

Objection to the Proposed Development of Site HT1

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5th February 2015

Planning Policy and Projects Group
North Hertfordshire District Council
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Reference: Site HT1

Please find included our response to the NHDC draft Local Plan (2011-2031).

The principle aim of this response is to object to the proposed development of Hitchin site HT1, a Greenfield site prioritised for the allocation of 484 homes. We feel the development of this site not only contravenes many of the official policies outlined by NHDC, but also threatens the identity of Hitchin as a small historic market town, much to the detriment of its existing residents.

The objections covered within this response have been supported by a local petition in the Walsworth area, both door-to-door, and online at <https://www.change.org/p/nhdc-save-hitchin-s-greenbelt> . **At the time of writing, the total number of signatures to this petition was 509.** Copies of this response and petition, as recorded at the end of the consultation period, have also been sent to:

Democratic Services Manager, Council Offices, Gernon Road, Letchworth, SG6 3JF (original)
Cllr. Bernard Lovewell (email)
Cllr. Alan Millard (email)
Cllr. Ray Shakespeare-Smith (email)
Cllr. Judi Billing (email)
Peter Lilley MP (email)

Objection to the Development of Site HT1 (Highover Farm)

The objection is split into 6 sections:

1. Impact on the Natural Environment
2. Provision of Local Amenities
3. Impact on Transport Infrastructure
4. Lack of Employment Opportunities
5. Concluding Remarks
6. Recommendations

Objection to the Proposed Development of Site HT1

1. Impact on the Natural Environment

We believe that development of site HT1 is in direct contravention of the following policies:

Policy NE1: Landscape and Environmental Protection

Section 9.3 (pg. 56) North Hertfordshire has a rich, varied and attractive natural and historic environment which is under increasing pressure from development, recreational uses and changing agricultural practices, particularly in the areas which are adjacent to the towns and villages. The natural environment forms the setting to the towns and villages in which people live, work and spend their leisure time. It should be protected and enhanced in the future to maintain the existing high quality of life that people in the district enjoy.

Section 9.9 (pg. 57) Natural Environment Policy NE1: Landscape and Environmental Protection

Development proposals that would be detrimental to the natural environment will be refused where suitable mitigation measures cannot satisfactorily address the adverse impact.

Site HT1 is entirely Green Belt – protected under current planning legislation; a fact noted in the Local Plan, which concedes that significant revision of the Green Belt boundaries would be required for the development to proceed. In light of this we question the reason for proposing development here; as such an action implies that NHDCs total housing needs cannot be accommodated by brownfield development alone. On the issue of housing targets, NHDC appear to be vague on where the justification for proposing 14,200 houses derives. As the SHMA states in paragraph 5, ‘*in the absence of any direct guidance on matters such as housing targets, responsibility for establishing the level of future housing provision required rests solely with the Local Planning authority.*’ Yet in 2013, NHDC’s planned housing allocations were only 7000. This target is also substantially above the 8000 required to meet the needs of the district itself according to the Council’s Strategic Housing Market Assessment Update.

Assuming the projected housing requirements to be an overestimate, one must consider whether all redeemable brownfield allocations have been considered as alternatives. One significant flaw in the SHLAA is that the total representations of brownfield dwellings excludes those that could be utilised through ‘change of use’ – a process that does not require planning permission and can provide significant housing stock. The Campaign for the Protection of Rural England informs us that this figure was 1500 homes for North Hertfordshire in the last year alone.

Highover Farm (HT1) is situated on an area of unspoilt Green belt. The land is categorised as grade 2 agricultural land and is part of a historic farm dating back to the 17th Century. As well as providing valuable grazing land and the habitat that this provides for small mammals and wildflowers (undisturbed by people); the farm land is also home to a diverse array of birds (including often witnessed murmurations of starlings, nesting skylarks, buzzards and jays). There are also sightings of mammals (deer, foxes, bats etc), reptiles (including legally protected slow-worms) all of which contributes to a diverse and irreplaceable ecosystem. Networking the site are a series of established hedgerows and a pond, with uncultivated areas of scrub providing a haven for wildlife. Development of this site would act not only to destroy this habitat, but would also damage the valuable connections between adjacent wildlife habitats.

Outside of the site, the verges either side of the potential access route along Stotfold road are designated Wildlife Sites and should be considered for protection. These Wildlife Sites provide vital linkages between habitats and ruin or destruction can have significant repercussions for the wildlife in the surrounding areas.

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The Local Plan provides no mitigating action for the natural loss that development of this land would incur. Furthermore, loss of this farm, and the likely removal of grazing cows on Purwell meadows would be a major detractor to the character of the local area.

The Green Belt land at site HT1 also acts as a limited buffer between the towns of Letchworth and Hitchin. As the Local Plan states '*...each town retains a distinct identity of its own. The needs for development arising from the three towns are comparatively high, but the gaps separating the towns are small and of great importance if the town's urban areas and identities are to be kept distinct.*' Development of Highover farm would bring the extent of Hitchin's outermost housing areas to within 400m of Letchworth's periphery. If this is permitted, the remaining Green Belt would be little more than a token gesture, providing not one of the key aims of Green Belt land as outlined by the CPRE:

- to prevent urban sprawl;
- to stop neighbouring towns and cities from joining-up;
- to protect the countryside;
- to preserve the setting and special character of historic towns, such as Bath, York and Oxford; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

With respect to the proposed site's impact on flood management, we believe the proposed development contravenes the following Local Plan policy:

Natural Environment Policy NE6 : Reducing flood risk

The Council will take a risk based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF. The sequential and exception test, as set out in the NPPF, will be applied for developments in North Hertfordshire.

Development of site HT1, which lies at the watershed of the River Purwell would increase the risk of local flooding to parts of Woolgrove road. At present significant amounts of run-off are delayed by the sink effect that the significant area of farmland at site HT1 creates (after prolonged periods of heavy rainfall, large areas of waterlogged land are visible to residents on the adjoining roads). As the Local Plan quite rightly states: '*increase in the number of hard, impermeable surfaces can prevent rainwater soaking naturally into the ground and generate additional rainwater runoff*'.

Development of this site, and thus reduction of this sink effect would lead to more run-off along High Dane and Highover way in particular. At present it is not uncommon for sections of Woolgrove road, Cambridge road and Willian road (in the vicinity of the Woolgrove crossroads) to become single lane during periods of intense rainfall as water accumulation builds. This would, in all probability become more severe with the development of site HT1. More worryingly, NHDC state that no quantitative analysis has been undertaken to assess the impact, nor has any mitigation been proposed. NHDC also fail to provide evidence that with an increasingly wetter climate, that any mitigation effort would be sufficient.

With respect to the proposed site's impact on waste water management, we believe the proposed development contravenes the following Local Plan policy:

Natural Environments Policy NE 8 : Water Framework Directive and wastewater infrastructure

New development in North Hertfordshire should not result in the deterioration of any watercourse in accordance with the Water Framework Directive.

There is anecdotal evidence to suggest that the wastewater infrastructure currently supporting the Walsworth area is near, or at capacity. There is obviously a very real concern that with the

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development of site HT1, significant infrastructural improvements would need to be undertaken, which along with the issues of run-off have been neglected in the overall impact assessment undertaken when assessing the feasibility of the site.

With respect to the proposed site's impact on air quality, we believe the proposed development contravenes the following Local Plan policy:

Policy D4: Air quality

*This policy supports Policy D3: Protecting living conditions but also in encouraging renewable energy development. The district will be accommodating a significant amount of development during the plan period which will undoubtedly generate additional road traffic and put added pressure on existing road networks. Therefore, because the major source of local air pollution in the district originates from road traffic emissions **it is important for this plan to deal with the implications for air quality of the anticipated development.***

*7.28 A more detailed description of developments considered to be 'major' and the expectations for air quality mitigation actions to be implemented as a result of **the outcome of the air quality impact assessment will be included in the Council's air quality and emissions planning guidance document (currently being prepared by the Council's Environmental Protection team).***

7.30 Methods available to mitigate the impact of developments on air quality may fall into a number of categories:

- *appropriate parking standards*
- *accommodating infrastructure to support the use of low emission vehicles*
- *appropriate location and design of buildings*
- *incentives to support initiatives for public transport, car sharing and using alternative modes of travel*
- *contributions to improve road and traffic management, infrastructure to support alternative modes of travel and air quality monitoring.*

The development of site HT1 would have a significant impact on air quality as a result of the increased traffic expected to access the site; the principle areas of concern area being Cambridge road and Grove road, which are at, or near capacity and subject to significant periods of stationary traffic. It is a point of contention that a major supporting document to the Local Plan (The Air Quality Emissions Planning Guidance) is not available for the consultation period. It is therefore impossible to make balanced comment on whether the detriment to the air quality of the area surrounding site HT1 would be acceptable, however one can surmise that with areas of the A505 already designated Air Quality Management Areas (AQMAs) this is likely to be a significant argument against such a development.

2. Provision of Local Amenities

In order to support a housing development of such magnitude it is necessary to ensure that the existing infrastructure of local amenities is sufficient to cope with the extra demand, or if not provide suitable development plans that address the shortfall. With respect to the proposed development of site HT1, we believe that the Local plan provides little evidence that the proposed development can be supported by local amenities as they stand. Furthermore, there is little to no evidence of planned amenity development within the local area that would help integrate the site at HT1 into the town.

With respect to the proposed site's impact on local amenities, we believe the proposed development contravenes the following Local Plan policies:

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Local Amenities (General):

Manual for Streets (Department for Transport, 2007) states that “Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m [0.5 miles]) walking distance of residential areas which residents may access comfortably on foot”. Therefore, convenient walking, as set out in the policy, will be taken to be up to 800m.

As discussed in policy ETC7: Additional Retail Floorspace, there is no immediate identified need (up to 2021) for additional retail floorspace. Therefore, no additional retail sites are formally allocated in the town.

In order for local amenities to be convenient, they must be within walking distance – which with reference to the above should be within 800m (0.5 miles). The Local Plan states (Section 12.9.2) that the following (local) community centres would be provided:

- The area around Café Valeriya (Grove road/Woolgrove road crossroads) 0.4 miles, or 8 minutes from nearest HT1 access point
- The area around Polcaro’s Fish and Chip shop (Woolgrove road/Cambridge road crossroads) 0.5 miles, or 11 minutes from nearest HT1 access point
- The area around Cambridge Road Stores (Cambridge Road). Just over 0.5 miles or 11 minutes from nearest HT1 access point.

Of these three, only one is within the maximum walking distance of the periphery of the HT1 site, the other two are at the maximum distance, with the majority of the development site outside of this maximum distance (to provide context, the periphery of site HT1 is 1.3km or 0.8 miles from the town centre).

In the Transport infrastructure plan, both sites HM5.5 (Grove road/Woolgrove road crossroads) and Site HM5.1 (Woolgrove road/Cambridge road crossroads) are indicated as being at near-capacity and are thus proposed for improvement schemes to encourage traffic flow, neither having any local parking. Only the area near Cambridge Road Stores – the furthest of the three, provides limited parking, with an estimated 20 spaces (maximum).

Given the above, it is extremely unlikely that residents (other than those at the periphery of site HT1) are going to walk to local amenities at the proposed community centres. If the majority drive, the likelihood is that most would travel to Hitchin town centre in preference, given the ease of access and greater choice. Since the proposed development caters for approximately 484 homes, or circa 1000 people, one can expect in excess of 630 cars (assuming 1.3 cars per household) to be associated with the development. This is approximately 70% of the allocated town centre car parking spaces provided by NHDC (neglecting Nightingale road, Hitchin swim centre and the shopping centre private car parks).

Unless sustainable transport alternatives are provided, or significant local amenities (i.e within the development) are included on site HT1, the stress upon the town centre generated by increased car travel would be severe.

In the context above, the term ‘local amenities’ is used loosely to cover those premises which provide necessary services for day-to-day life; this includes the private and public sector (shops, doctors, dentists, schools, nurseries etc.). NHDC should be well aware that local amenity provision in the area is already poor:

- There are just two local shops (MPM stores on Woolgrove road and Lifestyle express on Cadwell lane) and one local school (Highover JMI) within the proposed 800m walking distance.
- The local pub (the Sailor) has recently closed pending private development, with the nearest alternative – the Anchor 0.6 miles away; this ignores the Gardeners’ Arms which is positioned along a dangerous section of highway – inaccessible by foot.

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- The nearest doctors, dentists, opticians and other basic amenities are all classically defined as being within the town centre and well outside walking distance.
- Walsworth community centre is already under threat of closure. Should this happen, one of the key focal points necessary for any large community would be lost.
- The Local Plan specifically states that 'no additional retail sites are formally allocated in the town', implying that site HT1 would consist entirely of housing at detriment to any communal focal point.

The provision of local amenities in Walsworth is already inadequate. The Local Plan fails to provide any mitigation to the added pressures the development of site HT1 would provide, with all referenced community centre sites lacking specific detail, as well as being at the extreme or outside what is defined as 'walkable'.

3. Impact on Transport Infrastructure

With respect to the proposed site's impact on local transport infrastructure, we believe the proposed development contravenes the following Local Plan policies:

Transport Policy T1: Sustainable Transport

To help deliver accessibility improvements and the promotion of sustainable transport, development proposals should:

1. *be in locations which enable sustainable journeys to be made to key services and facilities;*
2. *comply with the provisions of the Local Transport Plan and other supporting documents as considered necessary;*
3. *ensure that a range of alternative transport options are available to occupants or users. This may involve new or improved pedestrian, cycle and passenger transport links and routes;*
4. *in the construction of strategic sites, allow for the early implementation of sustainable travel infrastructure in order to influence the behaviour of occupiers or users and in order that sustainable travel patterns become embedded at an early stage; and*
5. *protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, provide replacement routes to the satisfaction of the Council.*

As already stated in Section 2, there is little provision in terms of local amenities (with respect to the 800m maximum walking distance), it is also highly likely (despite NHDC's best intentions) that the majority of residents would either be commuters (it has been estimated that 49% of all North Hertfordshire residents who are in employment commute out of the district for work), or would seek employment in areas outside of walking distance.

Travel by Car

As previously detailed, it can be expected that in excess of 630 cars would be added to the road infrastructure as a result of the development of site HT1. It is already noted from the Local Plan that the infrastructure at the key junctions associated with this development (those on the A505) are already at or near capacity. Although it is unrealistic to expect this total volume of cars to be journeying simultaneously, it is probable that a majority would travel during peak times, given the distance of the site from the town. Furthermore the majority of these journeys would involve travel along the A505, as this is the principle access road to the development, linking to the site to the A1.

In the transport infrastructure study it is noted that two specific mitigation efforts could be employed to ease congestion:

1. Linking of Cadwell lane to Wilbury way and introduction of 'no right turn'/left turn filter lanes. (HM5.1)

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2. Inclusion of a MOVA signalling system on the junction of Cambridge road/Woolgrove road (HM5.2)

Point 1 offers little in terms of cost benefit. The transport infrastructure study estimates the total cost of the project to be £5.8 million, yet fails to provide quantitative information on how much the estimated improvements are likely to reduce congestion. Furthermore the objective of the 'improvement' is to increase the speed of traffic at the junction – a dangerous proposal given the nearest proposed community centre to site HT1 is located here and requires crossing of these two roads to access.

Point 2 aims to reduce congestion by inclusion of a 'smart' traffic system, which would regulate traffic at peak periods based on demand. The estimated reduction in congestion is 13%. In comparison The Traffic and Transport Data Report forecasts that traffic over the 2009 base will increase by 9.7% by 2021, or through extrapolation, 14% by 2025. This implies that introduction of the MOVA system would only act to return traffic congestion to 2009 levels by 2025 (i.e near or at capacity). This system therefore fails to provide sufficient mitigation for the Local Plan period to 2031.

Without sufficient evidence, it can therefore be concluded that the proposed improvements to traffic infrastructure are likely to have little or no benefit over the 2011-2031 time frame.

Train

From the Local Plan (Section 22.23):

Whilst the station is easily accessible from the town centre by walking and cycling, the lack of an eastern and southern access to the station is problematic for journeys from the periphery of the town. The station car park is privately owned, providing 338 long stay spaces which are in high demand during the week.

Other than implying that train service operators must act to create extra services from Hitchin to cater for the growing population, there is no mention of how commuters from the HT1 site are to access the station.

As covered above, the roads in the area are already gridlocked. There is little mention of planned cycle infrastructure between site HT1 and the station and it is worth noting that the railway bridge over Cambridge road and the accompanying junction to Nightingale road pose significant dangers to cyclists. Site HT1 is also outside the 800m walking distance target from the station. Should pedestrian access be encouraged, there are further issues posed by the constriction of the pathway under the railway bridge, as well as the frequent use of Walsworth common as a 'cut-through' which is unlit at night.

Bus

The Local Plan states that research has showed that only 3% of people living in Hitchin commute to work using the bus. The plan goes no further in suggesting how the use of buses might be encouraged to relieve pressure on other forms of transport (principally cars). From this it can be inferred that no effort would be made by NHDC to promote bus services to site HT1.

Cycling

As covered above, there is little or no provision of cycling infrastructure in Hitchin. The transport infrastructure plan places strong emphasis on easing traffic congestion at sites HM5.1 and HM5.2, including filter lanes on the former to keep traffic at speed. This emphasis would have a negative effect on potential commuters' adoption of cycling as a means to access either the centre of town or the railway station. Again the Cambridge road bridge also poses a significant danger area which has not been addressed in the Local Plan.

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It can be concluded from the above, that the proposed development of site HT1 is unfeasible with respect to creating a synergistic sustainable transport system that acts to unify this site with the other key areas of Hitchin (the station and the town centre). Such a development would, as a result, sit in isolation; its residents forced to use private cars as a means to access work and local amenities.

4. Employment

One of the main premises underlying the support of development of site HT1 is the intended promotion of site HE1 as a local employment centre. There are major flaws in this assumption, including:

- The scope for increasing employment is slim. As stated in the Employment Background Paper: *'Employment growth in North Hertfordshire has relatively low and has declined since 2005. During the period 1998-2011 the district experienced a -10% decline in employment (4,800 job losses) compared to 8% employment growth at the regional and national levels. Huge job growth would not be realistic or supported by any evidence'*. With the constraints on the use of existing brownfield land, the problems with transport infrastructure and the distance of the site from the station and town centre, it would be difficult to encourage new or existing companies to expand into this area.
- The majority of households occupying site HT1 are likely to be commuters either travelling to London or outside of North Hertfordshire for work. This would be exacerbated by the likely cost of private housing at site HT1. The average 3 bedroom semi-detached property in the SG4 postcode now costs in excess of £390,000 or 13 times the UK median salary. Although the objective of the Local Plan is to provide 40% affordable housing (a historically difficult requirement to enforce), this would still lead to the vast majority of residents being higher earners who work outside the district – principally London.
- Although the current unemployment level in North Hertfordshire is low (~2.5%) there would be a significant number of existing local residents who could also be expected to compete for jobs in HE1 (many in preference to lengthy commutes) although the Local Plan provides no data on where the expected workforce for HE1 would likely derive, what types of employment would be encouraged, or whether additional employment levels would be commensurate with the increase in demand. At present there is a significant mismatch between the predominantly light industry occupying this site and the mainly professional workforce expected to occupy site HT1.

The Local Plan lacks credible evidence that employers can be attracted to site HE1 and as such the premise that it can act as a major employment centre for site HT1 is unfounded. It is a point of contention that a proposed paper on the subject on employment is still under construction, and is therefore not available during the consultation period.

5. Concluding Remarks

It has been shown above that on significant policy areas covered in the Local Plan the proposed development at site HT1 falls short, we therefore object to the proposed development on the following grounds:

- In the context of preserving the Green Belt and maintaining the division between Letchworth and Hitchin, the Local Plan falls short; providing neither justification for the proposed housing figures nor data justifying the lack of sufficient development opportunities on Brownfield land.
- Development of the site would lead to an increase in surface water run-off. The questionable ability of the local waste water management system to service the area during periods of high rainfall would likely result in increased flooding of areas of Woolgrove road and Cambridge road.
- There are insufficient local amenities (planned or actual) within the target 800m walking distance from the site. The planned community centres are on the limit of this target and as

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such, the pressures on the town centre transport infrastructure, as well as on parking facilities in town and at the station would be significant.

- The proposed mitigation of the impact by this development to transport infrastructure is inadequate; access to the site would be predominantly by car, placing further pressure on the already strained road system in this area. The resulting increase in air pollution would have detrimental effects not only to this locality, but also to the main access routes to the town via Cambridge road and Grove road.
- Emphasis on providing employment locally for the residents of the HT1 development is unfounded; there are insufficient positive factors that would increase the likelihood of companies expanding or relocating to brownfield developments (specifically HE1) within the town. In fact, the strained transport infrastructure and distance from the A1 and train station are likely to be significant negative factors. The affordability and potential market for the housing allocations at site HT1 (considering the nebulous 40% affordable housing target), preclude the majority of workers who are likely to seek employment locally. For all intents and purposes, site HT1 would be a commuter suburb lacking adequate commuter infrastructure.

6. Recommendations

Given the inadequacy of site HT1 to fulfil the policy objectives of the NHDC Local Plan, we strongly urge NHDC to:

- Remove site HT1 from the list of proposed development allocations in the Local Plan.
- Re-consider the brownfield housing allocations, giving additional consideration to those properties that can be granted development status through the policy of 'change-of-use'.
- Re-assess the need to provide 14,200 additional homes in the region over the period 2011 to 2031, providing detailed justification for the revised figure.

If, despite addressing all of the points above, the intractable need for substantial new developments still arises, NHDC should consider the call made by Stephen McPartland, Sir Oliver Heald and Peter Lilley, for the development of a new Garden City, rather than piecemeal additions (such as site HT1) to already strained commuter towns such as Hitchin.

In their words, NHDC must 'redouble its efforts to protect the Green Belt by identifying and securing a suitable site for a new garden city, which is not in the Green Belt'.

Best Regards,

Glenn Kightley