



HOUSE OF COMMONS

LONDON SW1A 0AA

**Formal response to consultation on North Hertfordshire District Council
Local Plan 2011-2031 (Proposed Submission)**

I am disappointed by the proposed submission that has been produced by North Hertfordshire District Council (NHDC) and do not believe it is positively prepared, justified, effective or consistent with national policy, especially with regard to the sites in Knebworth, Codicote and North of Stevenage.

After considerable pressure NHDC reluctantly commissioned in January 2016 the North Hertfordshire New Settlement Study. Published April 2016, it does not make satisfactory reading. The 100 page document essentially concludes that a new settlement/Garden City will certainly be required to meet housing need post-2031 in this area. However, the study suggests NHDC has left the development of such a proposal too late to be included in this planning document and is also incapable of delivering it as a planning authority. It is clear the proposed Local Plan has not been positively prepared and NHDC should withdraw it, stop focusing on process and start focusing on delivering a new settlement/Garden City that could resolve housing need locally.

NHDC is headquartered in Letchworth Garden City, which was the first in the world. The proposed Local Plan takes no account of the need for highways, social and affordable housing, education, health and potential social and leisure infrastructure that will be required by this amount of housing in each community. A new Garden City located in NHDC could resolve all of these issues and create a wonderful place to live, if 13,800 homes are really required in North Hertfordshire and 7,600 within Stevenage.

Adding new developments of hundreds of homes on the edges of villages, such as Knebworth and Codicote, is hugely damaging due to the immense strain on public services in these villages. The small Primary Schools, for example, that serve these communities would be expected to cope. Yet they cannot cope at the moment, as evidenced by the annual complaints I get from local parents that their children cannot get a place at the local school. The proposal also states that NHDC do not identify any specific mitigation scheme for the transport modelling of Knebworth or Codicote, yet the local roads are already struggling with the high volume of cars that pass through the B197 and B656 to get to Welwyn, Stevenage, and Hitchin. In fact, NHDC granted permission in October for 70 dwellings on the Greenbelt, with a new access onto the B197. The site that was applied for is still not included in this proposed Local Plan submission, or the housing numbers taken into consideration.

Knebworth, a village with 2,002 dwellings in the parish, is being asked to accommodate an additional 663 homes, some on the Greenbelt, others adjacent to a Site of Special Scientific Interest and a priority habitat. Challenges such as addressing surface water flood risk from water running off the A1(M) are noted, but the fact the A1(M) is being widened from 2 -3 lanes over the next 3 years or how this would affect such sites is not.



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Knebworth cemetery already floods, which distresses local families and NHDC has no current solution available. Parking in the roads near the train station creates incredible tensions between residents and commuters. A major challenge that NHDC states it is reviewing constantly, but this does not make it into the proposed Local Plan.

NHDC accepts a new Primary School would be needed, although there is no land to build it, except on Greenbelt. There is no secondary school in Knebworth and children have to travel to Stevenage, Hitchin and Welwyn. The suggestion of the creation of an all-through school is ridiculous and no effort has been made to assess the impact on these local secondary schools, which are already at capacity.

Infuriatingly, the Local Plan states "a planning application has recently been submitted for a new library, doctors surgery and pharmacy on the site of the current library within the identified village centre." It does not add that this is to replace the current doctors surgery, pharmacy and library. It seems to suggest these are additional services, when in fact they are not.

Codicote, a village of 1,496 dwellings in the parish, is being asked to take 364 homes, some on the Greenbelt, others adjacent to local wildlife sites, priority habitats and listed buildings. The local Primary School is full and NHDC accept it is on a physically constrained site. Yet the proposed Local Plan states it needs to be expanded, which is not possible on the current site. Additionally, NHDC have precedent for ignoring Codicote's Greenbelt and trying to pursue inappropriate development. On 31st October 2016, the Secretary of State for the Department of Communities and Local Government (DCLG) overturned NHDC's decision and refused planning permission for an inappropriate Solar Farm at Three Houses Lane, Codicote.

I asked the Secretary of State to call-in the planning application, as I was concerned about the way NHDC was handling the matter and ignoring local people. It was clear NHDC were intent on granting planning permission, and their interpretation of 'exceptional circumstances' was against Government policies. I am delighted there was a full public inquiry and the Planning Inspector recommended the Secretary of State overturn NHDC's determination to grant planning permission. Instead of rushing ahead, NHDC should pause, reflect on the Planning Inspector's report and withdraw this proposed Local Plan that does such significant harm to the Greenbelt.

The proposals for 930 homes North of Stevenage (Site NS1) state they are dependent on Stevenage Borough Council (SBC) building on what is locally known as Forster Country. It is the last remaining farmland within the Borough of Stevenage and was home to E.M. Forster and the inspiration for Howard's End (1910). SBC have stated this land is not market tested for housing and more suitable for employment. It is unlikely to be viably developed, so this area should also be removed from the NHDC proposed Local Plan. I have asked the Secretary of State for DCLG to call-in SBC's Local Plan, which has been submitted, as it is not deliverable for a variety of reasons.

Land off Mendip Way, Great Ashby (Site GA2) is allocated for approximately 600 homes. It should be noted that NHDC accept roads and access are major issues in both NS1 and GA2 sites. In fact, Hertfordshire Highways has objected to the Roundwood application, which comprises 330 of the 600 homes in site GA2, as part of a current planning application. Both sites would require another



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2FE Primary School and once again, secondary school provision would have to be provided in Stevenage schools that are at capacity.

The National Planning Policy Framework (NPPF) states that Local Plans must be supported by a local evidence base. For housing, this means it must plan to meet objectively assessed needs for market and affordable housing and identify a five year supply of specific deliverable sites. The plan encompasses a twenty year period instead of only five and has identified a variety of sites to hit an arbitrary housing target that NHDC is not able to justify.

NHDC now state that the west land of the A1(M) is considered as significant land to safeguard for future housing post-2026, which is not in keeping with the NPPF. This site has been under discussion since the 1950s. No progress has ever been made due to an inability to resolve accessibility issues across the A1(M), East Coast Mainline and High Court judgements over the last 25 years.

It is clear that NHDC have not worked consistently with neighbouring local authorities. For example, SBC's submitted Local Plan 2011-2031 puts economic growth and employment at the heart of its plan, with their ridiculous proposals to demolish and rebuild Stevenage Station, close Lytton Way, demolish the Gordon Craig Theatre and build 1600 flats on the Leisure Park to wipe out our community facilities. Yet NHDC state in this submission (4.29) that "Stevenage, in particular, anticipates a shortfall of employment land against modelled requirements. These models assume continued commuting from North Hertfordshire to Stevenage, yet there is insufficient land in Stevenage to cater for the resultant growth." It is clear that both local authorities have paid lip-service to the idea of co-operation, but have developed their Local Plans in isolation rather than working together to resolve housing need across the area.

In conclusion, it is clear that the proposed Local Plan is not positively prepared, justified, effective or consistent with national policy. It has a disproportionate impact on the villages of Knebworth and Codicote in particular and should be withdrawn. A five year land supply should be identified and consideration given to the development of a new Garden City in partnership with SBC to meet future housing needs. Instead of adding increasing numbers of homes on the edge of communities already fully utilising the public services available.

Stephen McPartland
Member of Parliament for Stevenage

November 2016