

Dear Sir/Madam,

I have been a resident of North Herts for eight years and have grown to love this part of the world, having lived in London and Kent previously.

That development is needed in North Herts is axiomatic; it is clear that at this time, demand outstrips supply and ONS figures suggest that the District needs 12,100 new homes built between 2011 and 2031. North Herts District Council (NHDC) has increased this figure by 2,100, to take into account any 'unmet need' in respect of growth from neighbouring Luton, bringing the total number of new homes to be built in the period covered by the Local Housing Plan (LHP) to 14,200.

NHDC proposes that 60% of these homes should be sited within the Green Belt, which will have dramatic effects on well-established communities in the District. The council seems to adopt a pragmatic view of this rolling up of the Green Belt, by simply designating land on more convenient sites as Green Belt. In this way NHDC can say that far from diminishing the Green Belt, they have increased it; this is rather like building a new football stadium in the middle of Dartmoor and recovering that lost moorland by designating a similar area in the centre of Exeter as National Park. It may look good on paper, but it is unlikely to fulfil its original purpose.

NHDC seem to insist on the adoption of a plan that covers the period 2011 to 2031, when legal advice commissioned by the Council has clearly stated that the minimum requirement is a five year plan, which would give time to properly plan for additional numbers. It is this insistence on a plan which covers twenty years which is at the heart of the Council's indecent haste and lack of preparation.

Two Stage Plan

The three MPs for this area, Sir Oliver Heald, Peter Lilley and Stephen McPartland have all endorsed the creation of a two stage plan, initially dealing with the first 10 years (2011 to 2021), which would look at planning for 6,050 sites. Planning permissions have already been given for over 2,600 homes; this leaves 3,450 new homes to be found district-wide before 2021. This period should be well used in identifying and planning a new 'Garden Village' development. We have an opportunity to create something worthwhile, rather than simply adopting a 'bolt on' principle to new homes within existing communities.

Master Plans

NHDC has identified a number of significant sites, including Baldock, Letchworth and Stevenage, where infrastructure will be provided for within a 'Master Plan'.

Unfortunately no details of these plans have been made public. Public concerns about such sites have been met with assurances that concerns will be dealt with "as part of the Master Plan". My reservations concerning the efficacy of NHDC's planning were heightened when it was recently discovered that Network Rail had no knowledge of the proposed settlement north of Baldock (BA1), that will mean 2,800 homes built on Green Belt land, as a bolt on to the medieval town of Baldock. It is accepted by the Planners that for the development to be viable, a bridge will have to be built of the railway for access and transport. But Network Rail hasn't even been approached yet!

If the other Master Plans are built on such shaky foundations, I cannot see these plans becoming a reality without significant cost to the public purse. The Local Housing Plan should include, where appropriate, full details of a viable Master Plan, which has the buy in of all stakeholders. At the moment, the LHP does not fulfil these two criteria.

Spatial Strategy

This plan focuses development squarely on the four towns within the district, who between them will have to accept 70% of the development. Of these four towns, the smallest and most historic, Baldock, is expected to assimilate 3,591 homes, or 30% of the total. This is not fair, or equitable and does not take account of any possibility of the development of a Garden Village/City; as such it is short term and tactical, rather than strategic.

This plan relies on land that is put forward by developers and does not seem to be proactive in any way. Rather than look at land that would enhance future development and approach landowners, NHDC seems to have merely reacted to sites, preferring sites that are Green Belt and owned by another public body (Herts CC).

Green Belt

As previously stated 60% of homes in the plan are to be built on Green Belt land. Such land should only be used for development in exceptional circumstances. It is implicit in this policy that Brownfield and non-Green Belt land should be used before building on the Green Belt. Yet North Herts Homes (NHH) Brownfield Regeneration Project has not been included in this plan. This project aims to provide 400 homes, solely from the use of Brownfield sites within four years. I have asked NHDC whether they have done any work to identify similar schemes without receiving any meaningful answer.

The proposed sites in the Baldock, Hitchin and Letchworth area will lead to a ribbon of development from Baldock to Letchworth, to Hitchin, creating unrestricted urban sprawl, with encroachment into the countryside. This proposition counters recent Government statements on the use of Brownfield sites. In 2014, the Minister for Housing said "This government wants to see the maximum amount of brownfield land being used to build new homes, whilst also maintaining protections for our beautiful countryside."

Virtually doubling the size of Baldock will damage the setting of Baldock in its natural basin, currently surrounded by countryside; the unique character of the town, dating back to medieval times with a strong connection to the Knights Templar and many listed buildings will be irrevocably and fatally marred.

More and more development is occurring on Green Belt land; in 2008, less than 20% of new homes were built on Green Belt land. In 2011, that figure had risen to 34% and will now be much higher.

Transport

There are a number of gaps in the evidence offered relating to local traffic flows and I shall highlight just two of them.

As previously stated in this response, the major development north of Baldock has at its heart, the requirement to build a road bridge over the railway to provide access. All enquiries about the provision of infrastructure have been met with the response "It will be dealt with in the Master Plan". But at this late stage, Network Rail know nothing about any plans to build such a bridge. This is what Richard Kelly calls a "show stopper", but NHDC have, to date, ignored it.

The junction in Baldock where the A505 meets the A507 is a major junction; in many respects, all road lead to it and it is currently at capacity, with traffic jams both during and outside rush hour periods. No traffic survey has been done of this junction, which is expected to deal with a significant rise in traffic once the new development begins. To cope with such an increase in traffic, the junction must be re-engineered; however, the options for such work are severely limited. Houses on

two sides of the junction are listed, the oldest having been built in 1540. This seems to have been ignored by NHDC planners.

Natural Environment

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development with its three dimensions (economic, social and environmental). Development should support the local economy, provide social benefits in the form of new homes and social facilities and protect & enhance the natural environment.

The development north of Baldock will seriously and adversely impact on wildlife in the area. The Corn Bunting was once a common, widespread farmland bird (originally called the Common Bunting). Due to changes in farming practices, the Corn Bunting has experienced a dramatic decline of 90% between 1970 and 2010. It has become extinct in Ireland and is possibly extinct in Wales. It is a Red Listed Bird. During 2014 an extensive survey was carried out, which indicated that the area north of Baldock (BA1) is central to the population of this declining bird. This area also provides habitat for the following Red Listed species: Yellow Wagtail, Grey Partridge and Linnet.

Ivel Springs is a large Nature Reserve in Baldock and a Scheduled National Monument which means the site has national significance and is protected under statute. The springs, which are the source of the River Ivel, provide a diverse area for wildlife, including woodland, wetland and pasture; it is carefully managed to keep a mixed habitat and encourage wildlife to flourish. Chalk Rivers, such as the Ivel, are extremely rare and included in the Hertfordshire Biodiversity Action Plan. The River Ivel and its wetlands are important habitats for a wide range of species; however, for the past six summers, the river at Ivel Springs has dried up. It is contended that the imposition of the north Baldock development will increase the strain on this fragile ecosystem that has existed for at least 5,000 years. The loss of this Nature Reserve will have a catastrophic effect on wildlife and before NHDC embark on the development of north Baldock, research should be conducted to measure the level of threat that such proximity to a large development of 2,800 houses poses.

Evidence

During the course of the development of the LHP, a number of sites have been put forward and then rejected by the planners of NHDC. The consultation paper related to the Housing Growth Targets consultation run by NHDC from 17 February to 30 March 2012 outlined eight different options for housing growth, ranging from 15,800 to 2,500 new homes. Unfortunately no rationale for rejection of individual sites has been published, which leaves residents frustrated and unable to understand a) what specifically has excluded a particular site and b) whether once a site has been rejected anything can be done to reverse that decision.

The NPPF states that Local Plans must be supported by a local evidence base, which means that NHDC must plan to meet objectively assessed needs for market and affordable housing and identify a five year supply of specific deliverable sites. I have been unable to ascertain why certain sites have been rejected in favour of others.

On the evidence, I believe that the plan, as it stands, is flawed; three local MPs believe the plan is flawed; even the NHDC Portfolio Holder, responsible for the submission of the plan believes it is flawed. There is public condemnation of the plan across the District and an overwhelming desire for a two stage plan looking at deliverable sites for 6,000 homes in the first ten years and working with other housing authorities to provide a new Garden Village/Town style settlement. I urge you to consider the overwhelming public view across the District and adopt a two stage plan, which will embrace localism and demonstrate objective and equitable measure to deliver the right level of development across NHDC.

Please listen to the people!

Regards,

:: Jim McNally

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