashwell Springs SSSI.
- Historic England note there may be an impact on scheduled monument(s).
- Hertfordshire County Council note there may be potential for bats and lizards.

Where did the representations come from?

- 92% of the representations were from Ashwell residents.

Baldock (Pages 82 to 84 – including paragraphs 12.8 to 12.20)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Baldock

Number of Respondents	67	Number of Objections	30
Number of General Comments	35	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

Baldock

Number of Respondents	413	Number of Objections	380
Number of General Comments	32	Number of Supports	1

Summary of comments

- There is concern regarding the scale of development proposed for Baldock.
- There is a lack of infrastructure to accommodate development, particularly issues of traffic, schools, health services and water supplies.

Where did the representations come from?

- 61.5% of the representations were from Baldock residents.
- Another sizable amount (20.6%) were from Bygrave.
- The rest were spread evenly throughout the District.

BA1 Blackhorse Farm (land north of Baldock) (mostly in Bygrave parish)

BA1 Blackhorse Farm (land north of Baldock) (mostly in Bygrave parish)

Number of Respondents	526	Number of Objections	482
Number of General Comments	39	Number of Supports	5

Summary of comments

- The proposed removal of Green Belt is contrary to the NPPF and other government guidance.
- The development is separated from the employment sites by the railway.

- Development would involve the loss of the safe cycle route along Bygrave Road which is heavily used.
- Historic England has concerns regarding the site because of its size and potential impact on the historic character of Baldock.
- The Environment Agency has indicated a significant surface water flood risk in the Laymore Farm, Freeland Farm and Half Way Farm area.

Where did the representations come from?

- The majority of the respondents (71%) were based in Baldock.
- The second largest number of representations came from Bygrave (10.1%)
- The rest were spread throughout the District.

BA2 Land west of Clothall Road (in Clothall parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA2 Land west of Clothall Road (in Clothall parish)

Number of Respondents	15	Number of Objections	5
Number of General Comments	10	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

BA2 Land west of Clothall Road (in Clothall parish)

Number of Respondents	60	Number of Objections	42
Number of General Comments	9	Number of Supports	9

Summary of comments

- Development will result in the loss of green space.
- Historic England notes that the site borders a large scheduled ancient monument.
- The proposals will increase traffic, particularly at the already congested junction between Whitehorse Street and Hitchin Street. The proposals will increase traffic on South Road.

Where did the representations come from?

- 73% of the representations were from Baldock residents.

BA3 Land south of Clothall Common (in Clothall parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA3 Land south of Clothall Common (in Clothall parish)

Number of Respondents	18	Number of Objections	6
Number of General Comments	12	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

BA3 Land south of Clothall Common (in Clothall parish)

Number of Respondents	67	Number of Objections	49
Number of General Comments	11	Number of Supports	7

Summary of comments

- The scale of development is disproportionate to the size of Baldock.
- The site is quite remote from the station which will lead to an increase in car usage.
- There will be an increase in traffic at the congested junction between Whitehorse Street and Hitchin Street. The proposals will increase traffic on South Road and Clothall Road.
- Historic England notes that the site borders a large scheduled ancient monument.

Where did the representations come from?

- 78.7% of the representations were from Baldock residents.

BA4 Land east of Clothall Common (part in Clothall parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA4 Land east of Clothall Common (part in Clothall parish)

Number of Respondents	11	Number of Objections	2
Number of General Comments	9	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014
BA4 Land east of Clothall Common (part in Clothall parish)

Number of Respondents	46	Number of Objections	31
Number of General Comments	8	Number of Supports	7

Summary of comments

- The development will result in a loss of green space.
- The proposals will increase traffic at the already congested junction between Whitehorse Street and Hitchin Street. The proposals will increase traffic on South Road.
- The Environment Agency notes that the site is in Flood Zone One.

Where did the representations come from?

- 71.4% of the representations were from Baldock residents.

BA5 Land off Yeomanry Drive

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA5 Land off Yeomanry Drive

Number of Respondents	3	Number of Objections	0
Number of General Comments	3	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014
BA5 Land off Yeomanry Drive

Number of Respondents	36	Number of Objections	24
Number of General Comments	7	Number of Supports	5

Summary of comments

- Loss of Green Belt.
- Development will increase traffic on Clothall Road and South Street.
- Historic England notes that the site borders a large scheduled ancient monument.

Where did the representations come from?

- 77% of the representations were from Baldock residents.

BA6 Land at Icknield Way

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA6 Land at Icknield Way

Number of Respondents	5	Number of Objections	0
Number of General Comments	3	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

BA6 Land at Icknield Way

Number of Respondents	22	Number of Objections	10
Number of General Comments	7	Number of Supports	5

Summary of comments

- The Environment Agency notes a significant surface water flood risk.
- There is a need to address traffic problems along the Icknield Way which serves the site.

Where did the representations come from?

- 53% of the respondents were from Baldock, with the next largest group of respondents (10%) drawn from respondents with a Luton address.

BA7 Land rear of Clare Crescent

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA7 Land rear of Clare Crescent

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014 BA7 Land rear of Clare Crescent

Number of Respondents	26	Number of Objections	14
Number of General Comments	7	Number of Supports	5

Summary of comments

- The land at BA7 has been allotments since the 1930s.
- The site is too small to accommodate affordable housing.
- Lack of vehicular access.

Where did the representations come from?

- 59% of the representations were from Baldock residents.

BA8 Works, Station Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA8 Works, Station Road

Number of Respondents	0	Number of Objections	0
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014 BA8 Works, Station Road

Number of Respondents	22	Number of Objections	10
Number of General Comments	7	Number of Supports	5

Summary of comments

- Development will make traffic worse.
- There is significant surface water risk to access (Station Road).

Where did the representations come from?

- 53% of the representations were from Baldock residents.

BA9 Adjoining Raban Court

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BA9 Adjoining Raban Court

Number of Respondents	0	Number of Objections	0
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

BA9 Adjoining Raban Court

Number of Respondents	21	Number of Objections	9
Number of General Comments	7	Number of Supports	5

Summary of comments

- The Environment Agency notes a flood risk to access (Royston Road).
- There should be site specific criteria to guide development and protect the setting of Raban Court.

Where did the representations come from?

- 56% of the representations were from Baldock residents.

BA10 Royston Road

BA10 Royston Road

Number of Respondents	9	Number of Objections	3
Number of General Comments	5	Number of Supports	1

Summary of comments

- Allocation is unnecessary as there is an oversupply of employment sites in the District.
- Expansion of employment uses on the site will contribute to traffic delays in Baldock town centre.
- The Environment Agency notes that the site has significant surface water flooding particularly around Warren Farm.
- Hertfordshire County Council highways note that the site has poor non-vehicle access.

BE1 Bondor Business Centre

BE1 Bondor Business Centre

Number of Respondents	2	Number of Objections	0
Number of General Comments	1	Number of Supports	1

Summary of comments

- The site is small and already partially in employment use.
- The Hertfordshire County ecological unit notes that the site is of negligible ecological value.

BE2 Royston Road

BE2 Royston Road

Number of Respondents	5	Number of Objections	2
Number of General Comments	3	Number of Supports	0

- The site is small and already partially in employment use.
- There is a concern about the impact that the development of this site might have on traffic.

BB1 Bondor Business Centre East

BB1 Bondor Business Centre East

Number of Respondents	2	Number of Objections	0
Number of General Comments	1	Number of Supports	1

Summary of comments

- The site is small and already partially in employment use.
- The site is of negligible ecological sensitivity.

Barkway (Page 85 – including paragraphs 12.21 to 12.25)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Barkway

Number of Respondents	10	Number of Objections	1
Number of General Comments	9	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Barkway

Number of Respondents	3	Number of Objections	0
Number of General Comments	3	Number of Supports	0

Summary of comments

- Barkway has the potential to contribute further to North Hertfordshire's housing number.
- The settlement boundary has been too tightly defined to offer any reasonable expansion of the village.

BK1 Land west of Cambridge Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BK1 Land west of Cambridge Road

Number of Respondents	1	Number of Objections	1
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

BK1 Land west of Cambridge Road

Number of Respondents	7	Number of Objections	1
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Number of General Comments	5	Number of Supports	1
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Summary of comments

- A localised foul network capacity upgrade may be required to enable the development of this site.
- The site has lifetime tenant grazing rights.
- The site is located outside the settlement boundary.

BK2 Land off Windmill Close

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

BK2 Land off Windmill Close

Number of Respondents	5	Number of Objections	2
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Number of General Comments	3	Number of Supports	0
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Total number of representations received in the Preferred Options Consultation 2014

BK2 Land off Windmill Close

Number of Respondents	5	Number of Objections	1
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Number of General Comments	4	Number of Supports	0
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Summary of comments

- Part of the site was the subject of a Village Green application in March 2013.
- The Environment Agency has noted that the site is in Flood Zone 1.
- The site will only deliver 3 affordable homes.

Barley (Page 86 – paragraphs including 12.26 to 12.30)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Barley

Number of Respondents	5	Number of Objections	1
Number of General Comments	4	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Barley

Number of Respondents	5	Number of Objections	2
Number of General Comments	3	Number of Supports	0

Summary of comments

- There is confusion regarding a boundary alteration from Barley Parish Council.
- Objection to Barley not having sites allocated as Barley is one of only five villages which have all five of the facilities identified and not proposed for development.
- Barley has good facilities and should be developed.
- Any site that might come forward for Barley should carefully consider infrastructure and sustainability.

Bygrave (Page 87 – paragraphs including 12.31 to 12.35)

Bygrave

Number of Respondents	70	Number of Objections	70
Number of General Comments	0	Number of Supports	0

Summary of comments

- There is a threat to the vitality of Baldock Town Centre.
- There is a lack of infrastructure to accommodate any development in nearby sites.

Where did the representations come from?

- 88% of the representations were from Bygrave residents.

Caldecote (Page 88 – paragraphs 12.36 to 12.40)

Caldecote

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Clothall (Page 89 – paragraphs 12.41 to 12.45)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Clothall

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Clothall

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Codicote (Pages 90 and 91 – including paragraphs 12.46 to 12.54)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Codicote

Number of Respondents	40	Number of Objections	22
Number of General Comments	18	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Codicote

Number of Respondents	231	Number of Objections	212
Number of General Comments	14	Number of Supports	5

Summary of comments

- Proposals are unsustainable due to lack of employment opportunities.
- Loss of village character.
- It will result in the removal of sites from the Green Belt without exceptional circumstances.
- There is no surgery in the village and existing surgeries in Welwyn are at capacity.

Where did the representations come from?

- 90% of the representations were from Codicote residents.

CD1 Land south of Cowards Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

CD1 Land south of Cowards Lane

Number of Respondents	25	Number of Objections	17
Number of General Comments	3	Number of Supports	5

Total number of representations received in the Preferred Options Consultation 2014
CD1 Land south of Cowards Lane

Number of Respondents	80	Number of Objections	72
Number of General Comments	7	Number of Supports	1

Summary of comments

- Loss of Green Belt.
- The Environment Agency has identified the site as being in Flood Zone 1.
- The scale of development is out of keeping with the surroundings.
- There will be access issues. Access from B656 will cause congestion.
- Cowards Lane is inadequate for development.
- The amount of parking proposed is inadequate.

Where did the representations come from?

- 87% of the representations were from Codicote residents.

CD2 Codicote Garden Centre, High Street

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

CD2 Codicote Garden Centre, High Street

Number of Respondents	46	Number of Objections	29
Number of General Comments	16	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014
CD2 Codicote Garden Centre, High Street

Number of Respondents	73	Number of Objections	64
Number of General Comments	8	Number of Supports	1

Summary of comments

- Access from the B656 will cause congestion.
- The site lies west of a listed church.
- The closure of the garden centre and café will result in a loss of amenity.

Where did the representations come from?

- 85% of the representations were from Codicote residents

CD3 Land north of The Close

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

CD3 Land north of The Close

Number of Respondents	37	Number of Objections	27
Number of General Comments	5	Number of Supports	5

Total number of representations received in the Preferred Options Consultation 2014

CD3 Land north of The Close

Number of Respondents	93	Number of Objections	87
Number of General Comments	6	Number of Supports	0

Summary of comments

- Previous refusal of planning permission on the site.
- Loss of Green Belt.
- It was previously determined that development would be unacceptable due to traffic concerns.

Where did the representations come from?

- 88% of the representations were from Codicote residents

CD4 Land at Pulmore Water, St Albans Road

CD4 Land at Pulmore Water, St Albans Road

Number of Respondents	7	Number of Objections	5
Number of General Comments	2	Number of Supports	0

Summary of comments

- Loss of Green Belt.
- Development would increase traffic on St. Albans Road.
- The Environment Agency has noted that the site is adjacent to an operational chalk quarry.
- Further proposals about the proposed drainage strategy will need to be provided.

Graveley (Page 92 – paragraphs 12.55 to 12.61)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Graveley

Number of Respondents	3	Number of Objections	1
Number of General Comments	2	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Graveley

Number of Respondents	10	Number of Objections	7
Number of General Comments	3	Number of Supports	0

Summary of comments

- Development will lead to Graveley merging with Stevenage and losing its identity.
- The heritage of Graveley will be under threat.
- The housing number allocated for Graveley is too low compared to other similar settlements.
- Graveley does not have sufficient infrastructure to accommodate development.

Where did the representations come from?

- 33% of the representations were from Graveley residents.

GR1 Land at Milksey Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

GR1 Land at Milksey Lane

Number of Respondents	8	Number of Objections	2
Number of General Comments	5	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

GR1 Land at Milksey Lane

Number of Respondents	6	Number of Objections	0
Number of General Comments	5	Number of Supports	1

Summary of comments

- Environment Agency notes the site is over one hectare in Flood Zone 1.
- The site lies partly within Graveley Conservation Area.

Great Ashby & North East Stevenage (Pages 93 and 94 – including paragraphs 12.62 to 12.66)

Great Ashby & North East of Stevenage

Number of Respondents	11	Number of Objections	6
Number of General Comments	4	Number of Supports	1

Summary of comments

- Loss of Green Belt status.
- Development of the proposed sites is unsustainable.
- The site is being developed primarily to serve the needs of Stevenage which has not exhausted its development sites.
- General lack of infrastructure.

Where did the representations come from?

- 44.4% of the representations were from Weston residents.
- Residents of Peterborough, Graveley, Letchworth, Hitchin and Stevenage made up the remaining 55.6% (11.1% each).

GA1 Land at Roundwood (in Graveley parish)

GA1 Land at Roundwood (in Graveley parish)

Number of Respondents	155	Number of Objections	141
Number of General Comments	14	Number of Supports	0

Summary of comments

- Loss of Green Belt status.
- Access to the site.
- Impact of the proposed development on the setting of the scheduled and Grade II* listed St. Ethelreda's Church at Manor Farm.
- Development will encourage the coalescence of Graveley and Stevenage.
- The access routes are unsuitable.

Where did the representations come from?

- 70% of the representations were from Weston residents.
- 12% were from Stevenage residents.

GA2 Land off Mendip Way (in Weston Parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

GA2 Land off Mendip Way (in Weston Parish)

Number of Respondents	26	Number of Objections	15
Number of General Comments	7	Number of Supports	4

Total number of representations received in the Preferred Options Consultation 2014

GA2 Land off Mendip Way (in Weston Parish)

Number of Respondents	166	Number of Objections	146
Number of General Comments	18	Number of Supports	2

Summary of comments

- Loss of Green Belt status.
- The impact of development on the woodlands around the site.
- The impact of the proposed development on the setting of Grade II listed building at Tilekiln Farm.
- Access to the site is along congested roads in Great Ashby.
- Hertfordshire County Council notes that the site falls outside accessibility criteria to local bus services. Size is of sufficient critical mass to warrant local bus service provision to be included.

Where did the representations come from?

- 72% of the representations were from Weston residents.
- 12% were from Stevenage residents.

Hexton (Page 95 – including paragraphs 12.67 to 12.72)

Hexton

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- The policy should mention the Hertfordshire and Middlesex Wildlife Trust reserve of Hexton Chalk Pits.

Hinxworth (Page 96 – including paragraphs 12.73 to 12.77)

Hinxworth

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Hitchin (Pages 97 to 102 – including paragraphs 12.78 to 12.92)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Hitchin

Number of Respondents	29	Number of Objections	0
Number of General Comments	29	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Hitchin

Number of Respondents	38	Number of Objections	29
Number of General Comments	8	Number of Supports	1

Summary of comments

- It will set a precedent for building on Green Belt land.
- Hitchin could take more housing than proposed.
- Facilities for pedestrians and cyclists should be improved.
- There are concerns that further development will have a negative impact on the town's character.
- The Council has failed to recognise that Hitchin is far more popular with commuters than Letchworth Garden City and Baldock.

Where did the representations come from?

- 77% of the representations were from Hitchin residents.

HT1 Land at Highover Farm

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT1 Land at Highover Farm

Number of Respondents	15	Number of Objections	4
Number of General Comments	7	Number of Supports	4

Total number of representations received in the Preferred Options Consultation 2014 HT1 Land at Highover Farm

Number of Respondents	116	Number of Objections	98
Number of General Comments	17	Number of Supports	1

Summary of comments

- The site has a history of planning permission refusal.
- When developed, HT1 would merge Hitchin and Letchworth.
- Development will lead to an increase in traffic. It has been noted that development will place an extra burden on the already highly congested A505 junction with the Stotfold Road. The A1(M) will have access issues.
- The site is not a comfortable walking distance from Hitchin Station or the town centre.

Where did the representations come from?

- 86% of the representations were from Hitchin residents.

HT2 Land north of Pound Farm (St Ippolyts parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT2 Land north of Pound Farm (St Ippolyts parish)

Number of Respondents	15	Number of Objections	3
Number of General Comments	11	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014 HT2 Land north of Pound Farm (St Ippolyts parish)

Number of Respondents	36	Number of Objections	20
Number of General Comments	14	Number of Supports	2

Summary of comments

- Access on the site should not be via Broadmeadow Estate.
- It will damage the character of St Ippolyts and merge the village with Hitchin.

Where did the representations come from?

- 72% of the representations were from Hitchin residents.

HT3 Land south of Oughtonhead Way

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT3 Land south of Oughtonhead Way

Number of Respondents	376	Number of Objections	113
Number of General Comments	262	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

HT3 Land south of Oughtonhead Way

Number of Respondents	265	Number of Objections	256
Number of General Comments	7	Number of Supports	2

Summary of comments

- Protection of flora and fauna on the site should be taken in to consideration.
- Traffic and access issues. Oughton Head Way and Oughton Head Lane have been mentioned as having existing traffic and access issues.

Where did the representations come from?

- 90% of the representations were from Hitchin residents.

HT4 Land off Lucas Lane

HT4 Land off Lucas Lane

Number of Respondents	273	Number of Objections	260
Number of General Comments	9	Number of Supports	4

Summary of comments

- Protection of flora and fauna on the site should be taken in to consideration.
- There is a covenant on the site that states it can only be used for sports purposes.
- Traffic and access issues. Oughton Head Way and Oughton Head Lane have been mentioned as having existing traffic and access issues.

- Development of this site will lead to a loss of a sports field.

Where did the representations come from?

- 91% of the representations were from Hitchin residents.

HT5 Land at junction of Grays Lane and Lucas Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT5 Land at junction of Grays Lane and Lucas Lane

Number of Respondents	24	Number of Objections	10
Number of General Comments	14	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

HT5 Land at junction of Grays Lane and Lucas Lane

Number of Respondents	261	Number of Objections	253
Number of General Comments	7	Number of Supports	1

Summary of comments

- Protection of flora and fauna on the site should be taken in to consideration.
- Traffic and access issues. Oughton Head Way and Oughton Head Lane have been mentioned as having existing traffic and access issues.
- Natural England highlight the site is in close proximity to the Chilterns AONB hence an assessment must be undertaken to ensure that the allocation can be delivered without having a significant impact on the purposes of designation of the AONB.

Where did the representations come from?

- 89% of the representations were from Hitchin residents.

HT6 Land at junction of Grays Lane and Crow Furlong

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT6 Land at junction of Grays Lane and Crow Furlong

Number of Respondents	700	Number of Objections	217
Number of General Comments	412	Number of Supports	71

Total number of representations received in the Preferred Options Consultation 2014

HT6 Land at junction of Grays Lane and Crow Furlong

Number of Respondents	260	Number of Objections	252
Number of General Comments	7	Number of Supports	1

Summary of comments

- Traffic and access issues. Oughton Head Way and Oughton Head Lane have been mentioned as having existing traffic and access issues.
- Natural England highlight the site is in close proximity to the Chilterns AONB hence an assessment must be undertaken to ensure that the allocation can be delivered without having a significant impact on the purposes of designation of the AONB.

Where did the representations come from?

- 90% of the representations were from Hitchin residents.

HT7 John Barker Place

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT7 John Barker Place

Number of Respondents	0	Number of Objections	0
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

HT7 John Barker Place

Number of Respondents	5	Number of Objections	0
Number of General Comments	5	Number of Supports	0

Summary of comments

- The Environment Agency note that the site has minor surface water flood risk to access (John Barker Place).
- Anglian Water has no objection to the principle of development on this site. However it is important to note that there are sewers which cross this site.

HT8 Cooks Way

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

HT8 Cooks Way

Number of Respondents	0	Number of Objections	0
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

HT8 Cooks Way

Number of Respondents	7	Number of Objections	0
Number of General Comments	7	Number of Supports	0

Summary of comments

- The Environment Agency note there may be potential contamination from previous uses (works) – PRA required (outside SPZs).
- National Grid identified this site as being crossed by or within close proximity to IP/HP apparatus.

HT9 Centre for the Arts, Willian Road

HT9 Centre for the Arts, Willian Road

Number of Respondents	7	Number of Objections	0
Number of General Comments	6	Number of Supports	1

Summary of comments

- Traffic issues.
- The Environment Agency note site is over one hectare in Flood Zone 1

HE1 Wilbury Way

HE1 Wilbury Way

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- This site would be more suitable for residential development.

HE2 Burymead Road

HE2 Burymead Road

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

HE3 Station Approach

HE3 Station Approach

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

HE4 Land adjacent to Priory Park

HE4 Land adjacent to Priory Park

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

HB3 Burymead Road

HB3 Burymead Road

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

HB4 Land adjacent to Priory Park

HB4 Land adjacent to Priory Park

Number of Respondents	3	Number of Objections	2
Number of General Comments	1	Number of Supports	0

Summary of comments

- The site is used by the community. It contains wildlife.

Holwell (Page 103 – including paragraphs 12.93 to 12.96)

Holwell

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- The site is used by the community. It contains wildlife.

Ickleford (Page 104 – including paragraphs 12.97 to 12.101)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Ickleford

Number of Respondents	4	Number of Objections	1
Number of General Comments	3	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Ickleford

Number of Respondents	2	Number of Objections	1
Number of General Comments	0	Number of Supports	1

Summary of comments

- Loss of Green Belt.
- It will set a precedent for future Green Belt development.
- Threat of coalescence between Ickleford and Hitchin.
- North Hertfordshire District Council should not take housing from neighbouring authorities.

IC1 Duncots Close

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

IC1 Duncots Close

Number of Respondents	8	Number of Objections	6
Number of General Comments	1	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

IC1 Duncots Close

Number of Respondents	13	Number of Objections	8
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Number of General Comments	5	Number of Supports	0
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Summary of comments

- Traffic and access issues. These issues would risk pedestrian safety due to inadequate footpaths.
- Environment Agency – Potential surface water flood risk/ ponding issues to eastern side of site.

Where did the representations come from?

- 67% of the representations were from Ickleford residents.

IC2 Burford Grange, Bedford Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

IC2 Burford Grange, Bedford Road

Number of Respondents	13	Number of Objections	9
Number of General Comments	2	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

IC2 Burford Grange, Bedford Road

Number of Respondents	14	Number of Objections	8
Number of General Comments	5	Number of Supports	1

Summary of comments

- Traffic and access issues. These issues would put risk pedestrian safety.
- The site could accommodate more housing than the allocated 48.

Where did the representations come from?

- 67% of the representations were from Ickleford residents.

Kelshall (Page 105 – including paragraphs 12.102 to 12.106)

Kelshall

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- Any future development that may occur on the site should carefully consider infrastructure and sustainability.

Kimpton (Page 106 – including paragraphs 12.107 to 12.112)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Kimpton

Number of Respondents	8	Number of Objections	2
Number of General Comments	6	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Kimpton

Number of Respondents	11	Number of Objections	6
Number of General Comments	2	Number of Supports	3

Summary of comments

- Loss of Green Belt.
- Loss of character.
- The Council's infilling policy is flawed.

Where did the representations come from?

- 75% of the representations were from Kimpton residents.

KM1 Land off Hall Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KM1 Land off Hall Lane

Number of Respondents	29	Number of Objections	26
Number of General Comments	3	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

KM1 Land off Hall Lane

Number of Respondents	28	Number of Objections	19
Number of General Comments	5	Number of Supports	4

Summary of comments

- Uncertainty regarding landowner's desire to make site available.
- Environment Agency – Site is over one hectare in Flood Zone 1.
- Planning permission on the site was refused before.

Where did the representations come from?

- 81% of the representations were from Kimpton residents.

KM2 Land off Lloyd Way

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KM2 Land off Lloyd Way

Number of Respondents	1	Number of Objections	0
Number of General Comments	0	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

KM2 Land off Lloyd Way

Number of Respondents	6	Number of Objections	2
Number of General Comments	4	Number of Supports	0

Summary of comments

- Traffic and access issues which puts pedestrian safety at risk.
- Environment Agency – Site is over one hectare in Flood Zone 1.

KM3 Land north of High Street

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KM3 Land north of High Street

Number of Respondents	2	Number of Objections	0
Number of General Comments	0	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

KM3 Land north of High Street

Number of Respondents	8	Number of Objections	2
Number of General Comments	6	Number of Supports	0

Summary of comments

- Historic England advise the site adjoins Kimpton Bottom Conservation Area has the potential to impact on the significance and setting of the conservation area, particularly given its position as a green and open site on the edge of built development.

King's Walden (Page 107 – including paragraphs 12.113 to 12.117)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Kings Walden

Number of Respondents	11	Number of Objections	3
Number of General Comments	8	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Kings Walden

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- Loss of Green Belt land.
- Threat of coalescence.
- Luton should pay for any affordable housing should it prove necessary to develop east of Luton.

KW1 Land west of The Heath, Breachwood Green

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KW1 Land west of The Heath, Breachwood Green

Number of Respondents	12	Number of Objections	8
Number of General Comments	2	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

KW1 Land west of The Heath, Breachwood Green

Number of Respondents	9	Number of Objections	3
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Knebworth (Pages 108 and 109 – including paragraphs 12.118 to 12.124)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Knebworth

Number of Respondents	27	Number of Objections	16
Number of General Comments	11	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Knebworth

Number of Respondents	201	Number of Objections	184
Number of General Comments	13	Number of Supports	4

Summary of comments

- Loss of Green Belt.
- Loss of village character.
- Lack of infrastructure in the village e.g. doctor's surgery, parking, secondary school and possibly primary schools.
- Traffic on B197.

Where did the representations come from?

- 81% of the representations were from Knebworth residents.

KB1 Land at Deards End

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KB1 Land at Deards End

Number of Respondents	14	Number of Objections	9
Number of General Comments	4	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

KB1 Land at Deards End

Number of Respondents	139	Number of Objections	121
Number of General Comments	12	Number of Supports	6

Summary of comments

- Permission was refused in the past.
- Access issues. Traffic to Stevenage would have to use Deards End Lane which is narrow and busy.
- The Environment Agency has identified parts the site as being in Flood Zone 1.
- KB1 should include land to the rear of Redwood on Deards End Lane.

Where did the representations come from?

- 84% of the representations were from Knebworth residents.

KB2 Land off Gypsy Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

KB2 Land off Gypsy Lane

Number of Respondents	12	Number of Objections	9
Number of General Comments	2	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

KB2 Land off Gypsy Lane

Number of Respondents	143	Number of Objections	125
Number of General Comments	12	Number of Supports	6

Summary of comments

- Previous refusal of permission for a school on this site.
- Access issues. Traffic would have to use narrow Gypsy Lane which a previous appeal decision concluded was inadequate.
- Traffic to Stevenage would have to use Deards End Lane.

- The junction at Gypsy Lane and Park Lane is dangerous.
- The proposed widening of the A1(M) will impact on residents of the development.
- The majority of site falls outside accessibility to rail and bus criteria.
- The site is more than 800 metres from services in the village so residents are unlikely to walk.

Where did the representations come from?

- 85% of the representations were from Knebworth residents.

Langley (Page 110 – including paragraphs 12.125 to 12.128)

Langley

Number of Respondents	2	Number of Objections	1
Number of General Comments	1	Number of Supports	0

Summary of comments

- Loss of Green Belt.
- Objection to any development in North Hertfordshire.

Letchworth Garden City (Pages 111 to 114 – including paragraphs 12.129 to 12.143)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Letchworth Garden City

Number of Respondents	16	Number of Objections	11
Number of General Comments	5	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014
Letchworth Garden City

Number of Respondents	56	Number of Objections	50
Number of General Comments	5	Number of Supports	1

Summary of comments

- There is a lack of infrastructure to accommodate development.
- Development poses a threat to the Garden City.
- Loss of Green Belt.
- There is no parking at the train station.
- Impact on wildlife and heritage.
- The Plan fails to recognise the differences between Hitchin, Letchworth and Baldock.
- Letchworth is too small to be viable in terms of population. It needs more development like Hitchin.

Where did the representations come from?

- 95% of the representations were from residents of Letchworth Garden City.

LG1 Land north of Letchworth

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG1 Land north of Letchworth

Number of Respondents	182	Number of Objections	88
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Number of General Comments	59	Number of Supports	35
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Total number of representations received in the Preferred Options Consultation 2014
 LG1 Land north of Letchworth

Number of Respondents	289	Number of Objections	261
Number of General Comments	23	Number of Supports	5

Summary of comments

- Traffic and access issues.
- Threat to surrounding conservation area.
- The Heritage Foundation indicates they would not be willing to release Green Belt land for development in the absence of a clear demonstration of need and no alternative sites being available.
- The Grange Estate is under threat as a valuable amenity for local residents.
- Development would threaten the heritage of the site.

Where did the representations come from?

- 86% of the representations were from residents of Letchworth Garden City.

LG2 Former George W. King site, Blackhorse Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG2 Former George W. King site, Blackhorse Road

Number of Respondents	2	Number of Objections	1
Number of General Comments	0	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014
 LG2 Former George W. King site, Blackhorse Road

Number of Respondents	13	Number of Objections	7
Number of General Comments	5	Number of Supports	1

Summary of comments

- Access issues due to traffic.

- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.
- The site may be better used for industrial development as it is surrounded by factories.

Where did the representations come from?

- 75% of representations were from residents of Letchworth Garden City.

LG3 Land east of Kristiansand Way and Talbot Way

LG3 Land east of Kristiansand Way and Talbot Way

Number of Respondents	73	Number of Objections	66
Number of General Comments	7	Number of Supports	0

Summary of comments

- The site is better served as green space.
- The roads surrounding the site are quite narrow, and will add to the traffic problems through Norton.
- Letchworth Garden City Heritage Foundation has a freehold interest on the site.
- Confusion whether allotments are considered part of the site of redevelopment.

Where did the representations come from?

- 88% of the representations were from residents of Letchworth Garden City.

LG4 Land north of former Norton School, Norton Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG4 Land north of former Norton School, Norton Road

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014
LG4 Land north of former Norton School, Norton Road

Number of Respondents	10	Number of Objections	4
Number of General Comments	5	Number of Supports	1

Summary of comments

- The area is already overcrowded with cars which causes parking issues.
- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.

Where did the representations come from?

- 50% of the representations were from residents of Letchworth Garden City.

LG5 Land at Birds Hill

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG5 Land at Birds Hill

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014
LG5 Land at Birds Hill

Number of Respondents	7	Number of Objections	0
Number of General Comments	5	Number of Supports	2

Summary of comments

- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.
- The Environment Agency notes the site is over one hectare in Flood Zone 1.

LG6 Land off Radburn Way

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG6 Land off Radburn Way

Number of Respondents	6	Number of Objections	1
Number of General Comments	5	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

LG6 Land off Radburn Way

Number of Respondents	13	Number of Objections	7
Number of General Comments	5	Number of Supports	1

Summary of comments

- The site may be of ecological and historical importance to the area. Reps make reference to trees on site.
- The site has received previous opposition from residents (the Buffer Strip).

Where did the representations come from?

- 50% of the representations were from residents of Letchworth Garden City.

LG7 Former Gates Garage, Station Road

LG7 Former Gates Garage, Station Road

Number of Respondents	7	Number of Objections	0
Number of General Comments	5	Number of Supports	2

Summary of comments

- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.

LG8 Pixmore Centre, Pixmore Avenue

LG8 Pixmore Centre, Pixmore Avenue

Number of Respondents	5	Number of Objections	0
Number of General Comments	4	Number of Supports	1

Summary of comments

- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.

LG9 Former Lannock School

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

LG9 Former Lannock School

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

LG9 Former Lannock School

Number of Respondents	6	Number of Objections	1
Number of General Comments	4	Number of Supports	1

Summary of comments

- This site should be retained as open space.
- Significant surface water flood risk on site.

LG10 Former playing field, Croft Lane

LG10 Former playing field, Croft Lane

Number of Respondents	12	Number of Objections	6
Number of General Comments	5	Number of Supports	1

Summary of comments

- Losing this site would damage the concept of the Garden City.
- The roads surrounding the site are quite narrow. There is a parking issue due to walkers in the area.
- Sport England - Objection is made to a potential allocation on this site as it would involve the permanent loss of one of the former Norton School's detached playing fields which may offer potential to meet community playing pitch needs.

Where did the representations come from?

- 50% of the representations were from residents of Letchworth Garden City.

LG11 Garden Square Shopping Centre

LG11 Garden Square Shopping Centre

Number of Respondents	5	Number of Objections	0
Number of General Comments	4	Number of Supports	1

Summary of comments

- Letchworth Garden City Heritage Foundation has a freehold interest on the site, subject to existing leases.
- Anglian Water has no objection to the principle of development on this site.

LG12 Former power station, Works Road

LG12 Former power station, Works Road

Number of Respondents	4	Number of Objections	0
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Number of General Comments	4	Number of Supports	0
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Summary of comments

- Site is over one hectare in Flood Zone 1 - FRA required.

LE1 Works Road

LE1 Works Road

Number of Respondents	2	Number of Objections	0
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Number of General Comments	2	Number of Supports	0
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Summary of comments

- Hertfordshire County Council – possible reptile interest adjacent to railway depending on habitat availability. County deem the site to have no ecological constraint.

LE2 Blackhorse Road

LE2 Blackhorse Road

Number of Respondents	3	Number of Objections	1
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Number of General Comments	2	Number of Supports	0
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Summary of comments

- Hertfordshire County Council – County deem the site to have no ecological constraint.
- Site LE2 should be allocated as housing.

LE3 Icknield Way

LE3 Icknield Way

Number of Respondents	2	Number of Objections	0
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Number of General Comments	2	Number of Supports	0
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Summary of comments

- Hertfordshire County Council – the site is close to Norton Common wildlife site. Reptiles possible if habitats suitable adjacent to railway. County deem the site to have no ecological constraint.

LE4 Spirella

LE4 Spirella

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- Hertfordshire County Council – the site is close to Norton Common wildlife site. County deem the site to have no ecological constraint.

LB2 Blackhorse Road North

LB2 Blackhorse Road North

Number of Respondents	2	Number of Objections	1
Number of General Comments	1	Number of Supports	0

Summary of comments

- Hertfordshire County Council – County deem the site to have no ecological constraint.

LB3 Icknield Way North

LB3 Icknield Way North

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- Hertfordshire County Council – the site is close to Norton Common wildlife site. Reptiles possible if habitats suitable adjacent to railway. County deem the site to have no ecological constraint.

LB4 Icknield Way South

LB4 Icknield Way South

Number of Respondents	2	Number of Objections	1
Number of General Comments	1	Number of Supports	0

- Hertfordshire County Council – the site is close to Norton Common wildlife site. Reptiles possible if habitats suitable adjacent to railway. County deem the site to have no ecological constraint.
- Site LB4 should be allocated as housing.

LB5 Spirella

LB5 Spirella

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- Hertfordshire County Council – the site is close to Norton Common wildlife site. County deem the site to have no ecological constraint.

Lilley (Page 115 – including paragraphs 12.144 to 12.149)

Lilley

Number of Respondents	2	Number of Objections	1
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Newnham (Page 116 – including paragraphs 12.150 to 12.155)

Newnham

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Nuthampstead (Page 117 – including paragraphs 12.156 to 12.160)

Nuthampstead

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Offley (Page 118 – including paragraphs 12.161 to 12.165)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Offley

Number of Respondents	4	Number of Objections	0
Number of General Comments	4	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Offley

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

OF1 Former Allotments, Luton Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

OF1 Former Allotments, Luton Road

Number of Respondents	10	Number of Objections	3
Number of General Comments	4	Number of Supports	3

Total number of representations received in the Preferred Options Consultation 2014

OF1 Former Allotments, Luton Road

Number of Respondents	5	Number of Objections	0
Number of General Comments	5	Number of Supports	0

Summary of comments

- Natural England noted that Site OF1 is in close proximity to the Chilterns AONB.

Pirton (Page 119 – including paragraphs 12.166 to 12.170)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Pirton

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Pirton

Number of Respondents	33	Number of Objections	26
Number of General Comments	5	Number of Supports	2

Summary of comments

- Concern over the number of houses proposed for Pirton.
- Loss of character.
- There are many objections to the boundary changes.
- The residents of Pirton feel the allocation of 142 dwellings is unfair when compared to other villages and towns within North Hertfordshire.
- The schools are at capacity.
- The scale of the development poses a threat to the tightknit community.

Where did the representations come from?

- 96% of the representations were from Pirton residents.

PT1 Land east of Priors Hill

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

PT1 Land east of Priors Hill

Number of Respondents	23	Number of Objections	21
Number of General Comments	1	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

PT1 Land east of Priors Hill

Number of Respondents	47	Number of Objections	38
Number of General Comments	8	Number of Supports	1

Summary of comments

- It will result in too many houses.
- There are sewerage issues on the site.
- There will be traffic and access issues.
- The site is close to a listed building.
- Planning permission on the site has been refused in the past.
- Development on the site would have a detrimental impact on the heritage of the site.

Where did the representations come from?

- 85% of the representations were from Pirton.

PT2 Holwell Turn, West Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

PT2 Holwell Turn, West Lane

Number of Respondents	70	Number of Objections	61
Number of General Comments	8	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

PT2 Holwell Turn, West Lane

Number of Respondents	47	Number of Objections	38
Number of General Comments	8	Number of Supports	1

Summary of comments

- Development on this site would degrade the space between Pirton and Hitchin.
- There will be traffic and access issues.
- The presence of parked cars causes obstruction to the traffic flow.

Where did the representations come from?

- 85% of the representations were from Pirton residents.

Preston (Page 120 – including paragraphs 12.171 to 12.175)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Preston

Number of Respondents	9	Number of Objections	2
Number of General Comments	7	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Preston

Number of Respondents	32	Number of Objections	26
Number of General Comments	4	Number of Supports	2

Summary of comments

- Objection to the village boundary amendments.
- There has been a lack of dialogue between North Hertfordshire District Council and Preston Parish Council.
- There are parking issues in Preston.

Where did the representations come from?

- 86% of the representations were from Preston residents.

PR1 Land off Templars Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

PR1 Land off Templars Lane

Number of Respondents	63	Number of Objections	59
Number of General Comments	4	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

PR1 Land off Templars Lane

Number of Respondents	54	Number of Objections	41
Number of General Comments	11	Number of Supports	2

Summary of comments

- Access to the site will be difficult as the surrounding roads are quite poor.
- The Wilderness Cottage is a listed building nearby the site. This needs to be protected.

Where did the representations come from?

- 80% of the representations were from Preston residents.

Radwell (Page 121 – including paragraphs 12.176 to 12.179)

Radwell

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Reed (Page 122 – including paragraphs 12.180 to 12.184)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Reed

Number of Respondents	5	Number of Objections	0
Number of General Comments	5	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Reed

Number of Respondents	3	Number of Objections	0
Number of General Comments	3	Number of Supports	0

Summary of comments

- Royston and District Committee have requested careful consideration of the infrastructure and sustainability of development in villages south of Royston

RD1 Land at Blacksmiths Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RD1 Land at Blacksmiths Lane

Number of Respondents	1	Number of Objections	0
Number of General Comments	0	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

RD1 Land at Blacksmiths Lane

Number of Respondents	4	Number of Objections	0
Number of General Comments	4	Number of Supports	0

Summary of comments

- The Environment Agency note that the site is in Flood Zone 1.
- The Hertfordshire ecological unit note that the site consists of rough grazing with hedgerows and dense brambles of low potential ecological interest, although reptiles may be present.

RD2 Farmyard, Brickyard Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RD2 Farmyard, Brickyard Lane

Number of Respondents	1	Number of Objections	0
Number of General Comments	0	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

RD2 Farmyard, Brickyard Lane

Number of Respondents	6	Number of Objections	0
Number of General Comments	5	Number of Supports	1

Summary of comments

- Royston and District Committee have highlighted the need to consider infrastructure and the sustainability of the development on this site.
- The Hertfordshire ecological unit note that the site consists of disturbed ground, a pond and bramble patches of low ecological sensitivity other than some reptile interest.
- Historic England have noted that the site have an impact on the significance and setting of Reed Conservation Area.

Royston (Pages 123 and 124 – including paragraphs 12.185 to 12.195)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Royston

Number of Respondents	15	Number of Objections	1
Number of General Comments	12	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

Royston

Number of Respondents	14	Number of Objections	7
Number of General Comments	7	Number of Supports	0

Summary of comments

- The scale of development proposed for Royston.
- Lack of infrastructure to accommodate development, particularly issues of traffic, schools, health services.
- Royston's growth importance within the Cambridge sub-region should be recognised. Royston has good road and rail access. Royston has retail and employment opportunities.

Where did the representations come from?

- 91% of the representations were from Royston residents.

RY1 Land west of Ivy Farm, Baldock Road

RY1 Land west of Ivy Farm, Baldock Road

Number of Respondents	14	Number of Objections	3
Number of General Comments	10	Number of Supports	1

Summary of comments

- A football ground on the western side of the site was previously refused. The area was previously described as 'unsustainable' by the Inspector.
- There is an opportunity to retain roadside trees as a buffer with the railway.

- The town is outside of the defined town boundary.

Where did the representations come from?

- From the information available, 38% of the representations were from residents of Hertford, 25% from Royston, and the rest were from Stevenage, Peterborough and Cambridge.

Ry2 Land north of Newmarket Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Ry2 Land north of Newmarket Road

Number of Respondents	5	Number of Objections	0
Number of General Comments	4	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

Ry2 Land north of Newmarket Road

Number of Respondents	15	Number of Objections	4
Number of General Comments	10	Number of Supports	1

Summary of comments

- The site could take upwards of 330 dwellings.
- The site has a history of planning permission refusal.
- Development of the site may provide community benefits by way of public community open space.
- Neighbours have reported drainage issues with surface water runoff from the site and local issues at the end of Garden Walk with the highway drains unable to cope in periods of heavy rainfall.

Where did the representations come from?

- 64% of the representations were from Royston residents.

RY3 Land off Burns Road

RY3 Land off Burns Road

Number of Respondents	6	Number of Objections	0
Number of General Comments	6	Number of Supports	0

Summary of comments

- Access issues.
- Site is over one hectare in Flood Zone 1.

RY4 Land north of Lindsay Close

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RY4 Land north of Lindsay Close

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

RY4 Land north of Lindsay Close

Number of Respondents	7	Number of Objections	0
Number of General Comments	7	Number of Supports	0

Summary of comments

- Royston Town Council deemed the site unsustainable because of sewage incapacity (Royston Sewage Treatment Works – AWS/EA).
- Access issues.

RY5 Agricultural supplier, Garden Walk

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RY5 Agricultural supplier, Garden Walk

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

RY5 Agricultural supplier, Garden Walk

Number of Respondents	6	Number of Objections	0
Number of General Comments	6	Number of Supports	0

Summary of comments

- Existing business currently on site.
- Some SW flood risk to access.

RY6 Royston Football Club, Garden Walk

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RY6 Royston Football Club, Garden Walk

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

RY6 Royston Football Club, Garden Walk

Number of Respondents	12	Number of Objections	1
Number of General Comments	10	Number of Supports	1

Summary of comments

- Until an appropriate alternative for the football club is found, the site is unsuitable.
- The site is best served with leisure use.
- Access and traffic issues.
- Failure to find an appropriate replacement would be contrary to policies that protect playing fields in the NPPF and Sport England's playing fields policy and would therefore not be considered to meet the tests of soundness. A detailed policy is required.
- Royston Town Football Club has an agreed option with Leach Homes to develop Garden Walk, which will come into effect when the relocation site can be secured.

Where did the representations come from?

- 43% of the representations were from Royston residents.

RY7 Anglian Business Park, Orchard Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

RY7 Anglian Business Park, Orchard Road

Number of Respondents	5	Number of Objections	1
Number of General Comments	0	Number of Supports	4

Total number of representations received in the Preferred Options Consultation 2014

RY7 Anglian Business Park, Orchard Road

Number of Respondents	8	Number of Objections	1
Number of General Comments	6	Number of Supports	1

Summary of comments

- The site is ideally suited to provide residential development due to its location, proximity to public transport and proximity to the town centre.
- The site would be better used as employment land.
- More housing could be accommodated on the site.

Ry8 Land at Lumen Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Ry8 Land at Lumen Road

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Ry8 Land at Lumen Road

Number of Respondents	7	Number of Objections	0
Number of General Comments	7	Number of Supports	0

Summary of comments

- A business exists on the site. The site may also need remedial measures.
- Potential contamination from previous uses.
- Trees on site are of local value.
- A Traffic Management Review is needed for the Mill Road area. Two dance studios located down Lumen Road mean there is heavy traffic in the area.

RY9 Land north of York Way

RY9 Land north of York Way

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- Hertfordshire County Council states that lizards need to be surveyed.
- The Environment Agency notes that site is over one hectare in Flood Zone 1.

RE1 Orchard Road

RE1 Orchard Road

Number of Respondents	2	Number of Objections	0
Number of General Comments	2	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Rushden (Page 125 – including paragraphs 12.196 to 12.200)

Rushden

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Sandon (Page 126 – including paragraphs 12.201 to 12.205)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Sandon

Number of Respondents	3	Number of Objections	0
Number of General Comments	3	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Sandon

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

St Ippolyts (Page 127 – including paragraphs 12.206 to 12.211)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

St Ippolyts

Number of Respondents	14	Number of Objections	4
Number of General Comments	10	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

St Ippolyts

Number of Respondents	5	Number of Objections	1
Number of General Comments	3	Number of Supports	1

Summary of comments

- Concern over traffic and access issues that will be generated at Site SI1 and SI2 as a result of development.
- The schools are at capacity.
- Lack of infrastructure.
- The transport system is inadequate to deal with the increase in population.
- The health facilities are at capacity.

SI1 Land south of Waterdell Lane

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

SI1 Land south of Waterdell Lane

Number of Respondents	13	Number of Objections	11
Number of General Comments	0	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

SI1 Land south of Waterdell Lane

Number of Respondents	36	Number of Objections	19
Number of General Comments	12	Number of Supports	5

Summary of comments

- Traffic and access issues. This will also put pedestrians at risk.
- The boundary along site SI1 should not protrude beyond the building line of south-west of Waterdell Lane.
- There are allotments on one corner of the site which are currently in use.

Where did the representations come from?

- 59% of the representations were from residents of Hitchin.

SI2 Land south of Stevenage Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

SI2 Land south of Stevenage Road

Number of Respondents	8	Number of Objections	1
Number of General Comments	5	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

SI2 Land south of Stevenage Road

Number of Respondents	19	Number of Objections	7
Number of General Comments	7	Number of Supports	5

Summary of comments

- It might be worth proposing some of the land for self build homes.
- Previous planning permission refused on site.
- The development of this site will set the precedent for urban sprawl.

Where did the representations come from?

- Residents of St Ippolyts and Hitchin made up 66% of the representations.

St Paul's Walden (Page 128 – including paragraphs 12.212 to 12.217)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

St Paul's Walden

Number of Respondents	17	Number of Objections	9
Number of General Comments	7	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

St Paul's Walden

Number of Respondents	10	Number of Objections	8
Number of General Comments	2	Number of Supports	0

Summary of comments

- The public transport system is inadequate.
- The schools are at capacity.
- There are concerns over sewerage capacity.
- Loss of character.
- The health facilities are at capacity.

Where did the representations come from?

- 89% of the representations were from residents of St Paul's Walden.

SP1 Land south of High Street, Whitwell

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

SP1 Land south of High Street, Whitwell

Number of Respondents	52	Number of Objections	48
Number of General Comments	3	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

SP1 Land south of High Street, Whitwell

Number of Respondents	143	Number of Objections	132
Number of General Comments	8	Number of Supports	3

Summary of comments

- Development would be in character with the surrounding area.
- The site is outside the village boundary.
- The site is far from employment and schools.
- Traffic and access issues. There is a presumption that possible access is through a gate between a listed building, and another access area by the High Street on a bend with poor visibility.
- A similar site (WH/r2) was withdrawn as a proposed site in the previous consultation on grounds of access. There is a precedent.
- Planners have already refused off road parking for a development at the Old Baptist Chapel in the past. It was refused due to poor visibility.
- It would result in the demolition of garages.

Where did the representations come from?

- 87% of the representations were from residents of St Paul's Walden.

Stevenage North (Page 129 – including paragraphs 12.218 to 12.221)

Stevenage North

Number of Respondents	17	Number of Objections	14
Number of General Comments	2	Number of Supports	1

Summary of comments

- The loss of Green Belt, particularly for access to the countryside.
- Concerns over the impact of development on Forster Country and St Nicholas Conservation Area.
- The increase in congestion on local and strategic roads and railways in the area resulting from development in the area.
- Lack of local infrastructure in the area in particular Thames Water's concerns over waste water capacity.

Where did the representations come from?

- 47% of the representations were from Stevenage residents.

NS1 North of Stevenage (in Graveley parish)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

NS1 North of Stevenage (in Graveley parish)

Number of Respondents	188	Number of Objections	70
Number of General Comments	108	Number of Supports	10

Total number of representations received in the Preferred Options Consultation 2014

NS1 North of Stevenage (in Graveley parish)

Number of Respondents	124	Number of Objections	108
Number of General Comments	14	Number of Supports	2

Summary of comments

- Concerns over the impact of development on Forster Country and St Nicholas Conservation Area.
- Development of this site would change the character of the Hertfordshire Way from rural footpath to a suburban alleyway. Graveley BR8 would become a strip between houses and small wood. Much of Graveley FP7 would be through the urban area. This is contrary to other policies in the Preferred Options paper.
- Development would cross the tree belt at the boundary of Stevenage borough and spill over the crest of the ridge between Graveley and Chesfield, into Graveley valley, making the new expanded Stevenage visible from many miles away.
- Affordable Social Housing is likely to be lacking in a developer-led development.

Where did the representations come from?

- 45% of the representations were from Stevenage.
- 20% of the representations were from Graveley.
- 9% of the representations were from Weston.
- The rest were from areas within the district and beyond.

Therfield (Page 130 – including paragraphs 12.222 to 12.226)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Therfield

Number of Respondents	4	Number of Objections	0
Number of General Comments	4	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Therfield

Number of Respondents	3	Number of Objections	0
Number of General Comments	3	Number of Supports	0

Summary of comments

- Both sites are within a historic settlement with archaeological potential.
- Royston and District Committee have highlighted the need to consider infrastructure and sustainability needs for proposed sites in the villages south of Royston.
- Improvement needed to the A1(M) (Therfield Parish Council).

TH1 Land at Police Row

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

TH1 Land at Police Row

Number of Respondents	0	Number of Objections	0
Number of General Comments	0	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

TH1 Land at Police Row

Number of Respondents	6	Number of Objections	1
Number of General Comments	5	Number of Supports	0

Summary of comments

- The site is unploughed meadow land.
- Development would be highly visible and damage the character of the village.
- The Environment Agency has noted that the site is approximately 130 metres and 160 metres away from two of our groundwater observation boreholes.
- Thames Water does not envisage infrastructure concerns regarding waste water capacity in relation to this site.

TH2 Land south of Kelshall Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

TH2 Land south of Kelshall Road

Number of Respondents	2	Number of Objections	0
Number of General Comments	1	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

TH2 Land south of Kelshall Road

Number of Respondents	5	Number of Objections	0
Number of General Comments	5	Number of Supports	0

Summary of comments

- The Environment Agency has noted the possibility of contamination from the previous use.
- Historic England have noted that site TH2 has the potential to harm the significance and setting of the conservation area and the surrounding countryside, as well as the Grade II* listed Old Rectory to the west.

Wallington (Page 131 – including paragraphs 12.227 to 12.231)

Wallington

Number of Respondents	1	Number of Objections	0
Number of General Comments	1	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

Weston (Page 132 – including paragraphs 12.232 to 12.238)

Weston

Number of Respondents	11	Number of Objections	7
Number of General Comments	4	Number of Supports	0

Summary of comments

- Weston is a small community and development would change the character of the Village irrevocably.
- Removal of sites from the Green Belt without exceptional circumstances.
- The schools in Weston are overstretched. Weston Primary School is already under pressure from housing development in Great Ashby.
- The surgeries are overstretched.
- The leisure facilities in Weston are overstretched.

WE1 Land off Hitchin Road

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

WE1 Land off Hitchin Road

Number of Respondents	8	Number of Objections	1
Number of General Comments	2	Number of Supports	5

Total number of representations received in the Preferred Options Consultation 2014

WE1 Land off Hitchin Road

Number of Respondents	87	Number of Objections	68
Number of General Comments	9	Number of Supports	10

Summary of comments

- The surrounding area could not cope with additional traffic and parking (Friars Road and the Snipe are at capacity).
- Poor access to the site due to narrow roads.

- General support. The development will support and maintain the facilities of the parish such as the shop, school, pubs, village hall etc.

Where did the representations come from?

- 88% of the representations were from Weston.

Wymondley (Page 133 – including paragraphs 12.239 to 12.245)

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Wymondley

Number of Respondents	21	Number of Objections	7
Number of General Comments	14	Number of Supports	0

Total number of representations received in the Preferred Options Consultation 2014

Wymondley

Number of Respondents	6	Number of Objections	5
Number of General Comments	1	Number of Supports	0

Summary of comments

- The scale of development proposed is disproportionate to the existing village which will suffer from a loss of character.
- Loss of Green Belt is justified only in very special circumstances which do not exist in this case.
- Lack of capacity on roads through the village will be made worse by the development.
- There are no doctors in the village.
- There is a lack of capacity at Lister Hospital.

WY1 Land south of Little Wymondley

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

WY1 Land south of Little Wymondley

Number of Respondents	30	Number of Objections	23
Number of General Comments	6	Number of Supports	1

Total number of representations received in the Preferred Options Consultation 2014

WY1 Land south of Little Wymondley

Number of Respondents	97	Number of Objections	80
Number of General Comments	14	Number of Supports	3

Summary of comments

- Foul sewer capacity enhancement may be required.
- Environment Agency recommends flood risk assessment for development.
- Impact on listed buildings.

Where did the representations come from?

- 76% of the representations were from Wymondley.

Chapter 12 Part II: Development for wider needs of Luton housing market area

Cockernhoe & East of Luton (Pages 135 and 136 – including paragraphs 12.246 to 12.253)

12 Communities Part II Development for wider needs of Luton

Number of Respondents	5	Number of Objections	3
Number of General Comments	2	Number of Supports	0

Summary of comments

North Herts must not cater for the needs of other local authorities.

Cockernhoe & East of Luton

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

Cockernhoe & East of Luton

Number of Respondents	142	Number of Objections	66
Number of General Comments	53	Number of Supports	23

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

EL1, EL2 & EL3 combined

Number of Respondents	729	Number of Objections	704
Number of General Comments	23	Number of Supports	2

Total number of representations received in the Preferred Options Consultation 2014

Cockernhoe & East of Luton

Number of Respondents	1638	Number of Objections	1622
Number of General Comments	13	Number of Supports	3

Summary of comments

- Traffic issues. The roads will become more congested.
- The health facilities are at capacity.
- The road infrastructure is inadequate to cope with any increase in traffic.
- The schools are at capacity.
- Threat of coalescence.
- There will be further pressure on the police service.

Where did the representations come from?

- 51% of the representations were from residents of Luton.
- 19% were from residents of Offley.
- 10% were from residents of King's Walden. The rest were drawn from areas within the district and beyond.

EL1 Wandon Park

EL1 Wandon Park

Number of Respondents	21	Number of Objections	12
Number of General Comments	7	Number of Supports	2

Summary of comments

- A previous petition objected to the site.
- The Environment Agency notes that the site is over one hectare in Flood Zone 1.
- Historic England highlighted the need to preserve archaeology and historic landscape features, including Brickiln Wood.

Where did the representations come from?

- 42% of the representations were from Luton residents.

EL2 Wandon Park extension

EL2 Wandon Park extension

Number of Respondents	20	Number of Objections	11
Number of General Comments	7	Number of Supports	2

Summary of comments

- A previous petition objected to the site.
- The Environment Agency notes that the site is over one hectare in Flood Zone 1.
- Historic England highlighted the need to preserve archaeology and historic landscape features, including Brickiln Wood.

Where did the representations come from?

- 33% of the representations were from residents of Luton.
- 17% from both Preston and Hertford.
- The rest were drawn from King's Walden, Peterborough, Cambridge and Offley.

EL3 Land west of Cockernhoe

EL3 Land west of Cockernhoe

Number of Respondents	21	Number of Objections	12
Number of General Comments	7	Number of Supports	2

Summary of comments

- Environment Agency notes site is over one hectare in Flood Zone 1.
- The site lies within 300 metres of Putteridge Bury and in conjunction with Sites EL1 and EL2 would effectively surround the village of Cockernhoe. There are concerns about the impact on Putteridge Bury and the urbanisation of its southern boundary.

Where did the representations come from?

- 31% of the representations were from Luton residents.
- A further 30% were made up of Preston and Hertford residents.
- The rest were drawn from King's Walden, Peterborough, Cambridge, Hitchin and Offley.

Chapter 12 Part III: Reserved sites for future needs

West of the A1 (M) at Stevenage (Page 138 – including paragraphs 12.254 to 12.257)

12 Communities Part III: Reserved sites for future needs

Number of Respondents	1	Number of Objections	1
Number of General Comments	0	Number of Supports	0

Summary of comments

- No substantive comments received expressing concerns.

West of the A1(M) at Stevenage

Total number of representations received in previous Housing Options Growth Levels and Locations 2011-2031 (February 2013) and Housing Additional Location Options (July 2013)

West of the A1(M) at Stevenage

Number of Respondents	207	Number of Objections	33
Number of General Comments	132	Number of Supports	42

Total number of representations received in the Preferred Options Consultation 2014

West of the A1(M) at Stevenage

Number of Respondents	41	Number of Objections	26
Number of General Comments	11	Number of Supports	4

Summary of comments

- Loss of Green Belt.
- There is a threat of coalescence.
- Loss of village character.

Where did the representations come from?

- 19% of the representations were from residents of Letchworth Garden City.
- 13% were from Weston.

WS1 West of Stevenage (straddles parishes of Knebworth, Langley, St Ippolyts and Wymondley)

WS1 West of Stevenage (straddles parishes of Knebworth, Langley, St Ippolyts and Wymondley)

Number of Respondents	8	Number of Objections	2
Number of General Comments	4	Number of Supports	2

Summary of comments

- There will be traffic and access issues.
- Development will result in the loss of valuable countryside.
- Historic England has previously expressed some concerns in terms of impact on the historic environment.
- Natural England note that a safeguarded land allocation is in close proximity to Knebworth Woods SSSI.
- The Environment Agency note that the site is over one hectare in Flood Zone 1.