

REPRESENTATION TO THE LOCAL PLAN

I wish to object to the Local Plan as I consider it NOT JUSTIFIED, NOT EFFECTIVE and NOT CONSISTENT WITH NATIONAL POLICY.

Policies SP8 and SP14 – The proposed allocation of 2,800 homes at North of Baldock (site BA1).

1. This site is acknowledged by the council as making a significant contribution to Green Belt purposes (Housing and Green Belt background paper para 3.14). The Plan is UNJUSTIFIED as it is not the most appropriate strategy.
2. Table 4 sustainability appraisal notes that this site creates a high probability of adverse impacts on landscape and townscape character and Landscape Sensitivity Study of July 2013 identifies the land north of Bygrave as having moderate to high landscape sensitivity. The Bygrave Road from Baldock has environmentally protected grass verges. The Plan is UNJUSTIFIED as it is not the most appropriate strategy.
3. Baldock sits in a valley which is well known for having poor air circulation causing air pollutants like PM2.5 from diesel emissions to be trapped and concentrated. The Eastern Baldock Bypass was finally built in 2003, following intervention in parliament by Sir Oliver Heald MP, to alleviate this pollution. Since then traffic has risen and now the levels pollutants in Hitchin St and Whitehorse St are in danger of exceeding EU permitted levels (para 9.28). The Housing and Green Belt background paper notes that former site 209E (Priory Fields Hitchin) was considered unsuitable for exactly this reason. The extra vehicles, domestic and service vehicles, which will arise from the building of 3,590 new homes and which will travel through and around Baldock will tip the balance and affect the health of all residents especially the very young, the old, pedestrians and cyclists raising health problems such as respiratory disease, cardiac problems and even cancer. The Plan is UNJUSTIFIED as it is not the most appropriate strategy.
4. The local highways network will be severely affected by the development of this site. Almost all of the traffic wishing to pass through Baldock travels from the A1 to Buntingford and Stanstead along the A507, and from Cambridge and Royston towards London along the A505 (now redesignated B656), and these two roads cross at traffic lights at the north of Baldock at Station Road and Whitehorse Street. The two roads are offset and the traffic lights are slow because of three way lights and now pedestrian crossing time when requested, mainly at school rush hours. The crossroad is bounded by listed buildings which makes turning difficult especially for the huge lorries on the A507, some going left to Royston at that junction, which still go that way despite recommendations that they use the A1 and new bypass. One of the listed buildings has suffered many hits by vehicles.

The proposed miniroundabout at Whitehorse St / Station Rd crossroads, the only mitigation planned for Baldock(AECOM technical note para 5.1, Draft report of North Herts Local Plan Model Testing Table 5.1) may reduce accidents between vehicles but will not reduce time spent and congestion caused by this junction.

The A507 passes the only access to the railway station causing extra congestion in peak travel periods. The railway access is shared by about 100 houses in a cul-de-sac Icknield Way East and work is currently in progress to build another 41 houses which will also have to use this access. The survey used to discuss traffic impact at this junction refers only to Icknield Way East, not Station Approach nor the A507 on to which they both deliver traffic.

Station Road passes under the 14ft 6in railway bridge which historically has suffered frequent hits by lorries (8 or so per year). Despite the building of sacrificial metal beams at each side of the bridge and new signage the hits continue to occur. Whilst the long delay to rail traffic no longer happens, road traffic is still impacted while the mess is cleared up, the vehicle is extracted, two police vehicles are deployed. In addition to this there are numerous smaller holdups when lorries realise they will hit the bridge and manoeuvre via small residential roads damaging road furniture and grass verges as they do.

The traffic on the A507 is constant and heavy especially in peak periods which extend over at least two hours and are worst in school term time. It also increases any time of day or night if there is a crisis on the A1. The A507 is not shown as a "key feature to transport in North Herts" IDP (para 5.4) despite being now arguably the busiest road through the town. A survey of all Baldock roads at the time of the Bypass inquiry showed that this would be the case.

In the IDP the Traffic Baseline (para) shows that for North Herts as a whole traffic volume between 2014 – 31 is expected to increase by 16.1% and the average commuting distance in 2011 was 19.4km. Rail patronage at Baldock (para 5.12) went up 61% between 2005/6 to 2014/15. Para 5.19 mentions cycle paths in North Herts including Baldock but those referred to are mainly for leisure. Traffic demand in the A1 corridor may increase by 30% by 2031.

No traffic surveys on the A507 have been carried out by NHDC for development of this Local Plan. It has not been included in any meaningful traffic modelling exercises during research and forward planning. I can report, as a resident of this road, that the traffic volume has increased substantially since the Bypass was opened in 2003 and particularly since the A1 services at Radwell were built. GPS navigation also directs traffic along this road as an alternative to the A1/ Eastern bypass.

All of this ensures that the A507 from the traffic lights to the A1 roundabout is not a suitable road to give access to a new development at BA1 as NHDC plans. It is very likely, since there are few work opportunities in Baldock that most of the residents will commute to other parts of North Herts, Bedfordshire and Cambridgeshire. NHDC has projected 2-3 vehicles per house so 5-7000 vehicles can be expected to be generated from this BA1 site and most will want to visit Baldock, Letchworth, Hitchin i.e pass through the traffic lights at Station Rd /Whitehorse St.

The link roads proposed by NHDC will do nothing to solve this traffic problem. A "northern" link is proposed through the BA1 site and a "southern" link road is mentioned between BA 3 and BA4 but with even less substance. No information is provided as to route impact or viability. Indeed these roads threaten to conduct traffic of all descriptions through the new residential areas forming a real hazard to residents both by potential accidents and by air pollution. These roads are referred to in the Infrastructure Delivery Plan para 5.110 and it is stated they "have been included in the traffic modelling." But where is the evidence? Their "provision (cost and delivery) is assumed to be absorbed within the specific proposals for these areas and they are subsequently not specifically identified in this IDP." This and the fact that Baldock is listed as a separate town but in traffic terms is always grouped with Letchworth which has its own completely different transport problems is concerning, leading to the belief that Baldock traffic problems have not been acknowledged and addressed.

The Plan is UNJUSTIFIED and NOT EFFECTIVE. There is insufficient evidence that the development can be achieved without a huge negative impact on the local highway network. This applies also in respect of BA4 and BA10 (SP8 and SP14). There is no adequate Transport Assessment or Transport Statement and the Plan is therefore NOT CONSISTENT WITH NATIONAL POLICY.

5. Baldock's railway station is on the northern edge of the town with few houses lying to the north of the railway line. A major development on this side of the railway line would result in a pinchpoint for traffic at the WhiteHorse St/ Station Road intersection. The AECOM's technical note, table 4.1, identifies this crossroad and Letchworth Gate at the southern end of Baldock as problems (above capacity, unacceptable queuing) by 2013 even without further development.

The Plan acknowledges that "not all" traffic from BA1 will have to use the Whitehorse St/Station Rd crossroads (4.179) but this also acknowledges that a good proportion of it will. The Plan makes employment provision at above modelled levels SP3, 4.26 and this could increase traffic flow between Baldock and Letchworth and Hitchin. The plan stresses how interconnected Baldock Letchworth and Hitchin are (paras 2.31, 4.27, 13.14) and that many residents commute out (4.25, 4.26). This will lead to more peak hour traffic.

Since it is expected that most new Baldock residents will commute to work outside Baldock, as well as extra pressure on the roads there will be unacceptable pressure on the railway. The station is small and would need extending to accommodate more passengers and the longer trains needed for them. Govia are currently holding their own consultation on their future rail provision and intend to cut "fast" trains stopping at Baldock other than at peak rush hours. This will not serve 7-8000 extra people well. Moreover British Rail had not till recently known of NHDC's plans such as building a bridge over the railway from the A505 Royston road into or round the BA1 site. There is no information on deliverability or cost of this proposed road / railway crossing which will be very expensive if it is to be delivered without visual impacts. It is quite exposed at this point.

This indicates that NHDC has produced a poor plan without much forward planning and appreciation of all the related infrastructure required.

The link road proposed through BA1 will not relieve congestion at the Whitehorse St/ Station Rd crossroad if it is not the shortest route into Baldock. It may, however, be used by many people as a shortcut from A505 to A507 and will deliver more air pollution to the site BA1.

There is no modelling of the impacts from developments or their dependency on new infrastructure (AECOM section 7 Summary). No information is given about mitigating measures. It has not been shown that this part of the plan is deliverable.

The Local Plan Viability Assessment (update 2016) has not considered specific infrastructure pressures and mitigation concerns associated with the major sites, of which BA1 is the biggest proposed.

The Plan is NOT EFFECTIVE as it cannot be achieved without considerable negative effect on transport and local highway network.

6. The National Planning Policy Framework states in para 32 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" "the opportunities for sustainable transport modes have been taken up but the Plan does not give information of things such as cycleways between towns for commuters, "safe and suitable access can be achieved for all people" but the increased traffic on A507 and through any link road and under the very narrow railway bridge will act against this, "improvements can be taken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused where THE RESIDUAL CUMULATIVE IMPACTS OF DEVELOPMENT ARE SEVERE".

The full impact of the scale of development proposed for Baldock – 3590 homes BA 1/2/3/4 and BA10, industrial development or the individual major sites,- have not been properly assessed. Nor has evidence been offered on the impact of these developments on the existing town of Baldock and its environs and its local transport network. No information has been given about proposed mitigation measures.

The Plan is NOT CONSISTENT WITH NATIONAL POLICY.

7. The Plan does not retain and enhance the town centre of Baldock as recommended by the NPPF (para 23). Indeed by trying to build a new development BA1 on the other side of the railway line it encourages a pinchpoint for traffic and a pulling apart of the community.

Developments should “be expected to work closely with those directly affected by the proposals to evolve designs that take account the views of the community (NPPF 66) but NHDC have not done this. They have not sought the views of existing residents.

“By designating Local Green Space local communities will be able to rule out new development other than in very special circumstances”. But NHDC have decided to locate many sites including BA1 on Green Belt land going in the face of this policy. They have not provided appropriate justification for redesignating Green Belt land as they should, showing “exceptional circumstances”. Indeed the area BA1 is acknowledged by the Council as making a significant contribution to Green Belt purposes as shown in NPPF chapter 9. It is good quality agricultural land and of great importance for feeding the local area. “Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer areas of land in preference to that of a higher quality NPPF 112.

Water provision at a time when water in this area is scarce and in danger of being inadequate, and the provision of sewerage over an enormous area (BA1) have not been adequately documented. The protection of the Ivel Nature reserve has been glossed over as has the mitigation measures for protection of other wildlife such as the endangered corn bunting on BA1.

It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion” NPPF 177. The Council have failed to provide detailed plans, timescales or costings for the necessary infrastructure and this gives no confidence that said infrastructure will be provided at the times it is needed, of a good quality, or even at all. Other developments in the area eg Great Ashby have discovered this to their cost.

The Plan is neither JUSTIFIED nor EFFECTIVE nor CONSISTENT WITH NATIONAL POLICY.

I should like to be kept updated on the Plan’s progress
I should like to be invited to the Public Hearing.