

**North Hertfordshire Local Plan
Examination in Public**

Written Representation



On behalf of Warden Developments Limited (WDL)

**Matter 11 – The housing allocations and the settlement boundaries: the
Category A Villages (Codicote – Land South of Cowards Lane. Policy CD1)**

1. Warden Developments Limited (WDL) have been engaged with the Local Plan process throughout and have submitted representations at each relevant stage.
2. WDL are the promoters of 'Land south of Cowards Lane' in Codicote which is proposed for allocation under Policy CD1. Our responses to the various matters raised from 11.16 to 11.20 relate specifically to the Cowards Lane site.

11.16 Are all of the proposed housing allocations deliverable? In particular, are they:

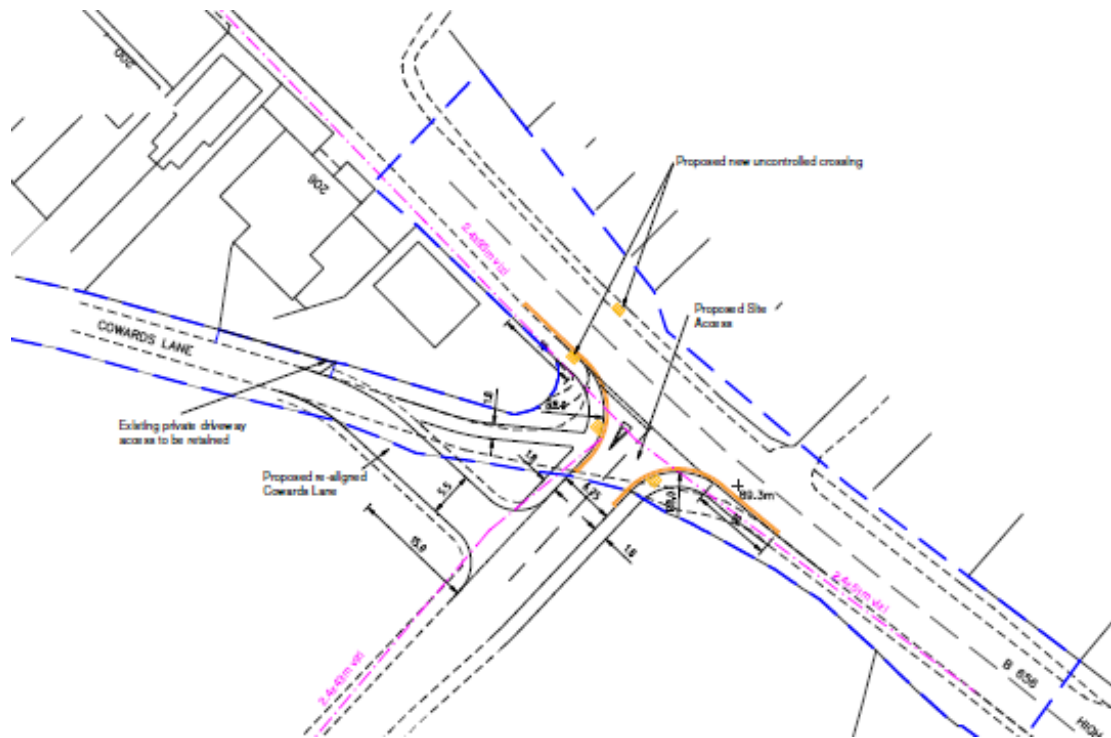
a) confirmed by all of the landowners involved as being available for the use proposed?

3. The site is in single ownership. Warden Developments Limited controls the site by virtue of a conditional contract with the landowner.
4. A planning application has been submitted and dwellings will be delivered upon grant of outline permission and subsequent reserved matters.

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

5. WDL has commissioned Highway & Transportation experts Phil Jones Associates (PJA) in respect of this site.
6. The site is currently accessed through a field gate set on the High Street. However, the Cowards Lane carriageway runs along the north-eastern boundary and links to the High street, just north of this.

7. PJA proposes that as part of the development of the site the existing junction between Cowards Lane and High Street is realigned at its eastern end to tie into the site before re-joining the High Street as shown on the plan extract below.



Proposed site access arrangements

8. These proposals have been agreed with Hertfordshire County Council Highways and have the subject of a Road Safety Audit (RSA) demonstrating their appropriateness. A copy of the RSA and Hertfordshire's County Council Highways agreement can be provided to the examination should the Inspector consider this helpful.
9. The proposals provide improvements to the existing vehicular and pedestrian visibility at Cowards Lane and High Street and bring this up to recognised standards.

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

10. As part of the local plan process the Council has consulted with all statutory undertakers and other relevant service providers regarding the likely infrastructure needs of the plan period to support the development being proposed.

11. Based upon the feedback received the Council has prepared an Infrastructure Delivery Plan (IDP). This puts in place proposals to deliver infrastructure needs arising from the allocations including those at Codicote as well as, as a result of other relevant development taking place in adjoining districts which could impact upon North Herts. This includes a trajectory for achieving the necessary improvements.
12. The Council has also entered into memorandums of understanding with key stakeholders including Thames Water, Anglian Water, Hertfordshire County Highways and The Environment Agency.
13. In addition, the Council has undertaken its own assessments of Green Infrastructure needs and capacity.
14. Each site has been the subject of Sustainability Appraisal and extensive public consultation which has ensured that any potential infrastructure needs or environmental constraints have been identified and addressed.
15. The Cowards Lane site is not the subject of any abnormal development costs and so will make appropriate contributions towards relevant infrastructure enhancements through the grant of any future planning application.

11.17 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

16. The Cowards Lane site has been the subject of detailed assessment as part of the preparation of an outline planning application.
17. This work has demonstrated that any potential for ecological interest is largely constrained to the boundary trees and hedging. Any mitigation of minor impacts to the boundaries can be delivered as part of a future site landscaping scheme. A Landscape and Visual Impact Assessment has concluded that the visual presence of the site is limited due to the tree belts / vegetated field boundaries, adjacent residential properties and small areas of woodland. The main views into the site are local, affecting a very limited length of the High Street. Therefore, in landscape terms the site is an appropriate location for new residential development.

18. The site lies within Flood Zone 1 and so not at risk from flooding. A sustainable urban drainage scheme will ensure no surrounding land or properties are impacted by surface water.
19. Highway modelling, scoped and agreed by Hertfordshire County Council's Highways, has demonstrated that traffic generated from the proposed development would not lead to significant impacts upon the local highway network.
20. In summary, the potential harmful impacts of development at this site are limited and can be minimised further through appropriate mitigation.
21. The limited impacts resulting from the development of the site would not (using the language of paragraph 14 of the NPPF) significantly and demonstrably outweigh the benefits of bringing forward market and affordable housing in what is clearly a sustainable location.

11.18 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

22. The proposed allocation at Cowards Lane is a product of the Council's overall spatial strategy and the options available to it if it is to seek to deliver sufficient housing to meet the objectively assessed needs for the district.
23. As discussed in response to question 11.19, the Council has concluded that due to urban capacity limitations, over 50% of the districts requirements will need to be met on Green Belt sites. It has undertaken an assessment of the sustainability of its larger towns and villages to provide a locational focus for potential allocations. Codicote has been assessed as being a sustainable location for new housing as part of this process.
24. It is a village which benefits from a good range of shops, services and facilities. This includes a lower school (with land available for expansion), three public houses, a number of shops, a public hall, place of worship, open space, play equipment and dedicated sport facilities. There are also regular bus services operating Monday-Saturday providing access to the major settlements of Welwyn Garden City, Hitchin, Stevenage and Luton as well as surrounding villages.
25. The Cowards Lane site is within walking and cycling distance of these facilities, which accordingly would be easily accessible to future occupiers.

26. Given this context and for the reasons set out above in our response to question 11.17, it is respectfully submitted that the Cowards Lane site should be considered an appropriate allocation.

**11.19 Sites CD1, CD2, CD3 and CD5 comprise of land in the Green Belt. For each:
a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?**

27. Yes, the exceptional circumstances do warrant the allocation of the site.

28. The Council has undertaken a detailed review of the districts brownfield land capacity. In this regard we draw the Inspectors attention to paragraphs 4.21 to 4.40 of the examination document HOU1, 'Housing and Green Belt Background Paper.

29. This makes clear that based upon the preparation of a detailed Strategic Housing Land Availability Assessment (SHLAA) and taking into account completions, permissions, windfalls and broad locations, a maximum of 6,343 homes could be delivered on non-Green Belt sites in North Hertfordshire over the plan period.

30. This represents less than half (46%) of the District's objectively assessed needs for housing. This is considered a conservative estimate of Green Belt need as it assumes that all identified permissions and windfalls occur on non-Green Belt land and that all non-Green Belt sites identified in the SHLAA will come forward regardless of potential constraints.

31. In short, the exceptional circumstance which justifies the allocation of this and other proposed Green Belt sites is that without it the Council would fail to meet over 50% of the Objectively Assessed Need for housing in the District.

32. Such a position would only serve to exacerbate current affordability problems within the district (please see our submissions in respect of Matters 4 and 7) and would render the Local Plan wholly unsound.

b) What is the nature and extent of harm to the Green Belt of removing the site from it?

33. It is acknowledged that the site does not currently accommodate any built form and so development will result in a loss of an undeveloped field and so some loss of 'openness'.
34. However, the site is well related to the form of the existing settlement and is set adjacent to Cowards Lane, the High Street and The Riddy to its north and west and the Hollards Farm complex to its east. The site is also contained by reasonably mature boundary landscaping.
35. Landscape assessment has found that views of the site are localised and generally associated with and closely related to the existing settlement. The level of harm i.e. to the wider character and openness of the area is therefore considered minimal.
36. In terms of the five 'purposes' for maintaining land in the Green Belt we highlight the following:

To check the unrestricted sprawl of large built up areas

37. The site is contained to the north and west by the existing village, whilst the Hollards Farm complex sits to its east. The site does not make a contribution to containing a large built up area. Whilst development of the site will clearly have an impact (development on land which is currently un-developed) the impacts will be very much localised and result in only limited or no harm to the wider function of the Hertfordshire Green Belt.

To prevent neighbouring towns merging into one another

38. The village and site are located approximately 1½ - 2 km from the nearest settlement, Welwyn. The development of the site would therefore not result in the merging of settlements.

To assist in safeguarding the countryside from encroachment

39. The containment of the site by existing development i.e. Cowards Lane and The Riddy and existing / proposed boundary landscaping creates a strong form and edge to the site and proposed development. Development would not appear as an undue encroachment into the countryside.

To preserve the setting and special character of historic towns

40. The site is located well away from the village's conservation area (e.g. the part of the village which best expresses its 'special character'). The development of the site would therefore have no implications in respect of this purpose.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

41. The site would not result in the recycling of any urban land. However as outlined above it is a fact that as a result of the limited urban capacity within North Hertfordshire over 50% of the development proposed within the plan is on Greenfield, Green Belt Land.
42. The proposed allocation at Cowards Lane is not therefore instead of as a preference to an urban site / site in need of regeneration, rather it is in addition to the Councils proposals to utilise all such available sites.
43. Development at Cowards Lane would very clearly have no impact upon the potential for urban regeneration or re-use of urban land.

c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

44. Draft Policy CD1 seeks to ensure that development at the site is sensitively integrated both in terms of its relationship with the existing village and the open land to the south which is designated as a local wildlife area.
45. Development at the site would be at a lower density of just over 20 dwellings to the hectare and only two with some two and a half storey housing. This will allow appropriate separation to boundaries and create a spacious character similar to the existing village form.

46. This combined with the existing boundary landscaping which contains the site and new landscape planting where necessary minimises the potential impact of the development.

d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?

47. Land to the west, north and north east is occupied by existing residential development which does not form part of the Green Belt. Land to the east comprises Hollands Farm complex which includes a number of larger buildings and hardstanding with the B656 to Welwyn to its east. Whilst this complex stands within the Green Belt it is not open but rather provides a transition between the village and countryside to the south.

48. Land directly to the south is open and serves a Green Belt function in this respect.

49. As the Inspector will note the sites southern boundary adjoins the southern boundary of the houses in The Riddy to the west and Hollards Farm to the east. (Please see annotated OS Plan extract at Appendix 1)

50. The sites southern boundary does not therefore project beyond the existing built form at the southern edge of the village but rather would sit within and contained by it.

51. The southern boundary is already well screened by a substantial hedge and tree lined boundary and so would form a clear edge to the settlement. (Please see photographs at Appendix 2)

52. Given this it is considered that the development of this site would in no way undermine the function of the adjacent Green Belt.

e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?

53. If the development requirements of the borough were such that a search for further development land had to be undertaken at the end of the current plan period in order to accommodate further growth it is possible that the Council may feel it necessary to make further changes to the Green Belt boundaries in the district.

54. However, it is considered highly unlikely that land south of the Cowards Lane site would be an area where a further boundary change would be seen as appropriate. The land to the south is part of a local wildlife site and even setting this aside development would appear visually as an incongruous projection beyond the existing settlement.

55. The proposed southern boundary is logical as explained above, connecting the Riddy and Hollards farm and rounding off the settlement. There is no need or case for further alteration here at the end of the plan period.

f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?

56. The Cowards Lane site boundaries are consistent with this aim, enabling the delivery of sustainable new residential development whilst protecting the environmental and visual character of the settlement.

g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?

57. As outlined above the sites northern, eastern and western boundaries adjoin existing built development.

58. The southern boundary is formed by a strong existing hedge / tree-line which follows and aligns with the southern boundaries of the housing in The Riddy and built form at Hollards Farm and provides a clear and defensible settlement edge.

11.20 Is the proposed settlement boundary:

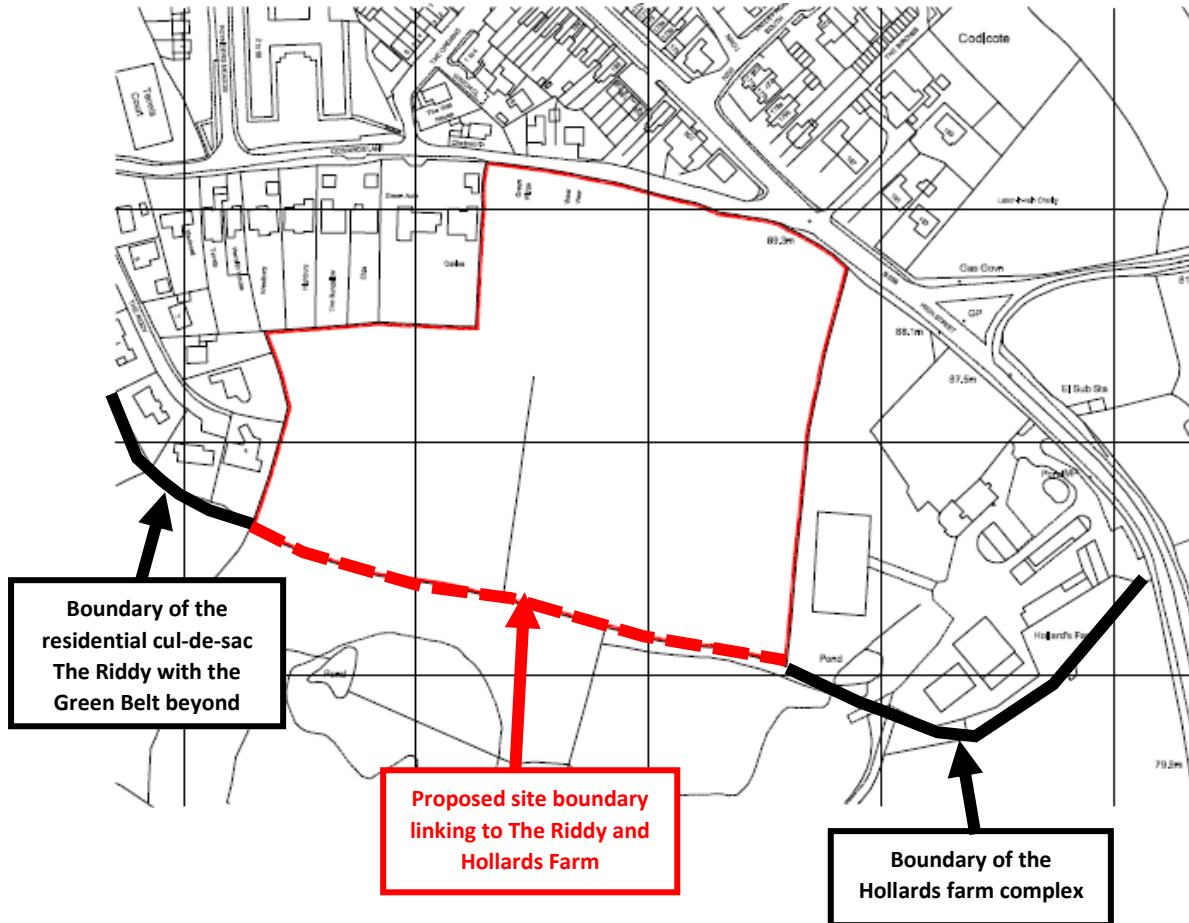
a) consistent with the methodology for identifying the settlement boundaries?

b) appropriate and justified?

59. For all of the reasons set out above the proposed site boundaries are clearly consistent with the methodology, are appropriate and justified.

Appendix 1

OS Plan showing site relative to neighbouring land and uses



Appendix 2

Photographs showing the southern boundary



View from the south west corner looking east along the southern boundary



View from the south-east corner looking west along the southern boundary