North Hertfordshire District Council

Local Plan 2011 – 2031

Regulation 22

Consultation Statement

May 2017
1. Contents

1. Contents .......................................................................................................................... 1
2. Introduction .................................................................................................................... 3
3. Regulation 19 Consultation ............................................................................................. 4
4. Local Plan Spatial Strategy and Strategic Policies ............................................................ 7
   3.1 Spatial Strategy and Spatial Vision ............................................................................. 7
   3.2 Sustainable Development ......................................................................................... 7
   3.3 Economy and Town Centres ..................................................................................... 9
   3.4 Countryside and Green Belt .................................................................................... 10
   3.5 Transport and Infrastructure .................................................................................. 11
   3.6 Design ..................................................................................................................... 13
   3.7 Healthy Communities .............................................................................................. 14
   3.8 Natural and Historic Environment .......................................................................... 15
   3.9 Housing and Development ...................................................................................... 16
   3.10 Strategic Housing Sites .......................................................................................... 18
       3.10.1 North of Baldock ......................................................................................... 18
       3.10.2 North of Letchworth Garden City ................................................................. 19
       3.10.3 North of Stevenage ....................................................................................... 20
       3.10.4 Highover Farm, Hitchin ................................................................................. 21
       3.10.5 Land off Mendip Way, Great Ashby ............................................................... 22
       3.10.6 East of Luton .................................................................................................. 23
       4.1 Economy and Town Centres ................................................................................. 24
       4.2 Countryside and Green Belt ............................................................................... 26
       4.3 Transport ............................................................................................................. 27
       4.4 Housing Strategy ................................................................................................. 28
       4.5 Design ................................................................................................................. 31
       4.6 Healthy Communities .......................................................................................... 32
       4.7 Natural Environment ........................................................................................... 33
       4.8 Historic Environment .......................................................................................... 35
   5. Local Plan – Communities ............................................................................................ 36
       5.1 Ashwell ................................................................................................................. 37
       5.2 Baldock ............................................................................................................... 38
5.3 Barkway ................................................................. 41
5.4 Barley..................................................................... 42
5.5 Codicote.................................................................. 43
5.6 Graveley and North of Stevenage .......................... 45
5.7 Great Ashby and North East Stevenage ............... 46
5.8 Hitchin ................................................................... 47
5.9 Ickleford.................................................................. 49
5.10 Kimpton ................................................................. 50
5.11 Kings Walden .......................................................... 51
5.12 Knebworth .............................................................. 52
5.13 Letchworth Garden City ........................................ 54
5.14 Lower Stondon ........................................................... 56
5.15 Pirton .................................................................. 57
5.16 Preston ................................................................. 58
5.17 Reed ..................................................................... 59
5.18 Royston .................................................................. 60
5.19 Sandon .................................................................. 62
5.20 St Ippolyts ............................................................. 63
5.21 St Pauls Walden ...................................................... 64
5.22 Therfield ................................................................. 65
5.23 Weston .................................................................. 66
5.24 Wymondley .............................................................. 67

6. Implementation Monitoring and Review .................. 68
6.1 Delivery .................................................................. 68

7. Appendices ................................................................. 69
7.1 Statistical breakdown of representations ............... 69
7.2 Schedule of late representations ............................. 74
Introduction

1.1. This statement sets out the consultation processes undertaken in preparing the North Hertfordshire Local Plan, 2011 – 2031. It sets out who was consulted, when that consultation took place and the main issues raised in the consultation.

1.2. This statement has been prepared to meet the requirements of Regulation 22 of the Town and Country Planning (Local Plan) (England) Regulations 2012. It will be submitted to the Secretary of State alongside the Local Plan.

1.3. The Council’s Statement of Community Involvement (SCI) has been followed in the preparation of the Local Plan. The SCI sets out who will be consulted and how that consultation will take place. The current SCI was adopted in September 2015. The 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

1.4. The Council has undertaken four stages of consultation in the preparation of the North Hertfordshire Submission Local Plan:
   - Local Plan Housing Growth Targets and Locations – February 2013;
   - Local Plan Housing Additional Locations and Options – July 2013;
   - Local Plan Preferred Options – December 2014; and

Details of the first three consultations are set out in the Regulation 18 Statement of Consultation, September 2016. This can be viewed on the Council’s website, https://www.north-herts.gov.uk/home/planning/planning-policy/local-plan/proposed-submission-local-plan-2011-2031
2. **Regulation 19 Consultation**

2.1. Consultation on the North Hertfordshire Proposed Submission Local Plan 2011 – 2031 took place over a six week period between 19 October 2016 and 30 November 2016. The consultation was undertaken in accordance with the Council’s Statement of Community Involvement, 2015 and included:

- an information evening led by the Planning Advisory Service for Parish Councils and local community organisations, “How to Make Effective Representations”;
- letters or emails sent to inform all consultees on the local plan database at the time of consultation;
- how and where to view the consultation documents and how to make comments;
- copies of the Local Plan and Proposals Maps placed in local libraries and made available at the Council Offices;
- copies of the consultation documents and the supporting evidence were made available on the Council’s website;
- hard copies of the proposed submission version of the Local Plan were sent to all Parish Councils; and
- advertisements placed in local newspapers at the start and halfway through the consultation period.

2.2. In total, representations were received from 2,551 unique respondents. In terms of representations, 5,666 individual representations were received from landowners, developers, community organisations, business interests and individuals. From the representations received, more than 2,600 representations were made in respect of the settlements and proposed land allocations, Section 4, Communities of the Local Plan, approximately 1,300 representations were made in respect of the strategic sites and approximately 1,700 representations in respect of the strategic and development policies. The remainder of the representations were made in respect of the strategic policies and the development management policies. A statistical breakdown of the how the representations were received and the areas they refer to is attached as Appendix 1. These figures have been updated since the report presented to Full Council, April 11 2017. This has not materially altered the outcomes of the consultation or changed any of the main issues identified in this report. In finalising this version of the report a net total of two (2) additional respondents and nine (9) fewer representations have been identified when compared to the figures reported to Full Council.

2.3. In addition to the representations received within the consultation period, nearly 200 representations were received after the deadline and about 25 of the representations were incomplete submissions. These representations have not been logged in the Council’s database. Most of the late representations came from individual members of the public with the majority of the representations referring to the proposed development sites to the north of Baldock, East of Luton or Codicote. Details of the late and incomplete representations are given in the schedule attached in Appendix 2.

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1 At the start of the consultation period there were approximately 12,300 contacts on the Council’s database.
2.4. Following acknowledgement of the representations a number of people contacted the Strategic Planning and Projects Team claiming that they had not made the representations that they had received acknowledgment of. It appears that most of these cases relate to representations received in respect of the proposed allocation SP 19: Sites EL1, EL2 and EL3 – East of Luton. The representations received were all standard letters with names and addresses added. Where we have been made aware of this, we have removed the representations from the database with the agreement of the individuals who contacted the Strategic Planning and Projects Team.

2.5. The following sections of this consultation statement set out a brief summary of the main issues raised in the representations. Whilst the consultation statement sets out the main issues, not all of the issues raised in the representations are listed and the Inspector may decide to look at different issues of concern during the course of the examination. All of the representations are available to view online using the following link: https://north-herts.jdi-consult.net/localplan/ and clicking on the link for the Local Plan 2011 – 2031 Proposed Submission Draft.

2.6. A number of representations were also submitted in respect of the Sustainability Appraisal. These are not recorded separately in this document but will be considered as part of the review of the Sustainability Appraisal.
3. Local Plan Spatial Strategy and Strategic Policies

3.1 Spatial Strategy and Spatial Vision

A number of representations received made comments about the spatial strategy and the spatial vision which set the context for the Local Plan as a whole. The main issues raised in these representations are summarised in the bullet points below:

Spatial Vision
The vision needs to refer to the provision of strategic and integrated SuDS;
No vision statement which directly relates to Policy SP10: Healthy communities;
Failure to consider a new settlement;
No spatial vision for Baldock included:
Proposals for Baldock contradict this spatial vision; and
Major infrastructure requirements should be identified.

Strategic Objectives
ENV4 – development to the north of Baldock could result in severe risk of flooding contrary to this strategic objective;
ENV5 – arguable whether reduction in water consumption is a realistic aspiration in the context of the increasing population;
ECON7 – is comparatively weak support for Policies SP6: Sustainable transport and Policy T1: Assessment of transport matters; and
SOC1 – should make reference to wider housing markets.

3.2 Sustainable Development

There are two policies in this section of the Local Plan, Policy SP1: Sustainable development in North Hertfordshire and Policy SP2: Settlement Hierarchy. A summary of the main issues raised against each of the policies is set out below:

Policy SP1: Sustainable development in North Hertfordshire
Policy should give greater encouragement and support to neighbourhood planning;
Policy should set targets in relation to neighbourhood planning;
There should be a focus on neighbourhood plans to deliver housing and other development in category A villages;
Will lead to excessive green belt development and urban sprawl;
The plan does not demonstrate that there is a sufficient need to justify removing green belt;
Biodiversity is omitted from Policy SP1 (c)(iv);
Policy makes no mention of protecting heritage assets;
Objections to the scale of growth proposed;
Alternative sites are available, unused brownfield and non green belt sites;
Additional criteria should be added to the policy, identifying the role of key settlements, ensuring long term viability of the villages and deliver an appropriate mix of homes, jobs and facilities;
Challenge the policy and the Sustainability Appraisal;
Additional criteria should be added to ensure the supply of water;
No strategy to improve or maintain employment opportunities in Knebworth; and
A sustainable plan would be to build a new garden city.

A number of the representations received supported this policy, particularly in terms of the proposed growth of the towns and villages in the District.

Policy SP2: Settlement Hierarchy
Policy only provides for limited development in Category A, B and C settlements but appropriately scaled development anywhere could be beneficial to meet housing needs;
A number of representations suggested that particular villages had been designated in the wrong category and should be moved to a different category to reflect the perceived level of services available, including Whitwell, Therfield, Sandon, Bygrave, Blackmore End;
Suggestions are included in the representations for the boundaries of particular villages to be reviewed and amended, in particular Ashwell, Preston, Whitwell, Cockernhoe and Weston;
Changes proposed to village boundaries were not consulted on prior to inclusion in the Local Plan;
The reference to “built core” of Category B villages is too prescriptive; and
Policy fails to reflect the role of Hitchin which should be given greater emphasis.

It should be noted that a number of representations were made in support of the policy and the concentration of development in the towns and larger villages, the village categories identified and the designated village boundaries.
3.3 Economy and Town Centres

There are two policies in this section of the Local Plan, Policy SP3: Employment and Policy SP4: Town and Local Centres. A summary of the main issues raised against each of the policies is set out below:

Policy SP3: Employment
Release of land from the green belt for employment uses is contrary to government guidance;
Impact on the strategic road network of significant imbalance between residential and employment provision;
Contribution to unmet needs from Stevenage should be quantified;
Explicit reference should be made to meeting unmet employment needs from Stevenage;
Policy seeking additional employment provision and promote the knowledge based economy is unlikely to absorb the working population from the proposed development north of Baldock;
Alternative sites have not been considered, e.g west of Stevenage
Clause (d) needs to be more specific with requirements for major new developments set out; and
Is sufficient employment land allocated in the plan?

SP4: Town and Local Centres
Conflict between the policy and the background paper about the precise amount and location of floorspace needed;
Query whether the sites allocated, LG19: The Wynd; LG20: Gernon Road; and LG21: Arena Parade are viable and deliverable;
Need for the Letchworth Garden City Town Centre Strategy to be reviewed;
Development to the north of Baldock should include a new town centre;
Impact of development on existing historic town centres; and
Support for the commitment to protect the vitality and viability of the range of retail facilities in the local centre of Knebworth.
3.4 Countryside and Green Belt

There is just one policy in this section of the Local Plan, Policy SP5: Countryside and Green Belt. A summary of the main issues raised is set out below:

Policy SP5: Countryside and Green Belt
Additional green belt will sterilize land for development;
Scale of compensatory green belt is not justified;
Exceptional circumstances to review the green belt are not adequately demonstrated;
Housing need alone is insufficient justification to review green belt boundaries;
Brownfield sites are available;
Release of green belt is not the most appropriate strategy for development;
Revised green belt boundaries are not defensible or permanent;
Reduce the extent of green belt release as required in the NPPF;
Plans are not consistent with national green belt policy;
Land to the north and north east of Stevenage should be released from the green belt and safeguarded for the longer term;
Policy approach to the rural area beyond the green belt is excessively restrictive;
Unclear why the rural area policy is so restrictive;
Inconsistencies in the green belt assessment of land between Hitchin and Ickleford;
Inclusion of Letchworth Hall Hotel within the green belt is unnecessarily restrictive;
Safeguarded land to the west of Stevenage should be referenced;
Green belt review identifies land around Knebworth makes a significant contribution to the green belt;
Steps should be taken to identify sites for new settlements to avoid future erosion of the green belt;
Proposed developments will bring about coalescence of settlements; and
Infilling policy required for settlements washed over by the green belt.

Supporting representations were also received, in particular:
Policy is sound, justified and effective in enabling strategic development and meeting the objectively assessed housing need;
Green belt review meets economic and social objectives;
The definition of settlement boundaries for villages, taking villages out of the green belt, including Cockernhoe and Kimpton;
The policy approach to rural areas beyond the green belt;
Revised green belt boundary to the west of Hitchin to facilitate development of site HT5; and
Additional green belt around St Pauls Walden should be added to the Chilterns AONB.
3.5 Transport and Infrastructure

There are two policies in this section of the Local Plan, Policy SP6: Sustainable transport and SP7: Infrastructure requirements and developer contributions. A summary of the main issues raised for each policy is set out below:

Policy SP6: Sustainable transport
Many of the representations received in respect of this policy were linked to representations for particular development sites.

Inadequate transport model validation prior to assessment of highway mitigation;
Policy lacks transparency on current and future journey times;
Detailed results for junctions needed;
Sustainable transport options should be provided to reduce the impact of additional traffic from new development;
Clearer and firmer link required between development and transport infrastructure;
Site specific requirements should be identified within each site policy;
Inadequate proposals made to deal with road infrastructure for development to the east of Luton;
Policy should commit to review and create new rights of way;
Inconsistencies and clarity needed for the traffic modelling for development to the east of Luton;
Traffic modelling excludes development from Luton;
Mitigation measures are inadequate for Hitchin;
Development proposals will exacerbate pedestrian safety issues and air quality;
Insufficient capacity of rail services;
Impact of development on A1(M);
Hertfordshire Local Transport Plan and supporting documents are flawed as they do not take into account development in Luton and other sources;
Air quality control and air pollution;
Impact of expansion of Luton airport;
Inconsistent with national policy; and
No evidence of consultation with rail service providers.

Policy SP7: Infrastructure requirements and developer contributions
Highway infrastructure required for increased growth;
NHS England intend to seek mitigation from developments to create additional capacity in the area;
Greater clarity between CIL and S106 is required;
Clause (a)(i), bullet 4 could place unachievable burden on development and exceeds provisions of the CIL regulations;
Clause (a)(i), bullet 5, “critical assets” not defined;
Clause (b) is unlawful;
Clause (c) could place unnecessary requirements on applications and lead to delays;
Clause (d) reference to “any” guidance is unclear;
Clause (f) “stringent approach” is unclear;
Infrastructure is not always the responsibility of the applicant to deliver;
Concern that insufficient secondary education provision will impact on deliverability of planned development in the wider Stevenage area;
No effective east – west routes;
Infrastructure is required before development;
No objective assessment has been made of infrastructure;
Cumulative impacts of Stevenage Local Plan and other Hertfordshire wide development;
Fundamental infrastructure needs to be resolved;
Unclear how infrastructure will be funded;
Impact of the policy on smaller developments;
Review mechanisms should be included;
No detailed plans on how the viability of sites can be assessed;
Text should refer to other sources of funding;
Insufficient detail given in the Infrastructure Delivery Plan; and
Policy should commit to development of partnerships for infrastructure delivery.
3.6 Design

There is just one policy in this section of the Local Plan, Policy SP9: Design and Sustainability. A summary of the main issues raised is set out below:

Policy SP9: Design and Sustainability
The justification for technical standards in criterion (d) is unclear;
Ensure that sensitive design is appropriately defined; and
Land could be provided to ensure bigger homes are built.

A number of the representations received supported this policy.
3.7 Healthy Communities

There is just one policy in this section of the Local Plan, Policy SP10: Healthy Communities. A summary of the main issues raised against each of the policies is set out below:

**Policy SP10: Healthy Communities**
Policy should be amended to include a criterion requiring new developments to be designed to encourage active lifestyles;
A new policy should be included to support the development of healthy places with a clear expectation to developers to maximise the impact it can make to promote physical and mental wellbeing;
No planning for education provision has taken place;
Plan requires a complete review of health provision for the increase in population caused by the proposed development; and
Provision should be made for incorporating A4, business facilities into proposed plans for new local centres.

A number of the representations stated that there were a number of sites allocated in the Local Plan, which would be contrary to the provisions of this policy, in particular sites in Baldock, North Stevenage and Little Wymondley were highlighted.

A number of the representations received supported this policy.
3.8 **Natural and Historic Environment**

There are three policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy SP11: Natural resources and sustainability**
The Local Plan does not provide certainty of the capacity at Rye Meads Sewage Treatment Works and there are potential capacity issues there post 2026;
Policy should be amended to ensure that appropriate capacity is available to serve new developments;
Policy needs to acknowledge development can effect betterment in regard to flood risk and use of sustainable drainage techniques; and
A number of sites have been allocated in the Local Plan, contrary to the provisions of this policy, in particular sites in Baldock, Letchworth and Little Wymondley were highlighted in the representations.

**Policy SP12: Green infrastructure, biodiversity and landscape**
Elements of Policy NE6 should be included in the strategic policy;
Policies promoting development will allow the urbanising of green corridors; and
A number of sites have been allocated in the Local Plan, contrary to the provisions of this policy, in particular sites in Baldock, Great Ashby, Letchworth and are highlighted in the representations.

**Policy SP13: Historic environment**
A number of sites have been allocated in the Local Plan, contrary to the provisions of this policy, in particular sites in Ashwell, Baldock and Great Ashby are highlighted in the representations.

Most representations received were in support of this policy.
3.9 Housing and Development

There is just one policy in this section of the Local Plan, Policy SP8: Housing which sets out the housing requirements for the District, the need to provide additional land to contribute towards meeting the unmet housing needs arising from Luton, the geographic locations of the strategic housing sites and affordable housing. A summary of the main issues raised is set out below, these are split between sections of the policy:

Policy SP8: Housing

Housing numbers
- Housing figure is too high;
- No justification in the evidence of the housing numbers;
- No more than 13,000 homes needed;
- No account of the Brexit effect;
- Acceptance of unmet need from Luton;
- No obligation to meet unmet needs under the Duty to Co-operate;
- NHDC should approach other authorities to accept housing need;
- Luton’s unmet need is unjustified;
- 20% buffer should be applied;
- OAN should be based on Local Plan Expert Group method and set at 18,600 homes;
- Concern over the use of lower migration trends;
- Migration assumptions from London;
- Early review clause required; and
- Insufficient windfall allowance.

Development strategy
- No sequential approach to release land;
- Developer led strategy;
- Use of green belt – exceptional circumstances have not been demonstrated;
- Release of green belt is contrary to government policy;
- New settlement should be pursued;
- Available site near Ashwell for a new settlement;
- Inadequate consideration of other brownfield sites which are available;
- Safeguarded land to the west of Stevenage is available;
- Safeguarded land to the west of Stevenage should be deleted from the plan;
- Over reliance on sites adjoining settlements;
- Target of 20% building on previously developed land is too low;
- Disproportionate allocation of development in particular the representations refer to Baldock, Barkway, Codicote, Knebworth and Wymondley;
- Inconsistent approach to assessing housing sites;
- Housing strategy not justified until completion of the joint Growth Options Study;
- If all developments go ahead there will be an oversupply of housing;
- Inconsistent approach to housing developments in villages; and
Two stage approach should be pursued, five year plan to 2021 followed by development of a new settlement.

**Strategic sites**
Distribution of housing will result in harm to the heritage asset of Letchworth;
Over reliance on strategic sites to deliver strategy;
Number of dwellings at Great Ashby should be increased; and
Strategic policy required for land to the west of Stevenage.

**Other sites**
Concern about the deliverability of allocations from non-strategic sites.

**Housing mix / affordable housing / self build**
Lack of provision for self build and custom housing;
Inadequate self build target;
40% affordable housing not viable East of Luton;
Consider Luton affordable housing targets for consistency;
Lack of detailed evidence to justify affordable housing target; and
Housing mix target contradicts Policy HS3.
3.10 Strategic Housing Sites

3.10.1 North of Baldock

Land is allocated to the north of Baldock, mostly within the parish of Bygrave, SP14: Site BA1 - North of Baldock, for approximately 2,800 homes. The main issues raised in the representations in respect of this site were:

- Loss of green belt;
- No exceptional circumstances to release green belt;
- Loss of agricultural land;
- Disproportionate scale of development for Baldock;
- Merging of Baldock and Bygrave;
- Development will create a separate town attached to Baldock;
- Plan does not adequately address flood risk;
- Impact of traffic on A507 and A1(M);
- Increased traffic congestion, particularly at the Whitehorse Street junction;
- Impact on rail facilities, service and infrastructure, including the railway bridge;
- Impact on air quality;
- Impact on landscape and townscape;
- Inadequate education facilities which will need expanding;
- No transport assessment or mitigation plans in place;
- Site cannot be delivered in plan period;
- Impact on wildlife and biodiversity;
- Number of self build plots should be increased;
- Limited waste water and sewage capacity;
- Impact on water resources;
- Infrastructure requirements;
- Recreation facilities should be addressed as part of the expansion plans;
- Community facilities at capacity; and
- Alternative development strategy should be considered, e.g new settlement.
3.10.2 North of Letchworth Garden City

Land is allocated to the north of Letchworth Garden City, SP15: Site LG1 – North of Letchworth Garden City, for approximately 900 homes. The main issues raised in the representations in respect of this site were:

- Loss of green belt;
- Loss of agricultural land;
- Loss of green space;
- Conflicts with the NPPF;
- Coalescence of Letchworth Garden City and Stotfold;
- NHDC traffic modelling is flawed;
- No proof of local requirements;
- Brownfield sites are available;
- Concern for wildlife, habitats and biodiversity;
- Site has archaeological and geological interest;
- Local employment opportunities;
- Increased pollution;
- Impact on heritage and heritage assets;
- Too far from town centre;
- Impact on highway infrastructure and congestion;
- The Local Plan does not adequately address flood risk;
- Policy should be strengthened to address flood risk, secure well planned networks of green infrastructure and make a commitment to provide enhanced public transport;
- Community facilities required for the size of development;
- Infrastructure is lacking for doctors, schools;
- No additional parking provision at Letchworth Garden City railway station;
- Contrary to Garden City design principles; and
- Impact on village character.
### 3.10.3 North of Stevenage

Land is allocated to the north of Stevenage within the parish of Graveley, SP16: Site NS1 – North of Stevenage, for approximately 900 homes. The main issues raised in the representations in respect of this site were:

- Loss of green belt;
- No exceptional circumstances to justify release of green belt;
- Coalescence of Graveley with Stevenage;
- Poorly located to meet housing needs of North Hertfordshire;
- Impact on congestion at Corey’s Mill junction of the A1(M) and on the A1(M);
- Insufficient measures to mitigate extra traffic from NS1;
- Impact on local facilities, including schools, doctors surgeries, hospital;
- Proximity to Lister Hospital and conflict with emergency vehicles;
- Loss of access to recreation space for local residents;
- Impact on the conservation area;
- Impact on wildlife and biodiversity;
- Impact on “Forster Country”;
- No reference is made to the Stevenage design principles;
- Lack of retail provision;
- Reliance on infrastructure in Stevenage, e.g highways, education and retail provision;
- Alternative sites available, including land to the west of Stevenage;
- Impact on quality of life for residents in Wymondley and Graveley;
- Impact on watercourses and of surface water run-off into Wymondley;
- Site requires joint masterplanning with Stevenage; and
- Further evidence and detail required on self build (Clause e).

The policy should be amended to include the following:

- Green infrastructure networks; and
- Commitment needed to enhance public transport.
3.10.4 Highover Farm, Hitchin

Land is allocated to the east of Hitchin, SP17: Site HT1 – Highover Farm, Hitchin for approximately 700 homes. The main issues raised in the representations in respect of this site were:

- Loss of green belt;
- Coalescence of Hitchin and Letchworth Garden City;
- No demonstration of exceptional circumstances to release green belt;
- Impact on highway infrastructure;
- Increased congestion and pollution;
- Lack of local facilities, including schools, doctors surgeries, hospital;
- No vehicle access to Roundwood Close or Grovelands Avenue;
- Loss of agricultural land;
- Impact on unique heritage asset of Letchworth Garden City;
- Sewage and waste water at capacity;
- Flood risk; and
- Impact on existing residents.

The policy should be amended to include the following:

- Green infrastructure networks;
- Commitment to protect and enhance ecological features;
- Sustainable links to the station; and
- A Preliminary Risk Assessment would be required.
3.10.5 Land off Mendip Way, Great Ashby

Land is allocated to the north east of Great Ashby within Weston parish, SP18: Site GA2 – Land off Mendip Way, Great Ashby for approximately 600 homes. The main issues raised in the representations in respect of this site were:
Loss of green belt;
No special circumstances to justify green belt releases;
Undue reliance on infrastructure in Stevenage (highways, education and retail);
Impact on secondary education provision;
Insufficient provision to meet secondary education requirements;
Alternative site for education provision identified;
No reference to Stevenage design principles;
Remote from Stevenage town centre and railway station;
Weak green belt boundary;
Identified traffic and access issues;
Lack of adequate health facilities, doctors and dentists;
Contrary to transport policies in the Local Plan;
Alternative site available to the west of Stevenage;
Requirement to extend and enhance bus services should be included in the policy;
Impact on heritage assets;
Impact on wildlife and biodiversity, including ancient woodland;
Noise and air pollution;
Scale of development;
Impact of Brexit;
Justification of the housing target;
Inadequate car parking and traffic congestion;
Coalescence of Stevenage and Weston;
No additional facilities proposed – existing facilities are already stretched or non-existent;
NHDC historic inability to masterplan and enforce conditions on previous applications;
Fibre network in area already at capacity;
Small scale employment opportunities should be included; and
No mention of affordable housing.
3.10.6 East of Luton

Land is allocated to the east of Luton, SP19: Sites EL1, EL2 and EL3 – East of Luton for a new neighbourhood of approximately 2,100 homes. A large number of similar representations were received in respect of this site, the following bullet points set out the main issues raised:

- Loss of green belt;
- No special circumstances to justify green belt releases;
- 6FE secondary school required to meet needs arising from development and surrounding villages;
- Insufficient evidence of cooperation with Luton Borough Council;
- Unmet housing need figures for Luton are unsound and unjustified;
- Inadequate traffic modelling for the development;
- Air quality and impact on health of additional traffic;
- Inadequate highway infrastructure to accommodate additional traffic;
- Impact of airport expansion;
- Potential to impact on the Chilterns AONB;
- Impact on wildlife and biodiversity;
- Impact on heritage assets;
- Over subscription for school places;
- Inadequate social infrastructure, including community facilities, GP provision, healthcare, police and retail facilities;
- Water and wastewater infrastructure;
- Impact of Brexit;
- Should use brownfield sites and vacant housing before this site;
- Better alternative sites to the west of Luton;
- Detailed landscape assessments required to assess cumulative impacts on the Chilterns AONB;
- Policy should refer to protected species;
- Inadequate mitigation measures;
- Provision of new link roads to A505 not tested;
- Flood risk;
- Impact on surrounding villages;
- Loss of recreation opportunities;
- Commitment to integrating public transport links into development;
- Lack of specific consultation in the area;
- No employment opportunities in the area;
- Clause (k)(i) should be removed as Stubbocks Wood is outside the allocated site;
- Greater emphasis to noise mitigation and proximity to airport should be included in the policy;
- Transport impacts on airport operations should be considered;
- Explicit reference should be made to consultation with the airport during masterplanning;
- Historic landfill – further investigations required; and
- Policy should require appropriate community sports facility provision to be made on-site.
4. Development Management Policies

4.1 Economy and Town Centres

There are eight policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

Policy ETC1: Appropriate uses in Employment Areas
A review of the employment areas should be undertaken to identify land which could be used for housing;
Insufficient evidence in the background papers to justify the restriction of B1 uses in the employment areas;
Policy should be amended to allow suitably located employment sites adjacent to existing residential areas;
Support for the flexibility of the policy in recognising that employment areas could sustain other employment-generating uses. and
There is some support for the policy protecting the designated employment areas.

Policy ETC2: Employment development outside employment areas
A review of the employment areas should be undertaken to identify land which could be used for housing.

Policy ETC3: New retail, leisure and other main town centres development
The thresholds for undertaking a retail impact assessment for retail proposals outside the town centres of Hitchin and Letchworth Garden City should be reduced; and
The policy does not reflect on future retail trends.

Policy ETC4: Primary shopping frontages
For the policy to be relevant, the Letchworth Town Centre Strategy needs to be updated; and
The retail frontage at the southern end of Eastcheap should be designated as primary retail frontage as two stores comprise a significant concentration of A1 retail uses in this area.

Policy ETC5: Secondary shopping frontages
For the policy to be relevant, the Letchworth Town Centre Strategy needs to be updated.

Policy ETC6: Local Centres
The plan should approve applications for businesses which promote vegetarian and vegan foods.

Policy ETC7: Scattered local shops and services in towns and villages
Policy is supported as it could have helped Ashwell to save retail outlets in the last few years.

Policy ETC8: Tourism
The policy could be widened and be more supportive of tourism in rural areas;
The Local Plan should be aspirational to the benefits and potential of tourism; Both the policy and the supporting text are based on the assumption that hotel accommodation is for the tourist industry; and The evidence base does not recognise the need and opportunity for new conference facilities and associated accommodation.
4.2 **Countryside and Green Belt**

There are five policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy CGB1: Rural Areas beyond the Green Belt**
The policy should be amended to include provisions for Category A villages;
Policy should allow development if the quality of life for people is to be enhanced;
Policy will restrict development adjacent to settlement boundaries for Category A villages where development may be sustainable;
Unclear why rural areas beyond the green belt should have a similar status to the restrictive designation of the green belt;
Policy should be reviewed with regard to the level of flexibility; and
Several detailed wording amendments have been suggested in the representations.

**Policy CGB2: Exception sites in rural areas**
The policy provides the opportunity for affordable housing on the edge of villages contrary to other policies in the plan;
Policy is not clear as to whether any or all the criteria should be met; and
The policy is not consistent with national policy, there should be no exception for the cross subsidy of market housing for affordable housing.

There was some support for the policy, in particular the acknowledgement that limited market housing might be needed to cross subsidise affordable housing schemes and the need to include modern housing types.

**Policy CGB3: Rural workers’ dwellings**
Only one supporting representation was received in respect of this policy.

**Policy CGB4: Existing rural buildings**
No representations received in respect of this policy

**Policy CGB5: Urban open land**
The use of land adjoining settlements for growing food should be encouraged; and
The designation sterilises the area designated in Royston and inhibits growth.

There was also some support for removing land from the green belt and designating it as urban open land, although the policy should be amended to include education facilities as appropriate uses.
4.3 Transport

There are two policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy T1: Assessment of transport matters**
The Local Plan should address the effect of development on the strategic transport bottlenecks on the A1(M) and railway line;
Clause (a) is an unrealistic requirement as development which increases vehicle movements can be said to adversely impact on highway safety;
Emphasis should be placed on encouraging sustainable modes of transport and reducing the need to travel; and
The cumulative impact of proposed developments should be assessed.

**Policy T2: Parking**
Electric car charging points should be recognised in clause (c); and
Additional car parking should be provided in Knebworth.
4.4 Housing Strategy

There are seven policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy HS1: Local Housing Allocations**
Policy should refer to a “mix” of housing, rather than variety;
Site specific considerations do not make adequate provision for schools;
Housing target is unsound;
Plan should give more detail on required dwelling numbers; and
Implications of Brexit.

A number of representations also put additional sites forward for consideration. The sites include:
- Land at Station Road, Ashwell
- Land at Royston Road, Baldock
- Land at George IV pub, Baldock
- Land south of Ash Mill, Barkway
- Land at Picknage Road, Barley
- Land at The Spinney, Breachwood Green
- Land to the north of site CD2, Codicote
- Additional site at Cowards Lane, Codicote
- Land at Back Lane, Graveley
- Site adjoining HT5, Hitchin
- Site for 2,400 homes to the south west of Hitchin
- Land at Mill Lane / London Road, Hitchin
- Land adjoining Ninesprings Cottages, Wymondley Road, Hitchin
- Bowmans Mill, Ickleford
- Land at Ickleford Manor, Ickleford
- Land west of Bedford Lane, Ickleford
- Land south of Icknield Way, Ickleford
- Land south of Westmill Lane, Ickleford
- Martlets, Park Lane, Knebworth
- Land at Shillington Road, Pirton
- Land at West Lane, Pirton
- Land at Priors Hill, Pirton
- Land at Shillington Road and to the rear of Walnut Tree Road, Pirton
- Holwell Turn – Phase 2, Pirton
- Land adjacent to Crunnells Green, Preston
- Land at The Dower House, Preston
- Land adjacent to Brickyard Lane, Reed
- Barkway Road, Royston
- Land to the rear of High Street, Whitwell
- Land south of Codicote Road, Whitwell
- Land at Horn Hill, Whitwell
Land at Bradway, Whitwell
Estate Yard, nr Whitwell

Policy HS2: Affordable housing
Threshold for smaller sites is unclear;
No reference to viability;
Viability insufficiently addressed in policy;
Payments in lieu should be included in the policy;
Criterion (c) does not take into account individual circumstances;
Criterion (c) is unenforceable;
Policy is not sufficiently precise and is unclear – Clauses (i), (ii) and (iii);
The emphasis on rented accommodation places a financial burden on developers;
Relationship with CIL / S106 is unclear in viability terms;
Small numbers of affordable units are difficult to manage;
Review mechanisms should allow for decrease in affordable housing;
Concern that the target of 40% affordable dwellings will be seen as minimum target and lead
to onerous levels of justification for any departure;
Identified figure of 33% affordable housing in the SHMA should be used as the District target;
Rent to buy not specifically mentioned;
Retention in perpetuity only applicable to rural exception sites;
Tenure mix should be specified;
Tenure split should be an aspiration;
40% target is not viable for site to the east of Luton;
Targets inconsistent with Policy SP8;
Review mechanisms only appropriate for strategic scale development;
Planning permission should only be granted when the target quota is reached; and
Accept self build as a form of affordable housing.

Policy HS3: Housing mix
The policy is weakly worded and the Design policies in the Plan do not provide sufficient
protection;
An up to date SHMA is needed to reflect the different housing needs required;
Need to build low cost sheltered accommodation and bungalows for first time buyers and
older people;
Part (a) of the policy is too prescriptive in terms of the requirements sought;
Clarification needed about what is required of applicants in demonstrating housing mix on a
site; and
The policy could be interpreted as seeking a common approach across the District, rather than
looking on a site by site basis.

There is also some support for the policy which allows a flexible approach to development on
a site by site basis.
Policy HS4: Supported, sheltered and older persons housing
There should be a proven local need for such accommodation in a locality rather than a requirement for all sites to include Class 2 and Class 3 accommodation; and Provision should be commercially driven.

Three representations received were in support for the policy in recognition of people living longer, advances in medical care and controls which help to prevent over supply.

Policy HS5: Accessible and adaptable housing
The requirements in the policy should be stronger so that all dwellings meet the M4(2) (accessible and adaptable dwellings) and 10% of all dwellings meet the M4(3) (wheelchair dwellings) standards;
The approach to assessing the viability of the standards appears to be contrary to national policy;
Policy is considered to be too prescriptive in terms of the requirements it seeks;
Unclear how the standards have been arrived at, particularly considering the cumulative impact of such requirements;
The standards will lead to larger houses – the policy should not be restrictive to delivering housing numbers and flexibility;
There should not be an over provision of these houses; and
Council’s evidence contradicts the policy requirements which exceed the report’s findings.

Policy HS6: Relatives’ and dependents accommodation
No representations received in respect of this policy.

Policy HS7: Gypsies, Travellers and Travelling Showpeople
There is no statement which makes it explicit that the Local Plan meets G&T needs in full and that North Hertfordshire will not be seeking pitches outside the District in the lifetime of the Local Plan;
NHDC should reassure itself that the proposed allocation of a G&T site at Pulmore Water is an appropriate strategy, evidence from Welwyn Hatfield suggests that sites should be no more than 15 pitches;
Queries about the evidence base, part of the existing site changes to residential homes negating the need for additional pitches; and
There are inconsistencies between this policy and Policy SP8; Housing.
4.5 Design

There are four policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy D1: Sustainable design**
The Design SPD referred to in the policy is out of date; Policy should make reference to the Hertfordshire Health, Wellbeing and Planning Guidance; Consideration should be given to the requirement of Health Impact Assessments for strategic sites and major developments; The policy is too prescriptive and it is unclear how the proposed standards have been arrived at; and The policy implies that all development should incorporate sustainable drainage systems (SuDS) which may not always be the best or most appropriate solution.

There was some support for the policy with Sport England welcoming the reference to Active Design and a number of detailed suggestions for additional supporting text were also made.

**Policy D2: House extensions, replacement dwellings and outbuildings**

**Policy D3: Protecting living conditions**
No representations were received in respect of these policies.

**Policy D4: Air quality**
A number of representations referred to the detrimental impact to the air quality in Baldock as a result of the proposed development, Blackhorse Farm to the north of Baldock.

There was also one representation in support of the inclusion of the policy.
4.6 Healthy Communities

There is just one policy in this section, HC1: Healthy Communities. A summary of the main issues raised is set out below:

Policy HC1: Healthy Communities
The Community Halls Strategy needs to be updated to help inform the provision and retention of community facilities; and
Criteria should be added to the policy to provide consistency with the NPPF and to reflect the Council’s evidence base for indoor sport.
4.7 Natural Environment

There are 12 policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

**Policy NE1: Landscape**
Just one representation was received in respect of this policy which related to note in the Sustainability Appraisal which noted the moderate to high landscape sensitivity to the north of Baldock.

**Policy NE2: Green infrastructure**
One representation was received in support of the policy.

**Policy NE3: The Chilterns Area of Outstanding Natural Beauty (AONB)**
The policy should be clear that it is the AONB which should be protected.

**Policy NE4: Protecting publically accessible open space**
The policy should be amended to ensure that the criteria accord with the NPPF and provide a framework for assessing proposals for outdoor sports facilities in practice.

**Policy NE5: New and improved public open space and biodiversity**
The representations were largely supportive of the policy subject to some detailed comments:
- There is no reference to viability considerations in the policy or supporting text;
- No additional allotment provision planned;
- Policy needs to support the principle of new open space;
- Clarity needs to be provided about the approach to outdoor sports facilities; and
- The approach to open space provision in smaller residential developments needs to be set out.

**Policy NE6: Designated biodiversity and geological sites**
Policy should make reference to adverse effects being avoided;
- The 10m buffer zone could be included in the policy;
- A clause could be included to require ecological surveys and assessments;
- There are inconsistencies between paragraph 11.51 and the North Herts Green Infrastructure Strategy; and
- Changes required to the policy wording to ensure consistency with the NPPF.

**Policy NE7: Reducing flood risk**
Policy adds nothing to local to the NPPF;
- The policy is not clear about the sequential approach;
- Need to locate development outside medium to high flood risk areas;
- Development to the north of Baldock may affect the River Ivel catchment;
- Amendments needed to the supporting text to ensure development does not have a detrimental effect on flooding; and
No reference for the need for the ST to be applied to surface water flood risk or to groundwater flood risk as defined in the NPPF.

Policy NE8: Sustainable drainage systems
Criteria in the policy effectively require living roofs on all development;
Criteria should make reference to viability and feasibility;
Unclear how criteria (d) will be applied in practice;
Policy should be strengthened to include mitigation designed and implemented on development sites to attenuate flows;
Policy should include strategic, integrated and maintainable SUDs for all sources of flood risk; and
Policy should acknowledge how development can effect betterment to an area in regard to flood risk and the use of sustainable drainage techniques.

Policy NE9: Water quality and environment
There will be a detrimental effect on water quality from development;
Reference should also be made to the Bedfordshire and River Ivel IDB district; and
No reference is made to protecting groundwater quality.

Policy NE10: Water Framework Directive and wastewater infrastructure
The Plan does not provide the certainty of capacity at Rye Meads STW for the lifetime of the Plan;
The policy title should be changed to reflect wider Water Framework Development issues or the policy could be divided into two: Water Framework Directive and Wastewater Infrastructure; and
Detailed amendments have been put forward for consideration.

Policy NE11: Contaminated land
Policy is not consistent with national policy; and
Policy does not consider sensitive locations or emphasize the requirements for developers to secure a safe development tackling unacceptable risks from pollution.

Policy NE12: Renewable and low carbon energy
No representations were received in respect of this policy.
4.8 Historic Environment

There are four policies within this section of the Local Plan. A summary of the main issues raised against each of the policies is set out below:

Policy HE1: Designated heritage assets
Policy 58 from the adopted local plan, Letchworth Garden City Design Principles should be included in the policy;
The Design SPD should be reviewed; and
Paragraph 4.163 should recognise that locally important parks can play a role in green infrastructure.

Policy HE2: Heritage at risk
One representation noted that it is important to protect heritage at risk, in particular natural features in the allocated site, LG1, North of Letchworth.

Other representations made in respect of the policy were all supportive.

Policy HE3: Local heritage
The principles of the policy were supported, although it was noted that the policy applies only to buildings of local character and distinctiveness but there are landscapes which are not designated which also do this.

Policy HE4: Archaeology
One representation received in support of the policy.
5. Local Plan – Communities

The following pages set out a summary of the main issues raised in respect of the sites allocated in each Parish. There are a number of parishes where no sites are proposed to be allocated in the Local Plan and no representations have been received in respect of these parishes: Caldecote, Hexton, Hinxworth, Holwell, Kelshall, Langley, Lilley, Newnham, Nuthampstead, Offley, Radwell, Rushden and Wallington.

Representations received in respect of the parishes of Bygrave, Clothall and Cockernhoe principally relate to the proposed strategic developments and they are therefore included in the summaries for these sites:
SP14: Site BA1 – North of Baldock (Bygrave); and
SP19: Sites EL1, EL2 & EL3 – East of Luton (Cockernhoe).
5.1 Ashwell

Ashwell is identified as a Category A village with one site proposed for development, site AS1, Claybush Road.

The main issues raised in the representations were:
- Impact on the historic environment;
- Difficult access from the site into the village, particularly for pedestrians;
- Impact on valued landscapes;
- Additional housing could be met within the existing settlement boundary;
- Impact on highways and traffic congestion;
- Lack of consultation on proposals to extend the settlement boundary;
- Impact on community facilities, including education and healthcare facilities;
- Proposals are inconsistent with the NPPF;
- Site is unsuitable for the elderly and young families;
- Alternative sites identified in the Ashwell Neighbourhood Plan; and
- Failure to meet the Duty to Co-operate.

There is some support for the allocation of the site on the grounds that Ashwell is considered to be a sustainable settlement, with a range of local services and facilities and is served by public transport. The developer states that the site can be delivered early in the plan period.
5.2 Baldock

Baldock is classified as a town in the Local Plan, Policy SP2: Settlement Hierarchy. A number of sites have been allocated in the town, for residential and employment uses.

Seven sites are included in the Local Plan for residential development with an estimated 586 new dwellings proposed. (This figure excludes the strategic site, BA1: Land north of Baldock, addressed separately in this report). The main issues raised in respect of the site allocations for residential development were:

BA2: Land west of Clothall Road (Clothall Parish)

The main issues raised in respect of this site allocation were:
- Unequal division of housing allocation;
- Scale of development;
- Should investigate a new settlement as an alternative;
- Inadequate infrastructure, e.g. local amenities, healthcare and education facilities;
- Lack of a transport assessment;
- Impact on rail infrastructure and services;
- Impact on nature reserve at Weston Hills;
- Loss of green belt and agricultural land;
- Site needs to be planned with BA3 as one site;
- Impact of construction traffic;
- No details of green infrastructure provision;
- Reduced access to the countryside;
- Impact on landscape and townscape character;
- Cumulative impacts of development are not considered; and
- Other more suitable alternative sites available.

BA3: Land south of Clothall Common (Clothall Parish) and BA4: Land east of Clothall Common (part of Clothall Parish)

The main issues raised in respect of these two sites were similar and are set out below:
- Adjoining urban open land should be included in the allocated area;
- Lack of detailed transport assessment;
- Loss of green belt;
- Loss of agricultural land;
- Loss of recreational opportunities;
- Route of link road unspecified;
- Flooding;
- Impact on highway infrastructure and congestion;
- Inconsistency in assessment of sites allocated;
- Impact on rail facilities;
- No viability assessment;
- BA2 and BA3 should be treated as one site and subject to a separate masterplan;
- Heritage impact;
- Cumulative impact on the historic character of the town;
- No mention made of school or GP provision;
- Impact on existing community facilities;
- Air quality, noise and pollution;
• Impact of construction traffic; and
• No details of green infrastructure provision.

**BA5: Land off Yeomanry Drive**
The main issues raised in respect of this site allocation were:
• Flooding;
• Loss of open space, footpaths and recreational space;
• Impact on character of Clothall Common;
• Traffic impact;
• Opportunity to address school access not taken;
• Pollution;
• Detrimental impact on existing residents; and
• Insufficient infrastructure.

**BA6: Land at Icknield Way**
The issues raised in the representations were:
• Access to the town is constrained;
• Schools, child care and sports facilities already under strain; and
• Loss of employment land.

**BA7: Land rear of Clare Crescent**
The issues raised in the representations were:
• Increase in size of the allocation since last consultation;
• Loss of allotments;
• Site includes “Greenacres” which is a local habitat; and
• Part of the area should be left as public open space.

**BA11: Deans Yard, South Road**
The main issues raised in respect of this site allocation were:
• Highway facilities;
• Important to retain small businesses scattered in the local community;
• Reduces traffic caused by commuters; and
• Improvement to the street scene.

One site has been allocated for employment development, **BA10: Royston Road**. The main issues raised in respect of the site allocation were:

**BA10: Royston Road**
• Policy should specify that the site has the potential to be used for waste uses;
• No evidence of need for the site;
• Impact on nearby listed properties;
• No traffic assessment;
• Impact on existing wastewater arrangements;
• Noise and air pollution;
• Highway infrastructure and congestion;
• Impact on A507 and B656 junction;
• Impact on existing residents;
• Visual impact;
• Impact of industrialisation on the nature and character of Baldock;
• Other vacant industrial land available; and
• Policy should include the need for a Preliminary Risk Assessment to be undertaken.

The Local Plan also designated two employment areas, BE1: Bondor Business Centre and BE2: Royston Road and one employment area for business uses only, BB1: Bondor Business Centre East.

**BE2: Royston Road**

Representations were only received in respect of this designation which raised the following issues:

• Impact of industrialisation on the nature and character of Baldock;
• Historic town centre;
• Commuting and employment;
• Vacant industrial land available; and
• Highway infrastructure and congestion.
5.3 Barkway

Barkway is identified as a Category A village with three sites proposed for development, totalling about 173 new homes. The sites are:
BK1: Land off Cambridge Road
BK2: Land off Windmill Close
BK3: Land between Cambridge Road and Royston Road

Many of the representations set out objections to all three sites, the main issues raised in the representations were:
- Scale of development is disproportionate to the size of the village;
- Lack of public transport services resulting in an increase in the use of the private car;
- Loss of agricultural land;
- Concerns over infrastructure provision in the village, including education, healthcare, shops, water, sewerage and broadband;
- Increased levels of noise and light pollution;
- Impact on the historic environment and village character;
- Impact on wildlife, including bats on the site;
- Lack of employment opportunities in the village;
- Cumulative impact of the proposed development on the community;
- Contrary to evidence in the Council’s landscape study;
- Impact upon Newsells Park Stud;
- No consultation with local community;
- No consideration of the emerging neighbourhood plan;
- BK3 was previously rejected by the District Council; and
- Contravenes the NPPF.

There is some support for the smaller allocated sites BK1, land off Cambridge Road and BK2, land off Windmill Close as these offer small scale development which would meet the needs of the local area.
5.4 Barley

Barley is identified as a Category A village but no sites are proposed for development within the Plan.

The main issues raised in the representations were:
- Defined settlement boundaries should be amended to allow greater flexibility for development;
- Land identified at Picknage Road, Barley for residential development and the relocation of the village shop; and
- Land identified to the rear of the Surgery, High Street, Barley for residential development.
5.5 Codicote

Codicote is identified as a Category A village with four sites proposed for residential development, totalling about 315 new homes: CD1; Land south of Cowards Lane, CD2: Codicote Garden Centre, High Street, CD3: Land north of The Close and CD5: Land south of Heath Lane.

In addition a site, CD4: Land at Pulmore Water, St Albans Road has been identified for the provision of six additional pitches adjoining an existing gypsy and traveller site.

**CD1: Land south of Cowards Lane**
- Loss of green belt;
- Green Belt Review study is flawed;
- Coalescence of settlements;
- Loss of informal recreation opportunities;
- Cowards Lane is a permanent and recognisable boundary;
- Impact on adjoining farm;
- Scale of development and impact on village character;
- Heritage assets;
- Impact of changes to drainage on farm and adjoining wildlife sites;
- Scale of development;
- Infrastructure requirements;
- Insufficient infrastructure, including education and healthcare facilities;
- Broadband infrastructure is inadequate;
- Highway infrastructure, safety and congestion;
- Air quality and pollution; and
- Loss of agricultural land.

**CD2: Codicote Garden Centre**
- Loss of employment site in the village;
- Visual impact from the B656;
- Site would be a good alternative school site;
- Improve access to sports and community centre;
- Impact on retail and leisure;
- Impact on traffic congestion; and
- Loss of café and meeting point provision.

**CD3: Land north of The Close**
- Scale of development;
- Limited access to site;
- Highway infrastructure and congestion;
- Insufficient parking;
- Inadequate infrastructure, including education and healthcare facilities;
- Not consistent with NPPF;
- Access to open space;
- Loss of country views;
- Visual impact;
- Impact on footpaths and links to countryside;
- Flooding risk;
- Lack of public transport;
• Drainage and water run off issues; and
• Pedestrian facilities and safety.

**CD5: Land south of Heath Lane**
• Loss of green belt;
• Inappropriate scale of development;
• Infrastructure, including energy, education, healthcare, water;
• No prior consultation on the site;
• Loss of agricultural land;
• Access to open space;
• Proposed access to Heath Lane / St Albans Road is not viable;
• Highway infrastructure and congestion;
• Village amenities;
• Loss of country views;
• Impact on footpath users;
• Disconnection of school from the land to the south by a public footpath;
• Ability of school to expand;
• Impact on existing residents;
• Potential merging of village with Codicote village;
• Dwelling numbers could be increased; and
• Insufficient broadband capacity.

**CD4: Land at Pulmore Water, St Albans Road**
The main issues raised in the representations in respect of the allocated Gypsy and Traveller Site were:
• Impact on living conditions from the adjacent quarry;
• Lack of safe access to site;
• Location of all pitches in one location;
• Drainage issues; and
• No exceptional circumstances demonstrated to build in the green belt.
5.6 Graveley and North of Stevenage

Two sites have been allocated in Graveley parish, the strategic site NS1: Land north of Stevenage and GR1: Land at Milksey Lane. The issues raised in respect of NS1 are set out elsewhere in this report. Site GR1: Land at Milksey Lane is allocated for 8 homes.

Only one representation has been logged against this site from the County Council stating that any pupil yield arising from this site could be accommodated within the existing primary school.
5.7 Great Ashby and North East Stevenage

Two sites have been allocated in Great Ashby, GA1: Land at Roundwood and the strategic site GA2: Land north-east of Great Ashby. The issues raised in respect of GA2 are set out elsewhere in this report. Site GA1: Land at Roundwood is allocated for 330 homes.

Site GA1: Land at Roundwood
The main issues raised in the representations were:

- Loss of green belt;
- Undue reliance on Stevenage infrastructure, including highways, education and retail;
- Unrealistic delivery rates;
- Transport mitigation for identified traffic, parking and access issues;
- No reference to Stevenage design principles;
- Remote location from Stevenage town centre;
- No secondary school provision;
- Healthcare facilities, no local GP or dentist;
- Alternative site to the west of Stevenage;
- Education facilities are at capacity;
- Additional amenities required, including healthcare;
- Proposed development is not sustainable;
- A new link road is needed;
- Biodiversity and wildlife;
- Drainage and flood risk;
- Impact on rights of way;
- No restriction for homes in multiple occupation (HMOs);
- Great Ashby is now full;
- Impact on character and significance of hamlets and villages;
- Affordable housing; and
- Lack of employment opportunities.
5.8 Hitchin

Hitchin is classified as a town in the Local Plan, Policy SP2: Settlement Hierarchy. A number of sites have been allocated in the town for residential, retail and employment uses. Six sites are included in the Local Plan for residential development with an estimated 309 new dwellings proposed. (This figure excludes the strategic site of Highover Farm, addressed separately in this report). The main issues raised for each site were:

HT2: Land north of Pound Farm (St Ippolyts Parish)
- Impact on biodiversity and presence of protected species in reed beds (bittern);
- Effect on infrastructure, including schools, health facilities;
- Site unsuitable for social housing;
- Access should be onto the B656;
- No justification for loss of green belt;
- Impact on existing residential amenity; and
- Additional dwellings could be provided on site.

HT3: Land south of Oughtonhead Lane
- Loss of green belt;
- Loss of diverse ecosystems;
- Traffic and parking congestion;
- Inadequate infrastructure; and
- Effect on the local nature reserve.

HT5: Land at junction of Grays Lane and Lucas Lane and  
HT6: Land at junction of Grays Lane and Crow Furlong
The representations in respect of these two sites raised similar issues, which are summarised below:
- Loss of green belt;
- Loss of diverse ecosystems;
- Traffic and parking congestion;
- Impact on the Chilterns AONB
- Inadequate infrastructure;
- Effect of additional traffic on the Air Quality Management Area; and
- Inadequate access to the sites for traffic.

HT10: Former B&Q site
- Losing the retail provision on the site is inconsistent with the proposals to increase retail provision in the Town Centre; and
- The site is the only site for a large convenience store serving that part of Hitchin to the north of the railway.

HE3: Station Approach
- The site should be allocated for residential development.
The following issues were raised in respect of the two retail allocations in Hitchin, HT11: Churchgate and its surrounding area and HT12: Paynes Park

**HT11: Churchgate and its surrounding area**

**HT12: Paynes Park**

- Arbitrary figure for additional retail floorspace taken from NLP study;
- Upper floors in any development could be used for community facilities;
- Impact on heritage assets;
- Paynes Park should be allocated for housing;
- Additional retail provision is unnecessary;
- Increase in traffic; and
- Impact on car parking.
5.9 Ickleford

Ickleford is identified as a Category A village with three sites proposed for development, totalling about 199 new homes, IC1: Land at Duncots Close, IC2: Burford Grange, Bedford Road and IC3: Land at Bedford Road.

Many of the representations received referred to all three sites in the village, the main issues raised in respect of all sites were:
- Loss of green belt;
- Conflicts with the NPPF;
- Coalescence of Ickleford with Hitchin;
- Contrary to strategic objectives and vision in the Local Plan;
- Not the most appropriate strategy;
- Impact on water and waste water infrastructure;
- Flood risk;
- Increase in traffic;
- Inadequate infrastructure to accommodate new development;
- Impact on village character;
- Impact on air quality;
- Traffic modelling does not consider increased traffic from Central Bedfordshire;
- Cumulative impacts of development not considered;
- Impact on access to healthcare services;
- No coordination with neighbouring authorities;
- Detrimental impact of the relocation of village school;
- Impact on historic village character, heritage assets and conservation area;
- Local wildlife and biodiversity;
- Scale of development is disproportionate to the size of the village; and
- Failure to consult on sites at the required stages.

Particular issues of note which were raised in respect of individual sites are set out below:

**IC2: Burford Grange, Bedford Road**
- Inconsistencies in the identification of the site as greenfield / brownfield;
- Previous responses not reflected in the Statement of Consultation;
- Site is adjacent to the Oughtonhead local nature reserve; and
- Dwelling estimate for the site should be increased to 50 dwellings.

**IC3: Land at Bedford Road**
- There may not be sufficient demand to support the relocation of the school; and
- Feasibility work ongoing.
5.10 Kimpton

Kimpton is identified as a Category A village with one site allocated for development, KM3, Land north of the High Street for approximately 13 dwellings.

The main issues raised in the representations were:
- Visual impact;
- No access to the remainder of the field for development; and
- Support for the identified settlement boundary.

The landowners of the site, KM3, support the allocation of the site in the Plan.
5.11 Kings Walden

The largest village in the parish of Kings Walden is Breachwood Green, with a number of scattered hamlets and farms. Breachwood Green has been identified as a Category A village with one site, KW1, Land west of The Heath, Breachwood Green proposed for development, totalling about 16 new homes.

The main issues raised in the representations were:
- No exceptional circumstances to justify loss of green belt;
- Loss of well used allotments and wildlife;
- Location is unsustainable as increasing the need to travel by car;
- Limited public transport;
- Development would change character of village;
- Lack of facilities and infrastructure in the village, e.g shop, doctors surgery;
- Inadequate roads;
- Congestion from on street parking; and
- Noise and air pollution from London Luton Airport.
5.12 Knebworth

Knebworth is identified as a Category A village with four sites proposed for development, totalling about 598 new homes. Three of the proposed sites are greenfield sites, two to the west of Knebworth, sites KB1: Land at Deards End and KB2: land off Gypsy Lane and one to the east of the village, KB4: Land east of Knebworth. The remaining site KB3: Chas Lowe site, London Road is situated in the village centre.

KB1: Land at Deards End and
KB2: Land off Gypsy Lane
The main issues raised in respect of these sites were:
• Scale of development is disproportionate to the size of the village;
• Loss of green belt and impact on rural environment;
• No prior consultation;
• Highway infrastructure and congestion;
• Parking facilities;
• Transport assessment needed;
• Impact on railway station and rail services;
• Narrow railway bridges;
• Pedestrian infrastructure and safety;
• Loss of agricultural land;
• Concerns over infrastructure provision in the village, including education, healthcare, shops, water and sewerage;
• Proposed school location near A1(M);
• Air pollution;
• Concern over construction traffic;
• Proposals are inconsistent with the NPPF;
• Impact on village character;
• Sites KB1 and KB2 should be planned together;
• Wildlife and biodiversity;
• Alternative sites available to the west of the A1(M) at Stevenage; and
• Cumulative impact of proposed sites should be addressed strategically.

KB3: Chas Lowe site, London Road
The main issues raised were:
• Traffic congestion;
• Infrastructure
• Lack of parking;
• Loss of the business and employment opportunities;
• Inappropriate for residential uses in the High Street;
• Contradictory to retail policy; and
• Impact on the village centre.

KB4: Land east of Knebworth
The main issues raised were:
• Scale of development is disproportionate to the size of the village;
• Impact on village infrastructure and amenities, including school and doctors surgery;
• Highway infrastructure and congestions;
• Parking infrastructure;
• Drainage and local sewage at capacity;
• Flood risk;
• Education facilities at capacity;
• Inadequate access to the site;
• Rail infrastructure and services;
• Loss of green belt and coalescence with Stevenage;
• Impact on the historic environment and village character;
• No previous consultation;
• Impact on views from the recreation ground;
• Loss of agricultural land; and
• Visual impact.
5.13 Letchworth Garden City

Letchworth Garden City is classified as a town in the Local Plan, Policy SP2: Settlement Hierarchy. A number of sites have been allocated in the town for residential, retail and employment uses. Thirteen sites are included in the Local Plan for residential development with an estimated 623 new dwellings proposed. (This figure excludes the strategic site, Land north of Letchworth which is addressed separately in this report). The main issues raised for each site were:

LG3: Land east of Kristiansand Way and Talbot Way
- Loss of green belt and coalescence of Letchworth with Baldock and Stotfold;
- Scale of development;
- Impact on the green belt as a heritage asset;
- Protection of the Greenway;
- No provision for education or healthcare facilities;
- Impact on Bronze Age Henge adjacent to the site; and
- Protection of Norton village is required.

LG4: Land north of former Norton School, Norton Road
- Requirement for loss of open space to be justified;
- Re-provision or contributions towards improvements to existing provision needed;
- Impact on healthcare, education and other facilities;
- Highway infrastructure, safety, parking and congestion;
- Brownfield sites should be used first; and
- There is confusion between the Sustainability Appraisal and the Local Plan.

LG5: Land at Birds Hill
- Object to the change of use from industrial to residential uses;
- Risk to Garden City principles; and
- Homes will be used by commuters.

LG6: Land off Radburn Way
- Loss of orchard and community benefit;
- Site is on the national Priority Habitat inventory;
- No suitable alternative sites to provide compensatory habitat;
- Loss of biodiversity and wildlife;
- Number of dwellings is too great; and
- Legal covenant precludes development of the site.

LG8: Pixmore Centre, Radburn Way
- Object to the change of use from industrial to residential uses;
- Risk to Garden City principles; and
- Homes will be used by commuters.

LG9: Former Lannock School
- Requirement for loss of open space to be justified; and
- Re-provision or contributions towards improvements to existing provision needed.
LG10: Former playing field, Croft Lane
• Requirement for loss of open space to be justified;
• Re-provision or contributions towards improvements to existing provision needed;
• Impact on views from existing houses;
• Impact on conservation area and heritage assets;
• Increased traffic;
• Increase in noise and disruption;
• No evidence that 37 dwellings will positively impact housing shortages; and
• Legal covenant on land should be enforced.

LG13: Glebe Road industrial estate
LG14: Site at Icknield Way
• Support for the allocation of these sites to provide additional housing in Letchworth Garden City.

LG15: Garages, Icknield Way
• Object to loss of parking; and
• On street parking would increase rat running.

LG16: Foundation House
• Object to demolition of one of the best quality and most up to date office suites;
• Loss of employment land; and
• Development is linked to finding alternative accommodation.

LG17: Hamonte
• Replacement of the home with up to date elderly accommodation might be reasonable.

LG18: Former Depot, Icknield Way
• Object to loss of employment land.

Supporting representations were received in respect of the designated employment areas in Letchworth Garden City but no representations were received in respect of the sites allocated for retail uses in Letchworth Garden City.
5.14 Lower Stondon

The village of Lower Stondon lies outside North Hertfordshire in neighbouring Central Bedfordshire. Land within North Hertfordshire adjoining Lower Stondon to the south lies within Ickleford Parish. The land within North Hertfordshire but adjoining Lower Stondon is classified as a Category A village in this plan and one site, LS1: Land at Bedford Road, is allocated for residential development, totalling about 120 new homes.

The main issues raised in the representations were:
- No formal notification to the adjoining authority of the intention to allocate;
- More sustainable locations for development available in the Henlow / Lower Stondon area;
- Cross boundary infrastructure issues;
- Premature to allocate in advance of Central Bedfordshire Local Plan;
- Increased flood risk;
- Impact on drainage and sewerage infrastructure;
- Air quality;
- Impact of increased traffic on congestion and highway infrastructure, particularly the A600;
- Loss of green belt;
- Traffic modelling does not take into account increased traffic in Central Bedfordshire;
- Scale of development;
- Breach of defensible boundary of settlement;
- Impact on village character;
- Effect on village infrastructure (employment, retail, leisure and health facilities);
- Impact on wildlife corridors and biodiversity;
- Loss of agricultural land; and
- Proposals are contrary to the NPPF.
5.15 Pirton

Pirton is identified as a Category A village but no sites are allocated for development. Two sites at Holwell Turn and Priors Hill, Pirton had been identified for development in the Local Plan Preferred Options 2014 but before the Proposed Submission Local Plan was published, outline consent had been granted for the site at Holwell Turn whilst part of the site at Priors Hill had been designated as a Scheduled Ancient Monument.

The main issues raised in the representations were:
- Additional sites could be allocated in Pirton.
5.16 Preston

Preston is identified as a Category A village with one site, PR1, Land off Templars Lane proposed for development, totalling about 21 additional homes.

The main issues raised in the representations were:
- Loss of open space and recreation facilities;
- Impact on the character of the village;
- Impact on local road infrastructure of additional traffic;
- Inadequate infrastructure, e.g. education, shops, healthcare, public transport;
- Inadequate local facilities;
- Flooding and sewerage issues;
- No demand for affordable housing in the village;
- Housing demands from the village can be met by infill in the village boundary;
- Site could be used as a village green; and
- The assessment, methodology, assumptions and conclusions of the Ecology Study, “PR1 Preston: Recreational Impacts on Wain Wood SSSI” are not robust.
5.17 Reed

Reed is identified as a Category A village with one site allocated for residential development, RD1, Land at Blacksmiths Lane for approximately 22 new homes.

Only one representation was received in support of the allocation from the Parish Council.
5.18 Royston

Royston is classified as a town in the Local Plan, Policy SP2: Settlement Hierarchy. A number of sites have been allocated in the town for residential, retail and employment uses. Eight sites are included in the Local Plan for residential development with an estimated 1,049 new dwellings proposed.

**RY1: Land west of Ivy Farm, Baldock Road**
- Provision of new school supported;
- Loss of greenfield sites;
- Impact on biodiversity and the cumulative effects of development on the SSSI at Therfield Heath
- Insufficient detail given of mitigation works required for Therfield Heath;
- Role of adjoining open land unclear; and
- Impact on the highway.

**RY2: Land north of Newmarket Road**
- Impact on infrastructure, particularly education, health and social services, rail services;
- Biodiversity;
- Overdevelopment;
- Access; and
- Traffic safety.

**RY4: Land north of Lindsay Close**
- Proximity to Royston water recycling Centre;
- Odour assessment required;
- Access from the A505 required;
- Access for construction traffic; and
- Lack of amenities.

**RY5: Agricultural supplier, Garden Walk**
- No representations received in respect of this site.

**RY7: Anglian Business Park, Orchard Road**
- No representations received in respect of this site.

**RY8: Land at Lumen Road**
- Requirement to phase development in relation to wastewater treatment capacity; and
- Traffic management review is required in the area.

**RY10: Land south of Newmarket Road**
- Impact on the countryside – contrary to national policy;
- Education criteria should refer to a new 2FE first school if Site RY1 does not come forward;
- Concern over traffic flows;
- Only one access point from Newmarket Road;
- Access should be from the A505; and
- Impact on infrastructure, particularly education, health and social services, rail services.

The main issues raised in respect of the site allocations for employment development were:
RY9: Land north of York Way

RE1: Orchard Road

• The requirement to provide compensatory or offsetting measures for the loss of the existing grassland habitat is questioned;
• There are waste sites operating in close proximity to the site;
• Provision of a new access directly from the A505 to RE1 would ease traffic problems on the A1198; and
• There is an opportunity to build an out of town shopping centre here.

RY12: Town Hall Site, Melbourn Street

The main issues raised in respect of this allocation as a retail and mixed use allocation were:
• Loss of a building of local character;
• Loss of car parking;
• Town Hall and existing trees should be retained; and
• Proposal would revitalise the town centre.
5.19 Sandon

Sandon is identified as a Category A village with no sites allocated for development in the parish.

Only one representation was received in respect of the parish:
- Should the village be re-classified as a Category B village rather than a Category A village under Policy SP2; Settlement Hierarchy.
5.20 St Ippolyts

St Ippolyts is identified as a Category A village with the boundary drawn to include Gosmore. Two sites are proposed for development, totalling about 52 new homes, site SI1: Land south of Waterdell Lane and site SI2: Land south of Stevenage Road.

It should be noted that site HT2, Pound Farm, is in the parish of St Ippolyts but on the edge of Hitchin and is covered in the Hitchin section of this document.

The main issues raised in the representations were:

- Concerns over access for both sites;
- Impact on public rights of way; and
- Impact on heritage assets.

A number of representations were received in support of the allocations and the identification of St Ippolyts as a category A village.
5.21 St Pauls Walden

The main village in the parish of St Pauls Walden is Whitwell. Whitwell has been identified as a Category A village with one site, SP2: Land between Horn Hill and Bendish Lane, Whitwell proposed for development, totalling about 41 new homes.

The main issues raised in the representations were:

- Local Plan Preferred Options previously included the site as green belt;
- No justification for the change in status;
- Limited job opportunities;
- Location is unsustainable as increasing the need to travel by car;
- Unacceptable visual impact;
- Flood risk;
- Underground tanks and pumps are not sustainable as a solution to drainage issues;
- Lack of sewerage capacity;
- Highway infrastructure and congestion;
- Impact on historic assets;
- Impact on landscape character;
- Lack of public engagement;
- Inadequate social infrastructure, e.g education, shops, public transport;
- Scale of development is disproportionate to the size of the village;
- Whitwell should be a category B village;
- Previous refusal of planning permission;
- Site is not needed to meet identified local housing needs; and
- Contrary to the NPPF.
5.22 Therfield

Therfield is identified as a Category A village with one site allocated in the village for development, site TH1: Land at Police Row, totalling 12 new homes.

The main issues raised in the representations were:
- Hoop Meadow should be included within the settlement boundary;
- Further evidence should be provided to justify the restriction on the amount of development on the site;
- The site is an unsustainable location;
- Insufficient number of school places;
- Reliance on private transport;
- Impact on historic character;
- Lack of local support for the proposals;
- Coalescence with Hay Green; and
- Precedent for further development.
5.23 Weston

Weston is identified as a Category A village with one site allocated for development, WE1 Land off Hitchin Road, totalling 40 new homes.

The main issues raised in the representations were:
- Higher number of dwellings proposed than the identified need;
- Incursion into the green belt;
- Scale of development is inappropriate for the village;
- Extension of the village boundary;
- Increased traffic levels;
- Loss of countryside landscape character and wildlife; and
- Protected slow worms on the site.
5.24 Wymondley

Wymondley is identified as a Category A village with one site, WY1: Land south of Little Wymondley proposed for development, totalling about 300 new homes.

The main issues raised in the representations were:

- Cumulative impact of proposals arising from proposals in both the Stevenage and North Hertfordshire Local Plans;
- Highway infrastructure, safety and congestion;
- Air and noise pollution;
- Increased flood risk and surface water flooding;
- Conflict with the emerging neighbourhood plan;
- Lack of local support and consultation;
- Loss of green belt;
- Contravenes the requirements of Policy SP1;
- Impact on village character;
- Scale of development is disproportionate to the size of the village;
- Contamination of the site due to previous landfill;
- Lack of integration with the existing village;
- Loss of green space;
- Policy should include a requirement for a Preliminary Risk Assessment; and
- Policy should include a requirement for a site specific Flood Risk Assessment.
7. Appendices

7.1 Statistical breakdown of representations
<table>
<thead>
<tr>
<th>Section Name</th>
<th>Respondents</th>
<th>Objectors</th>
<th>Support Object</th>
<th>Comment</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plan</td>
<td>2551</td>
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<td>Policy SP6: Sustainable Transport</td>
<td>69</td>
<td>64</td>
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<td>Policy SP7: Infrastructure Requirements and Developer Contributions</td>
<td>51</td>
<td>38</td>
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<td>Policy SP11: Natural Resources and Sustainability</td>
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<td>Policy SP12: Green Infrastructure, Biodiversity and Landscape</td>
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<td>276</td>
<td>268</td>
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<td>Policy SP16: Site NS1 - North of Stevenage</td>
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<td>Policy SP17: Site HT1 - Highover Farm, Hitchin</td>
<td>32</td>
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<td>Policy SP18: Site GA2 - Land off Mendip Way, Great Ashby</td>
<td>107</td>
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<td>Policy SP19: Sites EL1, EL2 and EL3 - East of Luton</td>
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<td>36</td>
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https://north-herts.jdi-consult.net/localplan/adminsc/
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### 7.2 Schedule of late representations

Schedule of late representations – received after the consultation period finished on 30 November 2016

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