



Introduction

This Matter Statement has been prepared by WYG on behalf of Wyevale Garden Centres Ltd, in relation to Matter 11 of the North Hertfordshire Local Plan 2011-2031. It has been prepared to provide additional information responding to the matters and issues raised by the Inspector in relation to Matter 11 – The housing allocations and the settlement boundaries: Category A Villages. This statement specifically relates to the village of Codicote.

The statement follows previous representations submitted on behalf of our client, to the Proposed Submission Local Plan in November 2016, supporting the proposed allocation of site CD2 (Codicote Wyevale Garden Centre) and promoting the expansion of the proposed allocation to include the adjacent land to the north. This statement specifically addresses matters raised in relation to Codicote Village (questions 11.16-11.20), and should be read alongside those previous representations submitted indicating the suitability of site CD2 and adjacent land to the north for residential development.

Matter 11 – The housing allocations and settlement boundaries: Category A Villages

Matter 11 relates to the housing allocations and settlement boundaries proposed for the Category A Villages as identified by Policy SP2 of the emerging North Hertfordshire Local Plan. Where relevant we respond to the questions identified by the Inspector.

Question 11.17 – are the impacts of the development justified and appropriate?

Question 11.17 asks whether the proposed housing allocations are justified and appropriate in terms of the likely impacts of the development. All of the proposed housing allocations within Codicote, with the exception of site (CD2), will directly result in the loss of greenfield sites. Site CD2 comprises brownfield land and is the only site that will not result in the loss of greenfield sites from immediately adjacent neighbouring residential properties.

In addition, sites CD1 and CD5 are located adjacent to important wildlife sites which development could impact upon. North Hertfordshire District Council's (NHDC) Local Plan Background Paper – Site Information Matrix identifies that Natural England confirmed that site CD1 is situated directly adjacent to the County Wildlife Site 43/042 Hollards Farm Meadow. On this basis, the assessment identified the site as a high priority area for habitat creation due to the wildlife site. Similarly, site CD5 was also noted as being in close proximity (22m) from a wildlife site and the associated impact on this as a result of development would need to be considered. No evidence appears to have been put forward



to demonstrate that the impacts are not significant or that they could be mitigated. On that basis, it cannot be concluded that the impacts are justified as appropriate.

Question 11.18 – are the allocations most appropriate given the reasonable alternatives?

As our previous representations set out, we consider that an extension to site CD2 provides the opportunity to deliver a substantial number of new dwellings in one location to the north of the village. It would be a better alternative to proposed sites CD1 or CD3 and would reduce the ribbon extension of the village to the south or east towards Welwyn, in an area where the Green Belt is considerably more vulnerable. We briefly consider proposed sites CD1 and CD3 in relation to this alternative.

Site CD1 will result in an extension to the village to the south and will negatively impact upon the setting and entrance of the village. Upon entering the village from the south, the site provides an attractive green field which strongly contributes to the rural setting of Codicote Village. This was acknowledged within the Council's 2012 SHLAA which identified development of the site '*could have considerable urbanising effect on Cowards Lane/High Street.*' The sloping nature of the site would result in views from the surrounding residential areas being dominated by the site. In addition, residential development of site CD1 will harm the wider purposes of the Green Belt as dealt with in further detail below in response to question 11.19.

Turning to impact on the highway network and the access for site CD1, it is not considered to be the most appropriate option given the narrow width of Cowards Lane and poor visibility to the north when exiting from Cowards Lane. In addition, it is noted that Cannon Consulting Engineers have been appointed by local residents to provide highways and traffic advice in respect of site CD1. Within this they raise concerns regarding the trip modelling work undertaken by AECOM on behalf of NHDC and also the proposed junction arrangement, which they consider is not appropriate. Cowards Lane is identified as being significantly constrained within Cannon's report and also by a number local residents, with concerns raised that it will become a preferred route to the village school. In light of these existing access and transport issues raised in respect of site CD1, it is not considered to be the most appropriate option when compared to the suggested expansion of site CD2 to the north which will not give rise to any undue traffic or highway considerations, given that the site already has appropriate access as commercial premises.

In terms of site CD3, it is not considered to be the most reasonable option when considered against the extended CD2 site. The access to the site is proposed to be via the existing residential estate



from Valley Road and then The Close. As such, all traffic generated by the development of site CD3 (construction and end users) will be forced to travel through the existing established residential area and will have a detrimental impact on existing residents, particularly those within The Close. Whilst it is acknowledged that the representations submitted on behalf of the landowner for site CD3 confirm that a Highways Access Report has been undertaken, it is still considered that the defective highways and access arrangements for site CD3 render it not the most appropriate option when considered against reasonable alternatives (extension to site CD2).

The construction for site CD3 would generate significant impacts on residential amenity for existing residential occupiers. In terms of those residential properties facing/backing onto the site and also those living on Valley Road who would be impacted by the frequent and large construction vehicles travelling to and from the site. Again, we understand that it may be possible for such factors to be mitigated against, it is a negative attribute of the site, particularly, when compared to the option of extending site CD2 that would have no immediate neighbours.

The expansion of site CD2 will not give rise to any additional highway matters with suitable access already being available via the existing Codicote Garden Centre access. Should site CD2 be expanded to the north, this area would utilise the same access road as proposed for site CD2 as previously considered acceptable by NHDC. The expanded site would also not impact on residential amenity with Wyevale Garden Centre (site CD2) being adjacent to the site. The expansion of site CD2 to the north will have no impact on residents located to the south on Tower Road, as accepted through the proposed allocation of site CD2. In terms of construction activity, again the northern area to site CD2 would not give rise to any unacceptable impacts in terms of vehicular activity or residential amenity. It is therefore considered that the expansion of site CD2 to the north represents a reasonable alternative for sites CD1 or CD3.

Question 11.19 – Impact on the Green Belt

Question 11.19 comprises a number of sub-questions seeking to understand the impact that development on each of the sites will have on the Green Belt. We address each of those as far as they are relevant. For part a), the exceptional circumstance which warrant allocation of the sites within the Green Belt is NHDC's severe housing need and limited suitable sites not located within the Green Belt.

Part b) questions the nature and extent of the harm to the Green Belt following the site's removal and part c) questions to what extent the consequent impacts on the purposes of the Green Belt are



ameliorated or reduced. For site CD1 substantial harm will arise. Firstly, the development of the site will greatly contribute to the merging of settlements between Codicote and Welwyn. There is already substantial ribbon development along the B656 Codicote Road between Codicote Village and Welwyn, particularly the north side of the road, and the site's development would urbanise and extend the village. Development of CD1 would erode the existing gap between the village and Hollard's Farm and effectively elongate and extend the built-up area of the village to the south of Hollard's Farm. Cowards Lane currently provides a natural end to the village and suitable boundary for the Green Belt. Development of CD1 would effectively link Codicote to the ribbon development that stretches along the B656 to Welwyn exacerbating the coalescence of the two settlements.

Development of the site, with particular reference to its topography and siting to the south of the village would also add to encroachment of urban development into the open countryside. The existing low density development along the south of Cowards Lane and at The Riddy provides a natural filtering out of the built-development from Codicote and site CD1 will completely change the character of the village and the immediate surrounding area. Therefore, in summary, residential development of site CD1 for the proposed 73 dwellings would significantly reduce the openness of the Green Belt and undermine several of the Green Belt purposes.

Part e) relates to the Green Belt boundary and the likely requirement to alter it at the end of the plan period. In respect of our client's site, CD2, we would suggest that the boundary would need to be altered again in order to provide additional housing to the north of site CD2, in the future, if not released now. Mansells Lane, to the north of site CD2 and adjoining land, provides a natural boundary to the Green Belt which is clearly defined using physical features that are readily recognisable and permanent. Therefore, the Green Belt boundary should be amended to exclude land to the north of site CD2 now to allow this sustainable site to come forward for housing development as part of a wider scheme with site CD2.

Conclusions

This matter statement has been prepared on behalf of Wyevale Garden Centres Ltd in relation to Matter 11 of the North Hertfordshire Local Plan 2011-2031. It follows previous representations submitted on behalf of our client, to the Proposed Submission Local Plan in November 2016, supporting the proposed allocation of site CD2 and promoting the expansion of the proposed allocation to include the adjacent land to the north. This statement specifically addresses matters raised by the Inspector, in relation to Codicote Village (questions 11.16-11.20).



To summarise, this statement identifies that all of the sites, with the exception of site CD2, are greenfield sites and development of each will result in the loss of greenfield land and have an impact on the residential amenity of neighbouring occupiers. In addition, sites CD1 and CD5 are located adjacent to important wildlife sites which development could negatively impact upon. It is also highlighted that sites CD1 and CD3 are not considered the most appropriate option given the reasonable alternatives presented by the proposed extension to site CD2. Finally, it is noted that development of site CD1 will undermine the Green Belt function and in particular, contribute to further ribbon development and the eroding of the green gap between Codicote and Welwyn.

We trust the above are of use to the Inspector in considering Matter 11 and the proposed housing allocations within Codicote Village.