

This is a greenfield site within the green belt.

I OBJECT to this application for the reasons below:

Flooding and drainage.

1. Drainage

The river Hiz runs to the south of the site. The flood risk assessment and drainage strategy provided by the applicant makes no reference to the fact that the river Hiz is a rare chalk stream.

Chalk streams are among the most ecologically significant freshwater habitats, yet the planning system often overlooks their importance. Run off into a chalk stream degrades water quality and threatens the delicate ecosystems present there. The 2024 consultation on proposed changes to the National Planning Policy Framework (NPPF) elicited hundreds of responses calling for greater chalk stream protection. Yet, the updated NPPF still fails to explicitly mention chalk streams.

The applicant's solution for surface water drainage is:

5.4 There is a watercourse directly south of the Site boundary, which surface water will discharge to.

5.5 Therefore, in line with the drainage hierarchy it is proposed to discharge surface water from the Site to this watercourse and utilise the current private surface water sewer, which we have legal rights to connect to.

The 'watercourse' referred to is the river Hiz. Discharge into the stream will pollute this delicate ecosystem and this should not be permitted. Chalk streams are supplied by infiltration from the chalk ground rock. This filtration produces perfectly clear, cold water. The surface water run-off will likely contain a mix of pollutants including oils, heavy metals (like zinc, lead, and copper), hydrocarbons, microplastics, and sediment or soil.

Discharge into the chalk stream is contrary to Ickleford Neighbourhood Plan policy E2 which is very clear that chalk streams should be protected:

Policy E2: Protecting the landscape

Development proposals should protect and, where practicable, enhance the historic and natural landscape and local character of the Parish, including the delicate chalk rivers and their valleys, field ponds, mature trees, and hedgerows. Such features should be protected and, where appropriate, incorporated into landscape design schemes.

Insofar as planning permission is required, the planning of hedgerows and trees, and the enhancement of the existing vegetation and the chalk stream ecosystem will be supported.

It is also contrary to Local Plan policy NE7 (f)

*f) Any flood protection and mitigation measures necessary will not cause harm to nature **conservation**, heritage assets, and/ or landscape and recreation and, where possible, will have a positive impact in these respects;*

and NE8 (a)

a) The most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;

2. Flooding and sewers

The sewerage system in Ickleford is at breaking point and cannot accommodate any further homes until there is considerable investment by Anglian Water. This is a matter for Anglian Water as a statutory consultee.

In their section on Flood Risk from Sewers and Water Mains the applicant concludes that:

4.50 The site and development are at low risk of sewer flooding.

In Autumn 2024, heavy rainfall caused a severe flooding event at the properties immediately to the south of the site as drains and sewers were overwhelmed. This flooding event was exacerbated by increased run off onto Bedford Road from the nearby development at Ansell Grange.

Although the proposed site is at low risk of sewer flooding, the site may be putting neighbouring properties which are topographically lower, at an increased risk of flooding.

2. Ecology

The ecological assessment provided by the applicant concludes:

The proposed development has the potential to cause adverse impacts upon a number of ecological features ranging from District to Site importance. However, avoidance and mitigation measures have been proposed to ensure that these adverse impacts are reduced as far as possible.

It is clear that this development will cause ecological harm. The site is an important nature corridor. See comments from residents.

3. Travel and Transport

The information supplied in Figure 5 of the transport statement states that there will be 492 additional total daily vehicle movements on to Turnpike Lane and that 79% of these will turn left and head towards the roundabout at Bedford Road.

This roundabout is an existing accident black spot and cannot cope with this additional traffic unless there is significant investment in safety measures. Crash map data is only available up to 2023. This shows two slight and one serious injury. The roundabout has very poor visibility to the right when approaching from Turnpike Lane. When surveyed for the Neighbourhood Plan, residents commented:

"The Turnpike Lane roundabout is an accident waiting to happen."

"Turnpike Lane/ Bedford Road junction remove roundabout and put in traffic lights."

"The roundabout on Turnpike Lane is a major road traffic hazard particularly with the increase of traffic using Bedford Road."

Residents living on the west side of Bedford Road, Ryder Way and Ryder Avenue have long campaigned for a pedestrian crossing on Bedford Road to the north of the roundabout at Turnpike Lane. The increased levels of traffic on this road caused by this development should be assessed. The cumulative effect of development up the A600 corridor means that these residential areas are rapidly becoming unsustainable as there is no safe active travel route to the amenities in Ickleford. The additional vehicles from this development will only add to this. While it is not for the applicant to fix road safety issues in the area, there has to come a point where these issues are addressed.

The applicant's travel plan notes:

2.2.13 The closest National Rail station is Hitchin, located to the south of the site at an approximate 3.0 kilometres – the station could therefore be conveniently reached by bicycle or bus, as part of a multi-modal trip.

It should be noted that there is no direct bus from this site to Hitchin station.

4. Contrary to Ickleford neighbourhood plan.

In 2024, Ickleford residents had their say on planning policy when the Ickleford Neighbourhood Plan (INP) was made.

Planning law requires that applications for planning permission be determined in accordance with the development plan, this includes local and neighbourhood plans. This application is clearly in conflict with policy E2 regarding chalk streams as cited above. It is also in conflict with the following policies:

Policy E1: Maintaining Separation

Development proposals should respect the undeveloped gap between Ickleford and Hitchin.

Policy E4: Biodiversity

Development should protect and enhance existing natural features of sites and habitats, and provide at least 10% net gain in biodiversity.

As appropriate to their scale, nature and location, development proposals should:

- provide proportionate species-related measures;*
- incorporate appropriate native species into landscaping schemes; and*
- establish links with existing wildlife corridors and deliver sustainable drainage solutions.*

It is also in conflict with some of the sustainable development principles in the NP:

The following adverse impacts must be avoided:

- Avoidable intrusion into open countryside and Green Belt,*
- The loss of or damage to wildlife habitats, including delicate chalk streams, hedgerows and trees*
- A loss of amenity for existing residential properties and reduced efficiency for nearby businesses,*
- Overloading existing utilities and services (water, drainage, sewage and waste),*
- Reducing gap between Ickleford and Hitchin.*

Ickleford is a rural community. Paragraph 88 of the NPPF states that planning policies and decisions should enable...*the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

It was clear when writing the INP that residents wanted amenities alongside any development that may come. This application proposes only housing.

Conclusions

This is a major development of up to 100 homes. This is far too many homes to be considered as minor infill within the settlement boundary.

The development will add too many vehicles into an already under-strain road network.

The decision to route surface water into a chalk stream cannot be allowed.

The impact of the development on potential flooding to neighbouring properties to the south has not been considered.

This is a site rich with wildlife, including badgers, that the applicant acknowledges will be harmed.

This site offers only houses with no amenities for residents of the site or the wider community.

This application has been made possible only by recent changes to the NPPF. These changes have given little thought to villages, removing protection from the green belt around them. The objective of the NPPF changes is to build more homes, but it is resulting in homes causing harm to habitat and in locations where there is a lack of infrastructure to support them.

This site is not an allocated site in North Herts Local Plan. We need to achieve a 5-year land supply by bringing forward allocated sites such as IC3, not applications like this on green belt land.