

## SA/SEA of North Hertfordshire Proposed Submission Local Plan: consultation comments and responses

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p><b>Policy SP19: Sites EL1, EL2 &amp; EL3 – East of Luton</b></p> <p>There hasn't been an adequate assessment of alternatives. The Sustainability Appraisal (SA) should set out the alternative locations/sites considered to meet the housing need elsewhere or alternative ways of meeting the need, as well as the rationale for selecting the allocation site. We note that only 150 homes are required to meet North Hertfordshire's housing requirement with the remaining 1950 homes addressing needs that cannot be physically accommodated within Luton. Thus alternatives for this 1950 should be presented both within Luton and other neighbouring local authorities.</p>	<p>Representations by Natural England [15697] (Rep 5526)</p>	<p>Alternatives were considered, but no reasonable alternatives were identified to providing EL1, EL2 and EL3 to contribute to the housing need in the Luton Housing Market Area. However, it is acknowledged that this wasn't outlined in the Draft SA report.</p>	<p>Information on the approach to selecting EL1, EL2 and EL3 to be added to section 4 of the report as follows:</p> <p>The four local authorities in the Luton Housing Marking Area (HMA) commissioned a study to consider reasonable alternatives for delivering the housing need for the HMA and to help meet unmet need arising from Luton BC. The four authorities on the Steering Group for the study comprise Central Bedfordshire Council (CBC), Luton Borough Council (Luton BC), Aylesbury Vale District Council (AVDC), and North Hertfordshire District Council (NHDC).</p> <p>As outlined in this study<sup>[1]</sup>, it is possible to meet this need within the HMA. As part of the study, sites EL1, EL2 and EL3 (jointly named East Luton) are assessed as having a high deliverability and medium viability. NHDC has concluded that there are no reasonable alternatives to developing these sites to contribute to the need for the HMA and unmet need arising from Luton. That is because:</p>

<sup>[1]</sup> Luton HMA Growth Options Study , LUC in association with BBP Regeneration, November 2016

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			<ul style="list-style-type: none"> <li>• The duty to co-operate as set out in the NPPF and PPG requires the Council to make every effort to secure cooperation on strategic issues. In this regard meeting unmet need arising from Luton - The sites to the east of Luton are in close proximity to Luton (within the HMA) and are deliverable within the timescale and their selection is justified through the plan process;</li> <li>• The NPPF outlines that housing need should be met within a HMA (i.e. it is not reasonable to seek sites outside the HMA for this purpose) - Whilst large portions of the HMA lie outside the North Hertfordshire district area, it is not in the authority's jurisdiction to make judgements regarding the acceptability of these alternative sites. As neighbouring authorities plan's emerge the provision of need within the HMA will become clearer. The HMA Growth Study has highlighted that the need can be accommodated within the HMA boundary and so alternatives outside the HMA boundary cannot be considered as reasonable at this time; and</li> <li>• There are no other reasonable alternative sites within the North Hertfordshire part of the HMA that can contribute significantly to meeting the need. The HMA area is assessed in the growth study through constraints</li> </ul>

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			mapping and absolute constraints cover a large majority of the area within North Hertfordshire outside of the allocated sites.
<b>Table 6: Key sustainability issues</b> - Specific reference needs to be made to the issue of recreational disturbance on ecological designated sites under the heading 'Environmental protection. This is a key issue at, for example, Therfield Heath SSSI and should be a prominent element of the assessment of sites.	Representations by Natural England [15697] Rep 5526	Impacts on ecological sites were considered in each appraisal. Table 6 (and table 17) noted the pressure that key habitats are under pressure from a number of sources, including new development.	Add recreational disturbance as a cause of pressure on habitats in tables 6, 17 and Appendix 2.
<b>Table 7: Appraisal framework</b> - The SA objectives and sub objectives make no reference to geodiversity and soils. We would also expect to see an objective relating to Green Infrastructure.	Representations by Natural England [15697] Rep 5526	Protecting soil quality is included within objective 3(d). Geodiversity was included within objective 3(d) but this was not made clear. Impacts on RIGS sites has now been included in the significance criteria (appendix 5) and we have reviewed the appraisals to ensure that potential impacts on RIGS sites have been considered. It is considered that green infrastructure is adequately addressed by a combination of objective 2(b) and 3(a).	Significance criteria for objective 3(d) changed to reference impacts on RIGS sites (appendix 5) and reflect this in appraisal matrices for preferred sites(appendix 6).
<b>Table 9: Residual significant sustainability effects of the Plan</b> - Residual effects should include increased recreational pressure on ecological sites such Therfield Heath SSSI and appropriate monitoring should be added to Table 10 -	Representations by Natural England [15697] Rep 5526	As noted below, it is acknowledged that there are likely to be significant negative effects on the SSSI due to recreational pressures.	See below
<b>2 Context, baseline and sustainability objectives</b> We would have expected to see a list of important ecological features in this section. As a minimum nationally designated sites within and in close	Representations by Natural England [15697] Rep 5526		Main reported amended to note the presence of the 6 SSIs and the 3 European sites within 15km of the District.

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proximity to the district should be included.			
<p><b>2.16 Royston - RY1 –formerly site 218 – West of Ivy Farm</b> The site assessment of RY1 has given assigned a ‘?’ indicating uncertainty for SA Objective 3a (will the site protect and enhance biodiversity). Given that we consider current mitigation to be insufficient to prevent impacts on the adjacent SSSI this site should be assigned a negative or major negative score. It is notable that would leave the site scoring negatively in all of the Environmental Protection SA Objectives as well as for soils and a number of other sustainability criteria. There is no cumulative assessment of impacts arising from the sum of development in Royston and no consideration of alternatives.</p>	<p>Representations by Natural England [15697] Rep 5526</p>	<p>A cumulative impact assessment of development in Royston is included within the report -this is cluster A listed and shown in map form in para 7.2 in the report. Potential impacts on Therfield Heath are identified and listed in table 31, and mitigation measures identified. Given the concern expressed by Natural England it is agreed that stronger mitigation measures are needed to address potential disturbance and it is agreed that the site should be assigned a negative score for objective 3a. With regard to options for sites, a wide range of sites have been considered to meet the identified housing need and assessed as described in the report.</p>	<p>Appendix 6 – the summary and matrix for this site amended to reflect a negative score for objective 3a. Mitigation Table (Appendix 9) page 87 amended so that in the row noting impact on Therfield Heath SSSI the last sentence in the column regarding recommendations/mitigation reads: It is recommended that a Mitigation Strategy be developed in consultation with Natural England to ensure that developers of these sites contribute towards appropriate measures to protect the SSSI from recreational pressures. The mitigation strategy should include appropriate monitoring”. Row also amended to show that the residual effect is uncertain (because it is not clear whether the proposed mitigation will fully mitigate the potentially significant effect). Row also amended to correct the typographical error which is in the published version. In the main report, tables 9, 31, 35 and 36 amended to reflect this change</p>
<p>The assumptions made in the Draft Sustainability appraisal seem very biased and potentially flawed. In Table 4 What would happen without the plan? to sum up most of what could happen without a local plan "national policy might protect you but we might be able to do things better with a local plan". OK - now where's the table listing what could happen with the proposed local plan? (you're village / hamlet is subsumed into a neighbouring councils town and all</p>	<p>Representations by Crispin Mackay [2664] (rep 6009)</p>	<p>In terms of the factual basis of the appraisal, the appraisal of sites was conducted using clearly stated criteria and clearly referenced data sources – see appendix 5 of the sustainability appraisal report for further details.</p>	<p>None needed</p>
		<p>Table 4 of the sustainability appraisal</p>	

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<p>the buses taking pupils to school miles away are increasing traffic and CO2 emissions). That outcome is a lot more likely than half the possibilities mentioned in the report. The sustainability appraisal is one long extremely biased piece of scaremongering propaganda and a document so lacking in facts or balanced predictions has no place being included in this process. I object to policy SP1 and the sustainability report. Crispin Mackay rep</p> <p>The assumptions made in the Draft Sustainability appraisal seem very biased and potentially flawed. In Table 4 What would happen without the plan? 3(b) Protect and enhance landscapes The landscape east of Luton is well protected by the Green Belt. The local plan will destroy this protection and allow Luton to spread eastwards. It is disingenuous to imply that there are more protections with the new plan than with the status quo. 2100 dwellings in the countryside east of Luton will most certainly not protect the landscape. If the sustainability report cannot be written honestly with facts rather than with scaremongering then I question its validity. I object to policy SP1 since I believe the sustainability appraisal is flawed.</p> <p>The assumptions made in the Draft Sustainability appraisal seem very biased and potentially flawed. In Table 4 What would happen without the plan? 2(b) Provide access to green spaces The report is correct that locally defined policies</p>		<p>report indicates what would happen in the absence of the Plan. The consultee infers that greater protection for the countryside east of Luton could be achieved without the Plan. However, this fails to take into account the ‘presumption in favour of sustainable development’ which is stated within the National Planning Policy Framework (NPPF)<sup>1</sup>. This states that <i>“where the development plan is absent, silent or relevant policies are out of date, [permission should be granted] unless:</i></p> <ul style="list-style-type: none"> <li>• <i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</i></li> <li>• <i>specific policies in this Framework indicate development should be restricted “</i></li> </ul> <p>The NPPF also states a core principle to <i>“proactively drive and support sustainable economic development to deliver the homes, business and industrial units,</i></p>	

<sup>1</sup> Para 14

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<p>providing guidance on improving access for all residents of the District to green spaces would not necessarily occur.</p> <p>However without a local plan and the resulting destruction of Green Belt residents would be able to continue to enjoy the protected green spaces around their settlements. This applies not only to NHDC residents but also to many residents from neighbouring Luton who enjoy access to the countryside within walking distance due to the Green Belt having constrained Luton's expansion. Residents access to green spaces are better now than they would be under the new local plan. It is both inaccurate and dishonest for the sustainability appraisal to imply that the opposite would be true. I object to policy SP1 and the questionable sustainability appraisal it is based on.</p>		<p><i>infrastructure and thriving local places that the country needs”</i></p> <p>In this context, without a Local Plan in place, as Table 4 suggests, unplanned development may have a cumulative effect on landscapes in the District. This is not to say that the Plan will not also lead to impacts on landscapes and the impact on landscapes of the development of sites to the east of Luton is clearly acknowledged in the sustainability appraisal. See appendix 6.</p> <p>Similarly, with regard to access to green spaces, having no development is not an option and having a Local Plan in place to guide new development will help to ensure, as Table 4 suggests, that this new development occurs in such a way that access to green spaces can be promoted. If development were unplanned, this would not be the case.</p> <p>Nevertheless, the appraisal clearly acknowledges that there will be instances in which the preferred sites have a negative impact on access to green spaces, including the sites to the east of Luton. See appendix 6.</p>	
<p>There will likely be environmental, social and economic effects adversely emanating from the</p>	<p>Wymondley Parish Neighbourhood Plan</p>	<p>The option to build a new settlement was one of the strategic options</p>	<p>None</p>

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NHDC local plan, that will effectively be more challenging and less beneficial and we do not believe that the Sustainability Appraisal has accurately considered all reasonable alternatives in the light of the North Hertfordshire New Settlement Study, published in April 2016, such as the viable alternative option to build a new garden city. representation available from here:	Forum [16106] and Wymondley Parish Council (Ms Kathy Kerby) [13237 ] (Rep 6245 and 5215)	considered for provision of housing in the period of 2011- 2031 by the emerging Local Plan. As noted in the SA report (4.3.1), it has not been pursued. This is because no options for new settlements have been put to the Council and with the amount of deliverable land submitted as part the local plan process by developers and landowners, compulsory purchase would not be considered in the public interest. The New Settlement Study is looking at provision of housing for the next plan period , although it is recognised in the plan (Policy SP8) that a new settlement option could potentially deliver housing after 2026. However, this would require Government and other agency support.	
<b>Policy SPG15 Site LG1 North of Letchworth Garden City</b> <b>Paragraph 13.215 LG3 Land East of Kristiansand Way and Talbot Way</b> Letchworth has been re-designated as residential development land and proposals for the use of these for housing development. These policies are not Legally Compliant as the Sustainability Assessment does not form a suitable assessment of the sustainability of the council's proposals. The SA does not consider the undesignated heritage asset status of the Green Belt	Letchworth Garden City Society [10356] (representation 6212)	The green belt has a number of different functions which are outlined in NPPF <sup>2</sup> . These are: <ul style="list-style-type: none"> <li>• To check the unrestricted sprawl of large built-up areas;</li> <li>• To prevent neighbouring towns merging into one another;</li> <li>• To assist in safeguarding the countryside from encroachment;</li> <li>• To preserve the setting and special character of historic towns; and</li> </ul>	None

<sup>2</sup> Para 80

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<p>which was an integral part of the design of Letchworth, and the first designed Green Belt in England. The Green Belt is an important factor in the setting of the Heritage Asset which is the town of Letchworth.....</p>		<ul style="list-style-type: none"> <li>To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</li> </ul> <p>Each of these aspects is addressed by different criteria in the SA. The assessment of the impacts of LG1 and LG3 identifies a number of significant negative effects which pertain to these different green belt functions, and these are outlined in Appendix 6 of the SA. However, we do not accept that the green belt per se has heritage asset status. The 2013 Landscape Sensitivity Study which covered both sites, and which was referenced in the SA, reviewed the cultural heritage context and historic landscape character types. It did not identify any heritage asset status for the green belt. The Council's Green Belt Review provides the assessment of the Green Belt.</p>	
<p>The Council has simply chosen the wrong preferred option. The alternative option of meeting housing and other needs in a new settlement, together with using brownfield sites within settlements is in strategic and environmental terms, still a clearly better option in our view.</p> <p>The sustainability appraisal which underpins this submission version of the new local plan is still flawed in that it does not adequately assess the likely significant beneficial effects of that alternative spoke</p>	<p>Maze Planning [16464] (rep 6142)</p>	<p>The option to build a new settlement was one of the strategic options considered for provision of housing in the period of 2011- 2031 by the emerging Local Plan. The option of urban extensions on greenfield land adjoining existing towns was also assessed. This option was assessed in the SA process – details can be seen in Appendix 3.</p>	<p>None</p>



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<p>of a spatial strategy (when compared to the alternative of major releases of Green Belt land around established settlements).....</p>			
<p><b>Land to the rear of High Street, Whitwell (WH/r1)</b>  In this regard, the draft Sustainability Appraisal ('SA') supporting the Submission version of the Local Plan (September 2016) considers that the following options for growth have been explored:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <input type="checkbox"/> Focusing development on the four towns and fourteen villages, which may include limited development of greenfield sites;</li> <li><input type="checkbox"/> <input type="checkbox"/> Focus development on PDL within existing urban areas;</li> <li><input type="checkbox"/> <input type="checkbox"/> Urban extensions on greenfield land adjoining existing towns; and</li> <li><input type="checkbox"/> <input type="checkbox"/> Use smaller greenfield sites in the villages.</li> </ul> <p>Of particular relevance to our Client's interest, is the role of villages within meeting NHDC's OAN to 2031. It is noted within Table 24 of the SA that the housing within the NHDC villages is generally more expensive than the towns and that this is a factor in the villages having higher proportions of older people with consequent impacts on the viability of some local services. This is contrary to the objectives to achieve sustainable rural communities set out in paragraph 55 of the Framework.</p> <p>In this regard, some villages provide a range of local services including schools, surgeries and community facilities which need to be retained in the long term and are capable of supporting additional housing over the plan period. However, in the current drafting</p>	<p>Mr George Walsh  Waring [13206]</p>	<p>The options for growth which were considered, and the choices on site allocations were decided by NHDC as part of Local Plan development. The role of the SA is to appraise the options and sites against a series of sustainability objectives.</p>	

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<p>of the Local Plan it does not appear that NHDC has given due consideration to the opportunities for growth in these locations, especially where these are outside of the Green Belt. These should be the primary focus of growth in the first instance.</p> <p>However, what is clear when considering our Client's site within, Whitwell which is recognised as one of the most sustainable villages boasting a range of local facilities including a school and surgery whilst also being located outside of the Green Belt, is that the village has been identified for delivering merely up to 41 dwellings whereas the existing infrastructure could accommodate a larger proportion of growth without any adverse impact.</p> <p>Paragraph 2.2 of Table 24 of the SA further states that the emerging Local Plan '<i>reflects the options to treat all identified villages the same, though this is modified by the preferred option to base development on the level of facilities within the village</i>'. This approach has not been reflected within the assessment of development capacity across the settlements, with a lack of consistency in where growth would be appropriate, and with preference being given to settlements within the Green Belt (or inset within the Green Belt), as opposed to those outside it and unconstrained by planning policy or landscape designations.</p>			
<p><b>Sites EL1, EL2 &amp; EL3 – East of Luton.</b> The long term, cross-boundary and cumulative effects on the Chilterns AONB have not been</p>	<p>Chilterns Conservation Board Ms Lucy Murfett [8390]</p>	<p>The cross-boundary effects of the East of Luton sites were considered in the SA, and the proximity of the</p>	<p>Refer to the consideration of cross boundary impacts in terms of views from the AONB in the appraisal matrix</p>

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satisfactorily addressed in the Sustainability Appraisal. The duty to cooperate and the unmet needs of neighbouring Luton are not a reason to harm the AONB or its setting. There appears to be a lack of consideration of alternatives not affecting the AONB.	(Rep 5806)	<p>AONB is noted in the SA matrix (Appendix 6, page 116), however it is accepted that the matrix didn't specifically comment on cross boundary impacts in terms of views from the AONB. In the SA, the three sites were considered as a whole, and therefore the cumulative effects of the development of the three sites was taken into account.</p> <p>The SA mitigation table (Appendix 9 and table 35 in the main report) noted that there will be significant landscape impacts and that these will be partly mitigated by policies SP12 and SP19, and recommended as additional mitigation a site-specific landscape assessment to inform the masterplan for the sites. The two planning applications covering the sites included detailed landscape and visual assessments as part of the Environmental Statements. The Crown Estate application reports no impact on the AONB where as Bloor's reports no impact on the AONB, but negligible impact on the setting based on a combination of screening, use of the ridgeline and overall distance from the site<sup>3</sup>.</p>	(Appendix 6).
<b>BA1</b>	Mrs Kendall [1320 ]	The SA notes that a development of	

<sup>3</sup> Environmental Statement P102- see [http://documentportal.north-herts.gov.uk/GetDocList/Default.aspx?doc\\_class\\_code=DC&case\\_number=17/00830/1](http://documentportal.north-herts.gov.uk/GetDocList/Default.aspx?doc_class_code=DC&case_number=17/00830/1)

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<p>There are already tailbacks at the Whitehorse Street junction and if BA1 contains 2800 more households, the traffic flow through this junction will increase significantly. The plan mentions that BA1 site is big enough to support a new link road, including an additional bridge over the railway, but the sustainability assessment does not assess what is needed.</p>	Rep 5648	<p>this scale is likely to provide public transport facilities within the short to medium term, and could provide new infrastructure to bridge the barrier. However, it is not the role of the SA to undertake transport assessments.</p>	
<p><b>IC2 (Burford Grange)</b></p> <p>I also want to highlight inaccuracies in the council's Environmental Sustainability Appraisal dated September 2016.</p> <p>In the site matrix (Appendix 6, page 76), the site is correctly noted under 'Land Use' as greenfield and grade 3 agricultural land but then under 'Environmental Protection' it is incorrectly noted as an existing brownfield site. The vast majority of the site is open field and grazing land. Living nearby and walking along the river into Oughton Head, I regularly see birds of prey hunting over that site in the field and I am sure the field part of the site provides an important ecological resource. This aspect of the site sustainability review is therefore Not Sound.</p> <p>I also take issue with the comments within 'Protect and enhance landscapes' where the report states "the landscape is common and the impact of development moderate'. As already mentioned, this development would significantly impact on the outlook and landscape from the River Oughton pathway, which currently benefits from open countryside views here. If suddenly the horizon</p>	Mr Nick Richardson [ ] (Representation 5632)	<p>Reference to the site being a brownfield site is incorrect and should be removed, but this does not affect the scoring as the appraisal clearly recognises that, despite the lack of a designation, the site may have biodiversity value.</p> <p>The site is scored negatively for 3(b) Protect and Enhance Landscapes, i.e. the appraisal recognises that the impact on landscape of the development of this site would be negative.</p> <p>The appraisal does not state that 'the site has access to open space' but that there is access to open space within 400m of the site. For example, there is a footpath along the River Oughton which can be accessed within 150m of the site.</p>	Reference to the site being a brownfield site has been removed.

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<p>outlook is 40 houses this would significantly detract from the landscape. The report notes that this is a Landscape Conservation Area and it should therefore be protected. Again I think the comments and proposed allocation are therefore Not Sound.</p> <p>The report also says that the site has access to open space. Yes the site adjoins green fields but these are in private ownership and used for agricultural purposes. There is therefore actually no access to open space. Again the comment is Not Sound.</p>			
<p><b>LG6</b> The former orchard is recognised in the document 'Draft Sustainability Appraisal of North Hertford' (CAG consultants and NHDC, September 2016). The report erroneously contends that '[t]here is no biodiversity designation' even though this site has been on the national Priority Habitat inventory for six years and available to view or download on several Governmental web portals in a variety of formats. Indeed if a search had been done for Priority Habitats, it would be difficult to miss. Such a glaring oversight could call into question the competence of the consultants and the entire sustainability assessment.</p> <p>The document suggests that it has: '...no amenity value. Development would remove an urban eyesore'. This is an entirely subjective statement and has no place in an objective appraisal. The line should be redacted.</p> <p>(Appendix 6: Preferred sites – summaries and appraisal matrices. Page 96)</p>	<p>People's Trust for Endangered Specific (Mr Steve Oram) [11629 ]</p>	<p>In general the SA used the expert advice of Hertfordshire Ecology to identify significant biodiversity interest on sites in the plan (rather than the Priority Habitats Inventory). The comment made has alerted us to the fact that an earlier iteration of an appraisal matrix relating to an earlier iteration of the Plan was included in error. This did not include comments from Hertfordshire Ecology made in January 2015 which state that there is <i>potential for reptiles associated with allotments, and bats associated with some trees having splits and hollows etc.</i></p> <p>They also note that opportunities are limited if site is developed due to size, but recommend <i>compensation (for)loss of what is traditional orchard Priority Habitat given high numbers of surviving fruit trees</i> and that</p>	<p>The correct appraisal matrix is now included and the summary (appendix 6) and the mitigation table has been amended to reflect the comments of Hertfordshire Ecology, acknowledging the biodiversity assets of the site and removing the references highlighted by the consultee. Potential negative effects on biodiversity are listed in the mitigation table (appendix 9), which requires an ecological survey and protection of traditional orchard or compensation for any loss by appropriate offsetting. Appendix 6 has been reviewed to check all the matrices and a small number of other matrices have been amended to reflect comments from Hertfordshire Ecology with appropriate amendments to the mitigation table (appendix 9).</p>

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<p>I am startled that a professional consultant could conclude that a group of trees, be it forest, plantation, orchard or woodland, has no amenity value. How do they possibly reach this conclusion? It is widely accepted that a green vista, however poorly managed, is better for the health and wellbeing of those living nearby or who can see and use it than a view of buildings, concrete, or infrastructure; and almost always preferable. Indeed, if this site is an 'urban eyesore', the group of unmanaged trees in the nearby Jackson's Plantation must be a terrible eyesore, yet no one is suggesting that be removed for housing (N.B. by definition a plantation is generally planted for future timber extraction).</p>		<p><i>surveys are needed to properly assess site and any species interest.</i></p>	
<p><b>Site 209</b>  4.34 CAG Consultants carried out the Sustainability Appraisal of the Pre-submission Local Plan. No specific assessment of the objection site as a reasonable alternative is given – indeed no assessment is made of any reasonable alternatives for the delivery of housing or indeed highway infrastructure and traffic solutions. In fact, the only reference to alternatives is in the reported consultation comments on a previous (February 2013) iteration.</p> <p>4.35 Site 209 was recorded in the November 2014 SA of the Preferred Options noting that it was a site appraised previously in 2009 and 2013 and was contained within a schedule of sites not taken</p>	<p>New Road (Ashbrook) Ltd and the Taylor Family represented by DLP (Planning) Limited (Mr Mark Harris) [16338] (Representation 5525)</p>	<p>The following responses relate to comments made by the respondent in relevant paragraphs of their submission.</p> <p><b>Para 4.3</b>  The site was assessed as an alternative for contributing to delivering the required housing. A large number of housing sites were considered in the appraisal process, and the appraisals of these are documented in appendices 6 and 7 of the SA report.</p> <p><b>Para 4.4</b>  The submission comments on the appraisal of Site 209 in the November 2014 SA of the Preferred Options. However, this is an outdated version. An updated SA</p>	

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<p>forward.</p> <p>4.36 This SA sets out strengths and weaknesses, based upon a capacity of 2,800 – greater than that proposed in this objection. However, notwithstanding that Site 209 has consistently been put forward by our Clients in connection with the provision of a southern bypass for Hitchin, either in full or in part to enable staged delivery, the SA demonstrably makes no reference to the traffic relief that this would engage. To the contrary, amongst weaknesses the 2014 SA notes that the scheme could increase congestion, as well as light, air and noise pollution and cause disruption during construction.</p> <p>4.37 Stripping out this misassumption and the adverse impacts that would be common to all the strategic scale allocations, the only material impacts would be:</p> <p><input type="checkbox"/> Location likely to increase commuting by car – it can be noted that the site is significantly closer to an East Coast Main Line station than the Great Ashby allocation and not materially further than the proposed strategic allocation in Hitchin</p> <p><input type="checkbox"/> The site contains wildlife sites, trees and hedgerows – which can be addressed through good</p>		<p>document<sup>4</sup> was published for consultation to accompany the draft submission version of the Local Plan. This has changed significantly in some cases as data has been checked and updated and reviewed for consistency.</p> <p>The most recent iteration of the site assessment is contained in Appendix 7 of this report. It is named SWH (with a note that it includes sites previously named includes SWHa and 209E and 209W).</p> <p>Para 4.5 This is incorrect. The current SA notes<sup>5</sup> as a positive impact of the site that <i>The proposed bypass associated with the development could alleviate transport issues through the town (especially HGV), having a positive impact on noise and air pollution in the town.</i></p>	

<sup>4</sup> Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan September 2016, available at <https://www.north-herts.gov.uk/sites/northherts-cms/files/Sustainability%20Appraisal%20of%20the%20Proposed%20Submission%20Local%20Plan.pdf>

<sup>5</sup> Appendix 7 page 12

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<p>design and appropriate management of the natural environment</p> <p><input type="checkbox"/> The site contains designated archaeological areas – which can be addressed through heritage assessment, design and layout</p> <p><input type="checkbox"/> There will be significant landscape impacts as the site borders the AONB – as established above, the site does not border the AONB</p> <p><input type="checkbox"/> There is potential surface water flooding – management of surface water flows would be a feature of any such strategic scale development</p>			
<p>4.38 Therefore, whilst the SA analysis is right to identify specific issues, none are exceptional to the extent that the site did not constitute a reasonable alternative at the time of the original appraisals. However the Council has patently chosen not to consider the provision of development in the context of a bypass provision, the benefits of which must be set against the impacts.</p>			
<p>4.39 Having regard for the need to identify additional land to meet housing needs our Clients are of the view that there is no overriding reason why the objection site should not be allocated where matters of detailed masterplanning can address the principal identified site specific issues.</p>			



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<p><b>Reference to RY7:</b></p> <p>SA Objective 1- Achieve sustainable levels of prosperity and economic growth</p> <p>6. It is stated that development of the site will reduce the supply of employment land in Royston. Consequently, it is scored as having a negative impact against this particular strategic objective.</p> <p>7. It is evident that many of today's employers are seeking large edge of town employment facilities with good road access. It is likely that any businesses vacating the Anglian Business Park site would be seeking to relocate to such facilities. It is clearly the case that there has been a movement in recent years out from constrained town centre employment sites to more spacious edge of town accommodation. We note that the Draft Plan makes provision for a new employment designation of 10.9 ha on land west of Royston.</p> <p>8. Residential development already exists to the east of the site. In such circumstances we consider that the allocation of the site for housing is not likely to be harmful to economic growth. Accordingly, in terms of impact, we consider that the scoring against this objective should be amended to neutral.</p> <p>SA Objective 5(c) Improve conditions and services that engender good health and reduce health inequalities</p> <p>28. The site is a major development and appears to be in a residential area. Residential properties will be adjacent to manufacturing / storage and distribution</p>	<p>James Property Investments LLP (Mr Richard James) represented by JB Planning Associates (Mr Paul Cronk) [16083]</p>	<p>In relation to the comments on objective 1, the significance test for a negative score is whether development of the site would lead to the loss of land in active employment use. In this instance, it is clear it would and that this would have a negative impact on businesses, even if this negative impact could be mitigated to some degree through provision elsewhere and even though this is outweighed by other positive impacts.</p> <p>In terms of the comments relating to criteria 5(c), all sites proposed for major development which adjoin existing residential areas were scored negatively against this criteria. However, we recognise that on sites which formerly accommodated employment-related uses, the impact of development for residential use may not have significant negative effects beyond the construction phase. We have adjusted the significance criteria for 5(c) to reflect this and adjusted the site scoring for all sites accordingly. In the case of this site, however, the score remains negative because of the potential impacts on amenity for new residents from the adjoining</p>	<p>Significance criteria for 5(c) adjusted to reflect this point (appendix 5) and site matrices revised for all sites (appendix 6). Changes also carried through to the mitigation table (appendix 9).</p>

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p>uses. The site is scored as having a negative impact against this objective.</p> <p>29. The development site is actually located in the heart of the town. We consider that there is no justification for scoring the site negatively given it will provide opportunities for future occupiers to cycle and walk to the nearby Royston town centre. Furthermore, it should be recognised that in relation to proposed site allocation RY7, residential properties are presently situated adjacent to manufacturing / storage and distribution uses. Accordingly, we feel that the site should at the very least be scored neutral in terms of impact against this objective.</p>		<p>employment uses.</p>	
<p><b>Site AS1</b>  On behalf of our client, Croudace Homes, Savills (UK) Limited have been instructed to respond to matters raised within the North Hertfordshire Proposed Submission Local Plan including responding to issues in respect of their land interests on Land to the West of Claybush Road (allocated housing Site AS1).  We concur with the positive assessment of site AS1 in the Proposed Submission Plan's accompanying Sustainability Appraisal. The following significant negative effects and uncertainties have been identified in relation to the site and are discussed in further detail below:</p> <ul style="list-style-type: none"> <li>• The site is greenfield and is grade 2 or 3 agricultural land, with potentially high biodiversity significance due to the set-aside nature of land.</li> <li>• Proximity to a designated area of</li> </ul>	<p>Croudace Homes (Mr Lewis Brown) represented by Savills (Miss Rosanna Metcalfe) [16070]</p>	<p>The further information on agricultural land is useful and is noted, although this does not change the fact that it is designated as grade 3 land and therefore potentially useful for agriculture.</p> <p>The further information on the impacts on the conservation area and archaeology are noted. Whilst the further information on the SAM is useful, a precautionary approach is adopted in the appraisal. Since development would have some impact on the setting of the SAM, the site is scored negatively against this criteria.</p> <p>In relation to the comments on access to bus stops, the criteria for</p>	<p>None needed</p>

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p>archaeological interest and a conservation area.</p> <ul style="list-style-type: none"> <li>• Impact on the setting of a Scheduled Ancient Monument.</li> <li>• Distance of the site from a bus service and train station.</li> <li>• The site is a major development and appears to be in a residential area.</li> </ul> <p>Greenfield site classified as Grade 2 or Grade 3 Agricultural Land</p> <p>The scale, nature and location of the site on the edge of a residential area mean that it is unsuitable for intensive agricultural cultivation.</p> <p>Proximity to a designated area of archaeological interest and a conservation area</p> <p>The majority of the settlement is encompassed by the village conservation area and thus any development in the village will be in or within proximity of the conservation area. A Heritage Impact Assessment has been submitted in support of this response which concludes that the impact of development on the site upon the village's historic landscape will be 'slight'. The site is identified as having archaeological potential due to the moderately high levels of known archaeology within the area. A desk-based Archaeology Assessment has been submitted in support of this response which concludes that the periods from which finds and/or features are most likely to be present are Bronze Age and post-medieval/modern. There is also some potential for Neolithic and Roman remains, although this is considered less likely.</p> <p>In support of the planning application, an</p>		<p>scoring on criteria 2(b) was not simply about distance to bus stops, but distance to bus stops with a regular bus service, i.e. at least hourly between 0800 and 1800 Monday-Friday. The services which serve the stops near to this site do not meet this criteria.</p> <p>The comments on access to rail are noted but, to achieve consistency in the appraisal process, all sites were assessed against the same criteria, i.e. are they within 800m of a rail station?</p> <p>Similarly, in terms of the comments relating to criteria 5(c), all sites proposed for major development which adjoin existing residential areas were scored negatively against this criteria. Some impact on the existing residential area is considered inevitable, even if this is only significant during the construction phase.</p>	

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<p>Archaeological Evaluation was undertaken. This has also been submitted in support of this representation. This concluded that only peripheral human activity within the evaluation area and has found no evidence of settlement on the site. The report concludes that the work carried out at Ashwell does not add to what is already known of this small but interesting village located in North Hertfordshire.</p> <p>Impact on the setting of a Scheduled Ancient Monument The Scheduled Monument of Arbury Banks is situated 0.6km south-west of the proposed development site. This has been enclosed by tall modern wire fence with large concrete posts. The Heritage Impact Assessment confirms that if houses were to be built on the proposed site, there is a small possibility that the roof lines could be seen from the asset. Nevertheless, the impact from any development is considered to be negligible. The overall significance of effect upon Arbury Banks is concluded to be neutral/slight.</p> <p>Distance of the site from a bus service and train station We object to the statement in the SA that the site is located over 400m from the bus stop. This is incorrect. The nearest bus stop to the site is 'opposite Gardiners Lane' which is located approximately 320 metres north of the site. Pedestrian access is available from the north of the site onto Ashwell Lane, providing a safe and accessible link to the bus stop. Whilst the site is located over 800 metres from a railway station, Ashwell and Morden Station is</p>			

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<p>located within 3 miles of the site. The site's proximity to the Station is considered to be an attribute given that few village's in North Hertfordshire are located so close to a station. The site is a major development and appears to be in a residential area</p> <p>It is not considered that the development of the site will have a significant impact on the adjacent residential area or existing infrastructure. The site is well contained and can be carefully designed so as to integrate with the adjacent area.</p> <p>Representation 3978: <a href="http://north-herts.jdi-consult.net/localplan/viewrepfull.php?repid=3978">http://north-herts.jdi-consult.net/localplan/viewrepfull.php?repid=3978</a></p>			
<p><b>Site HT5</b></p> <p>On behalf of our client, Hill Residential Limited, Savills (UK) Limited have been instructed to respond to general matters raised within the North Hertfordshire Proposed Submission Local Plan including responding to issues in respect of their land interests at Lucas Lane, Hitchin (allocated housing site HT5).</p> <p>We concur with the positive assessment of site HT5 in the emerging Local Plan's accompanying Sustainability Appraisal (SA).</p> <p>The following significant negative effects and uncertainties have been identified in relation to the site and are discussed in further detail below:</p> <ul style="list-style-type: none"> <li>• Loss of informal open space for neighbouring housing;</li> <li>• Greenfield site classified as Grade 3 agricultural land;</li> <li>• The site is a major development and appears to be in a residential area;</li> </ul>	<p>Hill Residential (Mr Colin Campbell) represented by Savills (Miss Rosanna Metcalfe) [16072] (Representation 3938)</p>	<p>The information on the loss of informal open space is noted. However, the site is adjoined by a public right of way. If the site were developed, this footpath would no longer pass through green space so the effect of development would be to increase, to some degree, the distance to open space for existing residents.</p> <p>We agree that the agricultural land classification data is coarse and the absence of data on the distinction between grade 3a and grade 3b land means that the site assessment is, of necessity, somewhat crude. The appraisal does not suggest that this site is 'the best and most versatile agricultural land', as the</p>	<p>None needed</p>

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<ul style="list-style-type: none"> <li>• Distance from bus stop and train station; and</li> <li>• Proximity to a designated area of archaeological interest.</li> </ul> <p>Loss of informal open space The proposed allocation and the omission site is within private ownership and there is no public access to it. It is not open space. If it has been accessed by third parties, it has been done so without the consent of the landowner and unlawfully. The bridleway to the south of the allocation and a series of public footpaths to the north, connect the site with the countryside immediately to the west of Hitchin. The SA should be updated to remove any references to loss of any open space</p> <p>Greenfield site classified as Grade 3 Agricultural Land The Preliminary Agricultural Land Classification Maps are at a very coarse grain and are not based on field evaluation. A detailed evaluation would be likely to identify that the site is not Best &amp; Most Versatile. The scale, nature and location of the site on the edge of a residential area mean that it is unsuitable for intensive agricultural cultivation.</p> <p>Major development in a residential area It is not considered that the development of the site will have a significant impact on the adjacent residential area or existing infrastructure. The site will be carefully designed so as to integrate with the adjacent area and, where necessary, appropriate contributions will be made to local services.</p> <p>Distance from bus stop and train station The site is located approximately 550 metres (8 minutes walk) from the nearest bus stop on Old Park Road. This is within easy walking distance of the site.</p>		<p>representation suggests, but that it is classed as grade 3 agricultural land and therefore of 'good to moderate' quality and therefore potentially useful for agricultural purposes. For consistency, all sites have been appraised on the same basis, using the same data.</p> <p>In terms of the comments relating to criteria 5(c), for consistency all sites proposed for major development which adjoin existing residential areas were scored negatively against this criteria. Some impact on the existing residential area is considered inevitable, even if this is only significant during the construction phase.</p> <p>To gain a positive score for criteria 2(c) which relates to the sustainability of the location, the site must lie either within 800m of a rail station or in a town within 400m of a bus stop with a regular bus service, i.e. at least hourly between 0800 and 1800 Monday-Friday.</p>	

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<p>The site is also well connected to Hitchin Town Centre, railway station and other facilities by well lit 2 metres wide footways.</p> <p>As noted in the SA, improving public transport provision could help towards mitigating the distance of the site from the bus stop. Where necessary, an appropriate transport contribution could be made upon the development of this scheme.</p>			
<p><b>Site HT2</b></p> <p>SA Objective 2 (a) - Minimise the development of greenfield land and other land with high environmental and amenity value?</p> <p>This site is a greenfield site. The land is designated as grade 3 agricultural land, though most of it is grade 3b. The objective identifies that site HT2 will result in the permanent loss of greenfield agricultural land. It is scored as having a negative impact.</p> <p>Clearly given the scale and nature of North Hertfordshire's housing land supply requirement, and its limited brownfield sites capacity, it is inevitable that the Council will be required to heavily draw upon greenfield sites such as proposed allocation site HT2 in order to meet its overall housing requirement figure. The development of lower quality agricultural land such as site HT2 is clearly preferable to the loss of higher quality agricultural land.</p> <p>SA Objective 2 (c) - Deliver more sustainable location patterns and reduce the use of motor vehicles</p> <p>12. The site is identified as being located within 400m of a bus stop, but only with an infrequent service. The site is more than 400m from the nearest frequent</p>	<p>Beechwood Homes (Mr Sean Harries) represented by JB Planning Associates (Mr Paul Cronk) [16080] (representation 3805)</p>	<p>Since data on agricultural land classification is not accessible for sub-levels (i.e. it is not possible to distinction between grade 3a and 3b for all sites), for consistency in the treatment of all sites, negative scores have been applied to all sites falling within grades 2 or 3.</p> <p>The information regarding public transport access, including potential mitigation, is noted. However, for consistency in the assessment across all sites, a site can only be scored positively if it meets the stated criteria.</p> <p>Regarding the comments on objective 3(c), the significance test for a negative score is whether there is a 'potential impact on sites designated for their ecological value or features of ecological interest which cannot be mitigated.' The site was given a negative score because</p>	<p>The score for 3(c) has been changed to ?, recognising the fact the potential negative impacts of the development on the adjoining designated site could be mitigated, e.g. through retaining and enhancing the tree line and hedgerows around the perimeter, and maintaining appropriate buffers and set back from the designated site.</p>

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<p>service, and more than 800m from the railway station It is noted that the owners have produced a highway statement indicating that the site is 2km from Hitchin station which could be reached by cycling. Site on the edge of town – residents likely to commute, despite public transport and cycling options. Mitigation – Enhance pedestrian routes; encourage and promote sustainable transport initiatives. The impact against this objective is scored as negative.</p> <p>13. We consider that the site’s location on the edge of the urban area means that it will be positioned to access a range of the town’s facilities and services, particularly given that the distance between it and the town centre is not great in size. We would point out that::</p> <p>The proposed allocation is compliant with the standards advocated by the Institute of Highways and Transportation which support the sustainability of the site;</p> <p><input type="checkbox"/> Most people will walk to a destination that is less than 1 mile in distance (Planning for Walking, 2015 – Chartered Institute of Highways &amp; Transportation [CIHT]);</p> <p><input type="checkbox"/> Bicycles are a potential mode of transport for all journeys under 5 miles (Planning for Cycling, 2015 – Chartered Institute of Highways &amp; Transportation [CIHT])</p> <p>14. Consequently, we consider that site HT2 should be scored as having a positive impact against this particular objective.</p>		<p>it adjoins a negative site. However, we recognise that a sensitive approach to development may enable any impacts to be mitigated and the limited biodiversity value of the site itself could be enhanced.</p> <p>In terms of the comments relating to criteria 5(c), for consistency all sites proposed for major development which adjoin existing residential areas were scored negatively against this criteria. Some impact on the existing residential area is considered inevitable, even if this is greater during the construction phase.</p>	



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<p>SA Objective 3 (a) - Protect and enhance biodiversity</p> <p>15. This site is a greenfield site. A designated wildlife site borders this site, containing a woodland and further investigation will be needed on potential impact on site. Site is an open field, bordered by trees and hedgerows. It is noted that an ecological survey funded by the owners has shown no habitats of ecological value and that the site is of no botanical interest. Mitigation: ensure that the development retains and enhances the tree line and hedgerows around the perimeter. Mitigation – Ecological and habitat survey Mitigation – Tree survey. This site is scored as having a negative impact against this objective.</p> <p>16. Given that the site itself is an agricultural field, it is currently of limited ecological value given the lack of biodiversity present. This fact is acknowledged in the SA assessment which refers to the fact that the Council has been supplied with ecological survey evidence to demonstrate this. We do not consider that the negative impact score is justified with regard to this S.A. objective.</p> <p>17. Beechwood Homes is committed to ensuring that the design and layout of any development is sensitive to the ecological value of the adjoining Ippollitt Brook Local Wildlife Site. The proposed development will provide appropriate buffers and set back from the woodland plantation including further enhancements which will be submitted and assessed at the outline planning application stage. Therefore, we consider that the proposed allocation offers opportunities to actually</p>			

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<p>protect and enhance biodiversity and should be scored positively against this particular objective.</p> <p>SA Objective 5(c) Improve conditions and services that engender good health and reduce health inequalities</p> <p>30. The site is a major development and appears to be in a residential area. The site is not likely to cause any problems with regards to health Initial construction phase could possibly cause noise and nuisance effects to local residents. The impact against this objective is scored as negative.</p> <p>31. The development site is actually located on the edge of a residential area. We consider that there is no justification for scoring the site negatively given it will provide opportunities for future occupiers to cycle and walk in to Hitchin town centre. Accordingly, we feel that the site should at the very least be scored neutral in terms of impact against this objective.</p>			
<p><b>Strategic Options for housing location</b></p> <p>4.62 the Sustainability Appraisal in fact lists many negative effects of releasing Green Belt. However, in comparing two options - development around existing towns or development of new Settlements - the Sustainability Appraisal makes three flawed assumptions which have had a drastic impact on the plan.</p> <p>Firstly, it assumes that development of land north of Baldock will help to meet local housing need, however, it takes no account of the fact that the land is right next to the train station which has a direct fast (34 minutes) link to central London - the impact of</p>		<p>Many of these comments relate to the Local Plan rather than the SA. The following points relate to the SA:</p> <p><b>Commuting from Baldock to London and its impact on meeting local housing need</b></p> <p>The baseline data report (appendix 2) notes that in fact North Herts residents already travel significant distances to work – so providing housing within good access of Baldock station will meet the needs of these local residents.</p> <p><b>Taking account of the loss of</b></p>	<p>None needed</p>

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<p>this is that a large strip of this development (the area within 20 minutes walk of the station) will go toward London housing need and so will be strongly affected by house prices in the London Housing Market and will leave local housing need unmet and it may well act to drive up local house prices. The reason, I think, that this has been ignored is because it has been assumed that the Stevenage Housing Market will apply to this development - but that assumption is based on normal organic growth, where existing high value locations (for example close to fast connections to London) have previously been developed - however this is not the case for this site because this land was previously protected by the Green Belt allocation. The Sustainability Appraisal has failed to consider properly the impact of releasing so much previously Green Belt land so close to the train station. As mentioned elsewhere, this omission can be mitigated by separating the new development from Baldock so that very little of it is less than 20 minutes walk of the station, or by developing this strip only when the rest of the site has been developed. Secondly, the Sustainability Review assumes that existing facilities of existing towns can be efficiently leveraged by building onto those town, but takes no account of the fact that (in Baldock at least) existing facilities and resources are severely overstretched. For example, schools are very over subscribed, the GP surgery is a capacity, open space and leisure facilities are far below national averages and target values (from tables within Sustainability Appraisal documents themselves) - so extending existing towns</p>		<p><b>Green Belt</b> Green belt is not in itself a sustainability criteria used in the SA. However, the SA considered whether each option would minimise the development of greenfield land and other land with high environmental and amenity value. This question was applied equally to all strategic options considered.</p> <p><b>Impact of development on affordability</b> The respondent says that the SA appears to suffer the same flawed assumption that building large numbers of housing must necessarily improve affordability. This is incorrect, the approach of the SA is that the provision of large amounts of new housing is likely to have a positive impact on affordability since it will provide significant amounts of affordable housing.<sup>6</sup></p> <p><b>Effect of development on existing facilities</b> The SA takes account of the impact of Local Plan policies which require site developers to make a contribution to the provision of additional facilities (e.g. schools, health facilities) for new residents.</p> <p><b>Policy references in SA document</b></p>	

<sup>6</sup> See for example Appendix 3, page 123

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p>is actually starting from a deficit of local facilities and resources. However, it is clear the development creates opportunities to address this deficit and it is vital that the plan takes positive action to do so. It must recognise the poor starting point and deliberately set out to improve the overall situation as a result of any large scale development (for example the large site north of Baldock, or the cluster of sites surround Clothall Common, to the east of Baldock). Thirdly, it assumes that the District Council and County Council have the competency maturity to develop large sites quickly. Recent experiences, (for example, Great Ashby or the Church Gate development in Hitchin) point to this not being the case, and the largest sites should be scaled back and development distributed more evenly around the district.</p> <p>I also feel strongly that establishing (starting) 2 new garden villages by the end of the plan, will help create new options and facilitate an effective and achievable increase in the amount of housing and employment in the district - it will also set up options for continued sustainable development in the following planning period (rather than creating another cliff edge, like-it-or-lump situation of manufactured urgency).</p> <p>Sustainability Appraisal does not consider the release of so much Green Belt close to Baldock train station (with a fast link to London) as exceptional and instead assumes Stevenage HMA house prices will apply - it will in fact encourage migration from London and there needs to be a mitigation against this. It also assumes the district and county councils can deliver large developments quickly, against recent</p>		<p>The representation suggests that some of the references (in table 31 in the main report are to previous policy numbering. This is incorrect; Local Plan policy D1 is the sustainable design policy which includes the requirement for maximising accessibility and connectivity.</p>	

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<p>experience. Without these flawed assumptions the option of new settlements would have risen above the option of extending existing towns, or a least a blend of both approaches.</p> <p>With regard to point 4.62 there are flaw in the Sustainability Appraisal.</p> <p>The sustainability assessment is comprised of multiple documents concatenated together. I have only had time to skim this document. I do not have a planning background and I apologise if my comments misuse jargon or repeat things.</p> <p>&gt; Page 89 approx., points out that BA1, BA10, BA4, BA3 and BA2 all lie in open countryside on the northern and eastern edge of Baldock. 2(b) points to a requirement to provide access to green spaces and Maintain existing rights of way. It is highlighted that the distance to open countryside from existing housing will be increased.</p> <p>Policies mentioned in these documents don't seem to match up with the latest version of this plan - perhaps they relate to earlier versions? It states policy D1 will ensure through-routes are incorporated in new development, but that must be a different policy. The location of these sites to the north and east of Baldock and of all the major sites of employment and entertainment is a major flaw with these sites that hasn't been considered properly.</p> <p>&gt; Page 90 approx., states that Baldock BA1, BA10, BA4, BA3 and BA2 all lie in areas of high or moderate sensitivity. 3(b) states there will be residual landscape impact.</p> <p>In seeking to develop up to 'defensible' boundaries, it is important to respect the impact on the landscape.</p> <p>&gt; Page 96 approx., reduced access to open</p>			

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<p>countryside, potential negative effects on human health - highlights Baldock, Royston and Great Ashby.</p> <p>Steps must be incorporated into the plan to increase access to open countryside and not simply accept this as a negative consequence of development at these sites!</p> <p>&gt; Page 103 approx., Table 35: Residual significant sustainability effects of the Plan. States reduced access to the countryside. Sites this as being of high probability.</p> <p>Again, vital to take steps against this, or indeed to reverse this.</p> <p>&gt; Page 104 approx., Reduction in quality of landscape and townscape character. For Baldock (and other sites) this is sited as of high probability, permanent and irreversible.</p> <p>It is vital that the character of the landscape and townscape is respected as much as possible - I believe, separating the development to the north of Baldock, from Baldock will help to preserve the townscape character and will also preserve the character of the countryside around that location (rather than converting Baldock from a small town to a large town with the consequent impact).</p> <p>&gt; Targets for England: hectares per 1000 people, playing fields 1.2, all outdoor sports 1.6, equipped/designated play areas 0.25, other outdoor provision 0.3. Targets for East of England: children's playspace 0.7, outdoor sporting space 1.7, amenity space 0.8 (from Planning Obligations Strategy 2009). Actual for Baldock: outdoor sports facilities 0.41.</p> <p>This is far below the target values, far below the average for the district and only Royston is lower on the table (which has been the recipient of a lot of</p>			

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<p>recent development and is not a good precedent of the likely effect of development at Baldock). It is vital that development north and east of Baldock results in new open playing fields as well as new sporting facilities (for example tennis courts or new leisure facilities, perhaps tied to a new school). For the north of Baldock site it is possible to imagine that this will be ensured by the strategic plan covering that site, however, the cluster of developments surrounding Clothall Common on the east of Baldock is not covered by a strategic plan - it should be so as to ensure proper consideration of factors like additional facilities (among many other concerns of adding so much housing at one location - even though it is in 4 sites, they are very close to each other around a single part of Baldock).</p> <p>&gt; It seems from a skim of this Sustainability Assessment that it takes loss of Green Belt into account when considering the impact of a new settlement, but then does not take it into account (certainly gives it a lower consideration) when considering the impact of a large development attached to an existing town.</p> <p>This is a serious flaw in the analysis - it needs to be acknowledged and remedied as best as possible.</p> <p>&gt; The Sustainability Assessment appears to assume that house prices will go down with a large development on the edge of an existing town.</p> <p>However, releasing land for development so close to Baldock train station (with a 34 minute direct link to London) may drive house prices up. This is a significant flaw in the assessment.</p> <p>&gt; (item 1 and item 5(d) of option (a) continue development of 4 main towns including development of greenbelt). Option C, item 1 and item 5(d) of option</p>			

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p>(c)  Appear to suffer the same flawed assumption that building large numbers of housing must necessarily improve affordability, without taking into account the possibility of London commuters taking advantage of newly released land close to the train station and so actually driving house prices up and reducing affordability. It is vital mitigations are put in place - for example, leaving a strip of Green Belt near the train station, or ensuring this land can only be developed when the rest of the site (and other site around Baldock) are been developed. This assumption though is correct in the case of Item 1 and item 5(d) for a new settlement, as the only sites available for new settlements will not provide attractive settlement locations for people wishing to commute to London. This option will make housing more affordable across North Hertfordshire. There is no reason that some progress on this option could not be made over the period of the plan. The expectation that sites will be identified and development will commence during the period of the plan should be included in this plan. If progress is made on this option, other aspects of the plan can be reviewed accordingly. In fact, a long list of possible sites could be included in this plan to show good faith toward pursuing this option over the period of the plan. To kick the can down the road until the next plan is to accept unaffordable housing and non-sustainable development, with the hope that new settlements might be included in the next plan - this is why I feel it is vital that this aspect is included in this plan, so we can see progress against it over the period of this plan. Such sites cannot be counted against forecasts of housing to be delivered by this plan, as such sites might not be deliverable during</p>			



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<p>the time-frame of the plan, however, it is vital that progress is made against this option, and it is also possible the development could (in fact should) commence, in part, on new settlements during the period of this plan and this must not be deliberately excluded by this plan.</p> <p>&gt; page 533 approx., 5(b) of section 2.2 Baldock site BA1, fails to take into account the proximity of the train station in relation to affordability of housing.</p> <p>&gt; page 535 approx., 2(b) of section 2.2 Baldock site BA3,</p> <p>I agree that the site provides the potential for new sporting or recreational spaces and at this position in relation to Baldock and the few other areas, this would likely have a big impact on health and well being of residents in Clothall Common, this new site, and this side of Baldock.</p> <p>&gt; Page 530 approx., Site BA1 mitigation tables the proximity to the train station with a direct fast link to the centre of London is an important feature of this site and mitigation should be put in place to ensure new housing doesn't simply contribute toward inward migration of people currently living in London and who will continue to work in London (a long and environmentally friendly journey). For example that the land nearest the train station be given a special status, be developed last of other such mitigation.</p> <p>&gt; Section 1 - HMA housing market areas, fails to take any account of 'commuter belt' - areas that receive an uplift due to an easy commute into London and the higher salaries that can be obtained there. This is because it assumes organic growth, where locations close to good transport links into London tend to already be occupied and growth will be via in-fill (as has occurred in the centre of</p>			

Representation	Consultee	NHDC response	Change to be made to Submission SA
<p>Baldock). However, the massive site to the north of Baldock (BA1, Blackhorse farm) is exceptional as it lies very close to the train station and has been left undeveloped due to it's prior greenbelt status which has been removed as part of the review which forms part of this plan. The plan makes no accommodation for the exceptional nature of this site, situated so close to a train station with a fast (34 minutes) link directly into central London (London Kings Cross). It assumes that the normal HMA will apply to these houses, whereas, the strip of this development within a 20 minute walk will not fall into the normal rules of the Stevenage HMA but will instead be influenced by a significant uplift due to inward migration of people currently living in London (who are influenced by a very different and much more expensive HMA in London) and who will continue to work in London, leading to a large uplift on these houses. This seems obvious, so it is extra ordinary that this has not been considered as part of the plan. It is vital that this is considered. Easy mitigations, such as leaving the area closest to the train station undeveloped, or developing this strip last will greatly affect how effective this plan is at meeting local housing need in a deliverable and sustainable manner.</p>			