



DLBP

DOMINIC LAWSON BESPOKE PLANNING

7a Pindock Mews, Little Venice, London W9 2PY, UK
T: +44 (0)20 3713 8500 E: contact@dominiclawson.co.uk
www.dominiclawson.co.uk

North Hertfordshire District Council Local Plan - Hearing Statement

Project: North Hertfordshire District Council Local Plan 2011-2031
On behalf of: Newsells Park Stud Ltd
Date: February 2020

DLBP Ltd is registered in England & Wales at the above address, number 7229435.
VAT registration number 260 6370 18.

CONTENTS

A. SUMMARY AND CONCLUSION	3
B. BACKGROUND	5
C. MATTER 25 – NEW LAND PROPOSED FOR ALLOCATION THROUGH THE MAIN MODIFICATIONS	6
D. 'MATTER 26 – VILLAGES 'FOR GROWTH	7

A. SUMMARY AND CONCLUSION

1. This Hearing Statement to the emerging North Hertfordshire District Council Local Plan 2011-2031 has been prepared by DLBP on behalf of Newsells Park Stud Ltd.
2. Newsells Park Stud Ltd has consistently raised objections to the emerging Local Plan in relation to the proposed allocation of land at 'BK3 - Land between Cambridge Road & Royston Road' for 140 dwellings and as part of this overall suitability for the expansion of Barkway.
3. Objections have also been made against the current planning application (ref. 18/01502/OP) by Rand Brothers that is currently being considered by North Hertfordshire District Council.
4. This Hearing Statement sets out Newsells Park Stud Ltd's objection to the emerging Local Plan in the context of Matters 25 and 26 of the Inspector's Matters, Issues and Questions, relating to:
 - Matter 25 – new land proposed for allocation through the main modifications; and
 - Matter 26 – villages 'for growth'.
5. It is Newsells Park Stud Ltd's position that the inclusion of additional land within the proposed BK3 allocation (Land between Cambridge Road & Royston Road) is unsound and so not necessary.
6. The designation of Barkway as a village 'for growth' has ignored the evidence and is contrary to the following two key Sustainability Appraisal objectives:
 - deliver more sustainable location patterns and reduce the use of motor vehicles; and
 - achieve sustainable levels of prosperity and economic growth.
7. The evidence is clear that Barkway has poor accessibility by non-private car travel means, and its designation as a village for growth, which in effect only comes about through the proposed allocation of BK3 for 140 houses, will result in a spatial strategy that is not effective or consistent with national policy. Furthermore, the lack of any proper assessment of the economic impacts of the proposed allocation means that the Council's approach is unsound. If the large scale and disproportionate residential development goes ahead, not only will this not be sustainable development in its own right, but the economic impact on the village through the effects on Newsells Park Stud (ultimately through its closure) will further reduce the viability of the settlement - fewer jobs and employment opportunities, reduced investment and the closure of other business and services.
8. On this basis the inclusion of Barkway as part of the villages 'for growth' category is unsound and is not consistent with national policy as it will not result in sustainable development.

9. In order to make the Local Plan sound and effective, the following amendments should be made:
- Barkway should be removed from the villages 'for growth' classification and reinstated as a Category A village; and
 - in order to make Policy SP2 effective, the proposed allocation BK3 should be removed from the Plan.

B. BACKGROUND

10. This Hearing Statement to the emerging North Hertfordshire District Council Local Plan 2011-2031 (*the emerging Local Plan*) has been prepared by DLBP on behalf of Newsells Park Stud Ltd (*NPSL*).
11. NPSL has consistently raised objections to the emerging Local Plan in relation to the proposed allocation of land at 'BK3 - Land between Cambridge Road & Royston Road' for 140 dwellings and as part of this overall suitability for the expansion of Barkway.
12. Objections have also been made against the current planning application (ref. 18/01502/OP) by Rand Brothers that is currently being considered by North Hertfordshire District Council (*the Council*).
13. This Hearing Statement sets out NPSL's objection to the emerging Local Plan in the context of Matters 25 and 26 of the Inspector's Matters, Issues and Questions, relating to:
 - Matter 25 – new land proposed for allocation through the main modifications; and
 - Matter 26 – villages 'for growth'.

C. MATTER 25 – NEW LAND PROPOSED FOR ALLOCATION THROUGH THE MAIN MODIFICATIONS

Background

14. The Council has proposed Main Modification 216. This proposes that 1.5 hectares of land to the south of the original BK3 allocation will now be included within it to secure “a reserve site for primary education”. The associated change to the proposals map brings this land within proposed allocation BK3 (as indicated by Main Modification 389).

Objection

15. For the reasons set out in previous representations, NPSL object to the proposed BK3 allocation.
16. The allocation is for 140 houses, but this number is not a cap or the maximum number. The inclusion of additional land within the allocation, which is for residential development, will enable a significantly higher number of houses to be built if the land that has been identified for a primary school is deemed to be surplus by Hertfordshire County Council in the role as the local education authority.
17. The County Council’s Hearing Statement for Matter 11 as part of the original hearing sessions notes that “*current demographic analysis shows that the yield from the proposed new housing is likely to be able to be accommodated within the existing school capacity*” (paragraph 7). This strongly suggests that the land in question will not be required for a new school, which in turn increases the prospects of it being developed for housing instead. In this respect, as the additional area of land being identified within the proposed BK3 allocation is not required it does not meet the text of soundness.
18. As set out in previous representation and in this Hearing Statement, the allocation and development of this site will have a significant impact on NPSL, and these impacts will be exacerbated if the scale of the development exceeds the notional 140 dwellings suggested. The impact that would be caused by the allocation and development threatens the medium and long term viability of the business

Conclusion and amendments to the Plan

19. With respect to Matter 25a), the inclusion of the new area of land for allocation is not necessary for soundness. In the event that the BK3 allocation remains in the Local Plan, this additional land should be removed from the allocation.

D. MATTER 26 – VILLAGES ‘FOR GROWTH’

Background

21. The Council has proposed Main Modification 010. This amends Policy SP2: Settlement Hierarchy and Spatial Distribution so that “*Approximately 11% of housing, along with supporting infrastructure and facilities will be delivered in five villages identified by this Plan for growth*”. The five villages identified are:
 - Knebworth (736);
 - Codicote (367);
 - Little Wymondley (306);
 - Ickleford (210); and
 - Barkway (209).
22. The Main Modifications note that the above figures for individual settlements are the total of planned, permitted and completed development for the period 2011-2031 and are not a target or cap.
23. Main Modification 012 sets out that five villages have been identified “*that can support higher levels of growth*”. The following bullets points set out the justification for this:
 - Knebworth and Codicote are the two largest villages within North Hertfordshire and support a range of services, including a station at Knebworth;
 - Ickleford and Little Wymondley provide opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections; and
 - Barkway as a focus for development in the rural east of the District.
24. Main Modification 213 amends the text of paragraph 13.35, removing the reference to Barkway being a “*Category A village in the settlement hierarchy*” and replacing this with “*one of five villages where higher levels of growth will be supported*”.

Objection

25. The Council’s approach with respect to Barkway will result in a Local Plan that is not effective. The Council’s approach that Barkway is one of five villages out of 34 (not including Category C settlements) is not a sound one based on the evidence available.

26. The Council's original Sustainability Appraisal (SA) (LP4) for the emerging Local Plan set out that the first SA objective is to achieve sustainable levels of prosperity and economic growth. The key sustainability issue set out in Appendix 2 page 4 is the:

Need to provide more highly-skilled employment opportunities in the District. There is a significant net daily outflow of commuters, with the average out commuter being more highly skilled than the average in-commuter.

27. As set out below, NPSL is the largest local employer and these include highly-skilled rural jobs. There is a real and high risk that these jobs will be lost if the Council's approach to the development of Barkway is followed, and this loss of highly-skilled jobs will be in conflict with this key SA objective.

28. A second SA objective is to deliver more sustainable location patterns and reduce the use of motor vehicles. The key sustainability issue set out in Appendix 2 page 4 is the:

Unplanned development wouldn't necessarily locate development so as to reduce the need to travel or reduce car reliance, encourage walking, cycle, bus, and train use.

29. The identification of Barkway as one of five villages for growth fails these two key objectives for the following reasons. The effect is that Policy SP2 is not sound, consistent with national policy and will not be effective.

Economic impact

30. As set out in previous representations, it is NPSL's position that the development of 140 houses on the BK3 site would have a significant and detrimental impact on the viability of the business. NPSL note that modifications have been made to the policy to include text within it that seeks to 'minimise impact' on Newsells Park Stud. These measures are not sufficient and, put simply, the allocation and subsequent development of this land threatens the medium to long term future of Newsells Park Stud, for the reasons set out below.
31. In terms of the Council's decision to propose Barkway as a village for growth, which in effect only comes about through the proposed allocation of BK3 for 140 houses, it has not followed the principles set out in the SA.
32. In economic terms, whilst Newsells Park Stud does regularly make a profit, the nature of the business is highly susceptible to shocks, and its resilience against future pressures is very low.
33. It is worth setting out the macro economic climate of the horse racing industry. In 2018 PWC produced a report entitled 'The contribution of thoroughbred breeding to the UK economy and factors impacting the industry's supply chain' for the Thoroughbred Breeder's Association (TBA). This notes that in 2017 the overall Thoroughbred Industry contributed £427m to the UK economy, including 19,000 direct jobs and 15,500 in the supply chain. However, the industry is under threat, as:

- in 2017 66% of Breeding Operations surveyed were unprofitable, but in 2013 it was 45%;
 - there were 3318 Breeding Operations in Great Britain in 2017, down from 3400 in 2013; and
 - in 2017 353 (8%) of Breeders had left the Industry in the previous 5 years.
34. To put this into the context of Newsells Park Stud itself, this was purchased by a Swiss Businessman, Mr Klaus Jacobs, in 2000. He lived in Newsells Park Manor House and horse racing and breeding thoroughbred horses was a great joy and past time for him. As such a profit for Newsells Park Stud was not a priority (and so in effect the business was subsidised at this time). Since his passing in 2008 the ownership of NPSL has sat with Jacobs Holdings who are prepared to provide continued support as long as NPSL remains commercially viable, that means making a profit each year and delivering positive cash flow.
35. Half of NPSL's operation now supports client breeding operations and half is its own. Boarding operations for client horses generates revenue of circa £2m per annum for around 120 mares, yearlings and foals across circa 18 clients. Several client mares are valued at over £1m and some are worth £4-5m.
36. In the horse racing industry, NPSL is internationally renowned. NPSL are able to provide a premium product for which clients will pay a premium price. This is because of the current conditions and existing facilities at NPSL, much of which have been the subject of significant investment in recent years, in terms of new stables and upgrading facilities. If clients visiting their stock see 140 (or even more potentially) houses being built on a site immediately adjacent to prime paddocks it could have a significant impact on NPSL's revenue stream. Clients have other options not too far away at Newmarket which will not have residential dwellings immediately adjacent to their Stud Farms
37. NPSL own circa 50 Mares of high quality. A similar number of clients' mares reside at NPSL. Each year they produce circa 90-100 foals from January to May, which are raised on Newsells Park Stud before selling the majority the following October when they are about 20 months old. NPSL pride themselves on raising horses of quality and the current conditions enable them to do this. In 2019 14 horses bred at NSPL won or were placed in Group horse races. The highlights being Waldgeist who won the Prix de l'Arc de Triomphe and Japan, who came third in the English Derby and won the French Derby. In 2019 Waldgeist was ranked as the Highest Rated Horse in the World on official ratings.
38. However, with respect to the business operations of Newsells Park Stud, revenues can fluctuate significantly on a year by year basis and this is all depends on the quality of the horses that are raised. In 2019 NPSL sold yearlings at auction for £8m. Despite this, profit *before tax* in 2019 was just £1.3m. But in 2018 NPSL reported a record profit of £3.2m – this was based primarily on the sale of one yearling for £3m. This horse called Mogul is one of the leading ante post favourites for this year's Derby.

39. This indicates the correlation in the revenue of the business based on the quality of the very best horses raised in a particular year. The impact of just one stand out horse can make all the difference and having the right conditions to enable this is crucial. By its very nature, Newsells Park Stud relies on the environment being suitable and appropriate to raising exceptional thoroughbreds capable of winning at the highest level on a Global stage, both on behalf of NPSL itself and its clients. The ideal conditions required for this environment are those that have been successfully cultivated over the hundred years that Newsells Park Stud has been in existence and indeed for the hundreds of years before that in the setting of Newsells Park itself, which was first recorded in the Domesday Book of 1086. Tranquillity, isolation and separation from development are basic and essential qualities for a successful stud farm. Where these conditions do not exist and where human activity leads to the increased incidence of disturbance, shock and surprise, the impact is likely to be detrimental to the development of young horses, (and thoroughbreds in particular) and proven to result in the increased risk of accidents and injury.
40. The paddocks of NPSL immediately adjacent to the proposed land allocated for development (BK3), is part of the original Newsells Park Stud and selected as such because it provides the most advantageous conditions for rearing a young thoroughbred. With a clay cap over the underlying chalk, only these paddocks, and those immediately around Newsells Park Manor, provide the most sympathetic ground conditions for nurturing bone growth during the dry, hard months of the summer, where the surrounding chalk risks significant skeletal and conformation problems. Any development of the land immediately adjacent will fundamentally effect the Stud's ability to raise young thoroughbreds on land that has been essential to its success for many decades.
41. In this regard, it is the existing use of the land at BK3 as agricultural land that enables Newsells Park Stud to maintain a viable business. The land in itself acts as buffer between the built-up development of Barkway and so creates the conditions that enables the best land for the rearing of foals to be used. Development on the land at BK3 will reduce the effectiveness of this buffer, and if 140 (or more) houses are built then it will no longer have any effect whatsoever.
42. As noted earlier, Newsells Park Stud is a renowned leader in its field, but this development will put the business at considerable risk. Existing and potential clients will undoubtedly think twice about the sense of placing their stock with NPSL if they are aware 140 houses are being built on a site immediately adjacent to prime grazing land that is utilised for rearing their valuable youngstock. In a competitive, commercial environment where clients, both domestic and international, have many other options available, the negative perception created by a new housing development, will be a significant detrimental factor. NPSL's clients have sufficient wealth and are footloose in the sense that they are easily able to switch to alternative breeding establishments elsewhere if they are concerned for the safety of their valuable stock. PWC's report for the TBA notes that Suffolk is the county with the highest number of breeders (356), which means that the area which is geographically close to Barkway, is also the main competition and easily accessible in terms of moving their stock.

43. It is NPSL's position that the effect of this is very likely to be a reduction in the viability of the business that, ultimately, could lead to the closure of Newsells Park Stud. The lack of a proper assessment and understanding of this impact, as set out below, means that the strategic approach of the Council is unsound.
44. NPSL is a major local employer that generates a significant amount of economic activity, both at a local level and higher. In particular:
- NPSL is the largest local rural employer in the community, employing circa 35-40 members of staff throughout the year and provides on-site living accommodation for 25 families and a hostel for seven single employees;
 - both the staff individually and NPSL are significant contributors to the local village economy (see below); and
 - NPSL also support the local community and have funded a bus for the local school and provide a nature reserve for the school to use on its site.
45. In terms of the second bullet point above, the following local businesses benefit directly from Newsells Park Stud either through direct contracts or through spend by NPSL employees:
- Fox & Duck, Thirfield
 - Tally-Ho, Barkway
 - Fox & Hounds, Barley
 - The Woodman, Nuthampsted
 - Silver Ball Café, Thirfield
 - Lovely View Stables , Barley
 - Manor Farm Livery, Kelshall
 - Drayton's Garage, Barley
 - Barley Stores & Post Office, Barley
 - Econogard Alarms, Bassingbourne
 - Enfield Electrical Supplies, Royston
 - JHE Electrical, Royston
 - Philimore Garden Centre, Melbourn
 - Wrights Mower, Melbourn
 - Stamford Sprayers, Heydon
 - Sales of Sandon (Horse Feed & Supplies), Buntingford

- Robs mobile garden machinery, Bassingbourne
 - Lookers Dry Cleaners, Royston
 - Barkway Service Station, Barkway
 - Barbara's Flowers, Royston
46. The number and variety of these businesses shows the importance of Newsells Park Stud to the local economy. This is borne out by PWC's report the TBA, which notes that close to 90% of the direct economic benefit from a stud farm occurs in the rural economy.
47. The Council's decision to propose Barkway as a village for growth, which in effect only comes about through the proposed allocation of BK3 for 140 houses, will result in a significant adverse economic impact that has not been considered properly.
48. As part the original emerging Local Plan, the SA did not refer to any consideration of the impact on Newsells Park Stud, which is the land that is immediately adjacent to the BK3 allocation. The SA Addendum prepared as part of the Main Modifications noted on page 49 under the 'justification for assessment and any mitigation measures' column that:
- A development of this size in a village is likely to have a significant effect at the construction stage, and also to have residual long term impacts on amenity. Policy requires that development should include measures to minimise impact on Newsells Park Stud, in terms of proximity of built development, noise and increased activity. It is recommended that development also requires a construction management plan, and consideration of development layout and landscaping to minimise impact on neighbouring residents.*
49. What is relevant about this assessment is it is in connection with SA objective 5 (c) - 'improve conditions and services that engender good health and reduce health inequalities'. There is no assessment against SA objective 1, which is to achieve sustainable levels of prosperity and economic growth. It is axiomatic that in considering the suitability of a site for development, even if it is residential development rather than a commercial development, one must consider the impact on this. The impact here is that the allocation and development of the land at BK3 will have a negative economic impact and so SA objective 1 will be a negative impact (rather than neutral as recorded in the SA).
50. The lack of any proper assessment of the economic impacts of the proposed allocation means that the Council's approach to designating Barkway as a village 'for growth' is unsound. If the large scale and disproportionate residential development goes ahead, not only will this not be sustainable development in its own right, but the economic impact on the village through the effects on Newsells Park Stud (ultimately through its closure) will further reduce the viability of the settlement - fewer jobs and employment opportunities, reduced investment and the closure of other business and services.
51. On this basis the inclusion of Barkway as part of part of the villages 'for growth' category is not consistent with national policy as it will not result in sustainable development.

Sustainability

52. The Council themselves acknowledge that Barkway is not a sustainable village for growth. Paragraph 13.35 of the emerging Local Plan states that in Barkway:
- ...facilities are limited and so residents would be likely to travel to either Royston to the north or Buntingford to the south for many day to day items.*
53. Within both the original emerging Local Plan and the Main Modifications, no regard is had to the overall sustainability of Barkway as a settlement. Rather, its identification as a village that “can support higher levels of growth” (Main Modification 012) appears to be solely on the basis that it has the “largest in population terms of three villages located in the area to the east of the A10 and to the south of Royston” (paragraph 13.35 of the emerging Local Plan). The Council’s Housing and Green Belt background paper (HOU1) indicates that the village’s original classification in Category A was based on it having a school (paragraph 5.41). This is despite the fact that the school only serves Reception and year 1. Years 2, 3 and 4 are provided in Barley so there is not by any means a complete first school in Barkway.
54. As noted above, the Council acknowledge that the village has a limited level of local services, and of the services they do list as being within Barkway, one of these is the golf club (paragraph 13.34 of the emerging Local Plan). This is hardly a vital local facility and in any case is located some 2.4km from the sites to be developed, accessible only by private car.
55. This is borne out in the SA site assessment (within Appendix 6: Preferred sites – summaries and appraisal matrices) for the three proposed allocations for housing development in Barkway (BK1 - Land off Cambridge Road, BK2 - Land off Windmill Close and BK3 - Land between Cambridge Road & Royston Road). Under the heading ‘Significant negative effects and uncertainties’ in the summaries table it is noted for both BK1 and BK2 that these sites are not within 400m of a bus stop with a regular service, nor within 800m of a railway station; and for BK3 it is noted that this site has poor access to public transport.
56. In terms of the individual assessments of proposed allocations BK1, BK2 and BK3, all three fail to meet SA objective 2 (c) - Deliver more sustainable location patterns and reduce the use of motor vehicles.
57. In the column headed ‘Justification for assessment and any mitigation measures’ for BK1 and BK2 the comment is made that mitigation in the form of improvements to local public transport are required. With respect to BK3, it is commented that the site is close to bus stops “but these do not have a regular service”. Despite the short, medium and long terms effects of the SA objective being classified as ‘negative’, no mitigation is suggested.
58. This lack of sustainability is borne out by the evidence submitted as part of the representations to the emerging Local Plan. As part its response at the Regulation 19 stage of the Plan, Barkway Parish Council commissioned Transport Planning Associates (TPA) to assess the proposed allocations BK1, BK2 and BK3. The TPA report was included at Appendix G of the Parish Council’s objection.

59. In relation to BK3, page 7 of the TPA report noted the closest bus stop to the BK3 site is located approximately 200m to the south on Cambridge Road. There is only one stop (on the north bound side of the road), and in terms of infrastructure there is just a flag and timetable information. There is no bus shelter or Real Time Passenger Information (RTPI) screens. This infrastructure is important for encouraging a shift towards more sustainable modes of travel, and without it the likelihood of such a shift occurring is low.
60. The report also noted that there are additional bus stops located approximately 305m to the south of the site on Royston Road (page 7). Bus stops are provided on either side of the carriageway that incorporate a bus stop flag, bus shelter with associated seating and timetable information. But again, no RTPI screens.
61. The report goes onto note that whilst these bus stops are less than 400m from the BK3 site, and so within the 400m walking distance stipulated in the Chartered Institution for Highways and Transportation's (CIHT) 'Providing for Journeys on Foot' (2000) guidance, the key consideration is the *"number and frequency of bus services that service these local bus stops are important when considering the likelihood for future residents to travel via bus"* (page 7). The report then assesses the frequency of the bus services and concludes that due to the limited services available *"it is likely that the opportunities for any future residents at the site to travel via bus for purposes such a work or leisure will be limited. This therefore may lead to an increased reliance on the private car for means of transportation"* (page 8).
62. In terms of access to services, Table 3.2 of the report indicates that there are four local facilities and services which are located within a 2km radius of the BK3 site. These include the village hall, a hairdressers, the First School and a public house. There are no other services available in the village. Since the drafting of the TPA report, the hairdressers has closed down and this is now a florist.
63. Whilst the TPA report notes that these facilities are all within 2km, the CIHT's paper 'Planning for Walking' (2015) states (at page 29) that people will choose to walk if the length of the journey to their destination is less than a mile away (which is 1.6km). CIHT's paper 'Providing for Journeys on Foot' (2000) specifies a 'preferred maximum' walk distance of 800m to town centres, 2,000m for commuting/schools and 1,200m for other purposes, but that the desirable distances are 200m, 500m and 400m (Table 3.2 on page 49). Of the facilities that are available in Barkway, the hairdressers, school and public house all exceed these desirable distances, based on Table 3.2 of the TPA report.
64. The TPA report then notes a number of key facilities and services which residents are likely to require, but that are not available within Barkway village, and so are only accessible by non-sustainable modes of travel.
65. The TPA report assess the existing local transport patterns, and based on this concludes at paragraph 3.45 that:

Taking into account the analysis above, current existing private car use by Barkway residents could already be in excess of 85%. When considering the fact that the vast majority of future residents at the sites will not have the opportunity to work within Barkway village, given its few employment opportunities, it is possible to argue that private car use could become in excess of 90%. This level of private car use is considerably higher than what would typically be expected. This illustrates the unsustainable location of the sites in Barkway.

66. Paragraph 5.5 of the TPA reports concludes by stating:

The review of accessibility to the site by sustainable transport would be the main grounds for an objection. This is supported through the lack of frequent bus services in Barkway, and the rural characteristics of the local highway network making them generally uncondusive to casual cyclists. The lack of key facilities and services (less than what was deemed problematic within Reed) within Barkway mean that the current reliance on private cars is likely to be exacerbated, and will result in more private car journeys to surrounding settlements.

67. The Council has not suggested mitigating the poor accessibility of Barkway as part of the proposed allocations. The SA Addendum prepared as part of the Main Modifications notes in the 'justification for assessment and any mitigation measures' column that for BK3 the "Policy requires that development consider opportunities for pedestrian and cycle access into the village" (page 48); it is the case that the proposed policy does include this. But this in itself fails the test of effectiveness as a) the policy wording does not mandate improvements, only requires that 'opportunities' for this are considered; and b) even if there are better linkages into the village itself, this will not result in any improvements to the overall sustainability of the development because the services that are available in the village are so limited (as the Council themselves note).
68. If one considers the juxtaposition between Barkway and the four other growth villages, it is clear that it is stark and goes to the heart of why the Council was wrong to seek to include Barkway as one of them. The modification sets out that Knebworth and Codicote are the two largest villages within North Hertfordshire and support a range of services - these are legitimate planning considerations on which to categorise settlements as more sustainable and so suitable for higher levels of growth. The modification sets out that Ickleford and Little Wymondley provide opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections. Again, these are legitimate planning considerations on which to categorise settlements as more sustainable and so suitable for higher levels of growth. There is no such justification for Barkway. Rather, its inclusion is based solely on it being the largest village in a particular part of the District. This may or may not be so (as the figures used by the Council for calculating this are disputed as they include the population of Newsells hamlet), but this is not a sound or reasonable approach for designating the settlement as being suitable for higher levels of growth.
69. The inclusion of Barkway as part of the villages 'for growth' category is not consistent with national policy as it will not result in sustainable development.

Conclusion and amendments to the Plan

70. With respect to Matter 26a), it is NPSL's position that for the reasons outlined above, the changes proposed to Policy SP2 are not necessary for soundness. Rather they will result in a plan that is unsound.
71. With respect to Matter 26b), as a matter of broad principle the identification of villages 'for growth' as distinguished from Category A villages is appropriate, but only if the evidence and justification of the selection of the villages is sound. It is clearly not the case that Barkway is appropriately designated as a village 'for growth' and so this part of Policy SP2 is unsound.
72. With respect to Matter 25c), including the level of new housing proposed through the Local Plan (as originally submitted) at each of the five 'villages for growth' does not assist the effectiveness of Policy SP2. Policy SP2 will not be effective as it will result in a Local Plan that does not deliver sustainable development with respect to Barkway. Rather, Policy SP2 will result in unsustainable development through the allocation of a large residential site that has very poor accessibility, limited access to local services or employment opportunities and will very likely result in the closure of the current main local rural employer of high-skilled jobs. This latter effect will impact on the overall sustainability of the village of Barkway through the economic impact on local businesses that rely on Newsells Park Stud.
73. In order to make the Local Plan sound and effective, the following amendments should be made:
 - Barkway should be removed from the villages 'for growth' classification and reinstated as a Category A village; and
 - in order to make Policy SP2 effective, the proposed allocation BK3 should be removed from the Plan.