

# **NORTH HERTS DISTRICT COUNCIL LOCAL PLAN EXAMINATION**

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On behalf of Ashill Land Limited

**Hearing Statement: Matter 11**

**Examination Questions: 11.16, 11.17, 11.18  
and 11.19**

January 2018

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## 1.0 Matter 11

### MATTER 11: THE HOUSING ALLOCATIONS AND THE SETTLEMENT BOUNDARIES: CODICOTE

- 1.1 CBRE Limited (referred to as 'CBRE' hereafter) is instructed by Ashill Land Limited (referred to as 'Ashill' hereafter) to address the Examining Inspector's questions from the perspective of the proposed allocation of the land south of Heath Lane (ref: CD5) for housing.
- 1.2 Ashill have an interest in the land at Heath Lane in Codicote which is identified in the submitted Local Plan to be removed from the Green Belt and allocated for 140 dwellings.
- 1.3 We refer the Inspector to the representations made on behalf of our client responding to the Proposed Submission consultation<sup>1</sup>.
- 1.4 CBRE has prepared hearing statements in respect of four Matters (Matters 5, 6, 8 and 11).
- 1.5 This Statement responds to the Inspector's Questions 11.16, 11.17, 11.18, and 11.19.

#### Question 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?

- 1.6 The land south of Heath Lane (referred to hereafter as 'Site CD5'), is allocated for 140 dwellings in the draft Local Plan. The site is owned by three parties. Ashill have entered into promotion agreements with all three landowners to bring the site forward for housing. Site CD5 is therefore available for the use proposed in the draft allocation.

##### B) Supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

- 1.7 Ashill have commissioned RGP (transport consultants) to undertake highways and transport feasibility work in support of a forthcoming application for Site CD5. RGP's Access and Traffic Impact Study is appended to this statement (see Appendix A). In summary, two new vehicular/pedestrian access are proposed from Heath Lane and St Albans Road respectively. The northern access from Heath Lane would serve dwellings on the northern parcel of land while the southern access from St Albans Road would serve the dwellings on the southern parcel of land. It is proposed that there would be no connection between the two parts of the site aside from access for emergency vehicles, pedestrians and cyclists in order to prevent rat running.
- 1.8 The land required for the southern vehicular access is currently located within the settlement boundary but outside of the allocation boundary for Site CD5 and is occupied by an existing bungalow at 66 St Albans Road. The bungalow is outside, but immediately adjacent, to the proposed allocation boundary. Ashill have entered into a legal agreement with the landowner to purchase the property to create an access. As such, **the allocation boundary should be amended to include the land at 66 St Albans Road** (the boundary line is shown on Site Location Plan - Appendix B).
- 1.9 The design team has engaged with highways officers at Hertfordshire County Council (HCC) who have noted that they have no objections to the proposed vehicular accesses.

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<sup>1</sup> Ashill Local Plan: Proposed Submission November 2016

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- 1.10 With regard to pedestrian access, there are a number of existing Public Rights of Way (PRoWs) that traverse the site. These PRoWs would provide alternative pedestrian accesses to Site CD5 from Heath Lane, Heath Hill and two points on St Albans Road. All of the existing PRoWs that cross the site will be retained and upgraded appropriately as part of the planning application.
  - 1.11 In summary, appropriate access to the site can be achieved for all users within public highway land or within land under Ashill's control. No third-party land would be required.

**C) Deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

- 1.12 As stated in our hearing statement for Matter 6, the Council's Infrastructure Delivery Plan (IDP) (September 2016) identifies the expansion of the existing primary school as the only key item of strategic infrastructure to support proposed growth in Codicote.
- 1.13 The village has one school – Codicote Primary School. Codicote Primary School is a 1FE primary school which is currently oversubscribed and Herts County Council's (HCC) current forecasts indicate a shortage of places based on the existing baseline population i.e. it does not take into account of additional housing development<sup>2</sup>. The school is currently relying on temporary classrooms to address the shortfall which is not sustainable. Due to the existing capacity issues, HCC have noted that a permanent solution would need to be found and that further housing growth in the village would necessitate expansion of the school.
- 1.14 As Codicote is located within its own Primary Planning Area, and the majority of the existing school's pupils live in Codicote and its immediate surroundings, any permanent solution to addressing the shortage of school places needs to be local to Codicote.
- 1.15 The alternative - having children attend schools in other villages (assuming they have capacity) would not be sustainable, or desirable for HCC, and the village's residents.
- 1.16 Following discussions with HCC, it has been confirmed that the expansion of the existing school onto adjacent land is the County's preferred form of school provision. This would be achieved through the provision of land within site CD5 for a playing field adjacent to the existing school enabling the school to expand on its current site.
- 1.17 The construction of a new school in Codicote is unfeasible. HCC has a preference for primary schools of 2FE or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand.<sup>3</sup> Furthermore, HCC's preference is to have all the facilities a school requires, included playing fields, provided on a single site. Site CD5 will enable this requirement to be met.
- 1.18 Notwithstanding the above, HCC note that there may, however, be situations where in order to provide additional school place capacity at an existing site, a detached playing pitch may be required. However, this facility should ideally be located within 400m of the main school site and be appropriate to enable delivery of the PE curriculum. HCC have confirmed that they are not aware of any available sites within 400m of the school which would be available for playing fields. Therefore, expansion can only be achieved through the land adjacent to the school (within site CD5) being made available for use.

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<sup>2</sup> See paragraph 13.17 (p.15) of HCC Property's Representations to Reg 19 Consultation (November 2016), and HCC's Primary School Forecasts 2016/2017

<sup>3</sup> See paragraph 1.14 (p. 25) of HCC Property's Representations to Reg 19 Consultation (November 2016)

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- 1.19 In line with Regulation 122 of the CIL Regulations 2010, it is expected that all four sites in Codicote identified in the draft Submission Local Plan will need to contribute towards the cost of expanding the school from 1FE to 2FE. This will fall under the threshold set in Regulation 123 which restricts the pooling of more than five contributions from separate developments towards a single item of infrastructure. As such the funding for this infrastructure through S106 obligations would not be held up in the absence of CIL in the District.
  - 1.20 It is expected that S106 obligations will be required for site-specific mitigation of the impact of the allocations and that these can be negotiated at application stage.
  - 1.21 RGP's Access and Traffic Impact Study (see Appendix A), summarises the projected traffic impact of the scheme on the local highway network. It also identifies the level of mitigation that would be required to offset the proposals in transport terms. The document includes reference to the various transport models and strategy documents that have been prepared by NHDC to inform the Local Plan process. RGP found that the cumulative impacts associated with the proposed allocations in Codicote upon the existing operation of the local highways network would be negligible. Notwithstanding this, the scheme for Site CD5 would make a S106 contribution, if required, towards any forthcoming small-scale improvement works identified for the centre of Codicote. This would accord with the various modelling work and Transport Strategy that NHDC has prepared in support of the Local Plan process.
  - 1.22 In addition to transport and highways issues, Ashill have also commissioned a full suite of technical reports to inform a planning application for the site. The findings demonstrate that there are no fundamental constraints which would prevent the site being developed for housing within the first five years of the plan period.
  - 1.23 In summary, Site CD5 is deliverable in the context of the NPPF, in that it is "available now, offers a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable".
  - 1.24 Feasibility work has already commenced on Site CD5, with a detailed application expected to be submitted in mid-2018 and construction completed by 2022. There are no significant constraints which would prevent the site being redeveloped for housing.

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

- 1.25 CBRE wishes to respond to this question in the context of Site CD5 only. CBRE do not believe the number of dwellings allocated for Site CD5 is justified. It is unclear how the figure of 140 units that the Council have proposed for Site CD5 was calculated.
- 1.26 As noted in our hearing statement for Matter 6, Site CD5 is integral to unlocking development in the village, it should be the first site in the village to come forward to enable the school to be expanded. As such, the site could also act as the 'contingency site' should one of the other four sites not come forward to ensure that the expansion of the school remains viable.
- 1.27 To provide a degree of contingency and to ensure that the expansion of the school is as cost effective as possible, a greater proportion of housing should be allocated in Codicote, and CBRE respectfully request that the housing allocation for **Site CD5 is increased from 140 units to 180 to 200 units** in accordance with paragraph 154 of the National Planning Policy Framework which requires Local Plans to "be aspirational but realistic".

- 1.28 Furthermore, the technical evidence that Ashill has commissioned demonstrates that the site could accommodate a higher number of units without causing significant impacts from an environmental, technical or townscape perspective.

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

- 1.29 The Council's draft Sustainability Appraisal (SA) (2016) assesses various housing options including the creation of a new settlement. The SA concludes that the most sustainable approach is for development to be spread across the district combining a number of the spatial options. Paragraph 4.3.1 of the SA notes that:
- "Sites have been assessed against planning issues and those performing well in terms of constraints as well as being located closer to services and facilities have been chosen. The quantum of development is such that all options have been considered where deliverable sites are identified. There is also more development in the villages based on the amount of sites that have been submitted in these locations and the site's suitability based on the services that exist".*
- 1.30 Since the publication of the draft SA, the Council has tabled a proposed modification to the spatial strategy whereby five of the Category A villages that are best served by existing amenities are to be promoted into a category of their own, sitting just below the key towns. These villages are: Barkway, **Codicote**, Ickleford, Knebworth and Little Wymondley. CBRE support this proposed change as it reflects the greater ability of these villages to accommodate growth.
- 1.31 Furthermore, the Council's Housing and Green Belt Background Paper sets out the potential housing sites in Codicote which were submitted by promoters. It notes that seven sites were considered and Appendix 2 clearly presents the reasoning for allocating each site or otherwise.

### **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?**

- 1.32 Exceptional circumstances are not defined in the NPPF or NPPG; however, the matter has been tested in the courts. The pre-eminent case is the Calverton vs Nottinghamshire Councils judgement which identifies a number of exceptional circumstance tests.
- 1.33 On a strategic level, the Council's case for demonstrating exceptional circumstances is clearly set out in paragraphs 4.21 to 4.40 of the Housing and Green Belt Background Paper. The Paper notes that it can only meet 46% of its housing need through non-Green Belt sites. The District will simply not be able to meet its OAN without releasing some Green Belt sites.
- 1.34 As stated in our hearing statement to Matter 6 (Deliverability) and in the sections above, the key exceptional circumstance in allocating the site is the school. HCC, the education authority, have stressed in their Proposed Submission representations that no development in the village can come forward unless a solution is found to address the capacity issues at the existing primary school. Land will be set aside within the east of Site CD5 to enable the primary school to be expanded. Furthermore, the site will make an important contribution to meeting housing needs during the plan period.

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

- 1.35 The site is located in the Green Belt within the 'saved' policies of the NHDC Local Plan (April 1996; amended September 2007). As part of the preparation of the new Local Plan, NHDC has undertaken a Green Belt Review. The most recent Green Belt Review (July 2016) brings together the previous Green Belt Review documents and incorporates amendments made in light of previous rounds of consultation. Prior to this, the Green Belt has not been reviewed since 1992 and development needs of the District have changed significantly since then.
- 1.36 A site specific Green Belt Assessment (Appendix C) is included. The Assessment applied the same methodology and scoring criteria described on pages 99 to 101 of the Council's Green Belt Review (July 2016).
- 1.37 The assessment reviewed the site's existing contribution to the five Green Belt purposes defined by Paragraph 80 of the NPPF; namely to:
1. Check the unrestricted sprawl of large built-up areas;
  2. Prevent neighbouring towns merging into one another;
  3. Assist in safeguarding the countryside from encroachment;
  4. Preserve the setting and special character of historic towns; and
  5. Assist in urban regeneration by encouraging the recycling of derelict and other urban land
- 1.38 The Assessment concluded that the wider site has an overall score of 7; making a moderate contribution towards the first Green Belt purpose but a limited contribution to the other purposes. Furthermore, with the exception of the southern boundary, the remaining site boundaries are classified as strong. The Concept Plan attached at Appendix D illustrates how the site could also make the southern site boundary strong through the planting of a belt of screening trees and shrubbery. As currently exists, the south-west edge of the settlement is currently comprised of a variety of back garden boundary treatments which would be classified as 'weak' by the NHDC Green Belt Review.
- 1.39 The assessment concludes that the development of the site would not significantly infringe on the purposes of the Green Belt as defined by the NPPF.

## **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?**

- 1.40 Paragraph 1.38 of this statement sets out how the consequent impacts on the purposes of the Green Belt could be ameliorated through landscaping.
- 1.41 CBRE's findings are echoed in Appendix 2 of the Council's Housing and Green Belt Background Paper which notes that Site CD5 is:
- "On edge of Category A village on land currently within Green Belt. Ability to make significant contribution to additional overall housing numbers identified since Preferred Options stage and deliver supporting infrastructure to benefit of wider village. Site-specific criteria and proposed dwelling estimate allow for appropriate mitigation of potential impacts. On balance, positive opportunities afforded by this site are considered to outweigh harms."*

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**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?**

- 1.42 If Site CD5 is to be released from the Green Belt and allocated for housing, the adjacent Green Belt would continue to restrict sprawl of built up areas (purpose 1) and assist in safeguarding the countryside from encroachment (purpose 3). The adjacent Green Belt land is located to the south and west of Site CD5 would not be undermined by the site's allocation as the land has a weak relationship to the village being defined by a steep slope and belt of tree vegetation.

**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?**

- 1.43 It is not anticipated that the proposed Green Belt boundary adjacent to Site CD5 will need to be altered at the end of the plan period. The proposed Green Belt boundary will be defined by strong, permanent, physical boundaries.

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

- 1.44 Policy SP1 of the draft Local Plan sets out the guiding principles for planning in the District during the plan period. The release of Green Belt land within CD5 will align with the principles set out in the policy, namely it will ensure the long term vitality of Codicote by supporting growth and sustains key facilities.

**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?**

- 1.45 As noted in paragraph 1.38 above, the proposed allocation will create strong defensible boundaries using physical, permanent features which will clearly define the Green Belt boundary.

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## APPENDIX A





# ACCESS AND TRAFFIC IMPACT SUMMARY

## LAND SOUTH OF HEATH LANE, CODICOTE (LOCAL PLAN SITE CD5)

### Proposed Development of 198 Dwellings

Date: December 2017

Ref: ASHL/14/2368/TN05

## 1 INTRODUCTION

- 1.1 RGP is commissioned by Ashill to advise on highway and transportation matters in respect to the proposed construction of 198 dwellings on land south of Heath Lane, Codicote ('the site'). The proposals would also involve setting aside land within the site for a playing field adjacent to the existing school, thereby enabling the school to expand on its current site.
- 1.2 The site is included as Site 'CD5 – Land South of Heath Lane (140 homes)' within North Hertfordshire District Council's (NHDC's) Proposed Submission Draft Local Plan (2011-2031). Codicote as a whole is identified in the Local Plan as being suitable to accommodate a total of 315 dwellings across four potential allocation sites, including site CD5.
- 1.3 This Note has been prepared to inform the Examination of the NHDC Local Plan (2011-2031). It sets out the proposed access arrangements at the site for all users and summarises the projected traffic impact of the scheme on the local highway network. It also identifies the level of mitigation that would be required to off-set the proposals in transport terms. This includes reference to the various transport models and strategy documents that have been prepared as part of the Local Plan process.
- 1.4 Any formal planning application for the site would be supported by a full Transport Assessment and Travel Plan, which would provide further detail on these matters. It should be noted that the transport aspect of these development proposals, including the access strategy and the necessary scope of transport related documents, has been agreed with Hertfordshire County Council (HCC) as Highway Authority by way of a formal pre-application consultation process.

## 2 SITE ACCESS

### **Vehicular Users**

- 2.1 The proposed vehicular access strategy for the site takes the form of two separate accesses from Heath Lane and St Albans Road respectively. The northern access (from Heath Lane) would serve dwellings on the northern parcel of land while the southern access (from St Albans Road) would serve the dwellings on the southern parcel of land. There would be no connection provided between the two parts of the site, aside from for emergency vehicles, pedestrians and cyclists, in order to prevent rat running.
- 2.2 The proposed access arrangements, shown on attached drawings 2015/2368/001 and 2015/2368/003, have been designed with reference to HCC's 'Roads in Hertfordshire: Highway Design Guide – 3<sup>rd</sup> Edition' (January 2011). The layout and positioning of the accesses has also been informed by way of traffic surveys undertaken along St Albans Road and Heath Lane to ensure that the necessary levels of visibility for drivers can be provided, in accordance with relevant Design Standards.
- 2.3 In summary, the vehicular access strategy comprises the following elements:
- a) Two separate points of access would be provided from Heath Lane and St Albans Road respectively, designed to HCC standards;
  - b) The proposed access roads are of a suitable width to allow for two-way vehicle movements without blocking the public highway;
  - c) The visibility splays provided from each access would fully accord with relevant Design Standards and is based on actual vehicle approach speeds. All visibility splays are achievable within the site boundary or within public highway, without crossing third-party land. All visibility splays would be kept clear in perpetuity;
  - d) Suitable separation (at least 50 metres) would be provided from the proposed point of access to existing local junctions - i.e. Hill Road / Heath Lane and Cowards Lane / St Albans Road);
  - e) The proposed internal site layout is appropriate to allow for access by the largest anticipated vehicles, including fire tenders, large refuse vehicles and delivery vehicles. This has been tested through swept path analysis software;
  - f) The proposed car parking provision fully accords with North Hertfordshire's parking standards.

### **Non-Vehicular Users**

- 2.4 The site is located a short walk / cycle from the centre of Codicote (less than 600 metres from the centre of the site) where a range of local amenities can be accessed. This includes a post office, food stores, pharmacy, public houses, newsagent and hairdressers. Codicote Church of England Primary School is located immediately north-east of the site and is therefore also very well located to allow for convenient access by foot.

- 2.5 Local bus routes are available from the centre of Codicote, providing services towards Luton, Stevenage and Welwyn Garden City. Some of these services are also accessible from bus stops on Heath Lane.
- 2.6 The following provisions would be made in terms of site access for non-vehicular users:
- a) The proposed points of access from St Albans Road and Heath Lane incorporate appropriate footway (minimum 2 metres width) and crossing provision which would tie-in with the existing wider network of footways;
  - b) The internal layout of the site would be designed in accordance with the principles set out in Manual for Streets. The internal road layout and the surrounding environment would keep vehicle speeds low and would provide general priority to pedestrians over vehicles. A mix of footways and shared surface environments would be provided across the site as appropriate;
  - c) An appropriate network of lighting would be implemented across the site;
  - d) All existing public rights of way would be retained, including footpaths 014, 015 and 016. The proposals would provide extensive connections to these existing public rights of way and would deliver widening works to footpaths 14 and 15 within the site as part of the scheme;
  - e) A 3 metres wide footway / cycleway would be provided through the site;
  - f) Good pedestrian connectivity would be provided from the site to Codicote Church of England Primary School (via footpath 014);
  - g) Cycle parking would be provided on site fully in accordance with North Hertfordshire's cycle parking standards.
- 2.7 In summary, the proposals would deliver an excellent level of permeability onto, and across, the site for non-vehicular users. The existing public rights of way would be retained and enhanced as part of the proposals, thereby facilitating connections to existing local facilities, including Codicote Church of England Primary School and Codicote Village centre.

### **3 TRAFFIC IMPACT**

- 3.1 The projected level of vehicular and non-vehicular trip generation associated with the proposals has been determined by using the industry-standard TRICS databased and the figures have been agreed with HCC as being suitably reflective of the proposals. The impact of the additional vehicular traffic has been fully assessed in respect to its impact upon the local highway network in safety and capacity terms. The scope of this assessment has also been agreed with HCC through the course of formal pre-application discussions.
- 3.2 Traffic surveys were undertaken at key local road junctions, including those within the centre of Codicote and those along Heath Lane and St Albans Road. The surveys were undertaken during the key weekday morning and evening peak periods of operation to establish baseline traffic conditions. Appropriate uplifts to these traffic flows were then made in order to account for future traffic growth on the highway network.

- 3.3 The impact of the additional traffic from the site was then assessed using industry standard Junctions 8 capacity modelling software. The results of this assessment demonstrate that the proposals would have a negligible impact upon the local highway network in terms of queues and delay, including junctions along Heath Lane, St Albans Road and the B656 in the centre of Codicote. The results of traffic impact assessment indicate that the development proposals would increase peak hour traffic along Codicote High Street by in the order of just 5% during the morning and evening peak hours.
- 3.4 From a review of the likely cumulative impacts associated with the 3 other sites identified in the Local Plan (Sites CD1, CD2 and CD3), it is apparent that the cumulative effects of these schemes upon the existing operation of the local highway network would also be negligible.

## **4 MITIGATION**

### ***Off-Site Improvement Works as Part of this Scheme***

- 4.1 The traffic impact assessment demonstrates that the proposals would have a negligible or nil detriment impact upon the operation of the local transport network. Notwithstanding this, a number of off-site transport improvement works would be made as part of this scheme. These works would be undertaken on Heath Lane, as shown on attached drawing 2015/2368/003 and summarised below.
- a) A new section of footway would be provided on the southern side of Heath Lane to provide a connection from the site to the existing footway further east. This will deliver a continuous pedestrian route from the northern part of the site to the village centre;
  - b) The new section of footway would also continue west from the access to a new pedestrian crossing point across Heath Lane. This would link to the existing footway on the northern side of Heath Lane;
  - c) A new bus stop would be provided on the northern side of Heath Lane to improve access to eastbound bus services. The northern footway would be extended and widened to facilitate the bus stop and waiting area;
  - d) Localised carriageway widening works on Heath Lane would be undertaken in order to improve two-way vehicle flow along this section.

### ***School Expansion***

- 4.2 A parcel of land within the site would be gifted to Codicote Church of England Primary School as part of these proposals. The school is currently unable to expand due to insufficient land availability. As such the scheme would enable the necessary improvements to this key local service to be made and therefore represents a residual infrastructure benefit as part of the scheme.

- 4.3 Allowing the school to expand will also reduce the likelihood of existing, and future, children in Codicote from needing to undertake a trip away from the village in order to attend primary school. This would also therefore reduce the level of school traffic on the highway network.

### **Strategic Mitigation Measures**

- 4.4 A number of traffic modelling and transport strategy reports have been prepared to support the Local Plan process, which includes reference to the WHaSH and COMET traffic models. A number of mitigation measures are identified to improve strategic access in this area, including the A1 (M) smart motorway scheme between junction 6 and 8. The WHaSH model also includes an assessment of traffic delays in Codicote and demonstrates minimal levels of delay (less than 100 seconds) in the 'do minimum' and 'do something' scenarios. As such Codicote does not meet the criteria for constituting a 'problem location'. It is noteworthy also that HCC's response to the Local Plan does not refer to any significant issues within Codicote. Notwithstanding this, it is acknowledged that Codicote experiences high levels of rat running currently.

- 4.5 NHDC's Transport Strategy (October 2017), which supports the emerging Local Plan process, assesses the implications of the Local Plan proposals on the local transport networks. This document acknowledges issues associated with rat running through villages such as Codicote. A number of strategic mitigation measures are already identified to address such issues however. Moreover, a significant thread throughout this document, and HCC's Transport Vision 2050 document, is one which places the emphasis on sustainable travel and making improvements to local walking / cycling environments as opposed to increasing capacity for cars. It is now generally accepted that junction capacity improvements suggested by earlier HCC assessments may not be appropriate in that they could actually attract more traffic to use roads through villages, at the detriment of the village environment. NHDC's Transport Strategy states:

*"Increasing highway capacity is a 'double-edged sword' – it will reduce congestion at relevant locations, and improve air quality and reduce delays to bus services, – but it is also likely to be to the detriment of the local environment, encourage car use, could lead to congestion at other locations and increased volumes on minor roads, and will work against other proposals to encourage sustainable modes."*

- 4.6 In terms of transport issues and required mitigation in Codicote specifically, NHDC's Transport Strategy states that there are:

*"localised congestion issues (some caused by parking), which may be able to be resolved to relieve local congestion. Development proposed in these locations should contribute to small-scale improvements to traffic management and the urban streetscape, without encouraging more through traffic."*

4.7 On the basis of the above it is apparent that any mitigation for Codicote should focus on small-scale improvements. These should focus on the 'place' function of Codicote as opposed to increasing its highway capacity, which may simply encourage more through traffic.

4.8 Further assessments in respect to the exact mitigation measures for Codicote are still to be undertaken by HCC / NHDC. It is considered however that, as part of these development proposals, a financial contribution through a Section 106 process could be made towards any such mitigation measures within the centre of Codicote.

## **5 SUMMARY AND CONCLUSIONS**

5.1 RGP is commissioned by Ashill to advise on highway and transportation matters in respect to the proposed construction of 198 dwellings on land south of Heath Lane, Codicote ('the site').

5.2 This Note sets out matters relating to site access and transport impact associated with these proposals. In summary it demonstrates:

- i) Appropriate access to the site can be achieved for all users within public highway land or within land under Ashill's control. No third-party land would be required;
- ii) All existing public rights of way through the site would be retained, with a number of improvements made to these as part of this scheme;
- iii) A good level of permeability would be achieved through the site for non-vehicular users, enabling access to key local amenities;
- iv) The traffic generated by the proposed development, including in-combination with the other identified Local Plan sites for Codicote, would have a nil detriment or negligible impact upon the operation of key local junctions;
- v) A number of off-site highway improvements would be made as part of this scheme in order to improve pedestrian connectivity for existing and future users locally;
- vi) A parcel of land would be gifted to Codicote Church of England Primary School as part of this scheme in order to allow for the school's expansion;
- vii) The scheme would make a Section 106 contribution, if required, towards any forthcoming small-scale improvement works identified for the centre of Codicote. This would accord with the various modelling work and transport strategy documents that have been prepared in support of this Local Plan process.

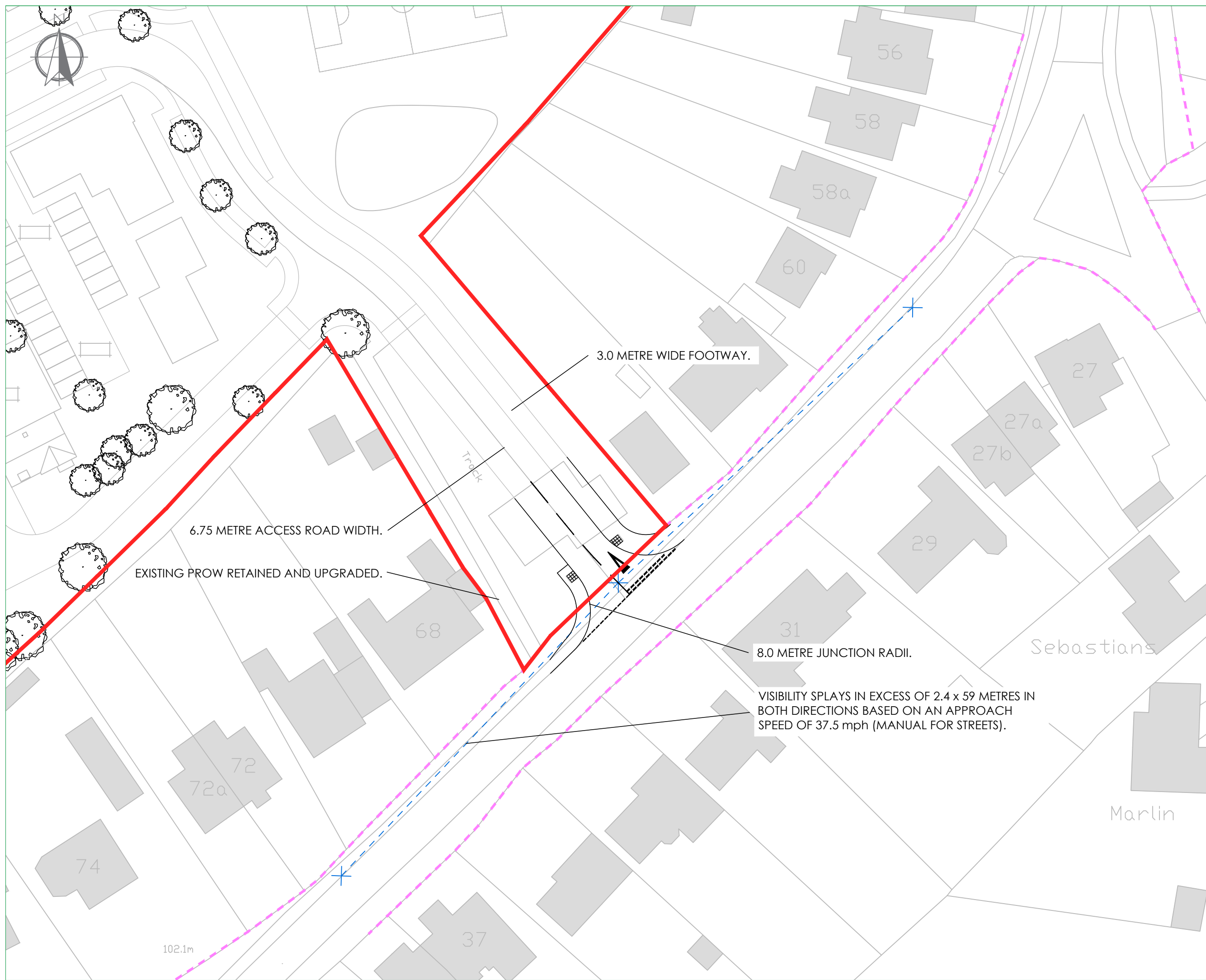
5.3 On the basis of the above it is apparent that the proposals would provide the necessary measures to ensure suitable access for all users and would include appropriate measures that would more than off-set any transport impact associated with these proposals.



# DRAWINGS

NOTES

- Site Boundary
- - - Visibility Splays
- - - Public Highway Boundary



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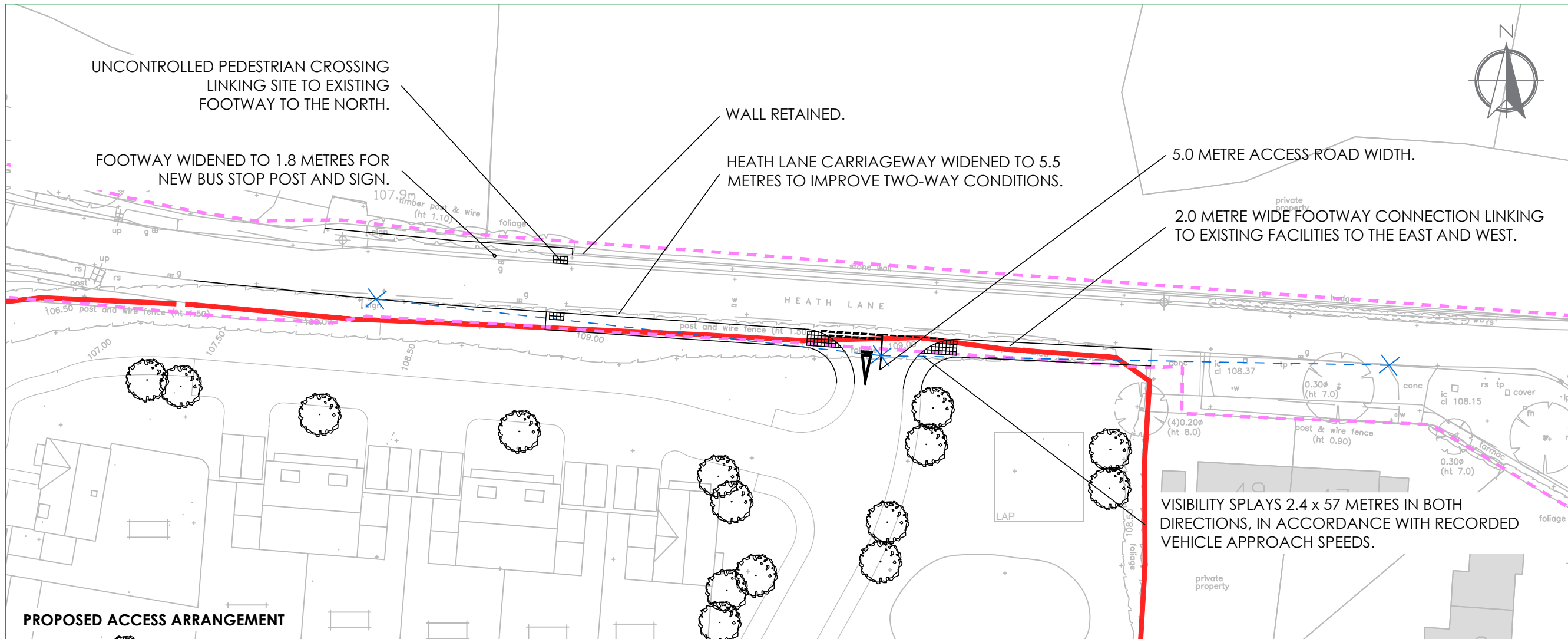


**rgp**  
 Transport Planning and Infrastructure Design Consultants  
 Shackleford Suite, Mill Pool House, Mill Lane, Godalming, GU7 1EY  
 Tel: 01483 861681 Fax: 01483 861682 www.rgp.co.uk

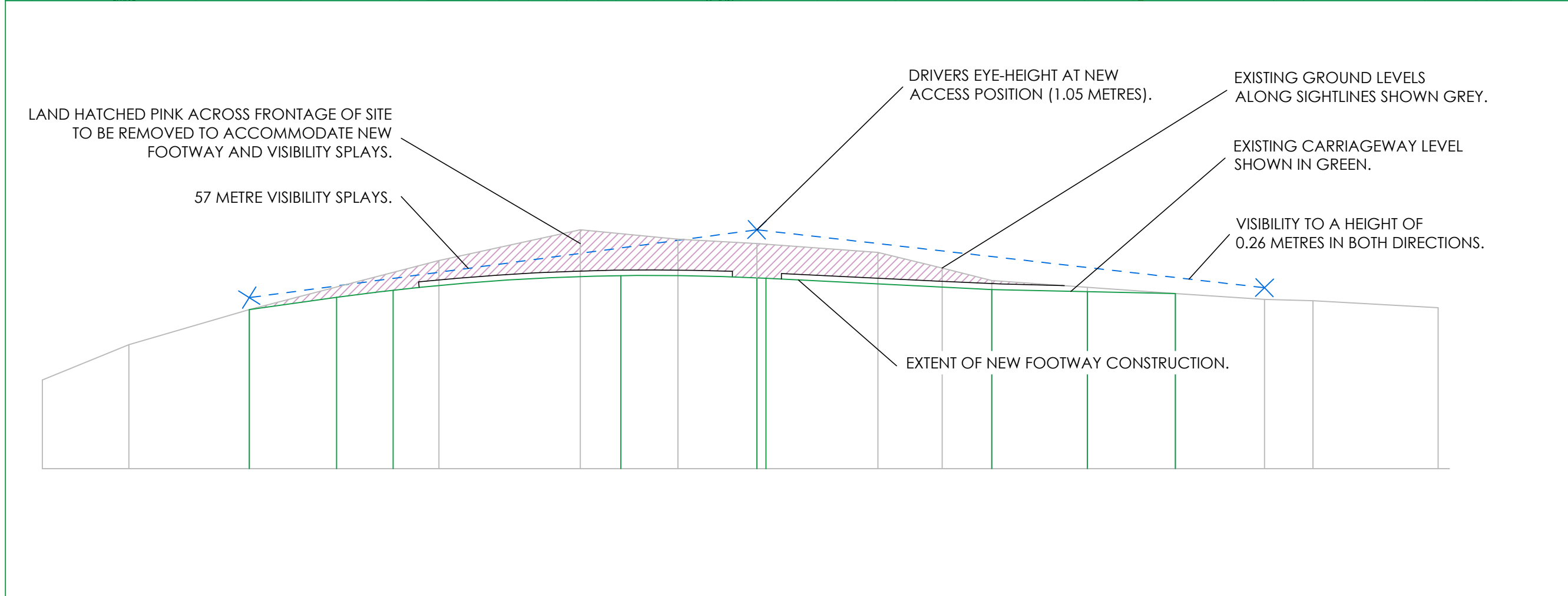
Client			
Ashill Group			
Project			
Land South of Heath Lane, Codicote			
Drawing Title			
Proposed Access Arrangement St Albans Road			
Scale	Drawn By	Checked By	Approved By
1:500	CEW	JCS	NDR
Date	Drawing No.	Rev.	
December 2017	2015/2368/001	E	



- Site Boundary
- - - Visibility Splays
- - - Public Highway Boundary



**PROPOSED ACCESS ARRANGEMENT**



**VISIBILITY IN THE VERTICAL PLANE**

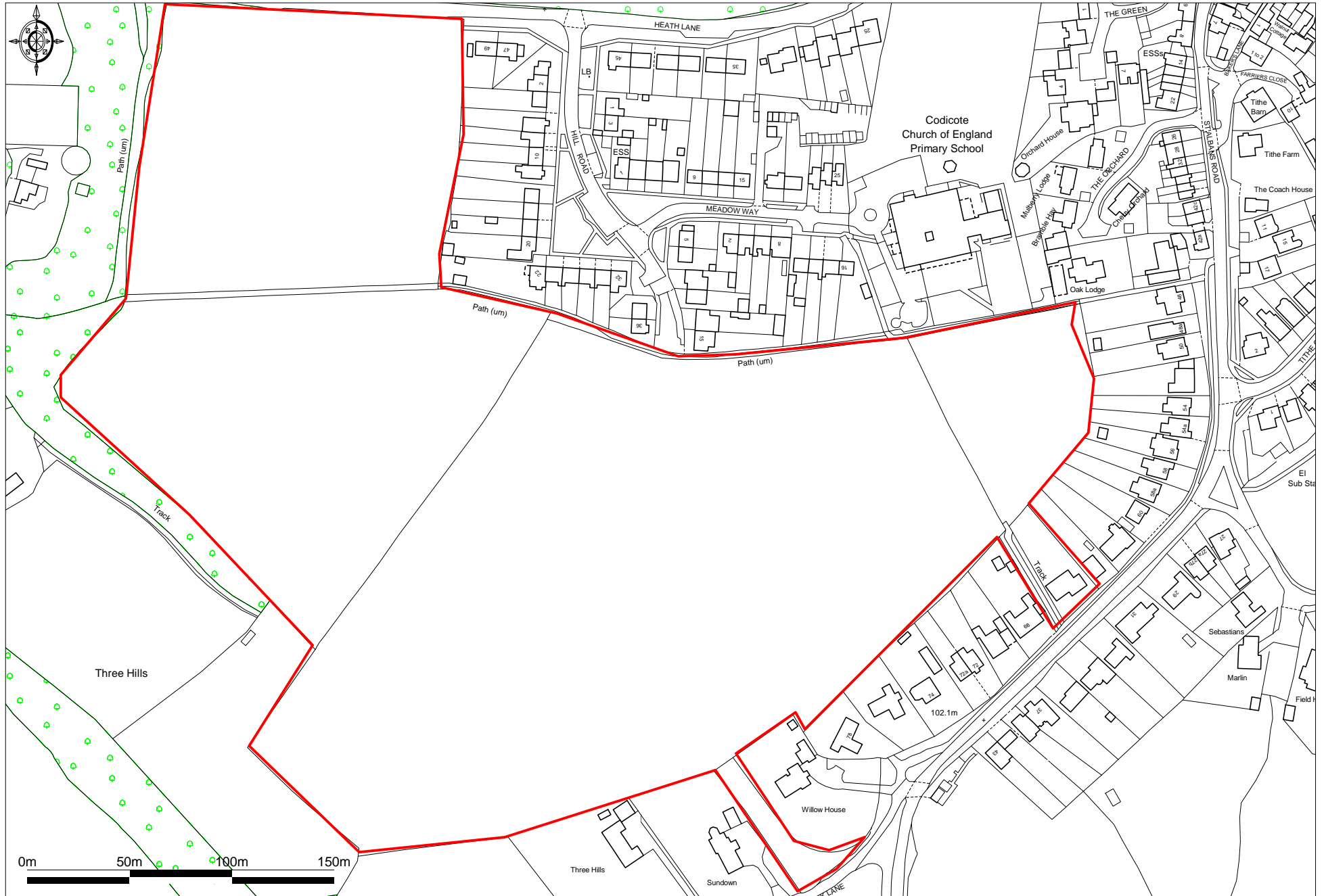
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Client Ashill Group			
Project Land South of Heath Lane, Codicote			
Drawing Title Proposed Access Arrangement Heath Lane			
Scale 1:500	Drawn By SAJ	Checked By JCS	Approved By NDR
Date December 2017	Drawing No. 2015/2368/003	Rev. C	

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## APPENDIX B



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## APPENDIX C

# **LAND SOUTH OF HEATH LANE, CODICOTE (REF: SITE CD5)**

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## **Appendix C: Green Belt Assessment**

January 2018

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# 1.0 Introduction

- 1.1 CBRE was appointed by the Ashill to produce a Green Belt Assessment for the land south of Heath Lane, Codicote. ('the Site'), on the south-west edge of Codicote.
- 1.2 The Site is allocated for 140 dwellings in the Draft Local Plan (ref: Site CD5).
- 1.3 This Green Belt assessment reviews the Site's existing contribution (see Figure 1 below) to the five Green Belt purposes defined by paragraph 80 of the National Planning Policy Framework (NPPF); namely, to:
  - 1. check the unrestricted sprawl of large built-up areas;
  - 2. prevent neighbouring towns merging into one another;
  - 3. assist in safeguarding the countryside from encroachment;
  - 4. preserve the setting and special character of historic towns; and
  - 5. assist in urban regeneration by encouraging the recycling of derelict and other urban land.

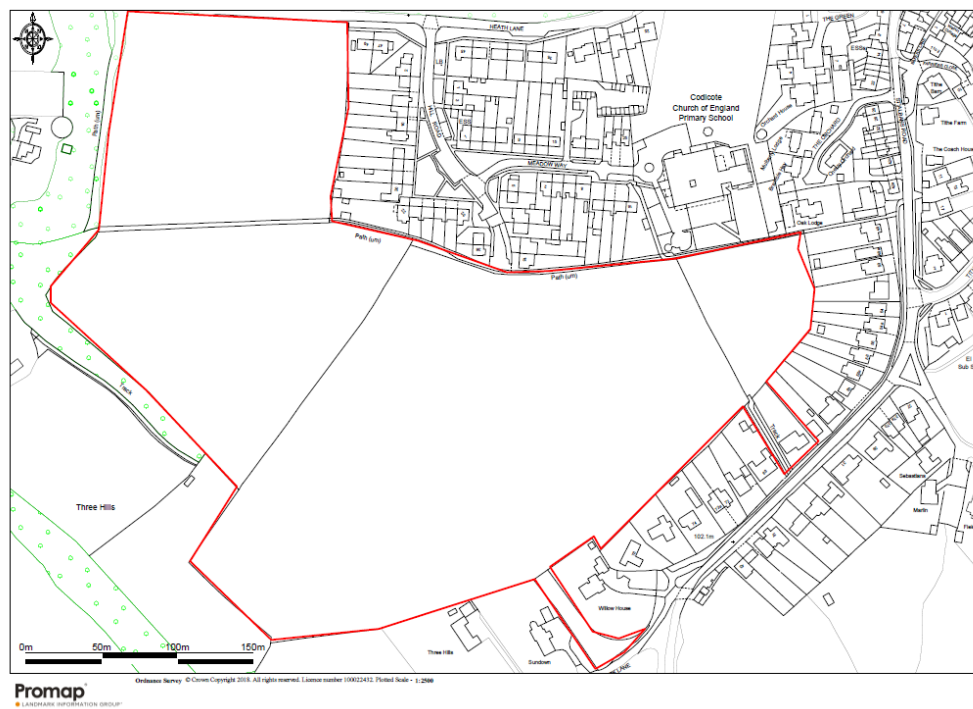


Figure 1: Site Location Plan

- 1.4 The contribution of the Site towards Green Belt purposes has been assessed by NHDC's Green Belt Review (July 2016). The Site is referenced as Sites 31 and 313 in the Review. Site 31 makes up the northern portion of the Site, and Site 313 makes up the southern portion of the Site.

## 2.0 Methodology

- 2.1 This Green Belt Assessment was undertaken using the methodology and scoring criteria described on pages 99 to 101 in NHDC's Green Belt Review Part. As such, the first four green belt purposes were assessed against the following criteria:

**Table 1: Green Belt Purpose Criteria**

1. Restricting sprawl of built-up areas

Criteria	Score	Description	Reason
Openness	1	Enclosed on all but one side by the same built-up area	The less open a site, the weaker its defence in checking sprawl
	2	Adjoining built-up areas on two sides with two sides open.	
	3	Adjoining a built-up area on one side or none.	The more open a site, the stronger its defence in checking sprawl
		<b>OR</b>	
Impeding ribbon development	1	Contains development along a distributor road which extends beyond the existing built-up area.	Sites containing ribbon development are weaker in checking unrestricted sprawl
	3	Does not contain development along a distributor road which extends beyond the existing built-up area	

2. Preventing towns merging

Criteria	Score	Description	Reason
<b>For town site</b>			
Distance between the site's outer boundary and nearest town built-up edge in direction of growth	1	More than 5km	A lower score denotes a lesser role in fulfilling the Green Belt purpose
	2	2-5km	

	3	Less than 2km	
		OR	
<b>For village site</b>			
	1	More than 2km	A lower score denotes a lesser role in fulfilling the Green Belt purpose
	2	Less than 2km	A higher score denotes a stronger fulfilment of the Green Belt purpose

### 3. Safeguarding the countryside

Criteria	Score	Description	Reason
Settlement boundary	1	The site is inside the existing settlement boundary	Sites within the settlement boundary make less contribution to the countryside
	2	The site is partly inside and partly outside the existing settlement boundary	
	3	The site is outside the existing settlement boundary	Sites outside the settlement boundary are already contributing to the countryside

### 4. Preserving the setting and character of historic towns

Criteria	Score	Description	Reason
Conservation Area	1	Not within, nor adjacent to nor affecting the setting of a conservation area of a historic town	
	2	Adjacent to a conservation area of a historic town or affecting the setting of a historic town	
	3	Within a conservation area of historic town	Sites containing or adjacent to a conservation area are considered to better contribute to and



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			preserve the setting and character of historic towns
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- 2.2 In line with NHDC's Green Belt Review methodology, the fifth green belt purpose (assisting urban regeneration), was not considered as part of this assessment, as the other four purposes were all deemed to contribute to urban regeneration.

## 3.0 Appraisal of Contribution to Green Belt Purposes

- 3.1 The Site has been assessed against the criteria set out in Table 2.1, and commentaries on the assessment of each criteria are detailed below:

**Table 3.1: Assessment of Site against Green Belt Purpose Criteria**

Criteria	Score	Commentary
1 Sprawl	2 – Adjoining built-up areas on two sides with two sides open	The eastern and south-eastern parts of the Site are enclosed on all but one side by built development lying within the existing urban boundary of Codicote (representing a score of 1), whilst the remainder of the Site adjoins a built-up area on one side only (representing a score of 3), resulting in an overall Site score of 2.
2 Towns Merging	1 – More than 2km	The Site lies over 2km from Kimpton and Welwyn, the nearest adjacent settlements with defined settlement boundaries.
3 Safeguarding Countryside	3 – The Site is outside the existing settlement boundary	The Site lies outside the existing settlement boundary of Codicote.
4 Preserve settings of historic towns	1 – Not within, nor adjacent to nor affecting the setting of a conservation area or historic town.	The Site does not lie within, nor adjacent to the Codicote Conservation Area. On site appraisal confirms the Site does not contribute to the setting of the Conservation Area.

### Boundary Detail Assessment

- 3.2 The majority of the Site is defined by strong boundaries, as described by the NHDC's Green Belt Review on page 100:
- Heath Lane provides the northern boundary to the Site;
  - the Site adjoins existing residential development to the north-east, east and southeast;
  - the western site boundary is defined by belt of tree and scrub vegetation; and
  - the south-western site boundary is defined by a steep slope and a belt of tree and scrub vegetation.
- 3.3 The southern site boundary is currently comprised of a post and wire fence, and would be classified as weak.

## 3.0 Appraisal of Contribution to Green Belt Purposes

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### Overall Contribution

- 3.4 The NHDC Green Belt Review assesses each site's overall contribution to the Green Belt. The Site's overall score is 7; and it is considered that overall it makes a moderate contribution to Green Belt purposes.

## 4.0 Conclusion

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### **Existing Assessment of Site 31 (Northern Portion of the Site)**

- 4.1 Site 31 is given an overall score of 8 in the NHDC Green Belt Review; namely it makes a moderate overall contribution to the Green Belt. This is one point greater than the overall score assessed for the Site in this study. This is because the wider site is less open and more enclosed by existing built-up areas in the eastern part of the Site (this relates to the first Green Belt purpose - restricting sprawl of built-up areas).
- 4.2 The Site and Site 31 score equally on the remaining three Green Belt purposes.

### **Existing Assessment of Site 313 (Southern Portion of the Site)**

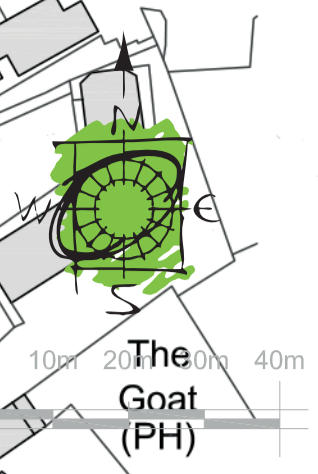
- 4.3 Site 313 is given an overall score of 7 in the NHDC Green Belt Review; namely it makes a moderate overall contribution to the Green Belt.
- 4.4 The Site and Site 313 score equally on the four Green Belt purposes.

### **Conclusions for the Site**

- 4.5 The Site is assessed as making a moderate overall contribution to the Green Belt.
- 4.6 This assessment concludes that development of the Site would not significantly infringe on the purposes of the Green Belt, as defined by paragraph 80 of NPPF.
- 4.7 Furthermore, with the exception of the southern boundary, the remaining site boundaries are classified as strong. There would also be scope to make the southern site boundary strong, should the Site be developed, through the planting of a belt of screening trees and shrub vegetation along this boundary. This would provide a more robust urban edge to Codicote than presently exists, with the south-west edge of the settlement currently comprised of a variety of back garden boundary treatments, which would be classified as weak by the NHDC's Green Belt Review.

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## APPENDIX D



Revised Illustrative Masterplan  
 Heath Lane, Codicote, Herts  
**16208 / SK28C**  
 Scale 1:1000 @ A1 August 2017

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