

11th November 2016

Dear Sir / Madam,

I am writing to comment on the North Hertfordshire District Council's Local Plan 2011 – 2031 (Proposed Submission, October 2016). In particular, I wish to object to the massive proposed development at the Blackhorse Farm site to the north of Baldock. My objections are based primarily on two of the "Tests of Soundness" that Local Plans are required to meet:

"Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities;"

"Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework."

My comments below identify six areas in which the Local Plan clearly fails to meet the requirements of the National Planning Policy Framework:

1. Traffic congestion in Baldock town centre
2. Access to Baldock station
3. Capacity restrictions at Baldock Station
4. Proposed new road connecting A507 and A505
5. Inadequate local infrastructure to support existing needs
6. Green Belt development

Sections 1 to 3 also demonstrate that the planners have failed to consider the transport and congestion issues raised by their plans. It has become clear during recent public meetings that they have no strategy for addressing these issues, and some of the issues raised by the proposed Blackhorse Farm development are so extreme that there is no realistic solution. I therefore believe that the Baldock part of the Local Plan is simply not deliverable, and so fails two of the four Tests of Soundness.

It is shown below that Baldock is already struggling with over-stretched amenities and major traffic congestion, and the Local Plan would increase Baldock's size by 80%. Sensitive infill development in appropriate areas of Baldock would be beneficial, but wholesale dumping of a major part of NHDC's housing requirement on one small town without any attempt to address the inadequate infrastructure will have very serious consequences that have simply been ignored.

1. Traffic congestion in Baldock town centre

Traffic access into Baldock is restricted by two major barriers: the railway line and the A1(M). As a result, a very high proportion of traffic entering or leaving Baldock is forced to cross one particular road junction in the town centre. This junction pre-dates the A1 and the railway by hundreds of years and was never intended to carry anything like the current volume of traffic.

The junction in question is the one where the A507 North Road meets the Royston Road (the old route of the A505) at the junction of Whitehorse Street, Station Road, Royston Road and Clothall Road. This junction is used by:

- Traffic entering Baldock from the north west on the A507;
- Traffic entering Baldock from the north on the A1;
- Traffic entering Baldock from the north from Bygrave, Ashwell, Steeple Morden, Guilden Morden and all the surrounding villages;
- Traffic entering Baldock from the north east on the A505;
- Traffic entering Baldock from the south east on the A507.

All these major traffic flows entering Baldock - plus all the corresponding traffic flows heading in the opposite direction - have to pass through this single junction. As a result, the junction is always congested, and congestion during the rush hour can extend back almost as far as the Baldock services.

Air pollution levels between the railway bridge and the junction are particularly high during the rush hour, and are probably higher than anywhere else in Baldock¹. It was stated during public meetings on the draft Local Plan that Baldock has an existing air quality problem, and that the “Baldock bowl” concentrates particulates from traffic exhausts.

There are listed buildings on either side of the junction so there are no simple solutions to this problem - which is why nothing has been done about it. The approach has been to avoid doing anything that makes the problem any more critical than it already is, so building 2,800 houses on the Blackhorse Farm site is about the worst possible thing that could happen in this part of Baldock. Planning should be about enabling the town to expand in a sustainable way, but adding approximately 5,600 cars to an area that is already massively congested will simply lead to gridlock and will further exacerbate the air pollution problem. Objective 2(c) of the Sustainability Appraisal Framework includes the sub-objective: “avoid exacerbating local traffic congestion”, but it appears that this requirement has simply been ignored.²

Surprisingly, the Draft Sustainability Appraisal by CAG Consultants³ does not appear to mention this problem, although it does include some generic concerns about traffic such as:

“The density of traffic on the principal road network is high and increasing but the rural nature of the District makes the provision of sustainable travel modes more challenging.”

In a response to the consultants’ findings, North Herts District Council stated that:

“Detailed policies and / or Transport Assessments (or equivalent) at planning application stage will ensure these issues are considered”.

I find it incredible that such a major problem has not yet been addressed by the planners. Since the Blackhorse Farm development will have a massive impact on traffic congestion, the National Planning Policy Framework clearly requires a Transport Assessment to be produced. This is defined as:

¹ I have been unable to find any air quality measurements for this stretch of road. Surprisingly, all but one of the data sources for air quality listed on Page 30 of the Sustainability Appraisal of the Proposed Submission Local Plan have been removed from the internet.

² Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan, p23.

³ Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan.

“A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.”

I can see no possible way in which a Transport Assessment that meets these requirements could be produced for the Blackhorse Farm site. Consequently, the Local Plan is not in accordance with the policies of the National Planning Policy Framework and is not deliverable, so it fails two separate Soundness Tests.

NHDC's approach of deferring the Transport Assessment until the planning application stage is simply kicking the issue into the long grass; it stops members of the public from commenting on this critical component of the Local Plan during the current (final) consultation, and it also prevents scrutiny by the Planning Inspector. This is unacceptable.

2. Access to Baldock Station

The problem described in the previous section is made considerably worse by the unfortunate fact that Baldock Station is located between the congested traffic junction and the barrier formed by the railway embankment. As a result, traffic heading towards the station has three options:

- Approach from the north via Station Road. This traffic has to pass through the constriction formed by the railway bridge, and this area is always massively congested during the rush hour.
- Approach from the south via Station Road. This traffic has to cross the congested traffic junction that was discussed in the previous section.
- Approach from the west via Icknield Way or Football Close. Both of these are residential streets with extensive on-road parking, so they are effectively only one car wide.

During the evening rush hour, the arrival of each train from London frequently creates dangerous situations at the bottom of the station approach road as cars from the station try to force their way into the traffic and face resistance from frustrated motorists who have spent a long time in the queue. Cars turning right have to undertake a particularly dangerous manoeuvre.

Despite the suggestions of the planners that a high proportion of “affordable” housing will be included in the development, there is very little evidence that employment in Baldock will grow sufficiently to accommodate this influx of new workers, or that the jobs will be sufficiently highly paid to allow people to pay for these homes. The location of the Blackhorse Farm development so close to Baldock Station inevitably means that many of the houses will be sold to people who commute to London or Cambridge. It was admitted at one of the planning meetings that the developers might try to buy their way out of affordable housing commitments so that they could focus on selling to affluent commuters. If this occurs, then existing congestion problems will be made far worse.

When Cllr. Levett was asked about this at a meeting on 12th July 2016 at Knights Templar School, he said that they were looking at walking and cycling options. It was pointed out to him that the railway bridge on North Road is only marginally wider than two cars, so the only cycling option is to sit between stationary cars in a traffic jam. The walking options are not much better because the

pavements under the bridge are extremely narrow. At this point, he declared that this was not a planning problem.

Once again, a fundamental weakness in the Local Plan is simply being kicked into the long grass to prevent the public or the Planning Inspector from commenting on it. Paragraph 32 of the National Planning Policy Framework requires the Blackhorse Farm proposals to be supported by a Transport Assessment to show how these issues will be resolved, and Paragraph 177 of the same document requires infrastructure development policies to be included in the Local Plan. When the Transport Assessment is eventually published, it will demonstrate that this Local Plan is not in accordance with the National Planning Policy Framework and is not deliverable.

3. Capacity restrictions at Baldock Station

The National Planning Policy Framework requires a Transport Assessment that emphasises “alternatives to the car such as walking, cycling and public transport”. Clearly, the railway is a major component of the public transport provision in Baldock, so it is important to consider whether it has the spare capacity to carry the additional traffic that would be generated by new developments in and around Baldock.

Baldock only has a small station, and many rail travellers are already forced to stand all the way to London. It has been estimated that the Local Plan will increase the number of rail journeys for Baldock from 330,000 to 600,000 per year⁴. Unfortunately, the additional capacity required in the rail network to support this simply does not exist, and would be massively expensive to create. One of the key constraints is the cost of upgrading the Welwyn Viaduct and the Welwyn tunnels from two tracks to four.

The “Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan” by CAG Consultants suggests that high density developments should be allowed in close proximity to town centres or railway stations. However, this pre-supposes that the railway station has the spare capacity needed to carry the additional passengers that will be generated by the development. In the case of Baldock Station, there is no realistic expectation of any new capacity becoming available.

Indeed, exactly the opposite seems to be happening. Under plans announced by Govia Thameslink in their 2018 timetable consultation, Baldock is set to lose semi-fast services to and from London in order to free-up capacity for services to other places further up the line with even more pressing needs. They will also be replacing the existing trains with newer models that provide air conditioning – but 30% fewer seats⁵. Far from the integrated approach to housing and transport planning advocated by Paragraph 31 of the National Planning Policy Framework

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

⁴ Baldock Planning Meeting, Knights Templar School, 9th November 2016.

⁵ <http://www.dearcustomerrelations.com/save-baldock-trains/>

the local authority and the transport provider in Baldock are working against each other to make the situation far, far worse.

The Local Plan proposes to increase the population of Baldock by 80%. These new residents will need employment so that they can afford to buy the proposed new houses. Whether they travel to work by road or by rail, it is clear from the arguments above that they will create unsustainable levels of congestion that cannot be mitigated by any realistic investment in new infrastructure. This Local Plan is therefore not deliverable.

4. Proposed new road connecting A507 and A505

Although the NHDC planners have not produced a Traffic Assessment for the Blackhorse Farm development, they have proposed a road linking the A507 north of Baldock to the A505 east of Baldock. Paragraph 4.179 of their "Final draft of the Local Plan" states:

"The site is also large enough to support new schools, local facilities and a new link road, including an additional road bridge over the railway so that not all traffic has to use the Station Road bridge and the Whitehorse Street/Royston Road crossroads."

In other words, the road would allow some traffic to avoid the junction that is discussed in Section 1 above. However, it is not explained how this link road will address the needs of the Blackhorse Farm development. People living on the new development are hardly likely to drive across to the other side of the railway line so they can enter Baldock via the same gridlocked junction from the east instead of from the north. The traffic implications of the proposed development are so serious that a Traffic Assessment based on rigorous traffic modelling should be published for public scrutiny and comment before the Local Plan goes to the Planning Inspector.

The link road will, however, be a major benefit to traffic flowing between places such as Ampthill in the east and Royston in the west. Both of these roads are dual carriageway as they approach Baldock, so the link road can be expected to be equally busy. Whether the planners intend it or not, this will become a major trunk road running through the development.

To minimise air pollution problems in the development, the capacity of this road and its associated railway crossing will have to be sufficient to allow the traffic to move freely. Furthermore, to minimise noise pollution, the road will have to be set in a cutting below the level of the surrounding development.

Since the railway is raised on an embankment in this area, a bridge over the embankment would have a major noise and visual impact on the surrounding area. It should therefore be a condition of this development that the road passes under the railway line (in a tunnel) rather than over it (via a bridge). For the residents of the new development and the existing residents of Lower Bygrave, the design of this road and the associated railway crossing is a critical issue.

During the Council Meeting on 24th July 2016, Cllr Levett said that the new road would probably join North Road near the turning for Radwell. However, he also said that they were forced to plan this development on Herts County Council land because no other land had been made available. I do not know whether it would be possible to bring the road as far north as the Radwell turning without

leaving Herts CC land. If it has to be brought out further south, it would cause even more congestion during the rush hour and would presumably require existing houses to be demolished.

Another problem with this road is that it effectively accepts that the Blackhorse Farm development can never become an integral part of Baldock. As explained in Sections 1 and 2 above, the railway and the traffic junction form a bottleneck between the new development and the centre of Baldock, and the proposed new road will do absolutely nothing to fix this. As a result, Baldock will develop like an hourglass with two physically-close but largely separate town centres linked by a narrow constriction. There is a real risk that the new road will mean that the Blackhorse Farm development will develop a closer affinity with towns such as Stotfold - which would only be about 2 miles away and linked by a fast road. Although the development would lie within the boundary of Baldock, it would be a ghetto having little involvement with the life of the town. This flies in the face of Section 2 of the National Planning Policy Framework which requires new developments to promote the vitality of associated town centres, and talks about developing on “accessible sites that are well connected to the town centre”.

Baldock is one of only five Hertfordshire towns classed as being of national importance for its historic character, and the town centre contains over 100 listed buildings. Nobody – not even the NHDC planners - claims that the Blackhorse Farm development will enhance Baldock town centre.

5. Inadequate local amenities to support existing needs

The number of houses allocated to Baldock will increase the population by 80%. Rather than seeking to preserve the character and heritage of this historic market town by sensitive and carefully-planned development, it has simply been used as a dumping ground for a large number of houses in order to meet an unrealistic quota. The scale of development around Baldock is so far out of alignment with the current size of the town that it will inevitably place massive additional pressures on local amenities that are already overstretched.

At local planning meetings, NHDC planners have been bombarded with questions and complaints about inadequate local amenities. Schools, doctors’ surgeries and other basic amenities are already at full capacity. Even water supplies are inadequate (Affinity Water describes our area as being under “serious water stress”, and there have been a number of incidents where residents of Upper Bygrave have lost water supplies completely).

During a discussion about the alternative option of a new garden city (as proposed by the local MP, Sir Oliver Heald) it was pointed out that a new city would at least start from a position of no amenities, but a massive development at Blackhorse Farm would be put into an area where the amenities are already in deficit. Furthermore, we can be certain that developers will build houses before building any amenities, so the situation will have to get considerably worse before any action is taken.

Paragraph 177 of the National Planning Policy Framework states that:

“It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are

drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.”

The Local Plan should not be accepted until residents’ concerns about local amenities have been fully addressed.

6. Green Belt development

Four of the large “strategic developments” proposed by NHDC, including the Blackhorse Farm development, have been located on Green Belt land. Paragraph 80 of the National Planning Policy Framework lists five purposes for the Green Belt:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Table 5 in the North Hertfordshire Green Belt Review⁶ provides a “Green Belt Review Assessment Matrix”. The Green Belt has been divided into sectors, and each sector is subjectively assessed against the first four of the five Green Belt criteria listed above. However, the table does not provide any assessment in relation to the fifth criterion. This omission is interesting, because I have seen very little evidence of urban regeneration in this Local Plan.

The proposed Blackhorse Farm development to the north of Baldock is a classic example of urban sprawl, and is exactly the kind of rapacious development that the Green Belt was intended to prevent. Paragraph 41 of the North Hertfordshire Green Belt Review states that

“Checking unrestricted sprawl of large built-up areas is a component of areas adjoining the three major settlements in North Hertfordshire. This explains the significant contribution scores for all areas surrounding the settlements of Hitchin, Letchworth, Baldock and Knebworth.”

It is interesting to consider why this has happened when the evidence presented in this letter shows so clearly that the Blackhorse Farm site is entirely unsuitable for the scale of development that is proposed. The answer seems to be that the normal planning process was bypassed for reasons of political expediency. Herts CC owned the land and were keen to sell it, so the planners were told to focus on this site rather than other more suitable land that might be available. Councillors claim that no farmers volunteered to contribute land for development, but it appears that the farmers were never asked! Since the location of this “strategic site” was determined by political expediency rather than by planning considerations, it is hardly surprising that the site has so many problems. As one

⁶ North Hertfordshire Green Belt Review 2014, Part 1: Assessment of current Green Belt and Potential Development Sites in the Green Belt.

councillor put it during the Council Meeting on 20th July 2016, you can't make a silk purse out of a sow's ear.

I feel very strongly that we should be doing everything in our power to protect the Green Belt – particularly since there are other sites available that DO meet planning criteria and are NOT in the Green Belt. According to the Department for Communities and Local Government's planning guidance:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open .. inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

It was stated at the meeting of North Herts District Council on 27th November 2014 that the council has no option but to develop on the Green Belt because they are required to meet housing targets set by the government. However, I have read the ministerial guidance on development in the Green Belt published by Communities Secretary Eric Pickles and Housing & Planning Minister Brandon Lewis on 6th October 2014, and it makes it clear that councils are NOT required to build on the Green Belt just so that they can meet housing targets. At the council meeting on 27th November, councillors consistently stated that they were being forced to develop the land to the north of Baldock, when it seems to me that they are specifically PREVENTED from doing this. My understanding from the meeting was that NHDC believe that they can ignore the ministerial guidance and propose a Local Plan in which most of the construction will be on Green Belt land.

The council also claimed at the same meeting that they can get around the Green Belt problem by removing the Green Belt designation from land where they want to build and applying it instead to land in other places where they do not want to build. This is clearly not a reasonable interpretation of the rules; if it was, then the Green Belt would become completely pointless because it could simply be shifted whenever it gets in the way of development. Maps of the Green Belt in the area indicate very clearly that it was specifically intended to protect the countryside around Baldock and the other local towns – not somewhere else.

The council have claimed that they have no alternative to developing Green Belt land, yet there are other sites available that meet all of the planning criteria and are not in the Green Belt. To my knowledge, the council have offered no explanation as to why these sites have been held back and placed on the reserve list when they should have been prioritised over Green Belt development.

Paragraph 79 of the National Planning Policy Framework states that

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

In spite of this, a large proportion of the development proposed in the Local Plan is on Green Belt land, suggesting that the Green Belt in North Hertfordshire is not permanent at all. Furthermore, the proposed Blackhorse Farm development is a classic case of urban sprawl driven by political expediency - despite the government making it very clear that political expediency does not constitute "very special circumstances". This is exactly the kind of inappropriate development that the Green Belt was intended to stop. It may be a fundamental government aim "to prevent urban sprawl by keeping land permanently open", but it is clearly not an aim shared by NHDC. How can we have any faith in a planning system that allows councils to ignore long-established environmental protections as soon as they become inconvenient?

Conclusions

The scale of the proposed Blackhorse Farm development is well beyond anything that Baldock could reasonably be expected to accommodate. The very large number of houses proposed, and the natural constriction of the transport corridors, indicates that the development would not be an enhancement to Baldock but a competing economy that will suck economic activity out of the town centre. The planners have not described the Blackhorse Farm development as a new town, but that is effectively what it is. Sensitive infill development in appropriate areas of the town would be beneficial, but the urban sprawl that is proposed will lead to massive traffic congestion and make the town centre almost inaccessible to residents in surrounding villages such as Ashwell. Sadly, the proposed development seems to be driven by political expediency rather than by any coherent plan for the sensible development of the town.

Paragraph 32 of the National Planning Policy Framework states that:

All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether ... improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Sections 1, 2, 3 and 4 of this letter demonstrate that the "residual cumulative effects" of the proposed Blackhorse Farm development are indeed severe, and the Local Plan is not supported by any Transport Statement or Transport Assessment for the site. The National Planning Policy Framework therefore requires that the development should be "prevented or refused on transport grounds". Deferring the requirement for a Transport Assessment until a planning application has been received effectively bypasses the scrutiny of the Planning Inspector and should not be permitted.

Section 5 of this letter shows that the scale of proposed development around Baldock is so far out of alignment with the current size of the town that it will inevitably place massive additional pressures on local amenities that are already overstretched. The planners have largely ignored residents' concerns about local amenities, but Paragraph 177 of the National Planning Policy Framework clearly

states that “infrastructure and development policies should be planned at the same time, in the Local Plan.”

Section 6 of this letter shows that the proposed Blackhorse Farm development is in direct contravention to clearly-stated government policy in relation to the Green Belt. The Department for Communities and Local Government’s planning guidance states that:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open .. inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

NHDC councillors have stated that they are forced to propose green belt developments in order to meet government housing targets, but the ministerial guidance on Green Belt development published on 6th October 2014 makes it clear that councils are NOT required to build on the Green Belt in order to meet housing targets. The Blackhorse Farm development is clearly urban sprawl, and political expediency does not constitute “very special circumstances”. This is exactly the kind of inappropriate development that the Green Belt is intended to stop.

A Local Plan is required to meet four “Tests of Soundness”:

1. Positively prepared – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
2. Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
4. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

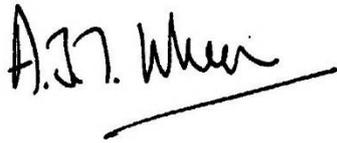
This letter has demonstrated that the Local Plan fails Tests 3 and 4 because it is not deliverable and does not comply with the policies in the National Planning Policy Framework.

I understand that the previous public consultation on the Local Plan generated over 8,000 replies, proving that there is very strong public opposition to it. Since then, the plan has not been revised in any meaningful way to address the primary concerns of the local residents. It may be late in the process, but now is the time to demonstrate that peoples’ views really do matter and this “public consultation” exercise is not just a sham.

The council will no doubt claim that people who object to their Local Plan are “nimbys” who will resist any development. That is simply not the case. We would welcome careful, well-thought-out development of Baldock, but not the wholesale devastation proposed by this Local Plan. We need a Local Plan that delivers development in a sensitive and sustainable way so that it is seen as a benefit and not as a threat. We also need a Local Plan that sets out a real vision for the future development

of local towns and villages rather than simply focussing on housing targets. For the record, I support the very sensible alternative proposal put forward by the local MP, Sir Oliver Heald⁷.

Yours Sincerely,

A handwritten signature in black ink that reads "A. J. W. Wheen". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Dr Andrew Wheen

⁷ https://www.oliverheald.com/sites/www.oliverheald.com/files/north_herts_dc_response.pdf