

Matter 11 - Codicote

Land adjacent to The Close - site CD 3

11.16 b) We do not believe that this site is supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided. Access to the site is via a dead-end residential road, Valley Road, which already carries a heavy volume of traffic having been subject to two further developments since it was originally built. Due to the necessity to use the carriageway for parallel parking (many of the properties have inadequate parking, if any), there are several areas where visibility is particularly poor for both drivers and pedestrians. Valley Road exits onto Bury Lane, a narrow and winding lane servicing the east of the parish. This lane caters for a large number of vehicles at rush hour and becomes very congested, particularly in the morning; further proposed development to the west of Knebworth will exacerbate this problem.

The undulating nature of the geography of the proposed site and the Valley Road area means that in icy conditions residents often leave their vehicles in the centre of the village rather than attempt the treacherous slopes - this leads to additional congestion.

11.16 c) We do not believe this site to be deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints. This site is vulnerable to flooding; residents on an adjacent site, The Paddocks, have often experienced flooding and further hard surfacing will exacerbate the problem. The sewerage/drainage capabilities of the village are already overstretched and properties in the lower lying areas experience regular problems. Electrical power cuts are a regular occurrence in the parish.

Land adjacent to St Albans Road and Heath Lane - site CD5

11.16 b) We do not believe that this site is supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided. Codicote Parish Council has been approached by a development company interested in this site, the proposed number of dwellings has increased to 200. Access to the site is via two narrow and winding residential lanes, not ideal to accommodate an increase in traffic. The only point of access onto Heath Lane is at a point where the road starts to drop away quite significantly and visibility is poor, this road caters for all traffic to and from Kimpton and, thereafter, Harpenden. In addition to the residents, St Albans Road caters for vehicles to and from Wheathampsted and St Albans; residents of the travellers' site, and the lorries using Codicote Quarry - lorry movements start at 7am. This is the road which provides the direct route to Codicote Primary School which children have to cross to access the school. Heath Lane and St Albans Road join the B656 from the west - since the majority of traffic exits the village to the south at morning rush hour, this means vehicles will have to cross both carriageways; even with a modest estimate of an extra 200 vehicles at rush hour period this will have a huge impact on traffic which is already at a standstill most mornings.

11.16 c) We do not believe this site to be deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints. We refer again to the

already overstretched sewerage and drainage, and question if the water companies have demonstrated the ability to provide for this level of development.

Land at Codicote Garden Centre - site CD2

In terms of vehicular access this site may be the least problematical as there is capacity to introduce a road layout to alleviate any potential congestion. There is, however, a suggestion that this site may be subject to an application for more than double the number of dwellings proposed in the Local Plan; situated to the north of the village this will add significantly to the number of vehicular movements heading south on the B656 in the morning. In terms of sustainability, the site is more than walking distance for many people, and the route to the shops etc along the busy B656 less than desirable.

11.16 c) We do not believe this site to be deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints. We refer again to the already overstretched sewerage and drainage, and question if the water companies have demonstrated the ability to provide for this level of development.

Land south of Cowards Lane - site CD1

11.16 b) We do not believe that this site is supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided. Vehicular access will, again, add to the problems already experienced on the B656; at this point traffic has begun to increase speed as it exits the village heading south; an outline proposal for the site has addressed access issues, but visibility is not ideal as the main road drops geographically away. Pedestrian access would not be ideal as Cowards Lane has no capacity for a footpath or safe crossing point.

11.17 We do not believe all of the proposed housing allocations are justified and appropriate in terms of the likely impacts of the development. As suspected, in terms of desirability, any site identified within the parish of Codicote is unlikely to remain undeveloped for long. The impact of development of any of the sites cannot be taken in isolation; the cumulative impact will have devastating consequences. Growth on this scale is unprecedented - the number of residences will increase by one third in a parish already struggling in terms of infrastructure, traffic, parking and services; a category A village we have no doctors, dentist, library, car park to service our shops, and an unsatisfactory public transport service.

11.18 We do not believe the proposed allocations are the most appropriate option given the reasonable alternatives. We believe that the idea of a new town has been under-investigated in favour of a seemingly random development approach, with the parishes of Codicote and Knebworth being subjected to proposed large scale development due, in large part, to proximity to links to London, A1M and train services.

11.19 a) We do not believe that NHDC have adequately demonstrated that exceptional circumstances exist to warrant the allocation of each site for new housing in the Green Belt, and

they have not exhausted the use of brownfield sites and infilling, albeit not in prime locations such as Codicote; ie. they have not satisfied the condition of green belt allocation 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'

b,d) Sites adjacent to Cowards Lane, St Albans Road and Heath Lane, and The Close currently provide safe areas to walk and enjoy, the loss of which cannot be ameliorated or compensated. Sites CD1 and CD5 are predominately pasture land which, aside from being grazed, has never been cultivated. These sites provide a natural and beautiful backdrop to the village 'built' boundary which is distinct from the cultivated farmland beyond. Whilst at least one of the five purposes of Green Belts would continue to be served if these sites were to be developed, the paramount purposes of Green Belt determination to a village such as Codicote are 'providing opportunities for access to the open countryside for the urban population'; 'the retention of attractive landscapes and the enhancement of landscapes, near to where people live'; and 'to preserve the setting and special character of historic towns.' The loss of this could never be rectified.

Matter 12 - The housing strategy: provision for gypsies, travellers and travelling showpeople

- The Inspector has made reference to the Gypsy, Traveller and Showperson Accommodation Assessment Update (July 2014), but no reference is made to the ORS document, Phase 1 report dated September 2017, does this later document have no relevance to the provisions in the Local Plan.
- Page 24 of the above report carries an important aerial photograph which helps define the different areas of the entire site; when the Local Plan refers to Pulmore Water/ Wexford Park, to which specific area does this refer? Are we talking about land previously referred to as 1 Pulmore Water?
- The 2017 report identifies two families on the site who have ceased to travel, has the 'unmet need' been adjusted to reflect this? Do these two families now live on the part of the site which has been granted the status of 'residential caravan park'? Has the status of each family been accurately assessed with regards to whether they travel or have ceased to travel?
- With regard to the granting of the above consent, post the July 2014 Assessment Update, why were these pitches taken out of the provision for travellers? If NHDC had carried out a robust assessment of needs, surely they would have identified that these pitches were required for travellers? (At the time of granting this consent a resident gave evidence that the occupation had not been continuous for a ten year period, a prerequisite of the consent). This area of the site is now run as a business providing accommodation for migrants, whilst members of the close family allegedly fall in to the category of 'unmet need'. Does NHDC know if migrant workers reside on all areas of the site?

- With reference to the previously mentioned aerial photograph of the site, it appears that many of the pitches on the entire site house one 'static mobile home', rather than the two caravans they can accommodate. Is this taken into account in the assessment?
- NHDC officers are currently recommending approval for a retrospective planning application for an illegal incursion on green belt land in the parish. The traveller family in this case have moved in from neighbouring Welwyn Hatfield; how has this been accounted for in the numbers reflected in the Local Plan?
- Site CD4 is within the Green Belt.
- In the light of all the above we fail to understand how NHDC have carried out their assessment, and if it is indeed 'robust'.