

**North Hertfordshire Local Plan
Further Examination Hearings**

MATTER 26

Thursday 26th March

Statement by Jed Griffiths MA DipTP FRTPI

**On Behalf of Knebworth, Codicote, and
Wymondley Parish Councils**

February 2020

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI (“the consultant”) on behalf of the Parish Councils of Knebworth, Codicote, and Wymondley. It has been compiled in response to an invitation by the Examination Inspector to submit material on matters to be considered at further hearing sessions in March 2020. The statement addresses issues and questions under Matter 26 – Villages “for growth”. The views set out in this document are also supported by the Parish Councils of Ickleford in North Hertfordshire, and Woolmer Green in Welwyn Hatfield Borough.
2. In the draft Main Modifications to the Local Plan, published in November 2018, the Council made an amendment to settlement hierarchy at Policy SP2. The Main Modification (MM010) proposed to remove five villages from Category A status and to identify them as “villages for growth”. The proposal caused considerable concern amongst the residents of the five villages - Barkway, Codicote, Ickleford, Knebworth, and Little Wymondley. All five Parish Councils objected to the Main Modification; in March 2019 the consultant was commissioned to prepare a statement setting out the objections. This is included in the list of examination documents.
3. The case against the proposed Main Modification is set out below in response to the Inspector’s questions (a) – (d). It is supported by the four North Hertfordshire Parish Councils listed above, plus Woolmer Green Parish Council. It is understood that Barkway Parish Council will also be making its case separately at the hearing.

MM010: The Case Against

4. The Parish Councils have already stated that they support the main thrust of the Local Plan, which is to concentrate future development in and around the four main towns. They accept that a level of growth must be provided proportionate to the needs of rural communities. The settlement hierarchy embodied in Policy SP2 has been a long-established device for distributing future development to those settlements which have the range of facilities and services to accommodate it.
5. At the top of the hierarchy are the larger Category A settlements, which have traditionally had a range of services and facilities to serve the village and a wider rural area. These villages are normally at the centre of a cluster of settlements. In successive iterations of planning policy in North Hertfordshire, Category A villages have defined boundaries, within which there is a presumption in favour of housing development.

6. With the exception of Barkway, all of the “villages for growth” are surrounded by the Green Belt. Any expansion of these villages would mean an adjustment to the Green Belt boundaries – this is a long-standing element of planning policy. The problem in North Hertfordshire is that the level of housing growth proposed in these settlements is disproportionate to their size. As has been argued in other hearing sessions, the District Council has not demonstrated the exceptional circumstances to justify the release of Green Belt land.
7. Because these four villages are located in the Green Belt, any proposals for housing growth must be proportionate to the size of each settlement and the scale of local needs. The identification of these villages for growth is not necessary in terms of the soundness of the Local Plan. In their justification for MM010, the Council have implied that the change in status of the villages would apply only to the current Local Plan. The Parish Councils reject this argument – there is a real danger that the categorisation would prevail in to future reviews of the Plan. It cannot be justified.
8. In the objection letter of March 2019, a number of specific issues were raised by the Parish Councils with regards to the Green Belt. The gaps between the four villages and adjacent settlements are particularly sensitive – between Ickleford and Hitchin, Knebworth and Stevenage, and Codicote and Welwyn. The area proposed for development to the south of Little Wymondley (WY1) is in the vulnerable gap between Stevenage, Hitchin, and Letchworth Garden City.
9. In the cases of Ickleford and Knebworth, little account seems to have been taken of the relationship between these villages and areas in adjacent local authorities. At Ickleford, additional pressures will arise from the redevelopment of the former RAF airfield at Henlow. Similarly, at Knebworth, there are concerns about the effects of the proposed levels of growth, particularly at site KB4, on the gap between the village and Woolmer Green, which lies to the south. This view is also supported by Woolmer Green Parish Council.
10. To the east of Knebworth, there are the proposals in the Stevenage Local Plan for 400 dwellings at Bragbury End, plus recent planning permissions for 226 dwellings at the Bragbury End Neighbourhood Centre (LPA references 18/000398/FPM and 18/000399/FPM). The cumulative effect of all these allocations and permissions should be referenced in the Main Modifications at paragraph 13.188.

11. The March 2019 letter also raised other issues about the effects of excessive growth on transport infrastructure and the pressures on community facilities, particularly education. Too much reliance is placed on developers to provide the necessary infrastructure without the Local Plan providing hard requirements via specific strategic policies for cumulative developments of over 500 dwellings in the villages. This is inconsistent with the main aim, which is to concentrate development on the towns, e.g. Baldock.
12. The Parish Councils have raised the point that the levels of development proposed for settlements should be determined in Neighbourhood Plans. In Wymondley, the Neighbourhood Plan, formally “made” by North Hertfordshire District Council, proposes “up to 50” dwellings to be provided in the Parish. This contrasts to the 316 units in the Local Plan (policy WY1).
13. In the other three Parishes – Codicote, Knebworth, and Ickleford, Neighbourhood Plan areas have been designated, and work has commenced on Neighbourhood Plans. In many of the other Category A villages in the District, Neighbourhood Plans are in preparation – some have been “made” by the District Council and are part of the development plan. The Parish Councils believe this is the way ahead – it would provide a means of securing development which is appropriate in scale and type for the needs of local communities.
14. In summary, the Parish Councils are of the firm view that the changes proposed in MM010 are unnecessary for establishing the soundness or otherwise of the Local Plan. The Parish Council areas are all located in the Green Belt, where development should be restricted in accordance with the NPPF 2012. Nevertheless, they should be considered alongside the Category A villages in Policy SP2. Detailed allocations for future housing should be brought forward not by a “call for sites”, but through a Neighbourhood Plan, prepared by the local community.

Jed Griffiths

Hertford

26th February 2020