

# Written Statement re Further Matters, Issues and Questions January 2020

## Examination of North Hertfordshire Local Plan 2011-2031

### Matter 25 – new land proposed for allocation

through the main modifications and

### Matter 26 – villages for “growth”

### Statement from Barkway Parish Council

## Introduction

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, of Govresources Ltd, Planning Consultant for Barkway Parish Council.
2. This statement supplements our previous representations relating to the village of Barkway and proposed Main Modifications to the North Hertfordshire Local Plan 2011 – 2031, published on 3<sup>rd</sup> January 2019:

**MM010, p.32, Policy SP2: Settlement Hierarchy and Spatial Distribution**

**MM012, p.34, After paragraph 4.12**

**MM035, p.47 to 48, Policy SP8: Housing**

**MM038, P.49, Paragraph 4.95**

**MM213, Barkway, p.143, Paragraph 13.35**

**MM216, p.144, Policy BK3**

And earlier representations on the North Hertfordshire Local Plan 2011 – 2031.

3. This statement addresses the Inspectors Further Matters, Issues and Questions in relation to **Matter 25 – new land proposed for allocation through the main modifications**, which seeks to include the reserved school site south of BK3 within the Site Allocation Policy BK3 and amend the boundary on the Policies Map, and **Matter 26 – villages for “growth”** which seeks to categorise Barkway as one of the five villages that can support higher levels of growth in the rural east of the District by amending the settlement hierarchy in Policy SP2.
4. We address ourselves specifically to the Inspectors questions in Matter 25 a) to c) and the issues raised in matter 26 a), b) and d).

## **Matter 25 a) Is the inclusion of the new area of land for allocation necessary for soundness?**

5. MM389 relates only to the inclusion of the area of land south of site BK3 within site BK3 on the Policies Map. If the Inspector was to conclude that MM216, which adds a bullet point to BK3 stating “Approximately 1.5 hectares of land at the south-west of the site secured as a reserve site for primary education”, and MM219, which amends paragraph 13.39 to describe the site as lying “within site BK3”, was acceptable, then an amendment to the Policies Map would be necessary for soundness.
6. However, and it is a big however, we remain opposed to the inclusion of this land within BK3 and therefore doubt the soundness of MM216, MM219 and MM389. We believe that the new area of land proposed is not deliverable

## **Matter 25 b) Is the new area of land proposed deliverable?**

7. In short, the answer to this question is no.

### **(i) confirmed by all of the landowners involved as being available for the use proposed?**

8. Irrespective of the availability of the land for a school, the real issue is that there is currently no evidence to suggest that the additional population expected to arise from the recent or proposed new development in Barkway, will support the building of a new school in the village. Future planning decisions based on the assumption that viability of a new school can be achieved, may conflict with Policy SP7 (Infrastructure requirements and developer contributions) which emphasises the need to ensure that “essential new infrastructure to support new development will be operational no later than the completion of development or during the phase in which it is needed, whichever is earliest” (Schedule of proposed Main Modifications, p.17).
9. The site is owned by Hertfordshire County Council and held by them as a reserve school site. HCC previously identified in their representations on the Plan that the existing schools in Barkway and Barley are located on constrained sites and would be difficult to expand. The presence of the reserve school site adjoining BK3 and the potential to accommodate increased demand for school places was a key influence on the decision by North Herts Council, to allocate this site for development.
10. Since September 2017 the Barley and Barkway schools have shared teaching resources with children being taught across both sites, in different year groups. HCC did not respond to planning application 18/01502/OP so there is no evidence to suggest that the development of BK3 would trigger the requirement for use of the school site and / or how it may impact upon the more recent practical arrangements between the schools detailed above.
11. Hertfordshire County Council did respond to an earlier consultation on North Herts Local Plan by letter dated 9 February 2018 (ED103) providing clarification

regarding the retention of the existing reserve school site in Barkway. HCC as local authority for education considered that the retention of the existing reserve school site in Barkway will ensure that the proposed housing allocations are deliverable and justified with regard to the impact they may [our emphasis] have on school places.

12. This statement is clear that the site may be needed but on the other hand, it may not. The proposed use is as a reserve school site, which may never be needed.
13. The inclusion of the reserved school site within the boundary of BK3, on the Policies Map, opens up the possibility that in the event that the viability of a new school cannot be demonstrated, the reserved school site may be proposed for more housing site. In light of the fact that Barkway does not have the facilities needed to support a large amount of growth in population, we request that the boundary of the site BK3 and Policy BK3 exclude the reserved school site
14. In the intervening period between its allocation in the Local Plan and a future need for school provision on the land, it could be put to temporary community use and green space, until such time as the school is needed.
15. Such a use of the reserved school site, which would deliver social benefits, would accord with promoting a sustainable future for the village of Barkway. Pending the need for a school in Barkway, the reserved school site which is adjacent to the village Hall, could become the location of much-needed facilities and services that would help foster a sense of community and ensure that new residents are not excluded due to the location of their homes being at the very edge the village, beyond the reserved school site.

**(ii) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**

16. As far as we are aware, the reserve school site has not been subject to any level of planning investigations to ascertain whether this can be achieved.

**(iii) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

17. As far as we are aware, the reserve school site has not been subject to any level of planning investigations to consider the necessary infrastructure and services or environmental constraints.

**Matter 25 c) Is the inclusion of the new area of land justified and appropriate in terms of the likely impacts of the development?**

18. The inclusion of the reserve school site within Policy BK3 and on the Policies Map within BK3 is neither justified, nor appropriate. The land is a green space outside the site allocated for development and should remain as such.

19. The likely impacts of development for school use would be the subject of a detailed planning application.

**Matter 26 a) why the changes proposed to Policy SP2 are not necessary for soundness;**

20. We understand why the idea was proposed, of identifying “growth villages” as a separate category over and above Category A villages.

21. The inclusion of Barkway as a Category A village is strongly contested by Barkway Parish Council. On this basis, it is obvious that being elevated to a village for growth, is even more alarming.

22. Barkway Parish Council has contested development on the site known as BK3 from the beginning, including objecting to planning application 18/01502/OP, dated 7 June 2017. We have also contested the inclusion of Barkway as a Category A village. Our objections are based the fact that the allocation of the site for housing and the development of the site for housing is not socially, economically or environmentally sustainable. Please see our documents ED101 and ED102 and our response to the recent Supplementary Statement to the Main Modifications.

23. In relation to economic sustainability, in particular, the allocation of BK3 for housing development risks the loss of the largest employer in the village, Newsells Park Stud. Despite a welcome amendment to Policy BK3, which includes the criteria “Development should include measures to minimise the impact on Newsells Park Stud, in terms of proximity of built development, noise and increased activity”, the viability of the stud would be at risk from any development on BK3. The loss of our major employer would reduce the sustainability of the village.

24. On the basis that the inclusion of Barkway as a Category A village is not sound, and the corresponding development allocation on BK3 is not sound, then the inclusion of Barkway as a “growth village” is also not sound.

25. North Herts Council agree with us on this point as they state “... facilities are limited, and so residents would presently be likely to travel to either Royston to the north or Buntingford to the south for many day to day items” (North Hertfordshire Local Plan 2011 – 2031, Schedule of proposed Main Modifications, p.110). Facilities are indeed limited. North Herts Council explain in their Local Plan that Category A villages normally contain primary schools. Barkway has no shop and the school accommodates only a reception class and year 1. There is a proposal to double the intake or year 1 to 30 pupils which can be accommodated on the existing site. A primary school caters for years 1-6. The tiny school in Barkway is not justification for the village being in Category A of North Herts Settlement Hierarchy.

26. In addition, the village of Barkway has a smaller population than that indicated in the Main Modifications. The 2011 census figures show 775 people living in Barkway, which includes the population of Newsells, a Hamlet located some

distance away to the north of Barkway and not part of the village. The population of Barkway itself is closer to that of Barley which at the 2011 census, had approximately 662 residents.

27. Barkway lacks key health services and facilities, the nearest surgery is in Barley and residents are often offered appointments in a surgery attached to the practice in Royston; which is further away. None of these destinations are accessible by a genuine choice of public transport. Bus service hours, particularly that of Bus 18 (the only bus that goes to Barley and Royston), are irregular throughout the week. There is no bus service going to Barley or Royston between 1pm and 4pm in the afternoon and outside these hours, there is an hourly bus service. Residents who cannot drive or do not own a car, have to rely on a poor bus service or pay for taxis.
28. The proposed change to SP2 is not sound because it compounds a number of other errors in the proposed Local Plan, which themselves are not sound.

**Matter 26 b) why separating out the ‘villages for growth’ from the ‘category A villages’ is not justified;**

29. Separating out the villages for growth from the Category A villages is in itself a justified approach, if the growth of those village was sustainable. Including Barkway as a village for growth is not sustainable and therefore not justified.
30. Barkway has been identified as a focus for development in the rural east of the District. This is the only other identifiable reason for it being included as a village for growth. This is not a sound argument.
31. Barkway is more akin to a Category B village described as those villages with a lower level of facilities such as village halls and public houses (para.4.14 of the Submission Local Plan).

**Matter 26 d) that the proposed main modification does alter the level of new housing that may be delivered at each/one of the five villages involved.**

32. Policy SP2 has been amended to state that “Approximately 11% of housing, along with supporting infrastructure and facilities will be delivered in five villages identified by this Plan for growth” namely “Barkway (209), ...”.
33. North Herts are attempting to force on Barkway development which equates to over 62% of the number of households at the 2011 census.
34. In absolute terms, the inclusion of Barkway as a ‘village for growth’ does not alter the level of growth proposed on the contested allocation of site BK3. However, in reality, the unrealistic statement of Barkway being a village where growth is appropriate, will make it vulnerable to further pressure for unsustainable development, development both from speculative developers and at future revisions of the North Herts Local Plan.

## Amendments to the Plan

35. Amendments should be made as follows:

- a. Barkway Parish Council maintain that the allocation of BK3 as a housing site for 140 homes should be deleted. However, if the policy remains in the Local Plan then the following amendments should be made to MM216:
  - i. The eighth bullet point of the policy should be removed
  - ii. The ninth bullet point should be amended to reinstate the words “adjoining reserve” school site
- b. Delete MM219 and replace it with the following wording at the end of paragraph 13.39 “In the interim, until the need for a school has been identified, the site should be identified for temporary community use and green space”
- c. Delete MM012 (the new paragraph after paragraph 4.12)
- d. Reinstate Barkway as a Category A village (Policy SP2 (MM010))
- e. Delete reference to Barkway as one of the five villages in paragraph 12.35 (MM213).