



**REPRESENTATIONS RELATING TO THE
CONSULTATION REPORT ON THE SUBMISSION
VERSION OF A REPLACEMENT NORTH HERTS
DISTRICT LOCAL PLAN 2011 – 2031 AND IN
PARTICULAR, WITH REFERENCE TO THE
PROPOSED RELEASE OF LAND SOUTH OF
COWARDS LANE, CODICOTE FOR A
DEVELOPMENT OF UP TO 73 RESIDENTIAL UNITS
(Site Reference CD1)**

**SUBMITTED ON BEHALF OF MR PETER BARROW, AND
MRS SANDRA BARROW OF HOLLARDS FARM, CODICOTE
ROAD, CODICOTE, AL6 9UH, AND A NUMBER OF OTHER
LOCAL RESIDENTS**

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1. INTRODUCTION

1.1 I am Christopher John Watts, MRTPI DMS, a qualified town planning consultant and a full member of the Royal Town Planning Institute. I have had 40 years' experience in both the public and private sectors, including working for a number of local planning authorities in Hertfordshire. I am submitting this report on behalf of my clients to make a number of objections to the Submission Version of the new replacement Local Plan for the District for the period 2011 to 2031. These representations are also supported by a Technical Paper and Appendices from Cannon Consulting Engineers relating to the highways and traffic impacts of the potential development of the site on land south of Cowards Lane, Codicote (ref CD1/ex 29), dated 19th January 2015. Their broad conclusions are referred to later in this Statement.

1.2 I submitted previous representations and a detailed report in response to the Preferred Options paper in early 2015, but the Council has confirmed to my clients that those previous representations will no longer be taken into account. This report is therefore intended to update those earlier representations and will have to be taken into account by the Council and the appointed Inspector in due course.

BASIS OF OBJECTIONS

1.2 My clients object on the grounds that:

1. The spatial strategy for the Local Plan Submission Version for the period between 2011 - 2031, is based on the concentration of housing growth and other new developments in and around the main settlements and larger villages of the District on previously developed and brown field land, and the release of a significant level of Green Belt land, around a number of towns and smaller settlements such as Codicote in order to meet all the objective housing needs that have been assessed. Compensatory replacement Green Belt land is also proposed in a few locations.
2. However this latest version of the emerging replacement Local Plan is still flawed in a number of respects, in particular that the ability of some of the larger villages and their infrastructure and essentially rural characteristics, in particular Codicote, to absorb residential development of the scale proposed. In the case of Codicote it is proposed that the village could accommodate 364 new houses in the plan period, as well as six new traveller pitches (12 homes). This is an even larger number than was previously proposed in the Preferred Options paper (220 dwellings). The latest proposals are shown on the plan at Appendix 11.
3. The potential very harmful effects on the people of Codicote of having to deal with this even greater additional level of housing growth and development have not been taken sufficiently into account in developing the Submission Version of the new Local Plan.

4. In addition reliance on the release of Green Belt land such as the site south of Cowards Lane, in Codicote (CD1), will cause significant harm to the openness, visual amenities, character and appearance of the Green Belt in this area and on the village, its road network, and on the rural character and appearance of Codicote. This level of growth in the Green Belt would also undermine the essential aim and purposes of designating a Green Belt in the first place, which even meeting an objectively assessed housing need, in itself, should not override in this particular case.
5. It is still not clear from the summary of key criteria set out for this site on page 152 and 153 of the Local Plan if the District Council has really taken full account of the cumulative impact on Codicote, the High Street, and the road network in and around the village, of the level of proposed housing growth in and around Codicote, as well as the likely level of traffic and vehicle movements which will be generated on the B656 from developments already being built in and around Welwyn, and being currently proposed through Welwyn Hatfield Borough Council's own emerging replacement Local Plan.
6. The growth being planned for the land west of Stevenage and east of Luton will also add a significant level of road traffic and pollution which will have a direct impact on the amenities and environment of existing residents in all small settlements in this District.
7. A sequential approach to the development of brown field land before any Green Belt land is released for housing has still not been included in the Submission Version of the new Local Plan and made a much more integrated key objective of the spatial strategy in the emerging Local Plan, if the plan is to be argued to be properly sustainable.
8. In other words, no existing Green Belt land should be released around Codicote until all other opportunities on previously developed sites within this, and other settlements in the District have been exhausted and delivered on the ground.
9. The offered area of land which would be included within a new area of Green Belt elsewhere in the District, as compensatory Green Belt, is still not seen by my clients as truly compensatory or located in a part of the District which would be readily accessible to residents of Codicote to use or enjoy. That land is a substantial distance away from the site at Cowards Lane and Codicote, which is land which local residents have used for many years for informal recreation and as access across the fields and other public rights of way. This latter point is addressed later.
10. The Council's overall approach to finding housing land is deeply flawed. It has made agreements with both Luton Borough Council and Stevenage Borough Council to find sites or to 'safeguard' land for housing that each of those Boroughs purportedly cannot find within their own administrative boundaries. It is not acceptable to add to

the Council's own housing requirement in the Plan Period (derived from the objectively assessed housing need) in this way where, as is the case here, it results in wholly unsuitable and harmful housing sites being allocated in villages such as Codicote. It should be noted that the land to the west of Stevenage is proposed to accommodate 3,100 dwellings, with the land east of Luton proposed to accommodate 2,100 dwellings of which 1,950 dwellings are proposed within this District to help meet Luton's unmet housing needs.

11. Moreover, the effect is to increase the burden on the number of housing sites which may have to be allocated in the Green Belt. It is not a coincidence, that a further area of land in the Green Belt off Heath Road in Codicote, has been added to the amount of land, proposed to be released from the Green Belt around Codicote. Green Belts should be permanent and only very exceptionally altered. Planning Practice Guidance (PPG) states:

“The Duty to Cooperate requires authorities to work effectively on strategic planning matters that cross their administrative boundaries. The Duty to Cooperate is not a duty to agree and local planning authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the National Planning Policy Framework, for example policies on Green Belt, or other environmental constraints.” *Reference ID: 9-021-20140410*

NHDC is not obliged **to accept** the unmet needs of other planning authorities and to do so would be inconsistent with Green Belt policies and other environmental constraints.

12. Furthermore, the Council has simply chosen the wrong Preferred Option. **The alternative option of meeting housing and other needs in a new settlement, together with using brown field sites within settlements is in strategic environmental terms, still a clearly better option in our view.**
13. The Sustainability Appraisal which still underpins this Submission Version of the new Local Plan is still flawed in that it does not adequately assess the likely significant beneficial effects of that alternative spoke of a spatial strategy (when compared to the alternative of major releases of Green Belt land around established settlements).
14. It would appear that instead the Council is now reliant on a report carried out in 2016 by ATLAS for the Council (North Hertfordshire New Settlement Study) to justify not bringing forward that new settlement for the foreseeable future. Yet the land proposed for East of Luton and West of Stevenage is more than 40% of N Hertfordshire's own housing needs in 2015, and more than 33% in 2016.

15. The ATLAS Report is very comprehensive and recommends a forward strategy to the Council once an earlier Scoping study has been undertaken. That scoping study should include the justification for a new settlement; its form and size; the role of the District Council; resourcing; and the preferred means of delivery.
16. The Council has confirmed explicitly in paragraph 4.100 that it... *''recognises many of the merits of this argument. In the longer term, continual incremental additions to existing settlements may not be the best solution''*
17. If this is the case why has the Council concluded that a new settlement, even of only 5,000 dwellings, not been given a higher priority as part of the proposed Local Plan, and effectively been put back until another future Local Plan replaces this one?
18. The Council also asserts in paragraph 4.103 that... *''If a new settlement is pursued, it would be unlikely to meet all future needs and it would probably still remain necessary to identify additional sites''*.
19. This surely depends on the size of the resultant new settlement, and implies that even if the Council has acknowledged that the continued release of sites around established settlements, such as Codicote, is not the best solution. Once allocated, such sites are not going to be withdrawn and will remain as allocations, even if significant harm is caused to those existing settlements and their infrastructure.
20. In addition, the previous NHLP - Preferred Options Consultation left out of account the Ministerial Statement made on 6 October 2014 to prioritise the development of brown field land. The sites that have so far been allocated have been allocated prior to that advice being articulated in the way it was.
21. The weight that a local planning authority now has to give brown field sites in local plan preparation represents a step change. Furthermore, those making the value judgements as part of the Sustainability Appraisal have also done so, in the absence of that Ministerial advice.
22. Given the demanding housing requirement settled on by the Council, for the purposes of the Submission Version, it is my clients view, that the Council ought also to be in discussions with Welwyn Hatfield Borough Council (WHBC) as well as with other local authorities, to request that it finds land within its boundaries to take up the housing that cannot be reasonably provided in the North Herts District area in the Plan Period.
23. NHDC should be engaging constructively with WHBC pursuant to the duty to co-operate in s33A of the Planning & Compulsory Purchase Act 2008. I can see no evidence in the Submission Version of the Local Plan that such co-operation and

discussions with Welwyn Hatfield Borough Council have taken place. The failure to properly discharge that Duty could then result in the failure of the Local Plan.

24. There is a need for the Duty to Co-operate to be extended to Welwyn Hatfield Borough Council because of the potential very serious impacts of both authorities attempting in isolation, to meet their needs in the Codicote to Welwyn Corridor, on the Green Belt, on the traffic conditions on the B656, on road congestion in the wider area, and on existing infrastructure and education facilities over – capacity. If the Submission Version is pursued without applying that Duty to Co-operate to Welwyn Hatfield Borough Council in a pro - active and continuous manner, then this plan should fail in law.
25. There is very little evidence available either, that the local planning authority has applied a parallel policy of co-operation with Codicote Parish Council, who are preparing a Neighbourhood Plan for Codicote, the area of which has been agreed already by the District Council in June 2014.
26. If they had done so then the land south of Cowards Lane would not, most likely have been allocated in the Submission Version of the new Local Plan for housing and to be taken out of the Green Belt, since the Parish Council has previously objected to the inclusion of the site and its release from the Green Belt, in the 2009 consultations, and continues to do so.
27. It would also be premature to agree to release any other Green Belt land around Codicote before that Neighbourhood Plan had been consulted on and adopted by both authorities.
28. In addition the High Court has previously held that there is nothing in the Neighbourhood Planning (General) Regulations 2012 to prevent neighbourhood planning forums from allocating sites for housing in their Neighbourhood Plans (Larkfleet Homes Ltd v Rutland County Council (2014) EWHC 4095 Admin). Therefore it would be far more appropriate and would better reflect Government policy on localism, to allow the Parish Council to put forward sites for housing in and around Codicote through the neighbourhood planning process.
29. In any case, such significant harm would result from the release of the land south of Cowards Lane, from the Green Belt and its development for up to 73 residential units. And that such a release or development of that site, should not form part of the future new Local Plan for the period up to 2031.
30. This is not to say, that such a consultation with those other Councils would find that the site on land South of Cowards Lane should be released from the Green Belt to assist North Herts District Council, or even Welwyn Hatfield with its own unmet housing needs, or that it should be included in the Codicote Neighbourhood Plan.

31. In fact such co-operation would surely result in a shared acceptance by all three Councils that the Codicote Road, and Codicote as a village cannot sustain such growth in housing and traffic levels, as now proposed.
32. The Submission Version of the Preferred Options for the Local Plan 2011 to 2031 still only allows for the bringing forward of land West of Stevenage to provide a further 3,100 homes much later on in the plan period after 2026, although the designation of that land is proposed to be altered to safeguarded land and the Green Belt designation lifted sooner.
33. The use of the concept of safeguarded land as a designation should be wholly rejected by the Council at this stage and if not, by the Inspector at the examination in chief of the Submission Version. Given the onerous task of finding sites in NHDC especially given its expansive Green Belt swathes, land within NHDC should either be allocated for housing or not allocated for housing.
34. In this particular case, the use of the concept of “safeguarded” land merely cloaks the fact that the land will be favourably received for housing in the future. In effect, it removes a large section of the District Council’s for consideration in this Plan as housing land. By doing so, it takes that land out of consideration for meeting NHDC’s housing needs and transfers enormous pressure onto the remainder of the District. It results in wholly unsuitable Green Belt sites like Cowards Lane being earmarked for housing development. In many cases, such allocations will be unnecessary.
35. It is the view of my clients that if that major site and potential allocation west of Stevenage was brought forward much earlier in the Plan period, then Green Belt sites such as that at Cowards Lane on the edge of Codicote would either potentially not need to be released from the Green Belt in the Plan period at all or substantially fewer Green Belt sites would need to be released.
36. In addition, an earlier development of that site, even in phases, would assist the growth of Stevenage as a major strategic employment centre on the A1(M) thus providing more employment opportunities for residents in North Herts as well as those in Stevenage. It would also enable the widening of the A1(M) earlier than planned, which would be beneficial given the significant levels of traffic congestion on that motorway between Welwyn Garden City and Stevenage that occurs very frequently at peak travel times.
37. The report of the Head of Planning at Stevenage Borough Council to their Executive Committee on 20th January 2015, advises that the first consultation on the Borough’s own local plan was conducted in 2013. This identified a preferred option of 5,300 new homes to meet Stevenage’s own needs over the period 2011-2031. This was based on population and household forecasts available at the time. It was also considered to be

the maximum amount of development that could be accommodated within the Borough.

38. Since this point, updated population projections have been released for the Borough. These suggest that the new household projections will show a significant increase in requirements for Stevenage above those considered in 2013. Government guidance is clear that these figures should provide the 'starting point' for the consideration of any local plan housing target.
39. Until the new household projections are released, it cannot be definitively said whether or not the Borough Council would be able to accommodate their requirements in full within the administrative boundaries. However, it is considered highly likely that meeting the projections would require most, if not all, realistic development sites within the Borough to be utilised in the current local plan cycle.
40. In this context it would surely be better if the land West of Stevenage was brought forward at the earliest time possible and much sooner than the Submission Version consultation document suggests, so that the co-ordination and linkage between new housing and new employment land could be properly master planned and commenced on the ground.
41. The Submission Version of the proposed replacement Local Plan, as was the Preferred Options Consultation document, is also based upon an evidence base which is flawed in terms of firstly, having a full understanding of the capacity of infrastructure and education facilities that exist in Codicote to be able to accommodate the proposed levels of housing growth, now proposed at 364 dwelling units, in and around Codicote.
42. Secondly the Submission Version of the proposed replacement Local Plan does still not demonstrate any real understanding of the role that the site on land south of Cowards Lane plays in upholding a number of key purposes of Green Belt designation and the potential impact of a high density residential development on this very sensitive rural fringe site.
43. It continues to be the view of my clients that the existing highways, sewerage infrastructure, power infrastructure, and education and health facilities in this village cannot cope with more housing of the scale envisaged. For example, Welwyn Hatfield Borough Council in its response to the North Herts Preferred Options consultation document in 2015 confirmed that:

"There are significant constraints on the capacity of infrastructure to deal with waste water. The East of England Capacity Study identified significant capacity difficulties at Rye Meads sewage treatment works which serves much of the north of Welwyn Hatfield, as well as Codicote and Knebworth, and

other areas proposed for new housing developments within the East of England.”

44. In addition, it should also be noted in terms of water abstraction from rivers to serve residential areas and agriculture that from April 2018, the Environment Agency are going to revoke the licence currently with Affinity Water, to abstract any water from the river at Fulling Mill (see extract, and more recent e mail my clients have received at Appendix Twelve) in order to protect the river Mimram.
45. In relation to current health services serving Codicote, Knebworth has a surgery but Woolmer Green does not. The Bridge Cottage GP Practice serves Welwyn, some (Welwyn side) parts of WGC including Knightsfield, Woolmer Green, Datchworth, Knebworth up to the round-a-bout (even though they have their own surgery), Kimpton (where they hold a small surgery each morning), Codicote, Driver's End, Rabley Heath, Oaklands, as well as some other small villages surrounding these areas. The parking spaces at The Bridge GP Practice in Welwyn are always full and the car park is at capacity and cannot be extended any further.
46. However they have 16,000+ patients already and expanded the surgery up to full capacity a few years ago. It must be questionable if they do indeed have there is no room or space for extra capacity for any more GP consulting rooms.
47. Their list includes two care homes which also have to be visited, almost daily by a duty doctor. Within the past 18 months, due to patient number pressure, casual surgeries have been discontinued, in favour of appointment only consultations. Appointments are scarce, with waiting times of two weeks or more. With an influx of so many extra patients, the GP practice may have to redefine its patient area, with a consequent impact on Codicote.

2. LAND SOUTH OF COWARDS LANE, CODICOTE (CD1)

2.1 Turning to the detail of the potential harmful impacts of developing the site on land South of Cowards Lane, which is shown edged in red on the site location plan at Appendix One, these would be significant.

2.2 The Submission Version of the Local Plan sets out on page 152 a number of key criteria which it considers should be addressed in order to bring forward 73 dwellings on this allocated site on the edge of Codicote. My clients, in their previous representations on the Preferred Options consultation document, set out a far wider and more detailed review of the sort of impacts and harms that development of this site would result in. They are repeated below, but before expanding on them, it should be noted that the criteria set out in the Submission Version on page 152 **do not include that:**

- The land is an ancient pasture, “Unploughed in living memory” A required assessment of landscape impacts is essential;
- A required assessment of the limitations and constraints in place now of Cowards Lane in terms of its width, character and proximity to other dwellings;
- A required assessment of archaeological remains likely to be found;
- A required assessment of the previous and current use of the land for informal recreation and access use;
- A required assessment of power, sewerage, education, health and other local infrastructure limitations and capacities;
- A required assessment on the effects on Mr and Mrs Barrow’s ability to continue to maintain their land holding at Hollards Farm, which is adjacent to, and co-existing with the land south of Cowards Lane.

2.3 All these other and very serious potential constraints were identified by my clients as part of their previous representations on the Preferred Option consultation. It is completely unacceptable that the above constraints and issues are not included in the list of criteria set out by the Council on pages 152 of the Submission Version consultation document. In this context it is therefore important to repeat what we stated then as follows:

2.4 Our concerns regarding the development of site CD1 relate in the main to:

- The impact on the openness, character, appearance and visual amenities of this part of the Green Belt and the countryside, and this part of the village itself;
- The impact on the capacity of the local highways, sewerage and power infrastructure, and education and health facilities;
- The impact on the archaeology and ecology of the site and the surrounding land which includes a County Wildlife Site ref 43/042 (Hollards Farm Meadow) immediately adjacent to the site in question; and supporting two natural ponds;
- The impact on the current informal use of the land for recreation and as informal rights of way;
- The impact on my client’s management of the land and holding at Hollards Farm itself.

a. Green Belt and countryside impacts

2.5 Although the National Planning Policy Framework (NPPF) allows for a comprehensive review of Green Belt boundaries as part of the development of a new or replacement Local Plan, it also advises that Green Belt designation can also mitigate against the Council in question being able to meet its objectively assessed level of housing need.

2.6 In addition the NPPF also advises that new Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent.

2.7 In the case of the land South of Cowards Lane, Codicote, this Green Belt guidance in the NPPF would certainly apply in my client's view. Firstly, the value of this site in Green Belt terms is such that it should not be released from the Green Belt, and secondly there is already a very clear, permanent and recognisable boundary between the settlement of Codicote, and this Green Belt land marked by Cowards Lane and the ancient hedgerow on the southern side of that road. The District Council has recognised this fact in its Green Belt Review documentation, Part 2, Table 7.

2.8 In addition, in the case of the review which North Herts District Council has undertaken of its own Green Belt boundaries, this has, from a review of the summary findings, substantially underplayed the impact of a residential development and major road improvements on this site, and on the openness, character and appearance of the Green Belt.

2.9 For example the spreadsheet in Appendix 2 to the Matrix of Sites advises for site CD1 that under the heading of 'suitability' it is capable of delivering a residential development. In addition, under the heading of 'achievability', that the site is green field with no obvious factors that would influence viability. This is attached as Appendix Two to this report.

2.10 These statements can still reasonably be challenged in my view on the grounds that the site is clearly not suitable for a high density residential development of the scale envisaged by the local planning authority (73 units) and that to achieve such a development would entail major engineering works at the point of access and all along Cowards Lane, as well as on site to facilitate all that housing, the internal road network and car parking. This would completely change the whole fabric and rural character of this end of the village, to its detriment.

2.11 The land rises up from Cowards Lane, and it could also be reasonably argued that the necessary street lighting and lighting from houses, and cars exiting the development would add significantly to light pollution, thus urbanising further this end of the village, and harming nocturnal wildlife, including owls and bats that breed in the adjacent nature reserve. The increase of domestic cats on the development would drastically affect the birdlife and small mammals that currently thrive on the nature reserve.

2.12 In addition, in the Green Belt Review documentation Report 1b, at page 44, the Table summarising the Council's assessment of the role of each site in Green Belt terms, it is concluded that site CD1 only makes a moderate contribution to the Green Belt overall. The summary table also advises that the site adjoins the built up area on two sides. The relevant pages are attached at Appendix Three.

2.13 This assessment can be reasonably challenged. In terms of the topography and landscape value of the site, the site makes a much greater contribution to the qualities of the Green Belt

than is assessed. The loss of the site would also result in the beginning of the erosion of the strategic gap between Codicote and Welwyn, a factor which the District Council itself acknowledges elsewhere must be taken into account.

2.14 It should also be noted that the government published further guidance on the protection of the Green Belt under the National Planning Policy Framework (NPPF) in early October 2014 and added this to the on line Planning Practice Guidance notes on 6th October 2014. The updated version is attached as Appendix Four.

2.15 An accompanying press release on 4th October by the Department for Communities and Local Government (DCLG) advise that brown field land should be prioritised and that Councils should use their Local Plan, drawing on protections in the NPPF, to safeguard their local area against urban sprawl, and protect the green lungs around towns and cities. DCLG also advise that once they have been established, Green Belt boundaries should only be altered in exceptional cases, and that this should be done through the preparation or review of the Local Plan. This is attached at Appendix Five.

2.16 That Press release confirmed that housing need does not justify harm to the Green Belt. This latest guidance makes clear that the NPPF should be read as a whole, and that housing need is not the only issue to be considered in drawing up a Local Plan, it is just the first stage in that consultative and plan making process.

2.17 In relation to the specific harm caused by any residential development of the scale anticipated by the local planning authority, it is firstly important to consider that the NPPF confirms that the fundamental aim of designating Green Belts is to maintain their openness.

2.18 In addition the NPPF also sets out five main purposes of such a designation. In the case of this particular site, it is considered that not only would the openness of the Green Belt be completely lost, but that several purposes of designating a Green Belt would be undermined.

2.19 In particular, the development of this site for housing for 73 units, would, in relation to the purposes of Green Belt designation:

- erode the strategic gap between Codicote and Welwyn and make it more difficult to stop the merger of those two settlements;
- add to encroachment of urban development in the open countryside; and
- not enable the regeneration of, and would weaken the ability of the local planning authority to achieve the delivery of derelict urban sites in Codicote and elsewhere as part of a sustainable and sequential approach to the delivery of new housing sites.

2.20 In addition that scale of development as proposed and estimated by the local planning authority to be 73 units, on a site which rises up on a slope to a hill top, would completely dominate the views and outlooks from the surrounding residential areas; Hollards Farm itself and public rights of way in the local area. The topography of the site does not lend itself to a residential development of up to 73 units, and the land form would be completely changed through such an urbanising form of development.

2.21 The introduction of this scale, high density and suburban nature of residential development would not only destroy the openness of the Green Belt, but significantly harm the character, appearance and visual amenities of the Green Belt as a result. For example, a development of 73 houses could well involve, more than the current parking spaces planned and the need for the introduction of for at least 110 - 146 car parking spaces/garages, based upon an average on - site provision of 1.5 – 2 spaces per unit.

2.22 It is in practice more likely that many of those dwellings would have at least 2 on site car parking spaces or garages. The site could not possibly accommodate all that car parking without a significant urbanising impact on the land itself. In addition if the local planning authority wished to restrict the amount of car parking on the site for that very reason then there would almost inevitably be a significant proliferation of car parking in surrounding streets.

2.23 However, the High Street is already full of cars parked when commuters return home from work, and until the next morning when they leave again for work. The pavement widths cannot be reduced to widen the road and try to improve traffic flows. There is no available adjacent site for more car parking and no space on the single track Cowards Lane.

2.24 A survey was conducted by my lead client earlier this year of the car parking situation along the High Street. The survey of parking was undertaken on Friday evening on 19th November 2016 at 18.50pm.

2.25 On the South side of the High Street, the High Street runs from S East (Welwyn end) to N West (Hitchin end) there were 68 cars and one motorbike noted as being parked with no spaces available to park in save the driveways of houses. There were three cars parked in or straddling the marked bus 'pull in' and two cars straddling the disabled box. (Presumably, any bus stopping would stop and hold up the traffic?).

2.26 From the junction of Cowards Lane until house number 206, for a distance of about 25 metres, the cars had been parked on the narrow pavement, forcing pedestrians off the pavement into the road, or to cross it instead

2.27 On the opposite side of the High St, the Council has installed anti parking bollards on the pavement and the pavement is very narrow from The Globe PH until past the local Pharmacy with the result that there are now less parking spaces that are potentially available.

2.28 Cowards Lane and the hedgerow running along its southern side, would be completely dominated by the new residential development and required highway works and roundabout. Cowards Lane along the entire length has no pavement and for 80% of the Lane, it is a single track lane that affords little space for passing by. Drivers often using the driveways of houses on the northern side of the Lane. Cowards Lane is also used as a cut through from the B656 High St, to the St Albans Road for builders going to the quarry, apart from commuters.

2.29 The Lane, which is a single width lane with passing only achieved by using the access drives of the houses and drives along the lane very narrow and has no pavement for pedestrians at present and no room for car parking on either side, would have to be widened along its full length, which is not possible due to existing homes have new street lighting, and would cease to be rural in character containing features such as a mature hedgerow, which is consistent with the character of this part of the countryside.

2.30 However the Lane cannot be widened along its full length in any case because of the narrowness of the road.

2.31 The village would also lose an existing and long standing settlement boundary which is clearly defined and defensible in Green Belt terms. Once this site is developed, there would be nothing to stop other land between Welwyn and Codicote from also being developed, thus resulting in the potential merger of the settlements of Welwyn and Codicote, something which one of the very purposes of designating a Green Belt is intended to avoid.

2.32 The scale of the necessary new highway improvements along Cowards Lane and at its junction with the High Street and Codicote Road, B656, would also completely change the nature of this end of the village and result in a much harsher, engineered and car dominated urban form.

2.33 Because of the significant increase in car borne traffic which this development would also result in and as evidenced in the Technical Paper from Cannon Consulting Engineers,, other consequential alterations to the road through the village would also be required, which could in practice change its character from a self contained and pleasant village to a congested, polluted, and much more urban environment (see Cannon report 6.1-6.2)

2.34 It should be noted that it is quite likely that even if the scale and number of residential units were to be reduced in the future on this site, the scale of the required access and highway improvements would remain the same, ie a roundabout and the widening of Cowards Lane to the detriment of the character, appearance and visual amenities of the Green Belt and this part of the village. That position is confirmed by the report of Cannon Consulting Engineers.

2.35 It should also be noted that if it is the intention of the Council to rely on the release of such sites from the Green Belt to maximise the provision of affordable housing, and to

address the unmet housing needs of the District, then in this case, that assumption may not hold good.

2.36 It is extremely doubtful that a development of 73 dwelling units could be built here without serious harm being caused to the countryside and this part of the village. If the development was reduced to even 50 units in order to try to address those physical and visual impacts, then that reduced level of residential development would still need a significant and large scale new access with very costly engineering and drainage works to create a new roundabout, and links to Codicote Road, as well as the widening and improvement of all of Cowards Lane itself.

2.37 Cannon Consulting Engineers estimate that these highway improvement works could cost approx £1 million.

2.38 Such costs, as well as other Section 106 or future CIL Levy charges for education, sewerage, health facility and library improvements, would substantially reduce the financial viability of the development such that it would be likely that the developer would submit a viability appraisal with any planning application made in the future, to demonstrate that the Local Plan's affordable housing requirements could only be met, if at all, at a much lower level of on - site provision, or even only through some much reduced level of off – site financial contribution.

2.39 However the Council in Appendix 2 to the Matrix of Sites that are listed on page 21, and including site CD1 (land south of Cowards Lane) only advises that this is a green field site with no obvious factors that would influence viability!! (See extract attached as Appendix Two to this Report).

2.40 Firstly, the designation of the site within the Metropolitan Green Belt itself is not referred to here as it should have been, and secondly, as discussed above, there are several significant factors that would weigh heavily in relation to influencing the viability of a development of the site and a consequent reduced level of affordable housing that could be delivered, in viability terms.

b. The capacity of the existing highways infrastructure, sewers, power and education facilities in and around Codicote

2.41 The Technical Paper produced by Cannon Consulting Engineers demonstrates that firstly, the existing road network in and around Codicote could not cope with housing development of the kind proposed in the emerging Local Plan without significant harm arising through traffic congestion and other car borne impacts, in particular along the B656, the High Street in Codicote, and also within the immediate residential environs of the local school in Codicote, which is located within a Schools Safety Zone. The capacity is not there at present to deal with the additional population and consequent traffic increases.

2.42 Secondly, that significant changes and additions to highways infrastructure would be required to enable the development of land south of Cowards Lane in particular to be accommodated, even if the number of residential units proposed was reduced from 73. These changes are described in the Technical Paper from Cannon Consulting Engineers in more detail. These changes would include widening Cowards Lane and requiring new pavements, street lighting, drainage and urbanisation of this rural lane. The lane itself is narrow at its pinch point, being only approx 2.5 metres wide for a length of approx 120 metres.

2.43 In the view of my clients, those changes would in themselves cause harm to the Green Belt as described above, but also to the character, built form, and liveability and condition of Codicote, as a rural village set in the open countryside.

2.44 For example, the existing school in the village is already over capacity and would need to be expanded physically. There is not much room within the school site for new classrooms and associated new education and play facilities, but even if room was found, the impact of a significant number of new residents trying to park on the surrounding roads, which are designated a School Safety Zone, in order to drop off or pick up their children from the school would be substantial.

2.45 In fact there is no existing car parking available to allow for additional teaching staff to be able to park at the school, and potentially the existing external recreation and play space would have to be reduced to facilitate more buildings, and larger kitchen/dining areas. The concern of Codicote School, is that the expansion of such facilities and consequent reduction in external playing field and play space areas, could damage the health and well being of the children. This would be to the detriment of the childrens' health and fitness overall and contrary to the aims of chapter 8 of the Framework *Promoting Healthy Communities*.

2.46 The Council itself in the supporting evidence base confirms that there is a problem with the sewerage capacity in Codicote and that this infrastructure will have to be improved and increased if new housing is to be built here and on the proposed Green Belt sites.

c. Impacts on archaeology and ecology

2.47 It should also be noted that the land south of Cowards Lane is also likely to contain archaeology of some value, and in particular iron - age remains. (See plan attached at Appendix Six) A major report on these matters was published in 1990 for North Herts Museum, in relation to the Hollards Farm land holding, which at the time included the site in question off Cowards Lane.

2.48 The report, which followed a series of trial trenches and ground tests shows that the site south of Cowards lane contains large areas of ridge and furrow, which is an archaeological pattern of ridges (Medieval Latin *sliones*) and troughs created by a system of ploughing used in Europe during the Middle Ages, typical of the open field system. An old quarry is also identified.

2.49 There may of course be earlier remains underneath the surface as well, and any development of this site could result in the loss of that archaeology. It would be a normal precautionary approach where a developer seeks planning permission to develop a site where there may be archaeology present, to impose a planning condition requiring an extensive set of field trials to take place to identify the potential risk to that archaeology before the development can commence on the ground.

2.50 However in this case, because the impact on the land form and topography of any residential development of the scale envisaged would be so significant and harmful, my clients cannot see how such a development would not destroy all such remains in situ. It is a question of the cumulative impacts of such a development as potentially proposed here, that must be taken into account.

2.51 It should also be noted that the Council's published Site Selection Matrix, which forms part of the Background Papers for the Preferred Options consultation now, and which is attached at Appendix Seven, makes no mention of any potential archaeology interests on the site or that a ridge and furrow landscape exists. This omission should be corrected and the site re-assessed. The Sustainability Appraisal is flawed as a result of this omission.

2.52 Furthermore, in relation to ecology interests, the site itself is an ancient pasture which has not been ploughed up in living memory, and is adjacent to a designated County Wildlife Site, ref 43/042 (Hollards Farm Meadow). That wildlife site includes habitats for Roman Land Snails, Doormouse, Great Crested Newts along with other species of newts and toads, Fallow deer, bats and kingfishers. Song Thrush, house sparrows the great and lesser spotted woodpeckers, are amongst other birds are also regularly seen here. The land south of Cowards Lane provides a valuable food resource for the wildlife in the nature reserve. A more comprehensive list of bird species present can be found in Appendix Twelve.

2.53 It should be noted that when the site was first suggested as a potential residential site, in 2009 as part of a consultation on the (then) Preferred Options for the new Local Plan in North Herts, Natural England commented and advised that...." This site appears to be directly adjacent to the County Wildlife Site 43/042 Hollards Farm Meadow, and any potential adverse impacts on the site from development would need to be addressed".

2.54 The summary of their representations in 2009 are attached as Appendix Eight. It does not however follow that once a study of the impacts on ecology has been completed, that a residential development would automatically follow on with mitigation measures being undertaken. That would be lawful if a decision was taken on that basis to allow a residential development with such mitigation in place.

2.55 However it could also be the case that the local planning authority could equally decide that the impacts on the ecology interests of the designated County Wildlife Site and the

adjacent ponds and meadows, would be so harmful that no residential development should be allowed and could not be reasonably mitigated for either nearby or elsewhere.

2.56 The summary for the site in the Council's published Site Selection Matrix, which forms part of the Background Papers for the previous Preferred Options consultation, and as advised previously, is attached at Appendix Two, only states that mitigation would be required through such an ecology study. However this statement presumes that a decision has already been made and the consequences for important habitats and wildlife have been understood.

2.57 This is plainly not the case. Would it not be better for other sites which do not adjoin such important and identified reservoirs of ecology to be developed first if there is no alternative? Any change in drainage will affect the adjacent nature reserve which is currently fed by a spring emerging from the direction of the site.

d. The impact on the current informal use of the land for recreation and as informal rights of way

2.58 A number of local residents have confirmed that this site is used, and has been used for many years, over 21 years in some cases, for informal recreation and as informal access to reach other public rights of way and for dog walking. Residents are now pursuing the potential formalisation of these rights which could lead to a long and protracted legal process. The reality is that this will be a site which is not deliverable in terms of paragraph 47 of the NPPF. It will not be a site which can therefore realistically be included in any 5 year housing land supply for the District.

e. The impacts on the management of Hollards Farm itself.

2.59 Hollards Farm is used for grazing sheep and the production of hay and haylage. The wildlife site – ref 43/042 – which is referred to earlier, is sympathetically grazed with Shetland sheep. Shetland sheep are a much smaller breed than traditional lowland sheep breeds. They have been selected for the least damage to this predominantly wetland site. The wildlife site and adjoining fields drain the higher land of the proposed development site CD1 and has an established eco system which includes the meadow of site CD1.

2.60 Any change in the drainage due to development is likely to significantly change the wildlife site, with the possibility of flooding or drought as the natural established drainage is completely changed. In this event, it could make the site unviable for the use of grazing and thereby change the whole eco system of the site and area. This would also impact upon the size of flock with the loss of any natural grazing acreage.

2.61 Neighbouring fields that also support the flock and wildlife area may also be impacted by the change in drainage with resultant loss of flock size and flock revenues. Sheep production in Hertfordshire is a financially tenuous industry and any unexpected change to grazing land could lead to irreversible change.

2.62 During a very wet spring or summer, any change in field conditions due to the drainage of the higher land of site CD1 could delay farm machinery going onto the land and the crop being reduced in quality and or value when subsequently harvested.

2.63 Mr and Mrs Barrow, who own and manage Hollards Farm, are also extremely concerned about the potential of cats of future owners of dwellings on the site, to destroy wildlife, including birds and amphibians, and about the potential of sheep worrying by dogs off the lead. These problems occur all the time in urban fringe areas where residential development abuts a farm.

2.64 To this end, a statement from the shepherd at Hollards Farm is attached at Appendix Nine, which explains the problems that will occur if such a development is allowed.

2.65 Site CD1 acts as a significant open and green buffer of countryside between their farm holding and the village itself and should be retained as open fields and as part of the Green Belt as part of any future adopted Local Plan for the period up to 2031.

3. SUMMARY AND CONCLUSIONS

3.1 There are several ‘in principle’ objections to NHDC’s Submission Version Consultation paper:

- the decision to propose a spatial strategy which places such great weight on meeting the District’s housing needs by concentrating growth around the main settlements and larger villages is flawed, because of the impact on the openness and visual amenities of the Green Belt, on already very limited infrastructure in and around such settlements, and on the amenities of people living in those villages, such as Codicote.
- The Sustainability Appraisal that has led to the choice of the proposed spatial strategy is therefore also flawed.
- The decisions by NHDC to meet the allegedly unmet housing need of other local planning authorities in this District is unjustified, undemocratic, and unsound.
- The use of the concept of safeguarded land to the west of Stevenage is also unjustified, undemocratic, and prejudicial to the residents of NHDC.
- To date there is still no clear reason given for the need to roll back Green Belt boundaries when the option of an alternative new settlement could be given earlier priority and funding instead of the very many extensions proposed to small settlements such as Codicote, which do not have the road network or other infrastructure to support such a significant expansion.

- Codicote is not a suitable location for an even larger number of additional dwellings (364) because of severe existing and future infrastructure, road, education and health services constraints.

3.2 The site South of Cowards Lane, Codicote (CD1) is not a suitable location for residential development and should be retained as an important part of the Green Belt for all the reasons set out in this report.

Chris Watts MRTPI DMS
24th November 2016.

APPENDICES 1 – 12

1. Cannon Consulting Engineers Technical Note – Supporting Highways & Traffic Advice
2. North Herts Local Plan 2011 – 2031 Site Selection Matrix
3. Assessment of Potential Development Sites in the Green Belt
4. National Planning Policy Framework – Paragraph 44
5. Councils Must Protect Our Precious Greenbelt Land
6. 1990 – An Archaeological Evaluation of Hollards Farm, Codicote – NHDC Museums
7. NHDC – Allocated Sites – Summary of Evidence and Reasoning
8. Representations for Land Allocations: Additional Suggested Site 29 – Now CDI – July 2009
9. Statement of Keith Buck – Shepherd at Hollards Farm
10. Affinity Water, 1st April 2018 – Licence to Extract Water from River Mimram Revoked
11. Wild Bird Sightings at Hollards Farm, Codicote
12. Introduction to Codicote

APPENDIX 1

Cannon Consulting Engineers TN001 Technical Note – Supporting Highways & Traffic Advice

Project:	Land South of Cowards Lane, Codicote
CCE Ref:	Q851
TN001 Title:	Supporting Highways & Traffic Advice
Prepared by:	MK - Associate
Date:	12 th January 2015

1.0 Introduction

- 1.1 Cannon Consulting Engineers (CCE) has been appointed by Peter Barrow (and other local residents) to provide Highways and Traffic advice in support of an objection to the proposed development of the site identified as Land south of Cowards Lane, Codicote in the administrative district of North Hertfordshire District Council (NHDC).
- 1.2 The site is currently identified as a Greenfield site covering an area of approximately 3.64 Acres with a simple agricultural access located to the immediate south of the junction of Cowards Lane with the B656 Codicote Road. For completeness, **Figure 1** presents the current layout and access arrangement for the existing site.

2.0 Development Proposals

- 2.1 NHDC published their Strategic Housing Land Availability Assessment (SHLAA) in December 2010 and identified the site as being capable of delivering up to 73 residential dwellings during the period 2016 to 2021. An update to the SHLAA was published in November 2014 and again, the site has been identified as being capable of delivering up to 73 residential dwellings.
- 2.2 With regards the proposed scheme, representations on the NHDC Local Plan – Consultation for North Hertfordshire Housing Options 2013, were made on behalf of Warden Developments Ltd in March 2013. These representations included commentary on what was then identified as Site Ref 29, Land south of Cowards Lane, at paragraphs 4.30 to 4.41, an extract of which is included at **Attachment A**. A proposed scheme was prepared by Phillips Planning Services to support the representations and is also included at **Attachment A**.
- 2.3 The proposed scheme presented on the PPS Illustrative Layout Plan shows that the proposed development of up to 73 residential dwellings would be accessed via a new priority controlled junction that would incorporate the existing priority controlled junction of Cowards Lane with Codicote Road. Cowards Lane would be reconfigured so as to tie in with the proposed site access road and all traffic using Cowards Lane would then be combined with the traffic associated with the proposed development.

3.0 Background Considerations

- 3.1 The site was considered as part of the NHDC Land Allocations – Additional Suggested Sites Issues & Options Paper prepared for consultation in July 2009. The site was promoted by Warden Developments Ltd and whilst a number of strengths were identified with regards the Sustainability Appraisal of the suggested site, a key weakness was that the site would be likely to increase commuting and private car use. At the time, no further details were provided.
- 3.2 A number of representations were received by NHDC in relation to the 2009 Land Allocations - Additional Suggested Sites consultation and a brief summary in relation to highways and traffic matters is set out below. For completeness, the appropriate extracts referred to are contained at **Attachment B**:

- Hertfordshire County Council – Passenger Transport Unit (Ref 3952) commented that a site of this scale would need to consider the widening of Cowards Lane to accommodate

two-way traffic flow, the site would generate a significant increase in traffic and may overload this area of road network, and that any application would need to be supported by a Transport Assessment that would demonstrate how any potential impact would be overcome.

- Welwyn and Hatfield Council (Ref 3963) commented that the location of the site is likely to promote commuting.
- Roads (Ref 4252) objected on the grounds that there is already too much traffic in the village and that further development would make this worse.
- Morris (Ref 4771) objected on the grounds of increased traffic particularly on the B656 during the peak hours, additional pressure on the rail network for commuters to London.
- Green (Ref 4785) objected on the grounds of increased traffic using Cowards Lane and the B656.
- Green (Ref 4787) objected on the grounds of increased traffic using Cowards Lane and the B656 and raised concerns over the safety implications of the increase traffic flows.
- Williamson (Ref 6299) commented that the site would generate additional requirements for education, which in turn would require additional vehicular trips, place additional pressure on the public transport provision associated with journeys to schools, and recognised that Cowards Lane is congested at times due to the fact that it only provides a single lane width in places.

3.3 In February 2013 further consultation took place with respect to the housing options for the district up to 2031. As in 2009, representations were received by NHDC in relation to the Housing Options Growth Levels and Locations and a brief summary in relation to highways and traffic matters is set out below. For completeness, the appropriate extracts referred to are contained at **Attachment C**:

- Welwyn Hatfield Borough Council (Ref LDF/3963) commented that the location of the site is likely to promote commuting.
- Omer (Ref LDF/4502) objected on the grounds of increased traffic flows, particularly through the village of Codicote along the B656 High Street, towards the A1. Any increase in traffic would have a detrimental impact on road safety with the likelihood of more fatal accidents. Parked vehicles currently restrict vehicle movements through the High Street and an increase in traffic flows will exacerbate this problem. An increase in traffic will have a detrimental impact on the condition of the roads in the area. Due to the lack of a rail station in Codicote, and the “impractical bus timetables”, it is necessary for all residents of Codicote to own motor vehicles.
- Shaw and Shaw-Guichard (Ref LDF/6337), Janes (Ref LDF/7571), Murley (Ref LDF/8163), Broad (Ref LDF/8231), Gibson (Ref LDF/8508), Spires (Ref LDF/8590), Ireland (Ref LDF/8602), Day (Ref LDF/8611), Ewin (Ref LDF/8612), Pitman (Ref LDF/8613), Ronet and Osada (Ref LDF/8614), Hernandez (Ref LDF/8615) all objected in line with the comments made by Omer, as set out above.
- Melling (Ref LDF/8007) whilst this representation supports the scheme, it is noted that the preferred means of access to the development should be via a new roundabout junction with the High Street and Cowards Lane.
- Colston (Ref LDF/8384) objected on the grounds of increased traffic, the impact on the High Street, particularly as there is an existing constraint associated with parked cars on both sides of the High Street, the safety concerns associated with the narrow lanes in the vicinity of the development (Cowards Lane), inadequate public transport provision, and the increase in traffic will have a detrimental impact on levels of pollution.
- Sparrow (Ref LDF/8395) objects on the grounds of increased traffic flows, impact on the High Street in relation to the parked cars already identified, inadequate public transport provision, an increase in vehicle trips associated with schools children as the local primary

school is identified as being at capacity already and there are no local secondary schools. There is also a comment in relation to construction traffic having a detrimental impact on the surrounding area.

3.4 In summary, a common theme emerges from the consultation responses in relation to highways and traffic considerations, which can be summarised as follows:

- Concerns over the increase in traffic flows, particularly along the B656 Codicote Road and through the High Street where the existing parking arrangements often only allow for one-way traffic flow;
- Safety concerns for pedestrians, cyclists and other road users along Cowards Lane due to the pinch point(s) that currently only allow for one-way traffic flow and in places, do not provide pedestrian footpaths, nor is there any evidence that the opportunity to provide for an appropriate footpath in the future can be achieved due to Third Party land constraints; and
- Concerns over the form of access to the development from the B656 Codicote Road and the incorporation of the existing junction with Cowards Lane.

4.0 Traffic Assessment

4.1 In 2012, AECOM were asked by NHDC to consider the future transport issues in the district with respect to the proposed housing development forecasts as identified in the Core Strategy allocations. The site is identified as Site CD1 (previously referenced as Site 29) – Land south of Cowards Lane in the latest SHLAA (November 2014), which forms part of the Local Plan Background Papers. As such, it was included as an “emerging site” in the AECOM Traffic Assessment.

4.2 The AECOM Traffic Modelling Report was originally prepared in 2012 and updated following input from the Highways Agency in March 2014. The updated Report (published in December 2014) serves three key purposes and the appropriate extracts are contained at **Attachment D** of this Technical Note:

- Firstly, to explain the stages undertaken during the forecasting of the highway model assignment including the development of the future year highway network and traffic demand, including the housing developments (Section 2 to 4 of the AECOM Report).
- Secondly, to present details of potential transport issues on the highway network with the Preferred Option housing development scenario (Section 5 of the AECOM Report).
- Thirdly, to discuss mitigation proposals, in response to the transport issues of the Preferred Option housing development scenario (Section 6 of the AECOM Report).

Trip Rates

4.3 A review of the AECOM Report identifies that as neither Stevenage Borough Council (SBC), NHDC, Hertfordshire County Council (the Highway Authority), nor the Highways Agency have an agreed set of Trip Rates in order to define the level of traffic that would be generated by a residential scheme, a set of generic Trip Rates was identified for both Residential and Employment Trips based on the TRICS database. Whilst this is an industry standard method of deriving Trip Rates, each site should be considered as a standalone development as there will be localised conditions that might impact on Trip Rates.

4.4 There are a number of local conditions that would suggest that a generic Trip Rate should not be applied for residential trips associated with the site at Land south of Cowards Lane. These would include the fact that the local primary school at Codicote is currently oversubscribed (as are other nearby schools at Welwyn) and as such, additional vehicle trips will be generated in order for parents to drive their children to the nearest school with capacity to accommodate

them. Being primary school children, they are unlikely to be able to use public transport services (even if these were sufficiently frequent and provided appropriate links to schools with capacity).

- 4.5 In addition, and as noted, the local public transport services do not include for journeys by train as the nearest train stations are located at Knebworth (approximately 3.1 miles and about 10 minutes' drive away), and Welwyn North (approximately 3.4 miles and about 10 minutes' drive away), both of which are located on the eastern side of the A1(M) which would result in additional traffic impact on the local highway network if those wishing to commute to London by train were to drive to the local train stations. The local bus services that are identified as linking the site with Welwyn Garden City and Hitching are infrequent. For info, Route 215 offers 1 service per day for the school run from Codicote to Welwyn Garden City only and Route 315 operates on an hourly basis from 07:00 to 10:00 and then 2-hourly up until 18:00 on a weekday and about 2-hourly on a Saturday with no services on a Sunday or Public Holidays. For completeness, the timetables for these bus services are contained at **Attachment E**.
- 4.6 With the above constraints identified as being relative to the site at Land to the south of Cowards Lane, a considerably higher level of traffic would be generated by the residential development than would be generated by the "generic Trip Rates". This in turn means that the traffic modelling work that has been undertaken by AECOM for the site, and others in the area of Codicote, is flawed.

Scenario and Mitigation Testing

- 4.7 Sections 5 and 6 of the AECOM Report summarise the Scenario and Mitigation Testing undertaken. However, and as referenced above, it is considered that the level of traffic associated with developments (including Land south of Cowards Lane) has not been appropriately identified and in reality, considerably more vehicle trips will be identified from these sites. Notwithstanding the above, the AECOM Report identified the level of 'stress' that would be associated with the development proposals in the future year of 2031 on the highway network. The AM and PM Stress Plots are contained at **Attachment D** for completeness and identify that in the AM Peak Hour the B656 north of Codicote would operate at between 75% and 100%, and the B656 Codicote Road (south of Codicote) would operate at less than 75% capacity. In the PM Peak Hour, the B656 north of Codicote would operate at over 100% and the B656 Codicote Road would operate at less than 75%. It is likely that these capacity assessments would alter if an appropriate Trip Rate were applied to the local highway network, which would have even more detrimental impact than has been identified.
- 4.8 Based on the identified highway impact on the local network identified in the AECOM Report, a problem location is identified at the junction of the B656 London Road with the A602 Stevenage Road and the A602 Park Way. Whilst this junction is a considerable distance from the proposed development, some of the traffic associated with the site that would travel to and from the north, might have an impact on this junction and as the Trip Rates identified in the AECOM Report are considered to be flawed, there is likely to be even more of an impact than has been identified. A cost assessment for the proposed improvements to the Hitching Hill Roundabout improvements has been undertaken and details are included at **Attachment D** of this Technical Note. Even if the increased impact from the development proposals could be accommodated within the proposed mitigation and junction improvements, it is noted that no costs associated with Third Party land acquisitions were included in the assessment and the proposals would appear to require Third Party land to deliver them. As it is likely that the development at Land south of Cowards Lane would have a traffic impact on this junction, any

permission might be tied to the delivery of these improvements through a Section 106 Agreement, which in turn may not be deliverable due to the Third Party land constraints.

- 4.9 It should also be noted that as it has been identified that there would be an increase in traffic on the B656 Codicote Road to the south of the development, junction improvements may be required to the existing roundabout junction of the B656 with Fulling Mill Lane on the approach to Junction 6 of the A1(M). Again, no consideration has been given to the deliverability of any proposed improvements to this junction in terms of either Section 106 costs, Third Party land constraints, etc particularly when it has been identified that the traffic flows proposed to be generated by developments in the area are flawed.

5.0 Comments on the Proposed Development

- 5.1 Having considered the information presented above and as set out within the NHDC Local Plan, SHLAA, Traffic Modelling Report, Land Allocations, Preferred Options consultation documents, etc there are, in my view, a number of key elements that have not been appropriately considered. These are set out and summarised below for clarity.

Development Proposals

- 5.2 The Illustrative Layout Plan prepared by PPS proposes that the site will be accessed via a new priority controlled junction with the B656 Codicote Road, which would incorporate traffic associated with the properties accessed from Cowards Lane, as well as any through traffic that does and would use Cowards Lane in the future. Based on the Trip Rates identified in the AECOM Report, a development of up to 73 residential units would generate approximately 35 two-way trips in the AM Peak Hour and approximately 32 two-way trips in the PM Peak Hour. It has been identified that Trip Rates used by AECOM are considered to be too low and therefore, it might be more accurate to identify approximately 40 two-way trips in the AM Peak Hour and approximately 35 two-way trips in the PM Peak Hour. It is generally considered that the combined AM and PM Peak Hour trips form about 10% of daily traffic flows, which thus equate to approximately 750 two-way movements associated with the development of up to 73 dwellings at Land south of Cowards Lane.
- 5.3 A review of the Design Manual for Roads and Bridges (DMRB) notes at paragraph 2.16 of Volume 6 Section 2 Part 6 TD42/95, that a right turning facility should always be provided where the minor road flow exceeds 500 vehicles two-way Annual Average Daily Traffic (AADT). As it is identified that the development alone could generate as much as 750 two-way movements, which doesn't include the existing and/or proposed level of traffic associated with Cowards Lane, a simple priority junction arrangement is not considered appropriate.
- 5.4 Whilst it has been noted that the representations to the early consideration of the development have requested that a roundabout junction be provided for the site access, Figure 2/2 of the above mentioned section of DMRB notes that a ghost island junction should be provided for junctions where the two-way traffic flow on the minor arm is identified as being up to 5,000 AADT and the two-way traffic flow on the major arm is identified as being up to approximately 17,000 AADT. The introduction of a roundabout junction is only necessary where the two-way traffic flows exceed the identified AADT flows. As such, the appropriate junction type for access to the proposed development and the properties accessed from Cowards Lane is considered to be a ghost island arrangement.
- 5.5 The identified land constraints at the site are not likely to facilitate a ghost island junction arrangement due to Third Party land constraints, and as such, the only appropriate junction arrangement that could be conceived as being acceptable would be a roundabout junction.

The development proposals that have been presented and considered to date are therefore not considered to be acceptable in highway terms.

Cowards Lane

- 5.6 Cowards Lane is identified as being extremely constrained with no formal footpath provision, and in places, only allows a single vehicle to pass through pinch point(s). This is particularly evident at a point to the immediate north west of the development (in the vicinity of the junction with The Opening) where a tree is so close to the verge that there is damage from HGVs. Whilst it is acknowledged that the development proposals at Land south of Cowards Lane could provide for improved width along the frontage of the development site, which might include for the provision of a pedestrian footpath and potentially two-way operation, there is no opportunity to provide for adequate width, even just for an appropriate pedestrian route, without the inclusion of Third Party land.
- 5.7 Any development at the site would have an impact on Cowards Lane and even if this was identified as being relatively restricted in terms of vehicle numbers, an increase in pedestrian and cycle trips are likely along Cowards Lane due to the location of the local primary school and other local facilities.

School Safety Zone

- 5.8 It has been noted that the local school, Codicote C of E Primary School, is currently oversubscribed. It is not considered viable for a development of up to 73 dwellings, even when combined with other local residential developments both committed and proposed, to provide sufficient financial contributions to deliver a further form entry at the school, effectively doubling the size of the school, and therefore there would be a need for pupils to travel to other schools in the wider area.
- 5.9 Notwithstanding the above, it is acknowledged that a "School Safety Zone" has been introduced in the vicinity of Codicote Primary School, which must be as a result of traffic on the surrounding streets, in terms of the nature of traffic flows (HGVs from the Codicote Quarry), traffic volumes, vehicle speeds, and on-street parking, particularly at school collections times. Any development in the area will have an onerous impact on the School Safety Zone.

6.0 Summary and Conclusions

- 6.1 The site was originally identified as being capable of delivering up to 73 residential dwellings as part of the NHDC SHLAA in December 2010. The updated SHLAA of November 2014 retained the site and supporting information submitted by Warden Developments Ltd with input from Phillips Planning Services (PPS), presented an Illustrative Layout Plan.
- 6.2 Having considered the various representations made to NHDC as part of the Core Strategy/Local Plan consultations, and including a review of the AECOM Traffic Modelling Report published in December 2014, this Technical Note has been prepared to comment on the suitability of development a Land south of Cowards Lane in highways and traffic terms.
- 6.3 The resulting conclusion is that the proposed priority controlled site access arrangement is not appropriate for a development of this size and scale, particularly when combined with the existing traffic that currently uses Cowards Lane. In addition, the level of traffic proposed to be generated by the development proposals as set out within the AECOM Report, is not considered to be appropriate as localised conditions have not been accounted for. As such, it is likely that there would be a more onerous traffic impact on the surrounding highway

network which may result in severe traffic impacts that have not been adequately considered as part of the mitigation proposals.

- 6.4 The proposals do not adequately address the existing constraints along Cowards Lane without the inclusion of Third Party land, which in turn may make the scheme undeliverable through onerous financial constraints that may be incurred in order to secure the necessary land required to deliver appropriate measures for pedestrians and other non-motorised road users along this important link in the immediate vicinity of the proposed development.
- 6.5 In my view, if a development were to be acceptable to the local planning authority following the submission of an appropriate Transport Assessment to support a future planning application, the necessary Section 106 financial contributions that would relate to off-site highway works, public transport improvements, travel planning measures, and other highway related matters, would be very onerous and would likely result in the scheme becoming sufficiently unviable so as not to facilitate any affordable housing on the site, or even sufficient development.

Figure 1
Site Location Plan



Scale: NTS
 Date: 05/01/15
 Drawn By: MK

Job Title:
**LAND SOUTH OF COWARDS LANE,
 CODICOTE, HERTFORDSHIRE**
 Client:
PETER BARROW

Drawing Title:
SITE LOCATION PLAN

16 Leadborough Lane
 Beaconsfield, Bucks, HP9 2PZ
 Tel: 01494 677 255 Fax: 01494 677 779
 Email: info@cannonce.co.uk
 Web www.cannonce.co.uk



Project No: Q851
 Figure No: Fig 1

Attachment A:

Warden Developments Lt Representations (March 2013)

PPS Illustrative Layout Plan (March 2013)

NORTH HERTFORDSHIRE LOCAL PLAN

CONSULTATION FOR NORTH HERTFORDSHIRE HOUSING OPTIONS 2013

REPRESENTATIONS ON BEHALF OF

WARDEN DEVELOPMENTS LIMITED

(March 2013)

- 4.26 Clearly these issues relate to nearly all of the potential village residential sites within the district. What was clear is that as part of the assessment there were no obvious physical site constraints to development.
- 4.27 Despite the apparent similarities in assessment in 2009, the current consultation document lists site 29 as Priority 3 and 32 as Priority 2.
- 4.28 Paragraph 3.3 of the consultation document suggests that the Priority 2 and 3 classifications have been made on the basis of whether Officers consider that a site would be more or less “controversial” in terms of public opinion should it come forward for development. Although evidence to support the classifications is not included within the evidence base, from discussions with officers it is understood that this is based upon responses received when the 2008 / 2009 consultation took place.
- 4.29 We query the appropriateness of this test as a method of selecting sites for allocation. That is, it is normal / good practice to make detailed assessments of the likely impact of development of a particular site i.e. to look at its strengths and weaknesses and the benefits it could provide. It is not good planning to simply seek to allocate on the basis of a ‘feeling’ as to which sites may attract less objection.

Site 29 Land South Of Cowards Lane

- 4.30 The only published document which seeks to provide any tangible reason as to why site 32 is categorised above 29 is in the SHLAA 2012. In the assessment matrix on page 35, it is noted that there is concern that site 29 may have an ‘urbanising upon Cowards Lane & the High Street’ whereas site 32 is considered to be ‘well related to the existing urban area’.
- 4.31 We do not agree with the assessment that site 29 would have an urbanising impact. The impact of a development at the site will be dependant upon how it is designed and laid out. Clearly, the creation of a new, wide open access and the removal of boundary landscaping could have an urbanising impact, particularly if new built form was located hard up against the front site boundaries and at an inappropriate scale and density of development.

4.32 However, a sensitively designed development could be accommodated comfortably without the urbanising affect feared in the SHLAA. In this regard, an indicative site layout plan is provided with this representation. This demonstrates the following key points:

- At present the junction between Cowards Lane and High Street is quite wide and open.
- By developing the site as shown on the accompanying plan, this junction could be made much narrower with planting added to each side thereby reducing the amount of hard surfacing apparent on entry to or exit from the village. Cowards Lane would be the subject of minor realignment at its eastern end to join the proposed new site entry as shown. The proposed access has been designed by Highway Consultants Phil Jones Associates and respects necessary visibility splay and junction capacity requirements.
- To further minimise the visual impact of the development it is proposed that new woodland planting is carried out as shown on the plan. This combined with the bend in the road which currently exists when accessing the village from the south would ensure that the proposed development would not be visible when driving north toward Codicote.
- Similarly, the plan proposes an open entrance to the site with provision of a community orchard maintaining the rural village feel.
- The site would therefore have a very minimal visual impact and could not reasonably be considered to have an 'urbanising' effect, particularly given the lower density development assumed in the SHLAA and consultation document.
- Rather, the layout demonstrates that the 73 dwellings as estimated in the SHLAA can comfortably be provided along with play and amenity space and also existing site features retained such as the central hedge / tree belt with no adverse visual impacts

4.33 It is therefore considered that the site 29 could be appropriately developed to provide a high quality residential environment whilst protecting the setting and rural character of the settlement edge.

Comparison of Site 29 and Site 32

4.34 Given the need for new housing within the district in the period to 2031 it is considered that both sites 29 and 32 should be allocated for development. However, it is our submission that if the Council were to only allocate one site then site 29 has a number of key advantages over site 32 which should lead to it being the favoured allocation for Codicote.

4.35 Firstly and with reference to the site assessment matrix prepared by the Council, it is noted that:

- Site 29 lies within 78 metres of the local outdoor sports and recreation facilities which it is understood the Parish Council is seeking to enhance further in the near future. In contrast the nearest green space to site 32 is the local allotments. This is further away (286 metres) and whilst useful resource does not provide the same level of general benefit to and likely usage by the future residents of a housing site.
- Site 29 lies within 32 metres of a bus stop. Site 32 is 230 metres and it is an uphill walk from the site to the High Street bus stop.
- Site 29 lies closer (317 metres) to the local primary school than Site 32 (413 metres). In addition, children coming from Site 32 would need to cross the fairly busy High Street whereas those from Site 29 would have direct access without the need to cross major roads.
- Site 29 is not impacted by Tree Preservation Orders, this is a constraint in respect of Site 32.

4.36 The majority of the other assessment criteria show comparable scores.

Highway Issues:

- 4.37 An element which the assessment matrix does not consider is the relative location of the sites in terms of their accessibility and traffic impact upon the local road system that could result from their development.
- 4.38 This is in our view a fairly major omission at this stage as traffic impact and the inconvenience that this can cause to existing local residents, children crossing local roads and the amenity of residents in general are often very controversial issues when allocating sites for development.
- 4.39 In this regard, Phil Jones Associates have assessed the relative merits of both sites and we highlight the following points:
- Access to Site 29 would be taken directly from High Street as shown on the accompanying plan minimising impact upon existing residential roads.
 - In contrast access to Site 32 brings all of the generated traffic through an established residential area and past a number of existing dwellings. During a visit to site 32 it became very clear that Valley Road suffers from significant levels of on street parking as not all of the houses enjoy off road parking / sufficient off road parking. Therefore there is already a degree of inconvenience caused to the flow of traffic and therefore the amenity of the residents of this part of the settlement.
 - As above, analysis suggests that most trips will head towards the A1(M) Junction 6 to the south of Codicote. Site 29 is therefore perfectly placed to minimise traffic impact on High Street and through the village.
 - Traffic from Site 32 would be forced to route via Valley Road and Bury Lane to reach the northern end of High Street, before tracking back down High Street through the village centre to head towards the A1(M). It was noted that the High Street already suffers congestion when delivery vehicles and / or refuse lorries are collecting. Traffic is forced to queue behind the larger vehicles and wait for oncoming traffic to pass. This leads to long queues during peak periods.

- The proposed access to site 29 would realign the existing skewed junction of Cowards Lane with High Street. This junction currently has a poor side road alignment and a very wide junction bell-mouth, to the detriment of pedestrian movement along High Street itself. The proposed realignment would reduce the distance pedestrians are required to cross at High Street, to the benefit of pedestrian safety.
- The point of access to the Valley Road is taken via The Close, a short cul-de-sac off Valley Road itself. This road is parked on both sides by residents of adjacent dwellings. Parking occurs on-street at an angle to the carriageway and would entail reversing manoeuvres as vehicles leave.
- Currently, The Close only provides access to some 19 lock-up garages which are only low trip generators. The development of Site 32 would increase traffic on The Close to the detriment of highway safety.
- Site 29 lies directly adjacent to National Cycle Network (NCN) Route 12 on Cowards Lane. NCN12 does not pass in close proximity to Site 32.

Urban Design Issues

- 4.39 A further issue for consideration in terms of the relative merits of the two potential sites is the significant rise in land levels across site 32.



- 4.40 As shown, site 32 rises from south east to north west by over 20 metres. The site is therefore extremely visible in long range views and from the public footpaths which run through and beyond the land and is substantially more prominent in views and has a far greater visual impact on the character of Codicote than would the development of Site 29.
- 4.41 In comparison site 29 is well contained by existing field boundaries and generally lower level such that development will be far less prominent.

Q.5 Mix of sites

- 5.1 For the reasons set out in this submission it is considered that the Council should seek to allocate as many of the non strategic sites Priority 1 – 3 as is possible and minimise any reliance on strategic site allocations.
- 5.2 In particular all 2,967 sites in or adjoin the villages should be given a high priority.

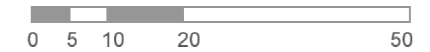
Land south of Cowards Lane, Codicote

Residential Development

Illustrative Layout Plan



Scale 1:1,000 @ A3



Notes:
 The layout shows 73 dwellings (20dph net density) inline with SHLAA.
 Site area - 3.9Ha
 Open space - Leap + Informal play - Informal Open Space -
 Average of 3 parking spaces per dwelling

Revisions:

Client: Warden Developments Ltd

p.p.s.
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Town Planning & Development Consultants

Job Number : 124379 Scale : 1:1000 @ A3
 Drawing Number : 13-SK01 Date : March 2013
 Revision : - Drawn By : FH

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Attachment B:

Extracts from the Representations to the July 2009
NHDC Land Allocations – Additional Suggested Sites Consultation

North Hertfordshire District Council



Local Development Framework

“Making North Hertfordshire a vibrant place to live, work and prosper”



www.north-herts.gov.uk

LAND ALLOCATIONS
Additional Suggested Sites
Issues & Options Paper

Sites suggested by the public **July 2009**

Site 29

Land Allocations - Additional Suggested Sites

July 2009

Land south of Cowards Lane, Codicote

Promoter (and agent, if any):
Warden Developments (Savills)

Area (hectares):

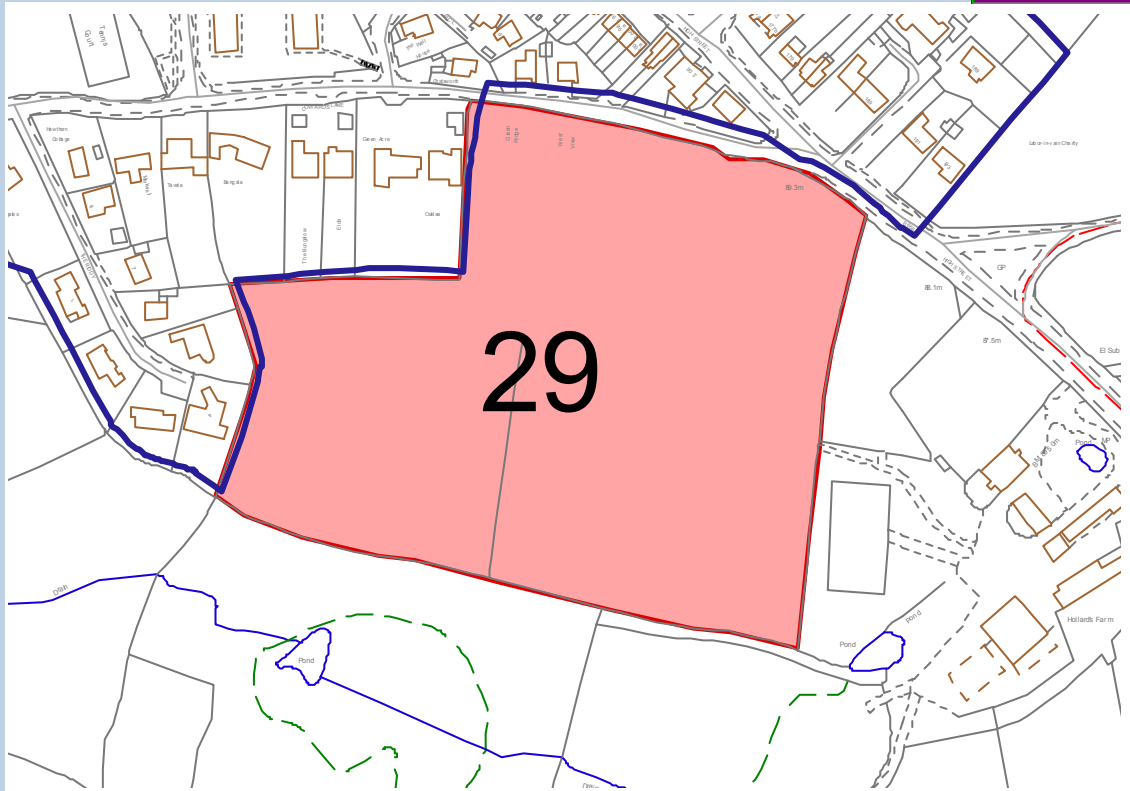
3.64

Existing use:

Agricultural / grassland

Proposed use:

Residential



1: 2500 - Mapping is Crown Copyright © 100018622 2009

Sustainability Appraisal summary	
Strengths	Weaknesses
<ul style="list-style-type: none"> Not affected by wildlife designations. No evidence of land contamination. The site does not border a watercourse. May provide affordable housing. Site is not within an area of archaeological interest. Site is not within a conservation area. Site contains no listed buildings. Sustainable Urban Drainage Systems are suitable. 	<ul style="list-style-type: none"> Greenfield site, classified as grade 3 agricultural land. Site is located within groundwater source protection zone 2. Likely to increase commuting and private car use.

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Representation for Land Allocations: Additional Suggested Sites July 2009



Site 29

Ref. Rep No. Applicant Agent
**0037 7 Savills on behalf of Warden
Developments**

Document Section: Site 29

Representation: *Support*

Further to the Land Allocations Additional Suggested Sites Consultation document published by the Council seeking representations on the additional 125 sites we wish to make the following comments.

Site number 29 which is located to the south of Cowards Lane Codicote due to its size presents the opportunity to provide additional residential dwellings to support the existing wide range of services and facilities including community facilities which are already located with the settlement as well as the Infant and Junior School.

Furthermore, the site would also have the potential to contribute to providing affordable housing, sheltered housing and even a nursing home for existing and future residents for which there is a need in this locality. Consideration is also being given to the provision of a doctors surgery facility which would be of huge benefit to local residents as well as supporting future residents associated with any new development.

We would comment that the development of this particular site would ensure a comprehensive approach which would be able to deliver an appropriate level of development which is commensurate with its scale and character within one location. Furthermore as far as we are aware the site is not with a conservation area, or an area of archaeological interest or the subject of any wildlife designations.

We understand that the site is available for development and could easily be brought forward within five years of the adoption of the Local Development Framework Land Allocations which would assist in the Council reaching their housing targets.

For these reasons we consider that site number 29 should be included in the LDF Land Allocations DPD.

0289 9 Codicote Parish Council

Document Section: Site 29

Representation: *Object*

Codicote is large enough, this site would have a detrimental impact on the boundary.

**0365 64 Natural England - East of
England Region**

Document Section: Site 29

Representation: *Comment*

This site appears to be directly adjacent to the County Wildlife Site 43/042 Hollards Farm Meadow, and any potential adverse impacts on the site from development would need to be addressed.

**0459 86 CPRE - The Hertfordshire
Society**

Document Section: Site 29

Representation: *Object*

This is a greenfield site in the Green Belt, just outside the boundary of the Excluded Village of Codicote. In accordance with emerging policies in the Core Strategy Preferred Options, this site should not be released for development, other than possibly as a rural exception site under draft Core Policy E.

**3950 66 Hertfordshire County
Council - Historic
Environment**

Document Section: Site 29

Representation for Land Allocations: Additional Suggested Sites July 2009



Site 29

Ref. Rep No. Applicant Agent

Representation: *Comment*

Requirement for Pre-application or Pre-determination Archaeological Assessment

The sites below have known archaeological remains within them or have archaeological potential. We would therefore wish that - in accordance with Government policy in PPG 16 and the current draft PPS 15 - the LPA requests that pre-application or pre-determination archaeological assessments should be included within all development briefs and other proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. The purpose of the archaeological assessment would be to provide sufficient information about the archaeological resource and in particular the extent of archaeological remains worthy of preservation in situ, to enable the LPA to determine any specific application for development.

**3952 29 Hertfordshire County
Council - Passenger
Transport Unit**

Document Section:Site 29

Representation: *Comment*

Plot 29: A vehicle access onto Cowards Lane, although classified as a local access road, is very narrow which makes the access corridor to the development site impractical without widening Cowards Way to accommodate two way traffic. The development could be developed to provide the necessary width of carriageway and vehicle to vehicle inter-visibility along the site frontage. The plot of this size could accommodate a large development. Consequently, it would generate a significant increase in traffic and may overload this area of road network. The application should be supported by a Transport Assessment, which sets out the transport implications of the development proposals and identify measures required to overcome any transport impact of the proposals such as the junction appraisal with the B656 (High Street).

**3963 6 Welwyn and Hatfield District
Council**

Document Section:Site 29

Representation: *Comment*

* Development on the edges of the village of Codicote would be contrary to the aim of the North Hertfordshire Core Strategy Preferred Options Paper (September 2007) for the following reasons:

It would undermine the spatial strategy which seeks to locate growth in accordance with the settlement hierarchy. Within the settlement hierarchy, Codicote is identified as a larger village where development only within the boundary of the settlement is allowed.

The additional suggested sites are outside of the boundary of the village of Codicote and their development would therefore be contrary to the spatial strategy as set out in Core Policies C and F.

* There are significant constraints on the capacity of infrastructure to deal with waste water. The East of England Capacity Study identifies significant capacity difficulties at Rye Meads sewage treatment works which serves much of the north of Welwyn Hatfield, as well as Codicote and Knebworth, and other areas proposed for new housing developments within the East of England.

*We note that the SA/SEA for Codicote highlights a weakness that Codicote has no doctor's surgery (page 224).

Representation for Land Allocations: Additional Suggested Sites July 2009



Site 29

Ref. Rep No. Applicant

Agent

- * Development of the four sites promoted around the edge of Codicote would erode the very narrow bands of countryside which separate Codicote from surrounding settlements.
- * Sites 29, 31 and 32 are particularly open and exposed. Development here would be highly visible from Welwyn Hatfield.
- * Development of sites 29 and 30 would lead to further coalescence between Codicote and Welwyn village.

The SA/SEA identified that sites 29 to 32:

- * Do not meet SA objective 2(a) to minimise development of greenfield land and other land with high environmental and amenity value. The sites are all green field and agricultural land grade 3.
- * Do not meet SA objective 3(b) to protect and enhance landscapes. The landscape character area assessment recommends these are improved and conserved.
- * Do not meet SA objective 3(d) to reduce pollution from any source. The sites are all situated in a source protection zone.
- * Significantly, it also found the location of each of the sites is likely to promote commuting.

4252 1 Roads

Document Section: Site 29

Representation: Object

The land in question is not suitable for development for numerous reasons. Firstly, it would close the gap between Codicote and Welwyn, whereas it is important to maintain the two villages as separate entities. Secondly, there is already far too much traffic volume through both villages, and a further development will make this situation worse. Thirdly, the area cannot cope with the increased requirement for water supply and drainage, plus schooling, medical care etc. Over the years there have been numerous planning applications for this site, all of which have been rejected for the above (and other) reasons. Nothing has changed to alter this situation. There is not a shortage of housing in the area, and further development will only serve to make the area far less attractive, and will have a negative effect on the property values for existing residents.

4771 4 Morris

Document Section: Site 29

Representation: Object

Residential development is not in keeping with current intelligent predictions that Britain will be unable to rely on imports to feed the nation and needs to raise the level of its own productivity. I object to residential building and suggest that farming is encouraged at this site.

I also object on the grounds of sustainability:

- *Codicote has little industry thus new residents will undoubtedly need to travel for work. The rail network already struggles, (the local MP has no faith in it, maintaining a London home at tax payers expense), thus traffic will increase. The B656 is already over used particularly during rush hour.
- *Codicote has a small school and no provision at all for older children; again the B656 will be put under strain.
- *Where in the plan is there provision of community resources for example: health centre, library, sports centre.
- *Where in the plan is there provision for a greater range of shops
- *Where in the plan is there provision of entertainment facilities for youths
- *Where in the plan is there provision of entertainment for adults
- *Where in the plan is there provision for additional policing resources

4785 1 Green

Representation for Land Allocations: Additional Suggested Sites July 2009



Site 29

Ref. Rep No. Applicant

Agent

Document Section: Site 29

Representation: *Object*

The size of this site and the likely density of housing on it will have a considerable impact on both the character of the southern part of the village and on the vehicle movements in Cowards Lane and on the B656.

4787 2 Green

Document Section: Site 29

Representation: *Object*

This is the largest site that is being proposed for development in Codicote and were it to go ahead the number of dwellings that are likely to be built on it would have a substantial impact on the character of the southern end of the village. Moreover, the traffic arising from these dwellings would put additional pressure on the B656 & Cowards Lane; there is also the question of how such traffic could safely be brought into the flows on those two roads. Of all the sites it is also the one that is farthest from the village school and shops which, again, would generate more traffic at peak times than others that have been put forward.

4871 24 Smith

Document Section: Site 29

Representation: *Object*

I object to all sites that alter the Green Belt boundary.

I object to the loss of agricultural land for the following reasons:

Food security is now a national priority;

Open green spaces are a valuable amenity for all;

This country has been in breach of European bio-diversity regulations for the past six years;

A survey of rare and endangered species needs to be undertaken;

Fields are necessary for water management.

6299 4 Williamson

Document Section: Site 29

Representation: *Comment*

Whilst I agree that Codicote could sustain some additional housing we must not lose sight of the fact that the primary school is single form entry, and has recently reduced its intake to 30 children per year. Transportation of older children to secondary schools in neighbouring Welwyn Garden City and Hitchin can also be overcrowded. These factors must be taken into account as any developments are likely to attract families with school age children due to the excellent provision available.

Site 29 at the South of the village, off Cowards Lane again has traffic as it's main concern. Cowards Lane is regularly congested due to it's single lane width in many places, and a new access leading straight on to the lower end of the High Street would be in very close proximity to the existing junctions with Cowards Lane and the Rabley Heath road.

Attachment C:

Extracts from the Representations to the February 2013
NHDC Housing Options Growth Levels and Locations Consultation

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
LDF/0079	53	Herts & Middlesex Wildlife Trust	

Document Section: Ref. 29 Land south of Cowards Lane

Comment

Representation:

This site is adjacent to two Local Wildlife Sites. Hollards Farm Meadow (43/042) is a meadow of rough, unimproved neutral grassland with damp and marshy patches. Meadow North-West of First Spring (43/052) is a semi-improved, neutral/damp grassland site.

LDF/3963	20	Welwyn Hatfield Borough Council	
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Document Section: Ref. 29 Land south of Cowards Lane

Comment

Representation:

It is noted that Site 32 at Codicote is now classified as priority 2 and therefore is considered moderately acceptable in the consultation. The following comments were previously raised by Welwyn Hatfield in response to consultation on these sites.

Development on the edges of the village of Codicote would be contrary to the aim of the North Hertfordshire Core Strategy Preferred Options Paper (September 2007) for the following reasons:

It would undermine the spatial strategy which seeks to locate growth in accordance with the settlement hierarchy. Within the settlement hierarchy, Codicote is identified as a larger village where development only within the boundary of the settlement is allowed.

The additional suggested sites are outside of the boundary of the village of Codicote and their development would therefore be contrary to the spatial strategy as set out in Core Policies C and F.

There are significant constraints on the capacity of infrastructure to deal with waste water. The East of England Capacity Study identifies significant capacity difficulties at Rye Meads sewage treatment works which serves much of the north of Welwyn Hatfield, as well as Codicote and Knebworth, and other areas proposed for new housing developments within the East of England.

We note that the SA/SEA for Codicote highlights a weakness that Codicote has no doctor's surgery (page 224).

Development of the four sites promoted around the edge of Codicote would erode the very narrow bands of countryside which separate Codicote from surrounding settlements.

Sites 29, 31 and 32 are particularly open and exposed. Development here would be highly visible from Welwyn Hatfield.

Development of sites 29 and 30 would lead to further coalescence between Codicote and Welwyn village.

The SA/SEA identified that sites 29 to 32:

Do not meet SA objective 2(a) to minimise development of greenfield land and other land with high environmental and amenity value. The sites are all green field and agricultural land grade 3. Do not meet SA objective 3(b) to protect and enhance landscapes. The landscape character area assessment recommends these are improved and conserved.

Do not meet SA objective 3(d) to reduce pollution from any source. The sites are all situated in a source protection zone.

Significantly, it also found the location of each of the sites is likely to promote commuting.

LDF/4502	4	Omer	
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Document Section: Ref. 29 Land south of Cowards Lane

Object

Representation:

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		<p>High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt. An increase in commuters using the lanes to access Stevenage will only worsen the condition of those roads and create an increase in the number of accidents in an already over used lane.</p> <p>Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely. Residents of The Paddocks already have to park along Valley Road to give them any hope of getting out.</p> <p>Safety of residents</p> <p>With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.</p> <p>Preservation of village life</p> <p>Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.</p> <p>Compromised education</p> <p>The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappointing and inconvenient for parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school.</p> <p>Air, sound and light pollution</p> <p>Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets.</p> <p>Protection of Green Belt area</p> <p>Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</p> <p>In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'</p>	

According to the National Planning Policy Framework 2012, the idea of the Green Belt 'is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues: 'Once an area of land has been defined as green

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
<p>belt, the stated opportunities and benefits include: Providing opportunities for access to the open countryside for the urban population Providing opportunities for outdoor sport and outdoor recreation near urban areas The retention of attractive landscapes and the enhancement of landscapes, near to where people live The securing of nature conservation interests Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.' This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year. Flood risk</p>			

Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

LDF/6337	3	Shaw and Shaw-Guichard	
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Document Section:	Ref. 29 Land south of Cowards Lane		
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		<i>Object</i>	
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Representation:

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of the Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt.

Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely.

Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		there been less cars on the roads and more visibility.	
		Preservation of village life	
		Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.	
		Compromised education	
		The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappoint and inconvenience parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools √.should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (currently 98% get their first choice in a rated school) as well as more traffic jams as parents take children to school.	
		Air, sound and light pollution	
		Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The Government have stated they are committed to reducing carbon emissions to meet international standards and almost 260 additional vehicles on the roads (assuming all 3 sites were developed) will not be in line with these targets.	
		Protection of Green Belt area	
		Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.	
		In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature √ and opened to people to experience it, to the benefit of body and soul'	
		According to the National Planning Policy Framework 2012, the idea of the Green Belt 'is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues:	
		'Once an area of land has been defined as green belt, the stated opportunities and benefits include:	
		√ Providing opportunities for access to the open countryside for the urban population	
		√ Providing opportunities for outdoor sport and outdoor recreation near urban areas	
		√ The retention of attractive landscapes and the enhancement of landscapes, near to where people live	
		√ The securing of nature conservation interests	
		√ Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'	
		This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.	
		Flood risk	
		Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods. The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat	

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and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy. I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

LDF/7301	13	Warden Developments Ltd	Phillips Planning Services Ltd
Document Section:	Ref. 29 Land south of Cowards Lane		
Representation:	<i>Support</i>		MAP Map/plans attached

Our site specific comments relate to the sites put forward for development, the manner in which these have been assessed with particular reference to examples in Codicote. Codicote is a village of reasonable scale with a population of around 3,150. There are a number of local shops, convenience stores and services in the village including a pharmacy, a primary school and active sport and leisure clubs. The village benefits from reasonable public transport links and has good access to junction 6 of the A1 to the south and therefore employment opportunities within Hitchin and Stevenage and along the A1 corridor. It is therefore, in principle a good and sustainable location for new residential development.

Development Sites in Codicote

The Housing Options Document highlights three potential sites. Two (Sites 29 and 30) are defined as falling within the 'Priority 3' classification whilst one (Site 32) is listed as being a 'Priority 2' site. Site 30 is of small scale (0.66 hectares) with an estimated dwelling capacity of just 13 houses. It lies close to a number of listed buildings including Codicote House, within an area of archaeological interest and within the Codicote Conservation Area. There are therefore a number of heritage constraints affecting the development of this site.

Sites 29 'Land South of Cowards Lane' and 32 'Land North East of The Close' are of larger scale (3.6 and 2.4 hectares respectively) and could therefore if developed in whole or in part offer a more meaningful contribution to the housing supply in the district.

When these sites were assessed by the Council as part of the 2008 / 2009 consultation exercise, the strengths and weaknesses identified were listed as exactly the same. The strengths were that neither site is affected by a wildlife designation, they are not contaminated, do not boarder water courses, could provide affordable housing, they are not with areas of archaeological interest, not with a conservation area, do not affect listed buildings and could include sustainable urban drainage systems. The only weaknesses were seen as their greenfield nature, the groundwater protection area within which Codicote is located and potential increased car usage. Clearly these issues relate to nearly all of the potential village residential sites within the district. What was clear is that as part of the assessment there were no obvious physical site constraints to development.

Despite the apparent similarities in assessment in 2009, the current consultation document lists site 29 as Priority 3 and 32 as Priority 2. Paragraph 3.3 of the consultation document suggests that the Priority 2 and 3 classifications have been made on the basis of whether Officers consider that a site would be more or less 'controversial' in terms of public opinion should it come forward for development. Although evidence to support the classifications is not included within the evidence base, from discussions with officers it is understood that this is based upon responses received when the 2008 / 2009 consultation took place. We query the appropriateness of this test as a method of selecting sites for allocation. That is, it is normal / good practice to make detailed assessments of the likely impact of development of a particular site i.e. to look at its strengths and weaknesses and the benefits it could provide. It is not good planning to simply seek to allocate on the basis of a 'feeling' as to which sites may attract less objection.

Site 29 Land South Of Cowards Lane

The only published document which seeks to provide any tangible reason as to why site 32 is categorised above 29 is in the SHLAA 2012. In the assessment matrix on page 35, it is noted that there is concern that site 29 may have an 'urbanising upon Cowards Lane & the High Street' whereas site 32 is considered to be 'well related to the existing urban area'.

We do not agree with the assessment that site 29 would have an urbanising impact. The impact of a development at the site will be dependant upon how it is designed and laid out. Clearly, the creation of a new, wide open access and the removal of boundary landscaping could have an urbanising impact, particularly if new built form was located hard

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		<p>up against the front site boundaries and at an inappropriate scale and density of development. However, a sensitively designed development could be accommodated comfortably without the urbanising affect feared in the SHLAA. In this regard, an indicative site layout plan is provided with this representation. This demonstrates the following key points:</p> <ul style="list-style-type: none"> - At present the junction between Cowards Lane and High Street is quite wide and open. - By developing the site as shown on the accompanying plan, this junction could be made much narrower with planting added to each side thereby reducing the amount of hard surfacing apparent on entry to or exit from the village. Cowards Lane would be the subject of minor realignment at its eastern end to join the proposed new site entry as shown. The proposed access has been designed by Highway Consultants Phil Jones Associates and respects necessary visibility splay and junction capacity requirements. - To further minimise the visual impact of the development it is proposed that new woodland planting is carried out as shown on the plan. This combined with the bend in the road which currently exists when accessing the village from the south would ensure that the proposed development would not be visible when driving north toward Codicote. - Similarly, the plan proposes an open entrance to the site with provision of a community orchard maintaining the rural village feel. - The site would therefore have a very minimal visual impact and could not reasonably be considered to have an 'urbanising' effect, particularly given the lower density development assumed in the SHLAA and consultation document. - Rather, the layout demonstrates that the 73 dwellings as estimated in the SHLAA can comfortably be provided along with play and amenity space and also existing site features retained such as the central hedge / tree belt with no adverse visual impacts 4.33 It is therefore considered that the site 29 could be appropriately developed to provide a high quality residential environment whilst protecting the setting and rural character of the settlement edge. 	

Comparison of Site 29 and Site 32

Given the need for new housing within the district in the period to 2031 it is considered that both sites 29 and 32 should be allocated for development. However, it is our submission that if the Council were to only allocate one site then site 29 has a number of key advantages over site 32 which should lead to it being the favoured allocation for Codicote.

Firstly and with reference to the site assessment matrix prepared by the Council, it is noted that:

- Site 29 lies within 78 metres of the local outdoor sports and recreation facilities which it is understood the Parish Council is seeking to enhance further in the near future. In contrast the nearest green space to site 32 is the local allotments. This is further away (286 metres) and whilst useful resource does not provide the same level of general benefit to and likely usage by the future residents of a housing site.
- Site 29 lies within 32 metres of a bus stop. Site 32 is 230 metres and it is an uphill walk from the site to the High Street bus stop.
- Site 29 lies closer (317 metres) to the local primary school than Site 32 (413 metres). In addition, children coming from Site 32 would need to cross the fairly busy High Street whereas those from Site 29 would have direct access without the need to cross major roads.

Site 29 is not impacted by Tree Preservation Orders, this is a constraint in respect of Site 32.

The majority of the other assessment criteria show comparable scores.

Highway Issues:

An element which the assessment matrix does not consider is the relative location of the sites in terms of their accessibility and traffic impact upon the local road system that could result from their development.

This is in our view a fairly major omission at this stage as traffic impact and the inconvenience that this can cause to existing local residents, children crossing local roads and the amenity of residents in general are often very controversial issues when allocating sites for development.

In this regard, Phil Jones Associates have assessed the relative merits of both sites and we highlight the following points:

- Access to Site 29 would be taken directly from High Street as shown on the accompanying plan minimising impact upon existing residential roads.
- In contrast access to Site 32 brings all of the generated traffic through an established residential area and past a number of existing dwellings. During a visit to site 32 it became very clear that Valley Road suffers from significant levels of on street parking as not all of the houses enjoy off road parking / sufficient off road parking. Therefore there is already a degree of inconvenience caused to the flow of traffic and therefore the amenity of the residents of this part of the settlement.
- As above, analysis suggests that most trips will head towards the A1(M) Junction 6 to the south of Codicote. Site 29 is therefore perfectly placed to minimise traffic impact on High Street and through the village.
- Traffic from Site 32 would be forced to route via Valley Road and Bury Lane to reach the northern end of High Street, before tracking back down High Street through the

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
village centre to head towards the A1(M). It was noted that the High Street already suffers congestion when delivery vehicles and / or refuse lorries are collecting. Traffic is forced to queue behind the larger vehicles and wait for oncoming traffic to pass. This leads to long queues during peak periods.			
- The proposed access to site 29 would realign the existing skewed junction of Cowards Lane with High Street. This junction currently has a poor side road alignment and a very wide junction bell-mouth, to the detriment of pedestrian movement along High Street itself. The proposed realignment would reduce the distance pedestrians are required to cross at High Street, to the benefit of pedestrian safety.			
- The point of access to the Valley Road is taken via The Close, a short cul-de-sac off Valley Road itself. This road is parked on both sides by residents of adjacent dwellings. Parking occurs on-street at an angle to the carriageway and would entail reversing manoeuvres as vehicles leave.			
- Currently, The Close only provides access to some 19 lock-up garages which are only low trip generators. The development of Site 32 would increase traffic on The Close to the detriment of highway safety.			
- Site 29 lies directly adjacent to National Cycle Network (NCN) Route 12 on Cowards Lane. NCN12 does not pass in close proximity to Site 32.			

Urban Design Issues

A further issue for consideration in terms of the relative merits of the two potential sites is the significant rise in land levels across site 32. As shown, site 32 rises from south east to north west by over 20 metres. The site is therefore extremely visible in long range views and from the public footpaths which run through and beyond the land and is substantially more prominent in views and has a far greater visual impact on the character of Codicote that would the development of Site 29.

In comparison site 29 is well contained by existing field boundaries and generally lower level such that development will be far less prominent.

LDF/7374	2	Knapper
Document Section:	Ref. 29 Land south of Cowards Lane	
Representation:	<i>Support</i>	

I would like to support plans for selective development of the green belt in Codicote which I believe will impact positively on the village

The plans (notably plans 032 -behind Valley Road and 029 - bottom of Cowards Lane / High Street) are important because:

1. they provide affordable housing for the young who we need for the future of the village;
2. they only increase the housing and population numbers by 4% - 6% respectively over the next 20 years (similar to the development of Valley Road, Grange Rise etc. in the 1970s and 1980s);
3. they will underpin (and even possibly expand) the resources we have in the village - school, shops, etc.
4. If / when the houses are built, there is a possibility that the village may financially benefit in other ways - for example, the developers will be obliged by law to give money / community infrastructure levy to the village via NHDC to ensure sufficient village infrastructure and facilities.

LDF/7524	1	Park
Document Section:	Ref. 29 Land south of Cowards Lane	
Representation:	<i>Support</i>	

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Ref. Rep No. Applicant Agent

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4. If / when the houses are built, there is a possibility that the village may financially benefit in other ways - for example, the developers will be obliged by law to give money / community infrastructure levy to the village via NHDC to ensure sufficient village infrastructure and facilities.

LDF/7571	2	Janes		
Document Section:	Ref. 29 Land south of Cowards Lane	<i>Object</i>		
Representation:			MAP	Map/plans attached

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt. An increase in commuters using the lanes to access Stevenage will only worsen the condition of those roads and create an increase in the number of accidents in an already over used lane.

Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely. Residents of The Paddocks already have to park along Valley Road to give them any hope of getting out.

Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.

Preservation of village life

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappointing and inconvenient.

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		parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school.	

Air, sound and light pollution

Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the road will not be in line with these targets.

Protection of Green Belt area

Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'

According to the National Planning Policy Framework 2012, the idea of the Green Belt is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:

Providing opportunities for access to the open countryside for the urban population

Providing opportunities for outdoor sport and outdoor recreation near urban areas

The retention of attractive landscapes and the enhancement of landscapes, near to where people live

The securing of nature conservation interests

Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'

This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.

Flood risk

Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
LDF/7792	1	Hibbins	

Document Section: Ref. 29 Land south of Cowards Lane

Representation:

Object

I am writing to oppose the housing proposal of three Codicote sites and in particular, to strongly object to the development of 13 dwellings at site 30, Lodge Farm. I would like to support in full the points raised by Mrs Colston (1 Lodge Farm) below (appendix A) and to add some further comments of my own.

As Jane has mentioned, the proposed entrance in and out is a relatively unsighted turn, particularly for cars coming from the right of Lodge Farm as you exit heading towards the High Street, proposing a significant hazard particularly should the volume of traffic increase.

A significant change to the historical environment of Lodge Farm would need to occur destroying the setting.

The existing gravel drive would be inappropriate and unviable for this volume of traffic. We as residents of six dwellings currently fund the re-gravelling of the drive every two to three years at present . It is also not a two-way drive and therefore would need to be expanded potentially resulting in the loss of two trees both of which are hundreds of years old

The current low level lighting would be wholly unsuitable for the increase in volume and street lighting would need to be installed

The historical setting of the walled garden would be destroyed in part

Trees thought previously to have been eradicated would be at risk

The ecological environment would be impacted affecting wildlife

Important parts of history dating back centuries would be lost

We would like to point out that a few of us have had planning applications refused in the past, albeit relating to our properties, however in keeping with the area the proposals have been (which has been acknowledged) due to the 'adverse affect upon the appearance of this curtilage-listed former dairy range by providing an overtly domestic extension'. I have been advised against an application for a small porch (see Appendix B) on the grounds that it would most likely be objected to by the Conservation Section, and a recent application for a flue projecting 60cm out of the extended roof of our property was also refused on aesthetic grounds (ref Ref 11/00393/1LB).

'It is considered that by reason of the flue's position when exiting through the roof and its height above the ridge, that it would be unduly prominent and would harm the special character of this converted, curtilage-listed former farm building and would also harm the appearance of Codicote Conservation Area, contrary to the provisions of Sections 16 and 72 respectively of the Planning (Listed Buildings and Conservation Areas) Act 1990 and as supported by PPS5 and English Heritage guidance entitled 'The Conversion of Traditional Farm Buildings' (October 2006).

We as residents are also in regular discussion with Daniel Rose of Hertfordshire County Council regarding the excessive noise coming from the High Street and The Bell Inn to the rear of our properties. To create what would effectively need to be another road and housing estate in front of our houses would increase this noise pollution considerably from all sides removing any peace we have and further affecting the health and sleep quality of our family.

Within both Codicote and Lodge Farm we have a strong sense of community and the benefits of village life which can only be eroded by further expansion into the green belt.

Our eldest child goes to Codicote Primary school and is in a class of 31 and our youngest is due to attend in 2014 although I'm advised her intake is heavily over subscribed as it currently stands and her place may be at risk.

Our children enjoy the woodland setting and wildlife of Lodge Farm (some of which we believe to be endangered) and they learned to ride their bikes within the grounds in peace and safety. The parks within Codicote are of extremely poor quality for young children , we have three all in various states of disrepair and all with limited facilities) and our garden and surrounding area provides them with a place to play safely.

We would urge NHDC to refrain from commissioning new housing at Codicote sites and in particular, site 30.

LDF/8007	1	Melling	
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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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Representation:

Support

I would to express my support for the additional housing that has been proposed for Codicote, especially the plot number 029. This would be a welcome addition to our community provided that the access to this area was via a new roundabout on the High Street at Cowards Lane.

I would also like to express my support for the housing and new development that has been proposed by Odyssey Knebworth - this will be very much welcome.

LDF/8163	1	Murley
Document Section:	Ref. 29 Land south of Cowards Lane	

Object

Representation:

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Sustainable transport

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Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely.

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Preservation of village life

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappoint and inconvenience parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively[1]) as well as more traffic jams as parents take children to school.

Air, sound and light pollution

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		<p>Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050[2]. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets.</p> <p>Protection of Green Belt area</p> <p>Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</p> <p>In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature, and opened to people to experience it, to the benefit of body and soul'</p> <p>According to the National Planning Policy Framework 2012, the idea of the Green Belt 'is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:</p> <ul style="list-style-type: none"> · Providing opportunities for access to the open countryside for the urban population · Providing opportunities for outdoor sport and outdoor recreation near urban areas · The retention of attractive landscapes and the enhancement of landscapes, near to where people live · The securing of nature conservation interests <p>· Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'</p> <p>This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.</p> <p>Flood risk</p> <p>Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.</p> <p>The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.</p> <p>I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.</p>	

LDF/8231	1	Broad
Document Section:	Ref. 29 Land south of Cowards Lane	<i>Comment</i>
Representation:		

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of the Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development. High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surroundings such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and the likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>

coming to a halt. Valley Road will become too bust and unable to support increased amount of traffic. Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station couple with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own tow cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state, numerous potholes and cracks (see exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow an dice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely.

Safety of residents.

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.

Preservation of village life.

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. This increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappoint and inconvenience parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that "key facilities such as primary schools... should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities". Children attending secondary schools will also have to fight for places at their preferred school (in 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school.

Air, sound and light pollution.

Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquility, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the worlds first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets. #

Protection of Green Belt area.

Codicote is within the boundaries of the Green Belt area (see exhibit 2) and subject to protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. THis high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that "Our natural environment is essential to our wellbeing , and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature- and opened to people to experience it, to the benefit of body and soul"

According to the National Planning Policy Framework 2012, the idea of the Green Belt " is a ring of countryside where urbanization will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail." The Framework continues: "Once an area of land has been defined as green

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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belt, the stated opportunities and benefits include:

Providing opportunities for access to the open countryside for the urban population

Providing opportunities for outdoor sport and outdoor recreation near urban area

The retention of attractive landscapes, near to where people live

The securing of nature conservation interests

Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries."

This open countryside is highly valued and enjoyed by walkers, bird watchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common site to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.

Flood risk

Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding high grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

LDF/8294	2	Johnson	
Document Section:	Ref. 29 Land south of Cowards Lane		
Representation:	<i>Support</i>		

1. they provide affordable housing for the young who we need for the future of the village;

2. they only increase the housing and population numbers by 4% - 6% respectively over the next 20 years (similar to the development of Valley Road, Grange Rise etc. in the 1970s and 1980s);

3. they will underpin (and even possibly expand) the resources we have in the village - school, shops, etc.

4. If / when the houses are built, there is a possibility that the village may financially benefit in other ways - for example, the developers will be obliged by law to give money / community infrastructure levy to the village via NHDC to ensure sufficient village infrastructure and facilities

LDF/8313	8	Kane	
Document Section:	Ref. 29 Land south of Cowards Lane		

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u> <i>Object</i>	<u>Agent</u> MAP	Map/plans attached
Representation:				

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of the Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt.

Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars.

Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely.

Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.

Preservation of village life

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappoint and inconvenience parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (currently 98% get their first choice in a rated school) as well as more traffic jams as parents take children to school.

Air, sound and light pollution

Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The Government have stated they are committed to reducing carbon emissions to meet international standards and almost 260 additional vehicles on the roads (assuming all 3 sites were developed) will not be in line with these targets.

Protection of Green Belt area

Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
<p>According to the National Planning Policy Framework 2012, the idea of the Green Belt 'is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:</p> <ul style="list-style-type: none"> ∫ Providing opportunities for access to the open countryside for the urban population ∫ Providing opportunities for outdoor sport and outdoor recreation near urban areas ∫ The retention of attractive landscapes and the enhancement of landscapes, near to where people live ∫ The securing of nature conservation interests ∫ Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.' <p>This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.</p> <p>Flood risk</p> <p>Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods. The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy. I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.</p> 			

LDF/8384	1	Colston	
Document Section:	Ref. 29 Land south of Cowards Lane		
Representation:	<i>Object</i>		
<p>Codicote is an ancient village of historic interest, the character and preservation of which is of enormous importance.</p> <p>Traffic</p> <p>The main road through the village is lined closely on both sides with attractive, period cottages and houses and the road is further constrained by parked cars belonging to the cottages.</p> <p>The High Street is the main thoroughfare between the A1 and Welwyn and Hitchin, Knebworth, parts of Stevenage and the surrounding villages and is regularly blocked by weight of traffic, especially during the rush hours, following an accident on the A1 or at any time of lorry deliveries to and from the quarry, to businesses or at refuse collection times. Traffic is already way in excess of capacity.</p> <p>The roads leading from Codicote to the surrounding villages are single track lanes at many points and are already totally unsuitable for either the volume or size of vehicles that use them. There are many serious accidents along the lanes, often caused by rush hour speeding. These lanes are shared by many horse riders and cyclists and are already extremely dangerous.</p> <p>The road surfaces are already unacceptable and these standards will only descend to almost impossible levels with an increased level of traffic using roads in the area.</p> <p>Public transport is simply not comprehensive enough to be practical for the vast majority of residents.</p> <p>The levels of pollution will rise with increased traffic with resultant health issues for any residents with asthma and other breathing related illnesses. There will also be pollution damage to historic buildings, flora and fauna.</p> <p>Schools</p>			

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
<p>The school provision is plainly inadequate for the large influx of children that this new housing will produce. Codicote Primary School is already over-subscribed from the current population.</p> <p>Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' There will also be increased pressure on the secondary schools in the wider area and the necessarily increased transport links.</p> <p>Green Belt</p> <p>Codicote stands in the Green Belt and is therefore protected from development and expansion.</p> <p>According to the National Planning Policy Framework 2012, the idea of the Green Belt 'is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:</p> <ul style="list-style-type: none"> Providing opportunities for access to the open countryside for the urban population Providing opportunities for outdoor sport and outdoor recreation near urban areas The retention of attractive landscapes and the enhancement of landscapes, near to where people live The securing of nature conservation interests The retention of land in agricultural, forestry and related uses <p>· Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'</p> <p>Lodge Farm</p> <p>History and ecology</p> <p>Lodge Farm was the Home Farm of Codicote Lodge (now Codicote House) and after it fell into disrepair, was converted to 6 dwellings in 2001.</p> <p>Prior to conversion the planning authorities went to huge lengths to ensure that the conversions were carried out with extreme sensitivity so that the exterior appearance of the properties and the integrity of Lodge Farm were retained. Trees were preserved and the extended walls along Heath Lane were matched with the original.</p> <p>Any development as an extension to the Farm would destroy what was so carefully preserved such a short time ago.</p> <p>Since that time, various relatively low-impact proposals have been muted but rejected on the basis of having an adverse effect on the character of traditional farm buildings.</p> <p>The immediate appearance of the Farm will be altered by the requirement to change the current gravel drive to a surface which can cope with potentially in excess of 52 more car movements per day + additional delivery vehicles - supermarket vans, couriers, removals, visitors, etc.</p> <p>The walled garden is of huge historic importance to the village of Codicote and the surrounding area, being at one time the market garden for the house and its dependents. Within the walls stand a Victorian greenhouse with original tiled floor and ventilation mechanisms and hot houses against the garden walls - these are currently being allowed to deteriorate to such an extent that any history may soon be lost.</p> <p>The garden contains varieties of native fruit trees which are still alive and fruiting and which were until recently, thought to have been lost to the nation.</p> <p>The garden and surrounding area provide an important ecological habitat which has been largely undisturbed for hundreds of years.</p> <p>Safety</p> <p>If development of Lodge Farm is allowed to go ahead, the resident children will lose their safe environment and the freedom to play safely without fear of either traffic or strangers. Lodge Farm will simply become just another road.</p> <p>The current entrance / exit on to Heath Lane is badly unsighted and is totally unsuitable for an increase of such magnitude in vehicle movements as detailed above.</p> <p>The access road to the new development would have to be properly lit with more conventional street lighting for safety, rather than the low level of lighting that currently exists.</p> <p>This would alter the feel of the Farm by introducing light pollution to a previously quiet and protected environment.</p>			

LDF/8395	3	Sparrow	
Document Section:	Ref. 29 Land south of Cowards Lane		
Representation:	<i>Object</i>		

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
The Village			
Codicote is a community and this will be destroyed by not only the additional number of people but in a lot of way/more importantly the increase to traffic.			
To build on this land, which is Green Belt, would initiate the end of village life and a gradual stream of dwellings being built, where Codicote would be lost as Codicote and just become part of Stevenage and Welwyn/Welwyn Garden City.			
Isn't and hasn't that always been why areas of Green Belt are not built upon? It is to keep such open spaces for recreation and personal well-being of people. Many dog walkers use this land, as do people with young (and older) families, horse riders and joggers. I do not own a dog but I often walk on this land for recreation and relaxation.			
Green Belt was in place to protect against planning and development of dwellings in these areas.			
Traffic/Road Use			
My first cause of concern under this category is that of Valley Road itself, if site 032 is chosen.			
The road is not that wide, with parked cars on both sides of the road. This means that apart from when you initially turn into Valley Road, it is only accessible one way at a time. Cars are parked either on both sides of the road, or where you have to give or accept right of way by/to other drivers. A clear view of the road is not always achieved because of the parking and the ups and downs of the road.			
By building 48 dwellings you will increase the number of cars using Valley Road by at least 96 cars, as these days all houses (or nearly 100%) have at least 2 cars.			
Children walking to school, people walking to the high street, dog walkers etc safety will be seriously affected by this increase in not just cars but vans and other vehicles that people own/use.			
My second cause of concern here is that of the road itself. The actual condition of the road is atrocious! Not only are there pot holes galore but also where the joins in the road have cracked. A couple of weeks ago, some and not all were filled but within 2 to 3 days these had all come out, so back to square one!			
These conditions of the road are with the current use by transport. Can you imagine the state of the road with at least another 96 cars (other vehicles) driving up and down it???			
More and more we seem to be getting snow and very icy conditions, which make Valley Road a nightmare to drive on, with cars often not being able to get up the hill and end up parking on the High Street.			
Transport			
Codicote's High Street in the morning, evenings and school finishing time is horrendous! With 48 additional dwellings, there will be commuters, whether to local towns, e.g. Welwyn Garden City, Hitchin, Stevenage etc or working further afield, e.g. London and to the main A1/M25 and M1.			
The only route to get to any/all of the above is firstly Valley Road and then the High Street! More cars when there is already way too many.			
Codicote High Street as mentioned above is horrendous! Parked cars everywhere, causing havoc all the time. Why has nothing still been done about cars parking on the pavements and on both sides of what is already a 'just passable by two cars' road??			

Representations for Housing Options Growth Levels and Locations 2011-2031

Ref. Rep No. Applicant Agent

Next is the bus service, which also leaves a lot to be desired! The 314/315 operates through Codicote from 7am (weekdays) on an hourly basis and then only every two hours until the last bus around 6pm. What do people then do to get back to Codicote? Get an expensive taxi and increase the traffic again in the village?!

Schooling
 Schooling in Codicote would be adversely affected by the increase in numbers not just in the school but within each class. It has already been said that the school can not be increased in its physical size, so how will we be able to accommodate the new children that will come with the new 48 dwellings?

There will also be the increase of older children travelling to Welwyn Garden City/Hitchin for school. That will mean more parents having to drive their children to school and more buses/coaches being laid on. Once more, this means additional transport on an already heaving, in places double parked, dangerous High Street.

Children will not be able to attend their chosen school and isn't government always trying to get us to walk children to their local school?

Local Facilities
 Codicote is not well known for its facilities for children, or adults for that matter! There is the social club, with football and tennis etc but that's it. Where and what will all these additional children (and adults) be able to do. If anything, they will have to travel further afield, e.g. Welwyn Garden City, Hitchin or Stevenage. That means more impact and traffic on Valley Road, Codicote High Street and other local roads, the majority of which are country roads which are dangerous enough in themselves.

The local doctor's surgery in Welwyn is already stuffed to over capacity and struggling. How will it be able to cope with the additional householders of 48 dwellings? It is difficult enough to get an appointment and I have never known it to run to time ¿ ever! Due to where they are based, travelling to Welwyn means more burden on the roads.

Flood Risk
 Due to where site 032 is situated, at the bottom of a valley, the area is vulnerable to flooding. How would this all be accommodated for? Where would the run off from the 48 dwellings go?

Building Site and Traffic
 Where to start on this one!

Valley Road, the High Street and the other local roads can not cope now with the amount of traffic that they have to deal with. How, how, how are they going to deal with building supply lorries, (potentially) cranes, transport of the workman/work person???. As mentioned above, the state of the road along Valley Road already. Many of these will not even fit down Valley Road because of the parked cars already there!

The detrimental effect these vehicles and the noise of the building works will have on the local residents and all of Codicote is incomprehensible!

To finish, I know that new dwellings do have to be built but can not areas that stand empty and going to waste be used? There is the old Kodak site in Stevenage and many other areas like this. In the current economy we do not need more offices being built and then sitting empty but houses for people to live in.

Sites 029 and 031 in Codicote will also have the same issues as above, in particular site 029, as Cowards Lane will have the same traffic issues as well as others.

Please save Codicote, which is a Green Belt area and let the village remain a village for the community, its current and future residents.

LDF/8508 1 Gibson

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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Document Section:	Ref. 29 Land south of Cowards Lane		
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Representation:	<i>Object</i>
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I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt. An increase in commuters using the lanes to access Stevenage will only worsen the condition of those roads and create an increase in the number of accidents in an already over used lane.

Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars.

Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely. Residents of The Paddocks already have to park along Valley Road to give them any hope of getting out.

Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.

Preservation of village life

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappointing and inconvenient for parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school.

Air, sound and light pollution

Increase in pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets.

Protection of Green Belt area

Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		recreation can make an important contribution to the health and well-being of communities.	
		In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'	

According to the National Planning Policy Framework 2012, the idea of the Green Belt is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:

- Providing opportunities for access to the open countryside for the urban population
- Providing opportunities for outdoor sport and outdoor recreation near urban areas
- The retention of attractive landscapes and the enhancement of landscapes, near to where people live
- The securing of nature conservation interests

Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'

This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.

Flood risk

Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

LDF/8590	1	Spires
Document Section:	Ref. 29 Land south of Cowards Lane	
		<i>Object</i>

Representation:

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

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Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		<p>local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars. Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely. 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Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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LDF/8602	1	Ireland
Document Section:	Ref. 29 Land south of Cowards Lane	
Representation:	<i>Object</i>	

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Sustainable transport

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Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		<p>congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.</p> <p>Compromised education</p> <p>The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappointing and inconvenient for parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' 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Representations for Housing Options Growth Levels and Locations 2011-2031

Ref. Rep No. Applicant Agent
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LDF/8611 **3** **Day**
Document Section: Ref. 29 Land south of Cowards Lane
 Representation: *Object*

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Sustainable transport

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Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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LDF/8612	3	Ewin
Document Section:	Ref. 29 Land south of Cowards Lane	
Representation:	<i>Object</i>	

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Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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belt, the stated opportunities and benefits include:

Providing opportunities for access to the open countryside for the urban population

Providing opportunities for outdoor sport and outdoor recreation near urban areas

The retention of attractive landscapes and the enhancement of landscapes, near to where people live

The securing of nature conservation interests

Green belt in England is protected both by normal planning controls and against "inappropriate development" within its boundaries.'

This open countryside is highly valued and enjoyed by walkers, birdwatchers, horse riders and sporting people alike. Site 32 has public footpaths and it is a common sight to see residents enjoying the open space by playing ball games, walking, running, jogging, riding and even tobogganing in the winter, promoting a healthier lifestyle that is in line with the health initiatives introduced after the very successful Olympic Games last year.

Flood risk

Site 32 is situated at the bottom of a valley so during periods of heavy rain, is vulnerable to flooding. This area is at a high risk of floods not only from its low position but also from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

LDF/8613	1	Pitman	
Document Section:	Ref. 29 Land south of Cowards Lane		
Representation:	<i>Object</i>		

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

High St in Codicote is the main artery for access to A1 motorway and serves Codicote and its surrounds such as Whitwell and Kimpton. As this is the only main road in and out of Codicote from Welwyn, an increase in car numbers means more frequent, traffic congestion and likelihood of more fatal accidents. Parked vehicles currently clutter High St and during peak hour it is impossible to drive through this stretch of road without coming to a halt. An increase in commuters using the lanes to access Stevenage will only worsen the condition of those roads and create an increase in the number of accidents in an already over used lane.

Access to high quality transport facilities in Codicote is non-existent. Without a Codicote train station coupled with infrequent, impractical bus timetables that do not connect local residents to Welwyn North train station means that it is a necessity for London commuters, in fact, all residents of Codicote to own motor vehicles. The proposed development of almost 50 houses at site 32 equates to almost 100 more vehicles utilising Valley Road and Bury Lane daily as each householder nowadays own two cars.

Valley Road is already beyond its maximum capacity to cope with existing traffic volume as clearly evident by its current poor state; numerous potholes and cracks (see Exhibit 1a-d). Also, this already very narrow road is heavily crowded with parked vehicles. When weather conditions are extreme such as snow and ice, problems of access are compounded, making it treacherous and difficult to manoeuvre safely. Residents of The Paddocks already have to park along Valley Road to give them any hope of getting out.

Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists

Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility. Preservation of village life Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents, especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain. Compromised education The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be a disappointment and inconvenience for parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school. Air, sound and light pollution Increase in pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government has stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets. Protection of Green Belt area Codicote is within the boundaries of the Green Belt area (see Exhibit 2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open space and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'	
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Representations for Housing Options Growth Levels and Locations 2011-2031

Ref. Rep No. Applicant Agent

from the runoff from surrounding higher grounds of built up areas, thereby making it unsafe for residents. Global warming and climate change may also have a detrimental impact on the environment in the future. Therefore the preservation of open, natural land is important in the management of potential floods.

The concept and charm of village life is about striking a fine balance between urban sprawl without compromising the quality of life of its residents, their health and wellbeing, the preservation of natural habitat and environment. I am genuinely concerned by these proposed housing plans and would like to voice my apprehensions to enable us, the people of Codicote, to shape the vision and future of our surroundings as we see fit, for countless generations to come, to enjoy.

I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

I would like to add the charm of Codicote is that it is an ancient village, where the residents in the main know each other. The proposed development is going toward turning it into a small town, this completely ruining its character forever.

LDF/8614 **3** **Ronet and Osada**
Document Section: Ref. 29 Land south of Cowards Lane
Object

Representation:

I am writing to oppose the housing proposal of three Codicote sites and in particular, strongly object to the development of 48 dwellings at site 32, land northeast of The Close leading on to Valley Road.

Sustainable transport

The safety and welfare of road users is compromised under this proposed development.

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Safety of residents

With the proposed development, the lives of young children will be at higher risk as it will become more dangerous to walk children to and from school. Cyclists, motorcyclists and horse riders alike also share the village roads and potentially, are at a greater risk of being involved in an unfortunate, fatal accident which could have been avoided had there been less cars on the roads and more visibility.

Preservation of village life

Village town centres are the heart of the communities and its viability and vitality relies upon the local residents supporting local businesses. This vitality is at risk as local residents; especially the elderly and families will refrain from wandering out into the village in fear of their lives while they cross busy roads or wish to avoid the clutter and congestion of the local streets. Consequently, many local businesses will suffer; their continuation and livelihood will become uncertain.

Compromised education

The local Codicote Primary School is at capacity presently and will not be able to accommodate more pupils in the foreseeable future. The increase in almost 130 homes in this village means that many local children will miss out on a place at the school and will have to travel afar, by car, to obtain an education. This will be disappoint and inconvenience

Representations for Housing Options Growth Levels and Locations 2011-2031

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		<p>parents who will have the added burden of transporting their children to a distant school. Under the National Planning Policy Framework 2012, the Government states that 'key facilities such as primary schools should be located within walking distance of most properties. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.' Children attending secondary schools will also have to fight for places at their preferred school (In 2012, 93.81% and 94.70% children allocated at a ranked school for primary and secondary education respectively) as well as more traffic jams as parents take children to school.</p>	

Air, sound and light pollution

Increase pollution from air, sound and light can have adverse impacts on health and quality of life. It is important that areas in Codicote are prevented from development to protect tranquillity, fresh air and space for recreational pursuits. The 2008 Climate Change Act established the world's first legally binding climate change target. Its aim is to reduce the UK's greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. The Government have stated they are committed to reducing carbon emissions to meet international standards and with these proposed developments; hundreds of additional vehicles on the roads will not be in line with these targets.

Protection of Green Belt area

Codicote is within the boundaries of the Green Belt area (see Exhibit2) and subject to its Protections. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'

According to the National Planning Policy Framework 2012, the idea of the Green Belt is a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.' The Framework continues: 'Once an area of land has been defined as green belt, the stated opportunities and benefits include:

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Representations for Housing Options Growth Levels and Locations 2011-2031

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
LDF/8615	1	Hernandez	

Document Section: Ref. 29 Land south of Cowards Lane

Object

Representation:

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		<p>keeping land permanently open, and consequently the most important attribute of green belts is their openness. This high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</p> <p>In March 2012, Rt Hon Greg Clark MP, Minister for Planning stated that 'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul'</p>	

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I urge NHDC to deter from commissioning new housing at Codicote sites and in particular, site 32.

Attachment D:
AECOM Traffic Modelling Report (December 2014)

Technical Note

Project:	Hertfordshire County Council Transport Planning Contract	Job No:	60271338 / M001.007
Subject:	North Hertfordshire District Council Preferred Option Housing Assessment - Transport Modelling Report 2014 - Update 1		
Prepared by:	Mia-Jade Thornton	Date:	04/12/14
	Abi Finch	Date:	16/12/14
Approved by:	Nick Secker	Date:	17/12/14

1.0 Introduction

In 2012 AECOM was asked by North Hertfordshire District Council (NHDC) to look at future transport issues in the district, in response to housing development forecasts proposed as part of the scenario testing to inform the development of Core Strategy allocations. Specifically, the aim of this assessment was to identify the potential transport related issues that may arise as a result of the housing development proposals and provide sufficient mitigation proposals.

Following this initial assessment, a final set of development proposals has been accepted as the Preferred Option development proposal. NHDC have consequently requested a new development assessment based on the Preferred Option and the latest SHUM forecasting model which was updated in January 2014, and approved by the Highways Agency (HA) in March 2014.

Following on from the Interim Transport Modelling Report this updated report includes explicit consideration of impacts of the latest Stevenage Borough development assumptions. It should however be noted that the housing allocations for other areas of the district, outside of the SHUM area such as Royston, have been included but an assessment of the impact on the road network in those areas is not possible due to the extent of the modelled highway network.

The preferred option development proposal identified a net total of 25,874 dwellings and 352,500 sqm of additional employment space with differing spatial allocations across North Hertfordshire.

This technical note serves three key purposes:

- Firstly, to explain the stages undertaken during the forecasting of the highway model assignment including the development of the future year highway network and traffic demand, including the housing developments (**Section 2 to 4**).
- Secondly, to present details of potential transport issues on the highway network with the Preferred Option housing development scenario (**Section 5**).
- Thirdly, to discuss mitigation proposals, in response to the transport issues of the Preferred Option housing development scenario (**Section 6**).

This assessment focuses primarily on the local road network in the SHUM model area shown in Figure 3.1 below. The impact of the housing allocations on the A1(M) is observed but no mitigation has been proposed as the A1(M) road improvements are subject of other more focused studies.

2.0 Background

A Stevenage and Hitchin Urban Transport Model (SHUM), covering Stevenage and some of the North Hertfordshire area (primarily Hitchin, with elements of Letchworth included) was developed by AECOM in 2009 and subsequently updated in October 2011 following a review and advice from the Highways Agency (HA). SHUM was developed to assist the preparation of the Hitchin and Stevenage Urban

Transport Plans (UTP) and is validated to a 2008 base against observed traffic count data and journey times. The HA signed off the 2008 base year model (October 2011 version) on 8th December 2011.

Using SHUM in forecasting mode seeks to determine the impact on the future transport network as a consequence of shifting patterns of demand over time, and forms the basis of the forecasting and analysis of the housing development proposals.

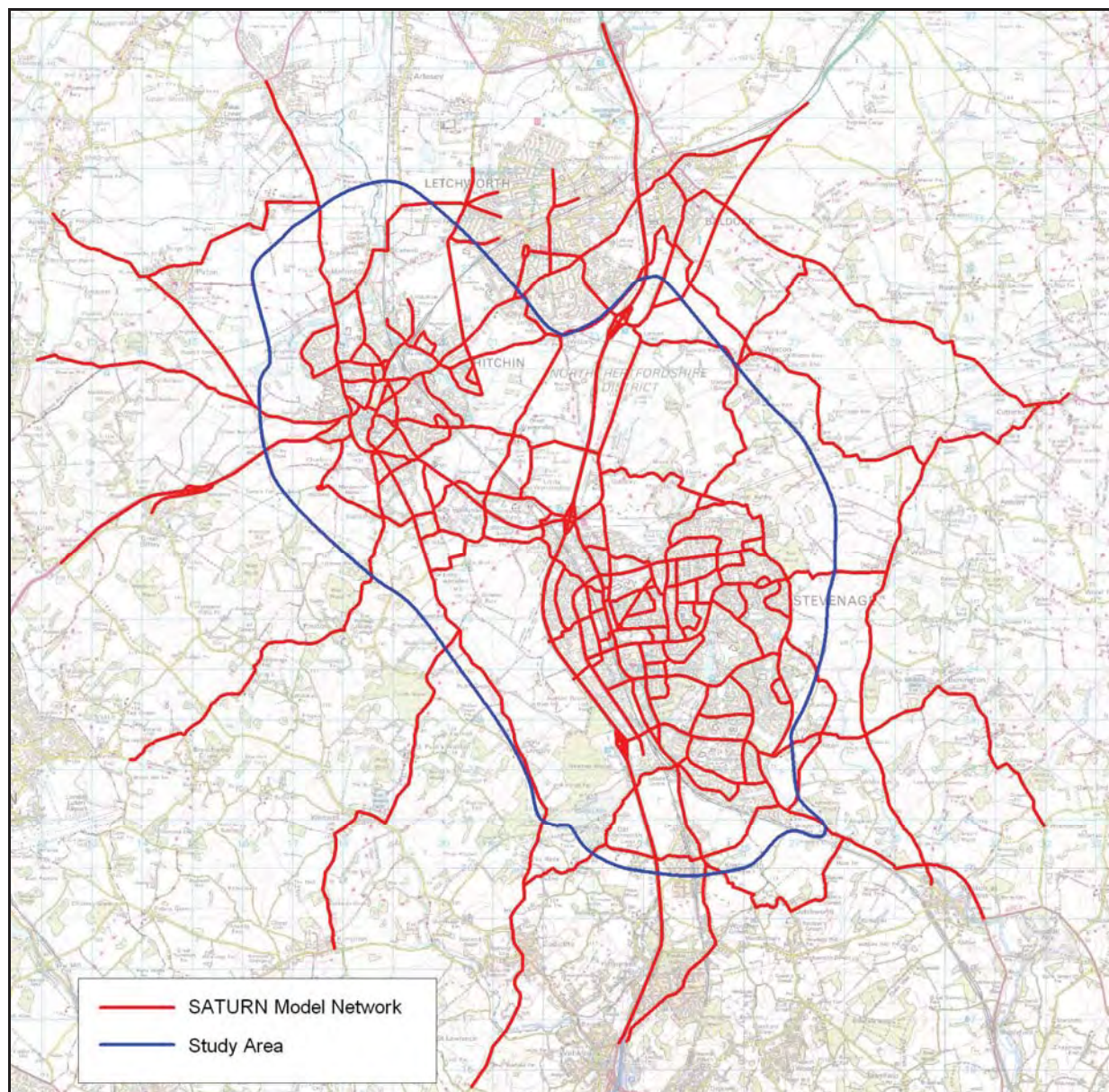
The forecasting methodology for SHUM has been reviewed on two occasions by the HA, who have provided advice on the approach and use of SHUM as a tool for forecasting. Where appropriate, this advice has been incorporated into an update to the SHUM forecasting model; the most recent update was in January 2014 and later signed off by the HA in March 2014. Details on the HA's reviews and subsequent forecasting model updates, can be found in SHUM Forecasting Model Update Report, issued January 2014.

3.0 Network Development

This section discusses the extent of the future year highway network, including constructed and committed infrastructure.

As discussed, the basis for the model forecasting was SHUM, which covers Hitchin and Stevenage, and the A1(M) motorway including junctions 7,8, and 9. The North Hertfordshire towns of Letchworth and Baldock are on the periphery of the model area but the model does not extend as far as the town of Royston. The extent of the highway network is shown in **Figure 3.1**.

Figure 3.1 SHUM Highway Network



3.1 Future Year Do Minimum Highway Network

SHUM was validated to reflect the transport network operation in 2008. To provide a representative transport network for 2031, the highway network was updated in 2012 to include the constructed and committed transport improvements in the study area. This resulted in the development of the Do Minimum network for 2031 which included the following identified improvements:

- Hitchin Payne’s Park gyratory pedestrian crossing;
- Glaxo Smith Kline junction improvements; and
- A1(M) Junction 7 signalised junctions.

It was anticipated that these improvements would be constructed and operational by 2021, therefore the 2031 highway network contains all the improvements.

3.2 Future Year Scenarios Highway Network

No information on anticipated network infrastructure specific to the identified housing developments was provided to AECOM for this assessment, therefore the SHUM Do Minimum network formed the highway network to which the Preferred (development) Option demand was assigned.

4.0 Demand Development

An important part of forecasting the likely traffic conditions on the highway network includes understanding changes to travel demand. Demand changes are a reflection of changes in income, transport prices, demographics and land use changes. The methodology employed for developing the Preferred Option demand matrices for the 2031 future year can be broken down into four stages, discussed below:

- **Stage 1** – Development of background growth factors for internal to internal (within the modelled area) and internal to external trips. Background growth effectively represents growth brought about by general changes in economic conditions resulting in increases in wages, changes in fuel prices etc., essentially all those elements not related to development. These factors were derived using the National Trip End Model (NTEM) forecasts and TEMPRO. The latest version of the dataset, NTEM 6.2 was used in conjunction with the current version of TEMPRO 6.2. This ensured the forecasts benefit from nationally and locally derived growth projections in accordance with government guidance.

For external to external movements, the East of England Regional Model (EERM v3.1) forecasts were used to provide growth factors. The growth factors were applied to the 2008 calibrated SHUM base year demand through a Furness process.

- **Stage 2** – Collection and assessment of development information in the area is undertaken to calculate the number of trips that specific developments can be expected to generate. These trips are then phased and allocated over the, development scenarios and trip demand purposes.
- **Stage 3** – The distribution of development trips in zones with no observed base year trip distribution, or similar existing land use, is determined using a gravity model. Where an observed base year trip distribution existed for zones with similar development trips, it was maintained.
- **Stage 4** – The future background growth (Stage 1) and proposed development trips (Stage 2 and 3) are added to the base year demand to produce final future year trip demand matrices.

Stage 1 – Background Growth

No changes have been required to the background growth assumptions for this assessment as the current SHUM forecasting is based on the latest available data. This initial stage of demand development therefore remains unchanged from the reforecasting of the SHUM model in January 2014.

Appendix D summarises the sources of the planning data assumptions for the East of England region that EERM v3.1 contains.

Stage 2 – Development Assumptions

The preferred option development proposal received from NHDC identified a net total of 17,380 dwellings. The housing demand forecasts provided by NHDC for the Preferred Option scenario were broken into three sets of data based on the current status of each development, and assuming all developments will be complete by the assessment year 2031. **Table 4.1** provides a breakdown of the development assumptions received.

Table 4.1 NHDC Preferred Option Housing Demand Forecasts 2031

	Developments	Total Dwellings	Total Employment (Hectares)
Emerging Sites ^a	72	15,290	32
Permissions (under construction & outstanding)	256	586	-
Completed (2011-2014)	228	934	-
Small Site Allocations	-	570	
Totals:	556	17,380	32

^a Emerging sites included the Stevenage West development, specified as 3,100 dwellings.

Small Site Allocations

A small site allocation of 570 houses was included within the Preferred Option developments which have no specific location so cannot be attributed to a particular zone. The trip volumes calculated for these houses were added into the final demand matrices using a global uplift factor in a relative proportion to the existing land-use.

Appendix A contains the full list of developments included within the Preferred Option modelling.

DM Development Duplications

A comparison was undertaken between the development assumptions provided and those already contained in the SHUM Do Minimum model for 2031 (which represents schemes that are committed or most likely to happen). There were a large number of developments which appeared in both lists, a total of 163 entries. The decision was taken to integrate these duplicate development sites into the Preferred Option matrices by keeping the quantities as they are in the existing 2031 matrices and add the remaining dwellings in to create the Preferred Option matrices.

The net total number of dwellings already accounted for in 2031 Do Minimum SHUM matrices is 1,838. This left 15,542 Preferred Option dwellings to add.

Luton Developments & External Zones

The Preferred Option developments have differing spatial allocations. The majority of these are spread across North Herefordshire however there were two developments, both notable in size within the Luton and Central Bedfordshire area which falls outside the SHUM model area.

Emerging Sites	EL1&EL2	East of Luton	1400 dwellings
Emerging Sites	EL3	Land north east of Luton	700 dwellings

To incorporate these developments within the assessment NHDC were keen to utilise the Central Bedfordshire and Luton Transport Model (CBLTM) in order to understand the volume of trips the Luton developments would generate which would route through the SHUM model area and impact on the performance of the highway network within Hitchin and Stevenage.

To do this a select zone analysis was carried out in the CBLTM 2013 model which showed the routing and volume of trips from the two developments, for this the proportion of trips travelling along the roads entering the SHUM model were then calculated and applied to the housing forecast supplied by NHDC.

This was one of a number of methods explored with NHDC and deemed to be the most appropriate despite notable differences in the development forecasts, with CBLTM based on 5,100 dwellings and NHDC forecasts of 2,100. The developments also cover a wider area than those shown in the maps

received from NHDC and some infrastructure changes have been included. These shortcomings of the CBLTM model impact on the route choice demonstrated within the model and consequently what is shown to route into the SHUM model area. This should be borne in mind when considering the resultant level of trip generation applied to the Preferred Option matrices for these sites.

Table 4.2 CBLTM Routing – Total Trips expected to enter/exit the SHUM model area

Road	SHUM Zone Allocation	Total Trips (Additions)			
		AM		PM	
		Dest.	Origin	Dest.	Origin
East of Luton	4305 (A505), & 4309 (Back Lane)	0.00	29.75	12.79	20.12
Percentage based on total trips for the full development quantum:		0%	7%	3%	11%
Land north east of Luton	4305 (A505), & 4309 (Back Lane)	0.00	7.01	5.57	2.26
Percentage based on total trips for the full development quantum:		0%	3%	3%	3%

With the exception of the two Luton developments, any housing development located outside the model area (allocated to an external SHUM zone) has been halved to account for only 50% of the trip demand generated by the development entering the modelled study area. Although a relatively coarse assumption, this retains the same assumption applied in the previous housing assessment in 2012.

Trip Rates

Trip rates were used to calculate the number of trips each development proposal would generate and attract. There were no agreed trip rates for the study area used by SBC, NHDC or Herts. Highways, nor did the Highways Agency have an agreed set. Therefore trip rates were derived using TRICS 6.2 (an industry standard database for development trip generation and analysis), the same rates as were used in the previous housing assessment in 2012. TRICS produces average trip rates from available data, the more detailed the input survey information, the more specific the trip rate.

The majority of developments had a development type description allowing the relevant private or non-private trip rates to be applied. If no description was given the mixed Private/Non Private trip rates were applied. There were also some development locations where the specific employment use was not stated, nor available. In this instance, the floor space was split between office (B1), industrial (B2) and warehouse (B8).

The trip rates adopted are given in **Table 4.3**.

Table 4.3 Generic Trip Rates (TRICS 6.2) 2009

Development Type	TRICS Use	AM Peak		PM Peak	
		Arr.	Dep.	Arr.	Dep.
Housing (per dwelling)	Private	0.106	0.366	0.293	0.153
	Non Private	0.058	0.223	0.290	0.168
	Private/Non Private	0.088	0.307	0.289	0.126
Employment (per 100 sq. m)	B1 – Office	1.211	0.132	0.104	1.052
	B1 – Business Park	1.356	0.314	0.199	1.103
	B2 – Industrial Unit	0.322	0.083	0.035	0.287
	B8 - Warehouse	0.098	0.051	0.036	0.092

Stevenage Borough Housing Allocation

Stevenage Borough’s housing allocation has been incorporated into the North Hertfordshire housing assessment. The latest development assumptions for the borough were provided by Stevenage Borough Council in November 2014 as a net total of 8,494 housing developments and 32,500 sqm. of employment space.

The housing demand forecasts were broken into two sets of data based on the current status of each development, and assuming all developments will be complete by the assessment year 2031. **Table 4.3** provides a breakdown of the development assumptions received.

Table 4.3 Stevenage Borough Preferred Option Housing Demand Forecasts 2031

	Developments	Total Dwellings	Total Employment (sqm.)
Completions & Permissions	33	1,919	-
Planning area sites	35	6,575	32,500
Totals:	68	8,494	32,500

The methods for incorporating the new developments into the model remain the same as the NHDC developments described above, but with the exception of the DM Development Duplications. The new Stevenage Borough housing assumptions replace the existing (DM) Stevenage Borough housing assumptions in the Preferred Option. The 32,500 sqm of employment development is in addition to the existing Stevenage Borough assumptions of 93,390 sqm.

Stage 3 – Distribution of Development Trips

The development trips had to be attributed to the five different car demand matrices used in SHUM, for example home based work, home based education etc. No development trips were generated for LGV or HGV as these were accommodated within the NTM assumptions for background growth.

The method employed in splitting out the development trips into demand segments was the same as applied to Do Minimum model update. In brief, five ‘typical’ zones for each of the main development uses; residential and business were selected. ‘Typical’ zones are considered as those where the predominant land use is one of the three types. Five zones were chosen for Stevenage and five for Hitchin.

The demand segment proportions were calculated from the base year trip matrices. Different segments were used for the different development land uses:

- Residential – all five car demand segments
- Business – two car demand segments (Home Based Work and Employers Business).

The matrices were added together and the origin and destination trip end totals used for proportioning the zones’ trips. From these zone proportions, an average proportion across the five zones was then taken forward to split the development trips.

The development trips at this stage of the process are zone trip ends, having an origin or destination at the development site location but the other end of each trip is still to be defined. Where development trips are identified in zones which contain an existing observed base year trip distribution, the zone trip end is distributed based on the observed distribution. However, in locations where no observed trip distribution exists, the matrix trip cells, and therefore distribution of the development trips, are filled by means of a journey purpose specific gravity model.

A gravity model distributes trip ends across the entire network according to weightings based upon the ‘population’ of different zones and relative attractiveness between each zone pair. In this instance, the attractiveness is based on trip volume and the time between each zone pair. Separate gravity models have been developed for each car journey purpose which allows different average trip lengths for each purpose to be represented within the model. Journey purpose specific zone to zone travel times were

obtained from skimming the base year highway network in the transport model, whilst the populations at both zones were defined using the existing trip demand.

Stage 4 – Final Demand Matrices

The last stage of the matrix demand process adds the net background growth and development trips to the base year demand.

For the purposes of the NHDC housing assessment the final future year demand has not been constrained to overall TEMPRO growth, as it is considered that the development assumptions provided for the Preferred Option are a more accurate representation of localised future levels of growth.

The final gross matrix totals are given in **Table 4.4**. The unconstrained Do Minimum forecasting demand totals have been included for comparison purposes.

Table 4.4 Summary of growth in demand

Peak	BY 2008 AM	DM 2031 AM	DS 2031 AM	BY-DS Percentage Difference (%)	DM-DS Percentage Difference (%)
Home Based Work	23,192	30,773	36,567	58%	19%
Home Based Education	1,996	2,611	3,265	64%	25%
Home Based Other	6,081	8,413	9,789	61%	16%
Non Home Based Other	2,157	3,086	3,439	59%	11%
Employers Business	1,692	2,045	2,291	35%	12%

Peak	BY 2008 PM	DM 2031 PM	DS 2031 PM	BY-DS Percentage Difference (%)	DM-DS Percentage Difference (%)
Home Based Work	15,815	21,494	26,007	64%	21%
Home Based Education	1,106	1,392	1,673	51%	20%
Home Based Other	11,558	15,684	18,202	57%	16%
Non Home Based Other	4,853	6,400	7,247	49%	13%
Employers Business	1,346	1,676	1,873	39%	12%

The final matrices were run through the modelled highway network and stress plots were produced, as shown in **Appendix B**. These plots show the links where there are capacity constraints – those highlighted in red are links where the volume over capacity is over 100% indicating that the design capacity of the highway network configuration cannot cope with the levels of demand.

5.0 Scenario Testing

This section discusses the transport impact of the Preferred Option housing development proposal. The Preferred Option scenario has been analysed to understand the development impact on the highway network. The cost associated with delivering the transport infrastructure required to facilitate the Preferred Option demand is presented in **Section 6**.

In this assessment we have developed a comparative Do Minimum scenario to provide a useful proxy for what mitigation might be required regardless of the full Preferred Option demand being delivered. This scenario is made up of forecast Do Minimum demand (background growth plus developments that are committed or very likely to be committed, in the future year) and a Reference Case highway network containing a number of mitigation proposals for pinch points that were observed in the existing 2031 highway network. Fourteen network pinch points were identified in total.

Figure 5.1 identifies where the modelling of Preferred Option demand has indicated that in 2031 there is a problem with network operation in addition to the pinch points addressed in the Do Minimum scenario. This has been identified through modelling indicators which show there are still more than 100 vehicles queuing at a junction at the end of the AM or PM peak hour. There are a whole range of indicators that could be used, but queuing traffic at particular locations at the end of the modelled peak hour enables us to focus on the pinch points on the network and identify in more detail what the issues are.

This information is also shown in tabular form in **Table 5.1**. The table, for each of the identified problem locations, provides information on when the problem occurs (i.e. morning peak, evening peak or both) and cross-references against the Do Minimum scenario. The table indicates in both scenarios there are operation issues at the same locations across the network.

Table 5.1 Identified Problem Locations in 2031

Ref.	Problem Location	Do Minimum	Preferred Option
HM2	A505 / B655 Pirton Road	✓	✓
HM3	Payne's Park	✓	✓
HM4	A602 / B656 London Road (Hitchin Hill)	✓	✓
HM5.1	Hitchin Industrial Area / Cadwell Lane	✓	✓
HM5.2	A505 Cambridge Road / Woolgrove Road / Willian Road	✓	✓
HM7	Fishers Green Road	✓	✓
HM9.1	A1(M) Junction 7 Northbound Onslip	✓	✓
HM9.2	A1(M) Junction 7 Roundabout (southbound offslip)	✓	✓
HM9.3	A1(M) Junction 7 Northbound mainline (from Junction 6)	✓	✓
HM9.4	A1(M) Junction 7 Southbound Onslip	✓	✓
HM10	A602 Hitchin Road / A1072 Gunnels Wood Road Roundabout (westbound approach)	✓	✓
HM11	A115 Fairlands Way / Grace Way	✓	✓
HM12	Six Hills Way / Homestead Moat	x	✓
HM13	A602 / Monkswood Way	✓	✓
HM14	B197 London Road / Monkswood Way	✓	✓
HM15	A602 / Stevenage Road	x	✓
HM16	A1(M) Junction 9 Northbound Mainline (from Junction 8)	x	✓
HM17	A1(M) Junction 8 Northbound Onslip	x	✓
HM18	Six Hills Way/ Valley Way roundabout	x	✓
HM19	A602/Valley Way/ Broadwater Crescent Roundabout	x	✓
HM20	London Road/Toby Carvery Junction	x	✓
HM21.1	Rectory Lane/Weston Road	x	✓
HM21.2	B197 North Road/A602 Lytton Way	x	✓
HM22	Arch Road/Hitchin Road	x	✓
HM23	A1072 Gunnels Wood Road/Clovelly Way	x	✓
✓	<i>Problem location in the morning peak only</i>		
✓	<i>Problem location in the evening peak only</i>		
✓	<i>Problem location in both morning and evening peak</i>		

In total, twenty five pinch points have been identified across the two scenarios. Ten of these pinch points were first identified in the LDF Housing Assessment in 2012 and found to still be an issue within the Do Minimum scenario. For comparison purposes the reference numbers for these pinch points have been retained. These are pinch points HM2-10, with the exception of HM9.4 which is a newly identified pinch point along with HM11-23.

Eleven pinch point junctions occur as a result of the full housing demand contained within the Preferred Option scenario. Notably the majority of these occur within the Stevenage area or the A1(M) which is

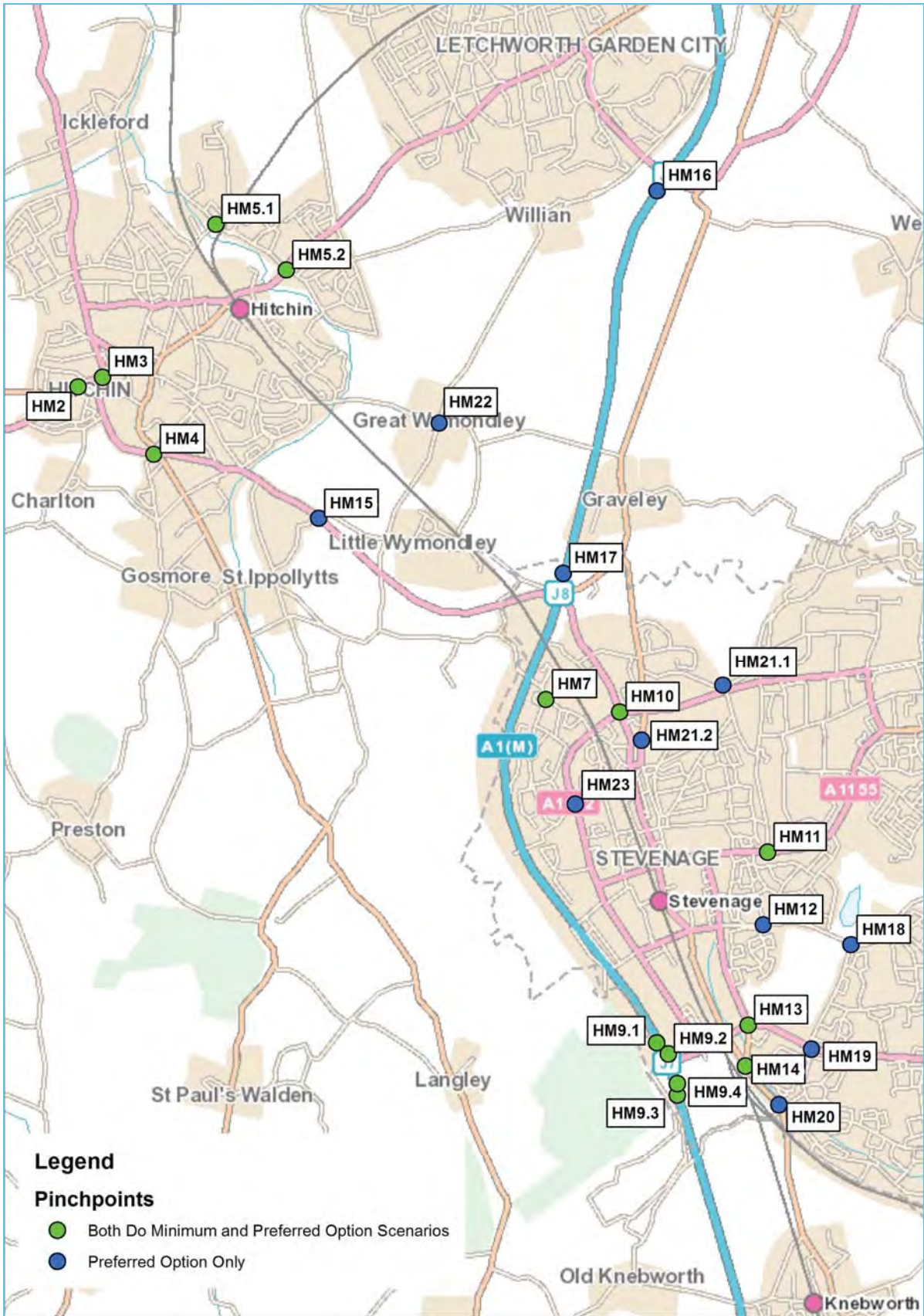
reflective of the fact that the most sizable developments are located within Stevenage or outside the model area so route along the A1(M), as shown in **Table 5.2**.

Table 5.2 Largest Preferred Option Developments

Ref.	Address
BA1	Land north of Baldock
LG1	North of Letchworth
GA2	Land off Mendip Way
NS1	North of Stevenage
WS1	West of Stevenage
SB	Stevenage Town Centre – residential development

Table 5.1 also indicates that the AM peak is the most congested time period with twelve of the junctions only occurring in the AM peak, and five occurring in both peak periods.

Figure 5.1 Problem locations in 2031 in the Do Minimum and Preferred Option Scenarios



6.0 Mitigation Testing

With the problem locations identified in 2031 for each housing development scenario, it is necessary to establish some mitigation proposals to address the problems and enable the growth to come forward. For each of the identified locations a mitigation proposal has been identified and tested within the model to establish whether it addresses the issues and does not create a problem elsewhere. For each mitigation proposal, a scheme pro-forma has been developed to explain the issues that have been identified as a result of the growth and outline the mitigation proposals to address the problem.

The original mitigation proposals set out in the 2012 LDF Housing Assessment were re-tested in this assessment and found to still be valid.

Scheme pro-formas have not been developed for the A1(M) pinch points due to more focused studies taking place on the A1(M) junctions by the A1(M) consortium led by HCC which is focussing primarily on the localised access arrangements to the A1(M) and the Highways Agency (HA) which has commissioned work to assess options for the A1(M) mainline. At this time no specific schemes for junctions 7 to 9 have been confirmed. Any mitigation designs or scheme costing based on this assessment would therefore be of limited value at this stage.

Current proposals for the A1(M) mainline carriageway between Junction 5 and Junction 9 are discussed in the HA documents entitled “Route strategies: Option Assessment Report” and “Route strategies: Strategic Outline Business Case”. The localised options are currently in development.

The scheme pro-formas are all presented in **Appendix C**, but in summary they include the following proposals outlined in **Table 6.1**.

Table 6.1 Summary of Mitigation Proposals

Ref.	Problem Location	Improvement
HM2	A505 / B655 Pirton Road	Change to a signal controlled junction
HM3	Payne's Park	Change to a signal controlled junction
HM4	A602 / B656 London Road (Hitchin Hill)	Widen approach arms and signalise the St John's Road approach
HM5.1	Hitchin Industrial Area / Cadwell Lane	Connect Wilbury Way and Cadwell Lane to the north of the industrial area; Redesign Cadwell Lane junction movements
HM5.2	A505 Cambridge Road / Woolgrove Road / Willian Road	Implement a MOVA signal controlled system at the junction, enabling the signals to respond and adjust according to traffic levels.
HM7	Fishers Green Road	Add an additional southbound lane on the northern approach
HM10	A602 Hitchin Road / A1072 Gunnels Wood Road (westbound approach)	Implement a MOVA signal control system; <i>Widen the westbound approach to 3 lanes at the junction stop line (if possible within the existing highway boundary)</i>
HM11	A115 Fairlands Way / Grace Way	Introduce a segregated straight on lane (westbound) at the roundabout, with a merge provided on exit
HM12	Six Hills Way / Homestead Moat	Signalised T-junctions at staggered junctions, with the introduction of MOVA operated signals
HM13	A602 / Monkswood Way	Implement a MOVA signal controlled system at the roundabout
HM14	B197 London Road / Monkswood Way	Extend flared length on southern approach
HM15	A602 / Stevenage Road	Ban the left turn movement from the A602 eastern approach arm to rural Ashbrook Road
HM18	Six Hills Way/ Valley Way roundabout	Change to a signal controlled T-Junction, with a 2 car right turn flare on the western approach

Ref.	Problem Location	Improvement
		and a 2 car left turn flare on the southern approach
HM19	A602/Valley Way/ Broadwater Crescent Roundabout	Implement a MOVA signal controlled system at the roundabout
HM20	London Road/Toby Carvery Junction	Change to a signal controlled junction
HM 21.1 & HM21.2	Rectory Lane/Weston Road & B197 North Road/A602 Lytton Way	Implement a 3 car flare to enable 2 lanes of traffic onto the circulatory from the B197 North Road approach
HM22	Arch Road/Hitchin Road	Change the priority of the junction to make Arch Road southern approach and Hitchin Road the major arms and Arch Road north approach the minor arm.
HM23	A1072 Gunnels Wood Road/Clovelly Way	Introduce a segregated left turn lane from Gunnels Wood Road to Clovelly Way.

6.1 Mitigation Scheme Cost Estimates

A costing exercise has been undertaken for the mitigation proposals, but these can only be considered as preliminary designs and estimates at this stage, suitable to inform the development of the Core Strategy and the associated Infrastructure Delivery Plan. We have included a caveat in association with these cost estimates which should be considered when interpreting the estimates, which can be found in **Appendix E**.

The costs associated with the mitigation proposals that have been identified are summarised in **Table 6.2**.

Table 6.2 Scheme Costing

Ref.	Mitigation Scheme Location	Cost (£)
HM2	A505 / B655 Pirton Road	842,000
HM3	Payne's Park	1,485,000
HM4	A602 / B656 London Road (Hitchin Hill)	1,221,000
HM5.1	Hitchin Industrial Area / Cadwell Lane	5,838,000
HM5.2	A505 Cambridge Road / Woolgrove Road / Willian Road	323,000
HM7	Fishers Green Road	61,500
HM9.1	A1(M) Junction 7 Northbound Onslip	-
HM9.2	A1(M) Junction 7 Roundabout (southbound offslip)	-
HM9.3	A1(M) Junction 7 Northbound mainline (from Junction 6)	-
HM9.4	A1(M) Junction 7 Southbound Onslip	-
HM10	A602 Hitchin Road / A1072 Gunnels Wood Road (westbound approach)	479,000
HM11	A115 Fairlands Way / Grace Way	191,800
HM12	Six Hills Way / Homestead Moat	852,500
HM13	A602 / Monkswood Way	666,000
HM14	B197 London Road / Monkswood Way	4,000
HM15	A602 / Stevenage Road	17,350
HM16	A1(M) Junction 9 Northbound Mainline (from Junction 8)	-

Ref.	Mitigation Scheme Location	Cost (£)
HM17	A1(M) Junction 8 Northbound Onslip	-
HM18	Six Hills Way/ Valley Way roundabout	785,750
HM19	A602/Valley Way/ Broadwater Crescent Roundabout	600,000
HM20	London Road/Toby Carvery Junction	905,000
HM21.1 & HM21.2	B197 North Road/A602 Lytton Way	134,000
HM22	Arch Road/Hitchin Road	18,800
HM23	A1072 Gunnels Wood Road/Clovelly Way	1,346,200

From the information we have provided in **Table 5.1**, we have identified the costs associated with the Preferred Option housing development scenario in **Table 6.3**. We have also included the cost associated with delivering the schemes that we had identified in the Do Minimum scenario. This only provides a means of comparison and gives an indication of the level of mitigation that might be required even if the full forecast of development does not go ahead. Mitigation schemes HM15 to 23 and HM12 are not required in the Do Minimum scenario, meaning that (excluding the A1(M) pinch point schemes) only an additional £4.660m would need to be spent for the mitigation scenarios associated with the Preferred Option scenario. It should again be highlighted that this does not include the costs associated with the A1(M) schemes which are likely to be significant. It is also not clear at this stage who is likely to bear these costs. It should however be stated that by providing the schemes as part of the Do Minimum means that additional capacity is available in the network which can be used by trips associated with the Preferred Option development – but the Preferred Option developments themselves very much contribute to the need for the schemes.

Table 6.3 Summary of Cost per Land Use Scenario

Land Use Scenario	Total Cost (£)*
Do Minimum scenario - indicative	11,111,300
Preferred Option scenario	15,770,900

* not including A1(M) Junction 7-9 scheme costs.

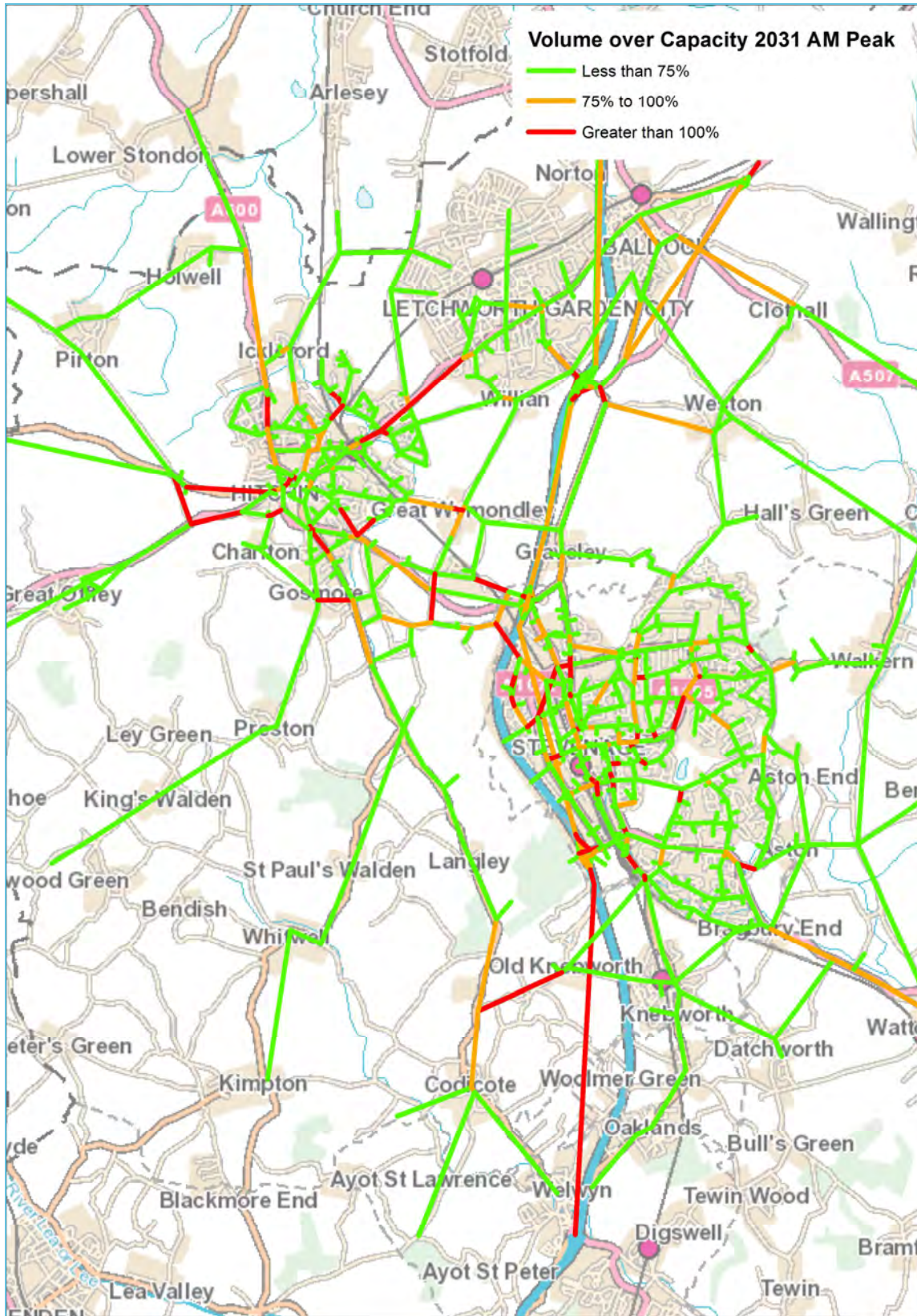
7.0 Summary

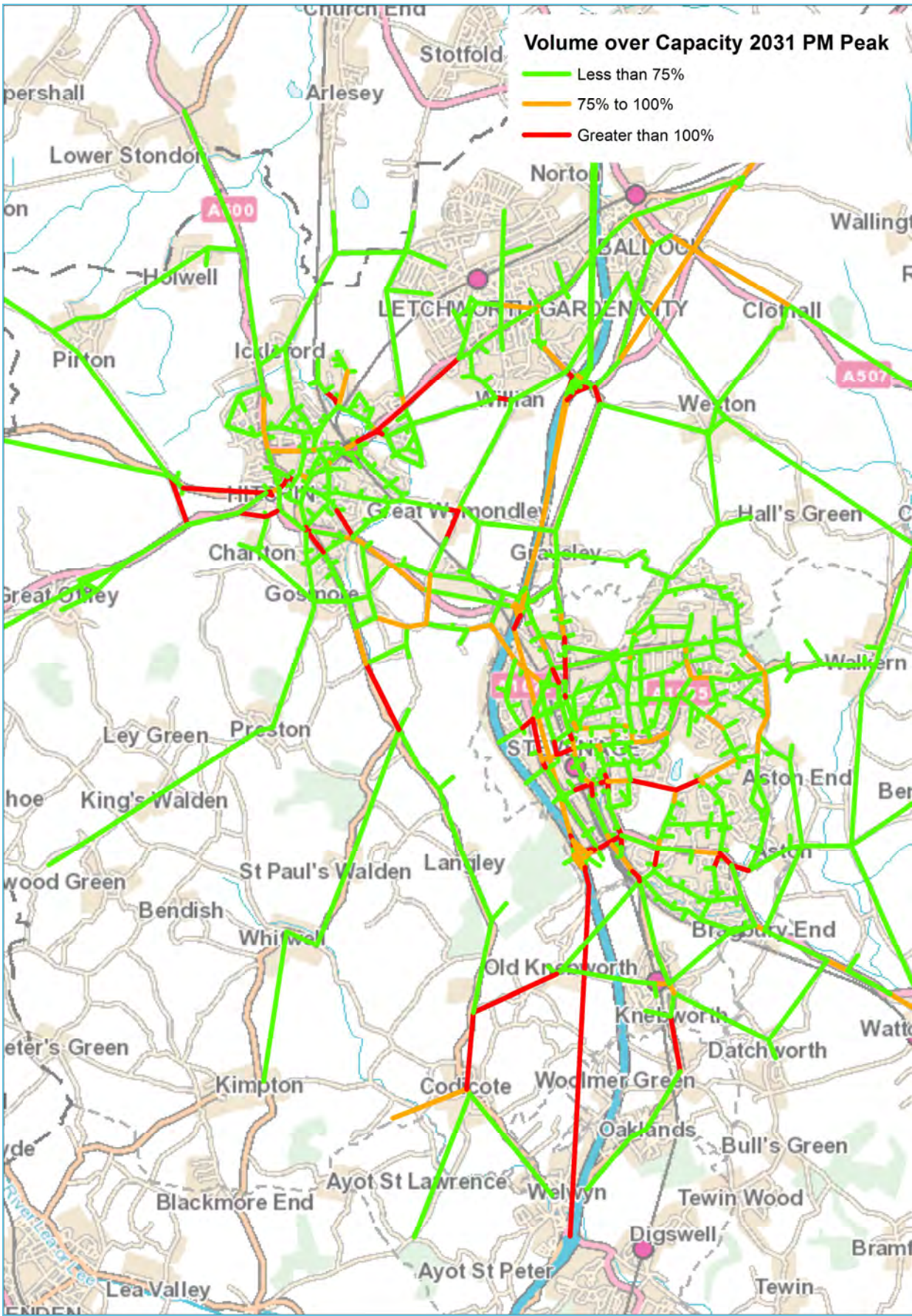
The assessment of the Preferred Option housing development scenario in 2031, highlights that there will be highway impacts across the network when the developments are in place. However, this assessment does not specifically identify the highways impacts that occur as a direct result of a particular development, or the dependency of a development on the provision of a transport intervention. This assessment provides a broad overview of potential problem locations identified in the future year of 2031, when a specific housing development scenario is in place.

Analysis of an indicative Do Minimum scenario indicates that many of the schemes required for the Preferred Option scenario are also needed in the Do Minimum situation. Although this would imply that many of the schemes would be required regardless of the development, each of the developments does have a significant impact at the locations and would use up the spare capacity available at these junctions so would need to contribute to their delivery.

Technical Note

Appendix B – Preferred Option Demand Link Capacity Stress Plots (Pre mitigation)





Location	A602 / B656 Hitchin Hill Roundabout
Reference	HM4

Description of Problem

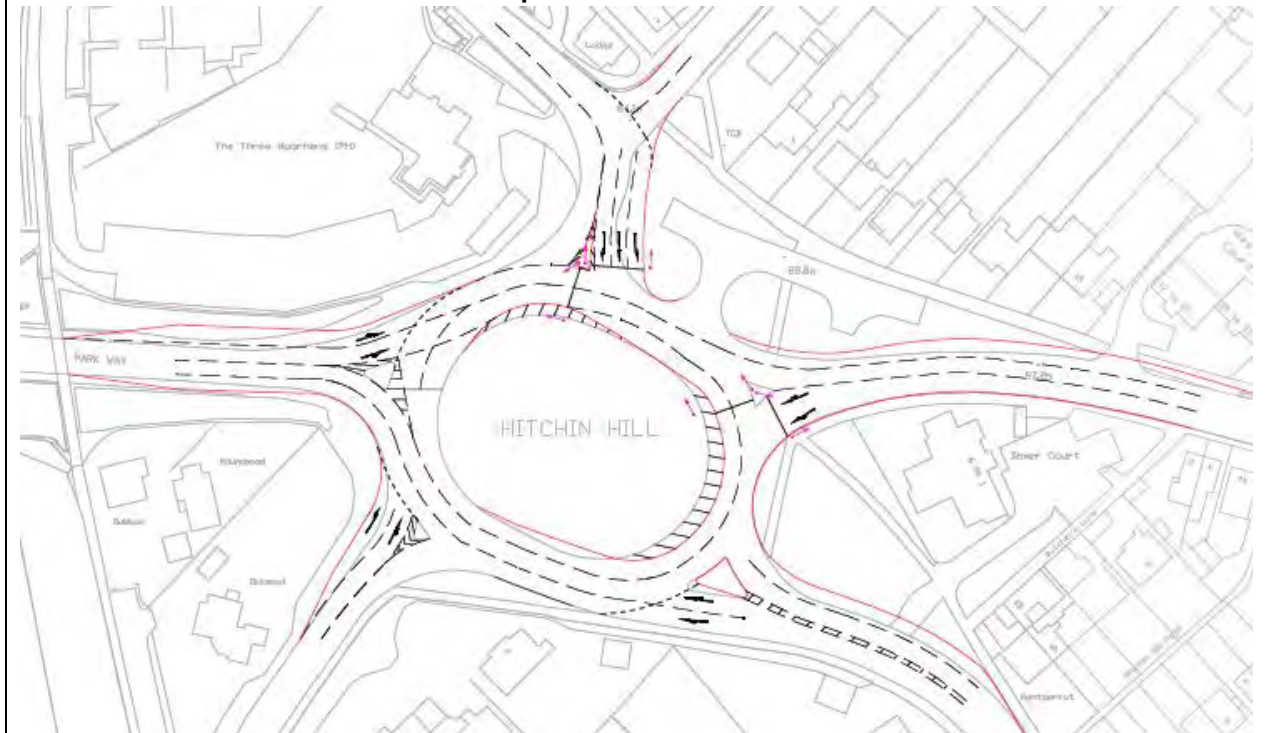
The A505 / A602 through Hitchin, which provides a link between Luton and Stevenage/ A1(M) has been identified as a key route which is susceptible to a lack of capacity. There is insufficient capacity at the A602 / B656 Hitchin Hill roundabout, which causes congestion on this main corridor during the busy AM and PM peak periods, with queuing on the A602 and St John's Road from the B656 Hitchin Hill approach despite a 'keep clear' sign in place.

Mitigation Proposal Details

Increase the roundabout capacity and improve the movement of traffic by widening some approaches and partially signalise the A602 / B656 arm of the existing roundabout.

- Widen St John's to a three lane entry.
- Widen Stevenage Road, London Road, Gosmore Road and Park Way to extend the existing two lane approaches.
- Provide two lane exits on St John's, Stevenage Road, London Road and Park Way with a single exit on to Gosmore Road.
- Install signals on St John's Road approach.

A505 / B656 Hitchin Hill Roundabout Improvement



Outline Cost Analysis

The cost estimate for delivery excludes the following:

- Legal Costs
- Landscaping Design
- Statutory Undertakers design fee.
- Statutory Undertakers diversion and or protection costs.

- Third Party Ground Investigation costs. Trial Pits and Geotechnical surveying will be supplied by third parties.
- Traffic Regulation Orders & any associated consultation (TRO's).
- 3rd Party Land acquisition costs and accommodation works costs.
- Dedication of Land, Land to be passed over to the council as highway.
- Contract documentation for appointment of the preferred contractor, as this is being progressed by others.
- Tendering of the works
- Site support fees during the construction period, this will be included within a later fee proposal, if required.

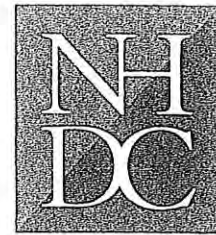
Initial costs for implementing this junction have been estimated at £1.2 million. These costs were based on a construction year of 2021 accounting for inflation, with the breakdown of the costs outlined in more detail.

Works Element	Estimated Cost	Notes
Construction Items	£337,000	
Allowances for Design Fees	£67,000	20% of the construction items
Allowances for Preliminaries	£337,000	100% of the construction items
Allowances for Supervision	£34,000	10% of the construction items
Allowances for Utilities / Electricals	£67,000	20% of the construction items
<i>Sub-Total for allowances and construction items</i>	<i>£842,000</i>	
Optimism Bias	£379,000	45% of sub-total
Cost for Delivery	£1,221,000	2021 Construction Year

Attachment E:
Bus Timetables – Routes 215 & 315

APPENDIX 2

North Herts Local Plan 2011–2031 Site Selection Matrix



North Hertfordshire Local Plan 2011 - 2031

Background Papers

Preferred Options - Consultation

November 2014

Site Selection Matrix

This study is one of several evidence studies which have been prepared. It needs to be read in conjunction with all other studies, which have all been taken into account in preparing the Local Plan Preferred Options paper. Collectively these studies have informed the site selection process. An overview of the conclusions can be found in the Site Selection Matrix. All studies are available to view at: www.north-herts.gov.uk/localplan

Ref	Site	Place	Dwelling estimate	Area (hectares)	Suitable	Suitability comment	Available	Availability comment	Achievable	Achievability comment	Category	New ref (sites in draft Local Plan)
BL/F01	Coach depot	Barley	7	0.162	Yes	Site forms previously developed site within existing settlement boundary.	No	2013 Survey	No	Achievability of unsuitable / unavailable sites not considered.	F	
BL/F02	Land east of Picknape Road	Barley	15	0.741	Yes	Site capable of delivering residential development. Outside existing village boundary. Not previously developed land.	Yes	2013 Survey	Yes	Impact on conservation area and listed buildings	C	
28	Land at Clothall House, Ashanger Lane	Clothall	252	12.604	No	Site contains an ancient Monument, is within a wildlife site and is remote and poorly related to village, which itself is very small.	No	No response to the 2013 Survey	-	Achievability of unsuitable / unavailable sites not considered.	F	
29	Land south of Cowards Lane	Codcote	73	3.640	Yes	Site capable of delivering residential development. Outside existing village boundary. Not previously developed land.	Yes	Representations made to Housing Options consultation Feb 2013	Yes	Greenfield site with no obvious factors that would influence viability.	D	CD1
30	Land at Codcote House, Heath Road	Codcote	7	0.666	Yes	Site capable of delivering residential development. Outside existing village boundary. Not previously developed land. May be difficult in designing acceptable scheme due to historic walls around site. Low dwelling estimate to reflect complexity of site.	Yes	2013 Survey	Yes	May be harder to design scheme which fits within historic walls.	D	
31	Land south of Heath Road	Codcote	42	2.100	Yes	Site capable of delivering residential development. Outside existing village boundary. Not previously developed land.	Yes	2013 Survey	Yes	Greenfield site with no obvious factors that would influence viability.	D	
32	Land north east of The Close	Codcote	48	2.397	Yes	Site capable of delivering residential development. Outside existing village boundary. Not previously developed land.	Yes	2013 Survey	Yes	Greenfield site with no obvious factors that would influence viability.	D	CD3

APPENDIX 3

Assessment of Potential Development Sites in the Green Belt

1b Assessment of Potential Development Sites in the Green Belt

Introduction

52. This part of the Green Belt review looks at potential development sites within the Green Belt and assesses them against the functions of Green Belt as set out in paragraph 80 of the National Planning Policy Framework (NPPF). This review forms part of the evidence base in support of the North Hertfordshire District Council Local Plan.
53. This Green Belt review will help inform decisions and potential changes that might be made to the extent and location of the North Hertfordshire Green Belt. Growing development pressure and the fact that there are limited brownfield sites or sites within North Hertfordshire settlement boundaries available for development means that areas within the Green Belt are potentially needed to accommodate new housing and related development.

Role and purpose of Green Belt

54. Green Belt in North Hertfordshire wraps around the three towns of Hitchin, Letchworth and Baldock. Inevitably the more sustainable locations for development are on the edge of these towns or other settlements within the Green Belt.
55. There are five functions to the designation of Green Belt:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
56. See Fig 1 Green Belt in North Hertfordshire.

National Planning Policy Framework (NPPF)

57. The guidance in the NPPF sets out the issues that need to be addressed when assessing the capture or release of Green Belt land. Part 1a of the report details the relevant principles but this part considers the need to ensure the Green Belt boundary is capable of enduring beyond the plan period and that the requirement for sustainable development is considered when making decisions on release of existing Green Belt or designation of new Green Belt.
58. The NPPF requires local planning authorities to:
- a. *Demonstrate why normal planning and development management policies would not be adequate;*
 - b. *Set out whether any major changes in circumstance have made the adoption of this exceptional measure necessary;*
 - c. *Show what consequences of the proposal would be for sustainable development;*

- d. Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining area; and
- e. Show how the Green Belt would meet the other objectives of the Framework.

TABLE 7: SUMMARY OF DEVELOPMENT SITES ASSESSMENT

Stage	Explanation
Potential development sites	Consider, at a more detailed scale, sites identified in the housing allocation study, within the Green Belt.
Assessment against Green Belt principles	Assess sites against four of the five Green Belt purposes. (Note that the fifth purpose has not been considered as the other four purposes are all deemed to contribute to urban regeneration).
Site visits	Check site boundaries.
Conclusion	Bring together scores for each of the four purposes to provide overall score for contribution to the Green Belt.

Methodology - potential development sites

- 59. There are over 300 potential development sites of which 114 are in the Green Belt. The remaining sites are either within settlements or on land beyond the Green Belt. The sites within the Green Belt that have been assessed range from individual fields to strategic sites. They have been assessed against the Green Belt purposes but the detailed criteria used to inform the assessment has been tailored to address the contribution individual sites can play in supporting the Green Belt purposes.
- 60. Site visits have been carried out as part of the original land allocation assessment of the sites.
- 61. As with the assessment of existing Green Belt, the fifth purpose, assisting in urban regeneration by encouraging the recycling of derelict and other urban land, was not assessed as the other four purposes are all deemed to contribute to urban regeneration.
- 62. The methodology for assessment against Green Belt purposes is set out below.
- 63. The following criteria have been derived from an analysis of other Green Belt Reviews and the establishment of a best practice approach with the intention of conducting an objective assessment of potential development sites in the Green Belt.

64. As part of this assessment the review considers what boundaries would result from potential allocation of any of these sites for development in the Green Belt. A boundary is a physical feature, easily recognisable and likely to be permanent. A strong boundary would be a road, railway line or established hedgerow. A weak boundary would be a ditch, fence or footpath.

TABLE 8: SITE ASSESSMENT

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
		OR	
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
For town site			
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	A higher score denotes a stronger fulfilment of the green belt purpose
		OR	
For village site			
Distance between the	1	More than 2km	A lower score

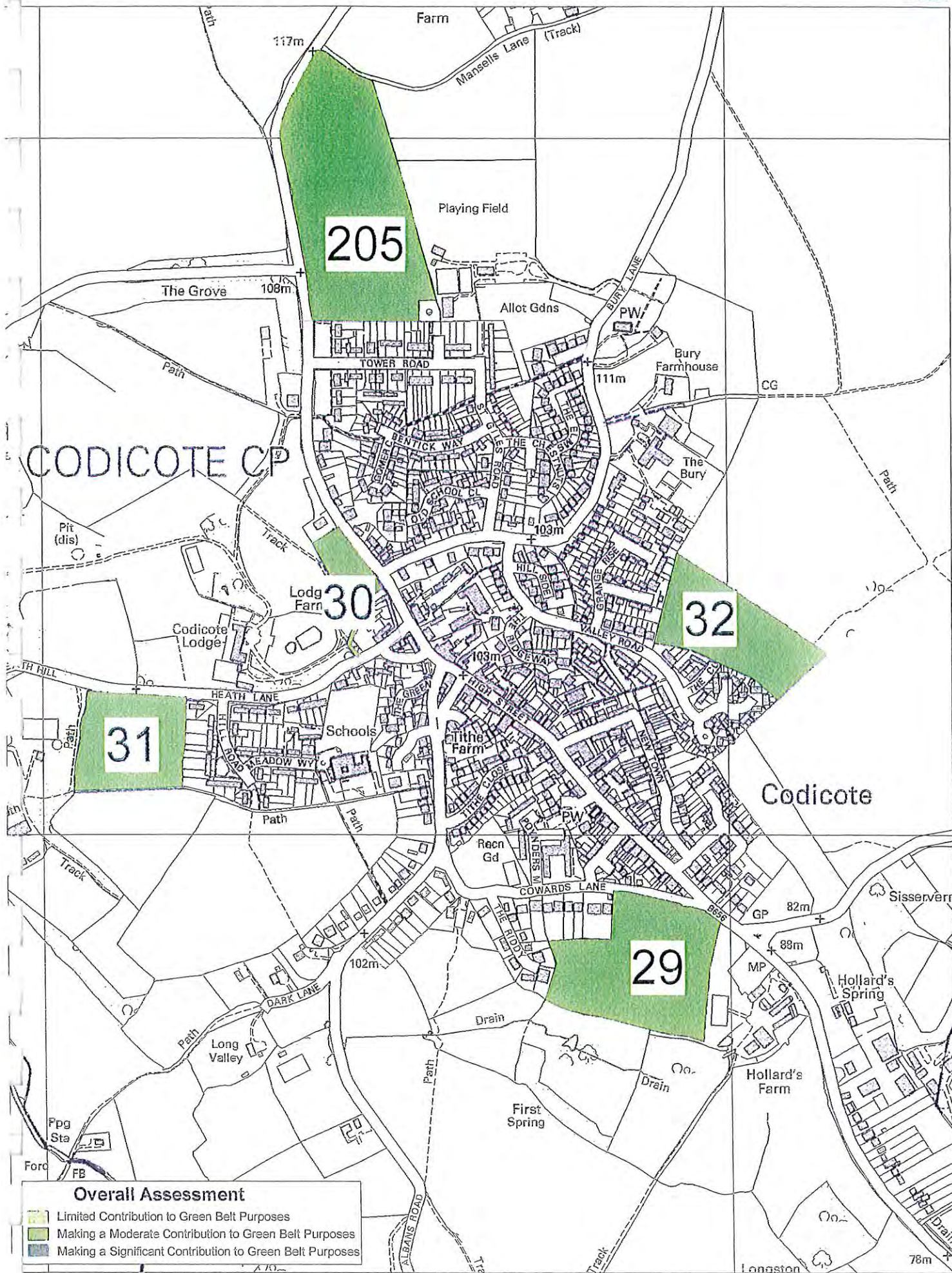
site's outer boundary and nearest village built-up edge in direction of growth			denotes a lesser role in fulfilling the green belt purpose
	2	Less than 2km	A higher score denotes a stronger fulfilment of the green belt purpose

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 or historic town	
	2	Adjacent to a conservation area or effecting the setting of a historic town	
	3	Within a conservation area	Sites containing or adjacent to a conservation area are considered to better contribute to and preserve the setting and character of historic towns



Scale: 1:5000
Date: 06.11.14



Ref	Property description			Attributes			Green Belt Assessment					Boundary Detail
	Address	Street	Settlement or parish	Urban /rural	Primary proposed use.	Sprawl	Towns merging	Safeguarding countryside	Preserve setting of historic towns	Score		
28	Land at Clothall House	Ashanger Lane	Clothall	rural	residential	3 - Not adjoining any built up area	2- Within 2km of Weston	3 - No village boundary	1 - No conservation area impact	9 - making a moderate contribution to Green Belt	North sloping site screened by hedgerows from surrounding lanes. Internal hedgerows.	
29	Land south of	Cowards Lane	Codicote	rural	residential	2 - Site adjoining built up area on 2 sides	2- Site under 2km to Old Welwyn village	3 - Outside village boundary	1 - Not within or affecting setting of conservation area	8 - making a moderate contribution to Green Belt	Cowards Lane and residential development provide boundaries to the north, southern hedgerows thicker than to the east, although adjoins farm.	
30	Land at Codicote House	Heath Road	Codicote	rural	residential	2 - Site adjoining built up area on 2 sides	1 - no settlements to merge with	3 - outside settlement boundary	3 - site within Codicote conservation area	9 - making a moderate contribution to Green Belt	Walled garden provides defined boundary.	
31	Land south of	Heath Road	Codicote	rural	residential	3 - Development on one side of site	1 - More than 2km to the nearest village	3 - outside settlement boundary	1 - Not within or affecting setting of conservation area	8 - making a moderate contribution to Green Belt	Heath Lane provides northern boundary and site adjoins residential development to the east. Open to the south vegetation to the west.	
32	Land NE of	The Close	Codicote	rural	residential	2 - Site adjoining built up area on 2 sides	1 - More than 2km to the nearest village (Old Knebworth)	3 - outside settlement boundary	1 - Not within or affecting setting of conservation area	7 - making a moderate contribution to Green Belt	Residential development to the west and south, good hedgerows north and east.	



North Hertfordshire Local Plan 2011 - 2031

Background Papers

Preferred Options - Consultation

November 2014

Green Belt Review – Part 2

This study is one of several evidence studies which have been prepared. It needs to be read in conjunction with all other studies, which have all been taken into account in preparing the Local Plan Preferred Options paper. Collectively these studies have informed the site selection process. An overview of the conclusions can be found in the Site Selection Matrix. All studies are available to view at: www.north-herts.gov.uk/localplan

Property description					Recommended Boundary
Preferred Options Reference	Old Ref	Address	Street	Settlement or parish	
BA1	B/r11	Land south of	Bygrave Road, Baldock	Baldock	See site BA1 (200)
BA1	B/r11a	Land north of	Bygrave Road	Baldock	See site BA1 (200)
BA3	B/r12	South of	Clothall Common, Baldock	Baldock	Eastern boundary extends to A505, southern boundary a weakly defined path.
BA1	B/r23	Land at	North Road, Baldock	Baldock	See site BA1 (200)
BA	B/e01 & Be02	Land at	Royston Road	Baldock	Eastern boundary formed by curtilage of cattery and southern boundary by former A505.
CD1	29	Land south of	Cowards Lane	Codicote	Hedgerow to the south provides strong boundary, thicker than to the east, although adjoins farm.
CD3	32	Land NE of	The Close	Codicote	Strong hedgerow boundary to the north and east
CD2	205	Codicote Garden Centre,	High Street	Codicote	Substantial trees form northern boundary, western boundary defined by B656. Hedgerow to the east.
GR1	208 (also 33)	Land at	Milksey Lane	Graveley	Site on corner of Milksey Lane and High Street adjoining residential properties. Bounded by footpath on western edge with hedgerow screening from railway line. Screened from roads by raised level, and embankment covered by mature trees and shrubs.
NS1	NS	N Stevenage		Graveley	Currently no boundary to the north. Eastern boundary marked by footpath and some trees. Western boundary marked by North Road

APPENDIX 4

National Planning Policy Framework – Paragraph 044

Do housing and economic needs override constraints on the use of land, such as Green Belt?

The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Revision date: 06 10 2014

APPENDIX 5

Councils Must Protect Our Precious Greenbelt Land

Press release

Councils must protect our precious green belt land

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014

Last updated: 6 October 2014 , see all updates

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

Ministers have underlined the government's commitment to protect the green belt from development.



Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis said that thousands of brownfield sites are available for development, and should be prioritised.

[New guidance](#), published on Monday 6 October, reaffirms how councils should use their [Local Plan](#), drawing on protections in the [National Planning Policy Framework](#), to safeguard their local area against urban sprawl, and protect the green lungs around towns and cities.

The guidance explains that, once established, green belt boundaries should only be altered in exceptional cases, through the preparation or review of the Local Plan.

It also states that housing need – including for traveller sites – does not justify the harm done to the green belt by inappropriate development.

Today's (4 October 2014) measures will reinforce the action taken by the government since 2010 to protect the green belt. This includes:

- abolishing the previous administration's top-down regional strategies
- selling surplus brownfield land for redevelopment
- introducing more flexible planning rights so empty and underused buildings can be brought back into productive use

Local Plans are now at the heart of the reformed, democratic planning system, so councils can decide where development should and shouldn't go in consultation with local people.

Eric Pickles said:

This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or

see the vital green lungs around their towns and cities to unnecessary development.

Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area.

Brandon Lewis said:

We have put Local Plans at the heart of the reformed, planning system, so councils and local people can now decide where development should and shouldn't go.

Support for new housing is growing, because communities welcome development if it is built in the right place and does not ignore their needs. That's why 230,000 planning permissions were granted by councils in the last year alone, while the most recent official statistics show that green belt development is at its lowest rate since modern records began in 1989.

Councils should consider how they will protect and preserve important sites in their area, especially green belt sites. Other considerations include:

- sites of special scientific interest
- areas of outstanding natural beauty
- heritage coastline
- national parks and the Broads

Further information

The [guidance](#) published on Monday 6 October includes the following questions:

Do housing and economic needs override constraints on the use of land, such as green belt?

The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as green belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Do local planning authorities have to meet in full housing needs identified in needs assessments?

Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

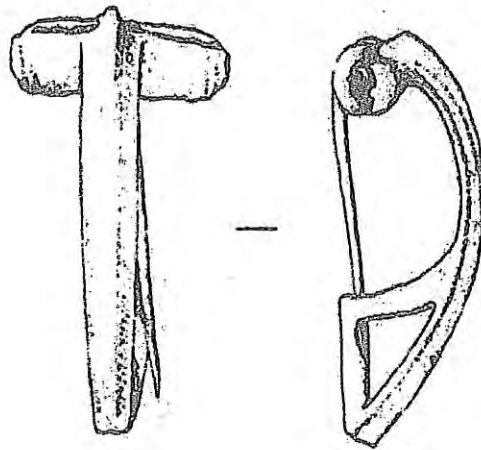
However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish

realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

APPENDIX 6

1990 – An Archaeological Evaluation of Hollards Farm, Codicote – NHDC Museums

*An Archaeological Evaluation
at Hollard's Farm
(Mimram Valley Golf Course)
Codicote, Hertfordshire.*



Hollard's Farm (Cod 2) Field Survey 1990

KEY

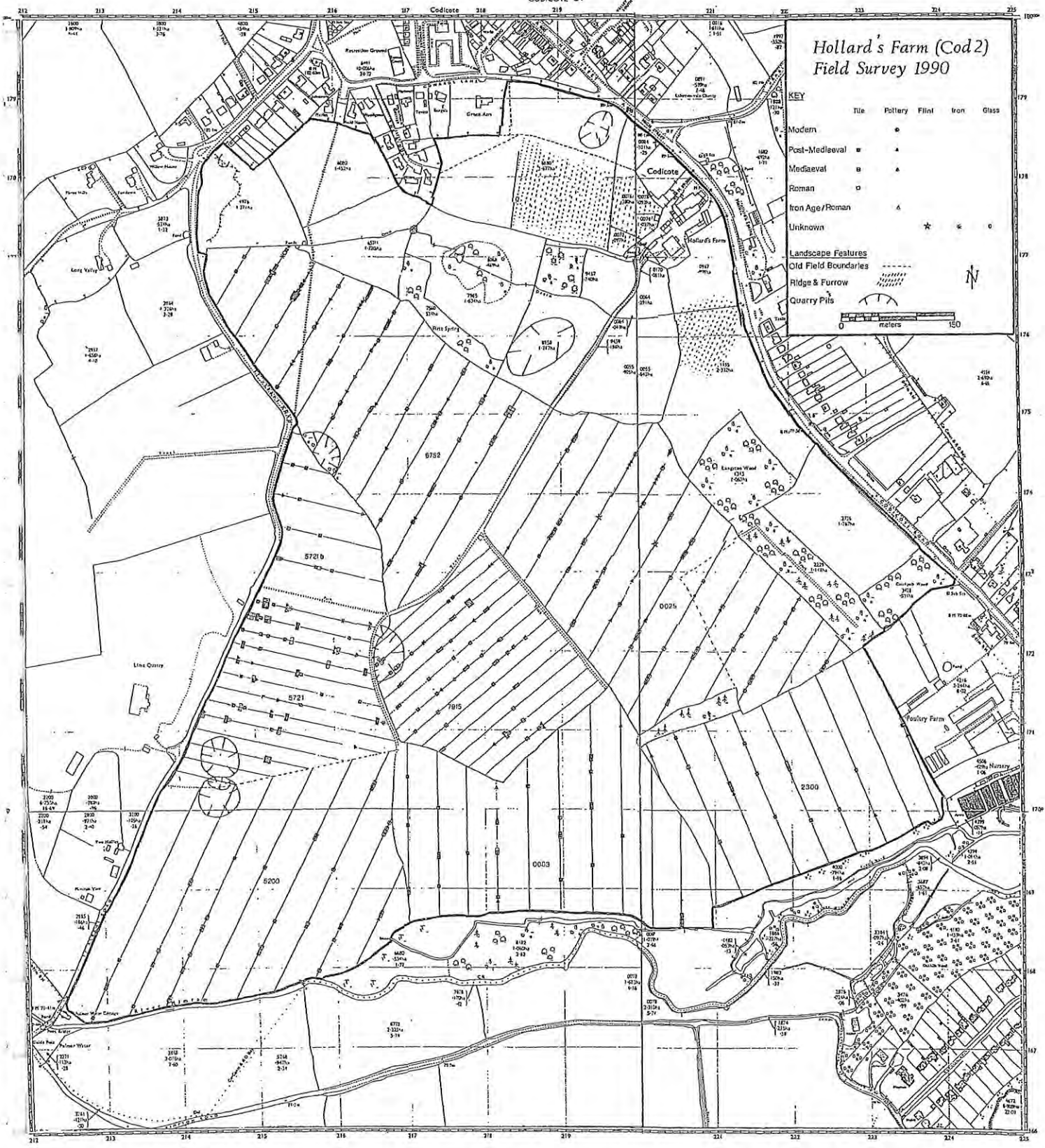
	Tile	Pottery	Flint	Iron	Glass
Modern	○	○			
Post-Medieval	■	▲			
Medieval	□	▲			
Roman	◻				
Iron Age/Roman		▲			
Unknown			★	✱	○

Landscape Features

- Old Field Boundaries
- Ridge & Furrow
- Quarry Pits

0 50 100 meters

N



APPENDIX 7

NHDC – Allocated Sites – Summary of Evidence and Reasoning

New Ref	Old Ref	Site	Place	Type	Summary of evidence and reasoning	Conclusion
CD1	29	Land south of Cowards Lane	Codicote	Housing	Good access to facilities, some spare capacity within existing school with possible room for expansion. Access requires improvement to junction with High Street. Green Belt Review says site makes a moderate contribution, within a wider area which makes a limited contribution to green belt purposes. Adjoins wildlife site, therefore mitigation required through ecology study. Major constraints on sewage treatment works, likely to have an impact on phasing.	Allocate site.
CD2	205	Codicote Garden Centre	Codicote	Housing	Good access to facilities, some spare capacity within existing school with possible room for expansion. Green Belt Review says site makes a moderate contribution, within a wider area which makes a limited contribution to green belt purposes. Loss of existing business and facility to village. Major constraints on sewage treatment works, likely to have an impact on phasing. Southern part of site considered suitable for development, existing buildings already on site. Northern part of site highly exposed - unacceptable landscape impact. Only allocate southern part.	Allocate site.
CD3	32	Land north of The Close	Codicote	Housing	Good access to facilities, some spare capacity within existing school with possible room for expansion. Green Belt Review says site makes a moderate contribution, within a wider area which makes a limited contribution to green belt purposes. Site is well contained with good access off The Close. Known to have risk of surface water flooding. Has woodland as strong boundary.	Allocate site.
CD4	(new site)	Pulmore Water	Codicote	Gypsy and Traveller	Site adjoins the existing gypsy and traveller site, representing an area with temporary planning permission. Logical extension. Well screened, access through existing site onto St Albans Road.	Allocate site.

APPENDIX 8

Representations for Land Allocations: Additional Suggested Site 29 – Now CDI – July 2009



**Representation for
Land Allocations: Additional Suggested Sites July 2009**

Site 29

Ref. Rep No. Applicant
0037 7 Savills on behalf of Warden
Developments

Agent

Document Section: Site 29
Representation: Support

Further to the Land Allocations Additional Suggested Sites Consultation document published by the Council seeking representations on the additional 125 sites we wish to make the following comments.

Site number 29 which is located to the south of Cowards Lane Codicote due to its size presents the opportunity to provide additional residential dwellings to support the existing wide range of services and facilities including community facilities which are already located with the settlement as well as the Infant and Junior School. Furthermore, the site would also have the potential to contribute to providing affordable housing, sheltered housing and even a nursing home for existing and future residents for which there is a need in this locality. Consideration is also being given to the provision of a doctors surgery facility which would be of huge benefit to local residents as well as supporting future residents associated with any new development.

We would comment that the development of this particular site would ensure a comprehensive approach which would be able to deliver an appropriate level of development which is commensurate with its scale and character within one location. Furthermore as far as we are aware the site is not with a conservation area, or an area of archaeological interest or the subject of any wildlife designations.

We understand that the site is available for development and could easily be brought forward within five years of the adoption of the Local Development Framework Land Allocations. which would assist in the Council reaching their housing targets.

For these reasons we consider that site number 29 should be included in the LDF Land Allocations DPD.

0289 9 Codicote Parish Council
Document Section: Site 29
Representation: Object

Codicote is large enough, this site would have a detrimental impact on the boundary.

0365 64 Natural England - East of England Region
Document Section: Site 29
Representation: Comment

This site appears to be directly adjacent to the County Wildlife Site 43/042 Hollards Farm Meadow, and any potential adverse impacts on the site from development would need to be addressed.

0459 86 CPRE - The Hertfordshire Society
Document Section: Site 29
Representation: Object

This is a greenfield site in the Green Belt, just outside the boundary of the Excluded Village of Codicote. In accordance with emerging policies in the Core Strategy Preferred Options, this site should not be released for development, other than possibly as a rural exception site under draft Core Policy E.

3950 66 Hertfordshire County Council - Historic Environment
Document Section: Site 29

APPENDIX 9

Statement of Keith Buck – Shepherd at Hollards Farm

Re: NHDC Local Plan 2011 – 2031 Preferred Options
Ref: CD1 Land South of Cowards Lane

Statement of:

Keith Buck
5 Tanglewood
Welwyn
Herts
AL6 0RU

17th January 2015

I am a small commercial livestock breeder and meat producer and keep a flock of Shetland sheep at Hollards Farm, Codicote Road, Welwyn, AL6 9UH. The Farm is DEFRA registered and I am registered at DEFRA as the keeper of these sheep.

Shetland sheep are a primitive native breed that are low input and are farmed to sell as premium quality meat and as breeding stock.

I have kept Shetland sheep at Hollards Farm since 2004. Being a keen naturalist I provide eco-friendly husbandry that helps to maintain a natural grazing environment and the production of a more organic and healthier meat.

The registered Nature Reserve, 43/042, known as the Riddy forms part of my grazing area at Hollards Farm. The indigenous grasses and herbs provide a very complete and natural forage that is an important factor in the diet of the sheep and produces healthier animals and high quality meat and breeding stock. If the natural drainage in the Riddy is altered the land will become either wetter or dryer. Should the land become wetter it will be impossible to graze and in either case indigenous species will be lost. If more supplementary feeding is needed my sheep will become an unviable operation.

In the Riddy, the relationship between the flora, the fauna and the sheep forms a thriving ecosystem and commercial operation which is entirely dependent on the balance that this successful relationship provides.

I have suffered damage, loss and the worrying of my sheep from dog walkers that refuse to walk their dogs on a lead. These walkers continually ignore my warnings and the country code and the incidents are increasing steadily. The footpath that runs between the fields at Hollards Farm facilitates dog walking and an increase in the use of this footpath will inevitably lead to more of these costly and stressful incidents. A dog running amongst heavily pregnant sheep will cause miscarriages that will threaten my livelihood.

Signed



APPENDIX 10

Affinity Water, 1st April 2018 – Licence to Extract Water from River Mimram Revoked

Peter Barrow

From: Peter Barrow
Sent: 13 February 2015 08:49
To: Helena
Subject: Fwd: River Mimram
Attachments: image001.gif; image002.gif; image003.gif

FYI

Sent from my iPad

Begin forwarded message:

From: "Powers, Ellie" <ellie.powers@affinitywater.co.uk>
Date: 12 February 2015 18:21:53 CET
To: "'peter@barco.net'" <peter@barco.net>
Subject: River Mimram

Dear Mr Barrow,

Thank you for your enquiry about our abstraction near Welwyn. This is one of our groundwater sources that is subject to a 'sustainability reduction' which come into effect over the next 5 years; with the aim of leaving more water in the environment, to improve low flows in our chalk streams. The Environment Agency has revoked our licence for this site from 1st April 2018, after which date, we will no longer be allowed to abstract.

We will be replacing this source with additional imports and by reducing the demand for water, through our water saving programme. The water saving programme includes leakage reduction, domestic metering and water efficiency. More information on this programme can be found on our website. <https://www.affinitywater.co.uk/water-saving-programme.aspx>

With regard to the environmental impacts of this abstraction reduction, we are currently monitoring groundwater levels and river flows on the Mimram, as well as, undertaking ecological surveys. We will use this data to monitor and evaluate the benefit that stopping abstraction has on the River. The abstraction represents a small percentage of high flows in the Mimram but under low groundwater level conditions, the cessation in abstraction should reduce the frequency and severity of low flows in the river.

For your information, we will be giving a short presentation at the next Friends of the Mimram meeting to update on progress and findings of our monitoring.

Please do not hesitate to contact me if you have any further queries.

Kind regards,
Ellie

Ellie Powers
Asset Sustainability Manager
Asset Sustainability

Affinity Water Ltd
Tamblin Way, Hatfield, Hertfordshire AL10 9EZ
Mobile: +44 (0)7740 740128 (mobex 14354)
Telephone: +44 (0)1707 679322 (x4322)
www.affinitywater.co.uk



This e-mail
(including any attachments) is confidential and may also be legally privileged or otherwise protected from

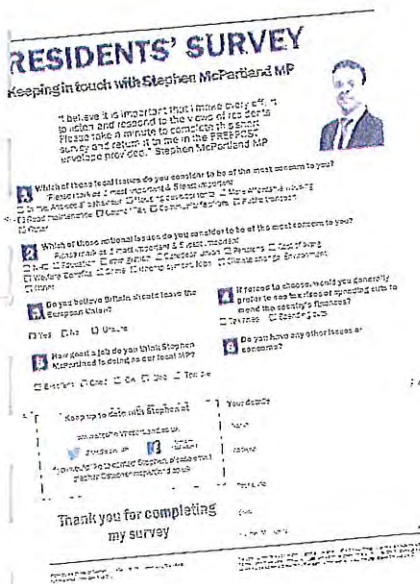
RIVER BEANE AND MIMRAM UPDATE

Stephen McPartland MP has been working with the River Beane Restoration Association and Friends of the Mimram. These two voluntary organisations have worked tirelessly for decades to help preserve these rivers for future generations.

Stephen said, "The Rivers Beane and Mimram are two of only 200 Chalk Rivers left in the world and for many years have been running dry in our area. I remember walking along a dry river bed some years ago with fellow campaigners and also launching the Chalk Stream Charter

in 2013 in what was a puddle rather than a river.

"However, we have made massive progress and the Environment Agency are changing Affinity Water's licence. From 1st April 2018 they will significantly reduce the amount of water which is allowed to be abstracted at Whitehall Pumping Station for the River Beane and to protect the River Mimram they will completely revoke the licence to abstract water at Fulling Mill. It is important we stay the course and keep the campaign going so we can see our rivers flow again."



THANK YOU FOR RESPONDING TO MY SURVEY

Stephen McPartland MP conducted a survey of as many residents as possible before Christmas in Knebworth, Codicote, Datchworth and Aston, which received a massive response.

Stephen said, "I am proud to be your Member of Parliament and the response to the survey was absolutely amazing. It is important to me that I am concentrating on the right areas that matter to local people and I am grateful to those who took the time to complete the

survey and return it to me. "It does make a huge difference and with your support I have secured over £300 million of infrastructure investment from the Government for our local hospital, schools, housing and jobs. The A1(M) will also be widened now and I have more projects in the pipeline to help improve our local community."

If you did not manage to return the survey and would like one sent to you please email Stephen at: stephen@stephenmcpartland.co.uk

LISTENING AND WORKING WITH THE COMMUNITY IN OUR VILLAGES

Stephen McPartland MP is always on hand to listen and work with the local community in our villages. Stephen works with local action groups, individuals, businesses and attends a huge number of events in the villages.

Stephen said, "Every week I deal with a variety of problems facing families in our villages. It is clear that they find it particularly difficult to have an issue taken up with the relevant organisation, because they will argue it only affects a small number of people. I do not believe that is good enough and I fight their corner. I cannot win every case I take up on behalf of local residents, but I will take them up and ensure the correct process and law has been followed.

"If you are experiencing some difficulties or you want me to drop in on your event, then please do email me at: stephen@stephenmcpartland.co.uk"



APPENDIX 11

Wild Bird Sightings at Hollards Farm, Codicote

APPENDIX 12

Introduction to Codicote

Codicote

Introduction

- 13.71 The parish of Codicote covers an area much wider than just the village as it includes some developed parts of Oaklands (Pottersheath) and areas north of Welwyn (Danesbury). It also includes hamlets such as Nup End to the north as well as a number of scattered farms.
- 13.72 The village of Codicote has a relatively good range of facilities, including a school, shops, several public houses, village hall, car repairs garage and a church.
- 13.73 At the 2011 census the population of the parish was 3,344 and there were 1,496 dwellings in the parish.

Role in settlement hierarchy

- 13.74 Codicote is identified as a Category A village. The development boundary is shown on the Proposals Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent but also allow for Codicote's future development needs.
- 13.75 The part of Oaklands in Codicote parish is also identified as a Category A village under Policy SP2. The rest of the parish is classed as Green Belt.

Heritage

- 13.76 The village has one conservation area covering the linear part of the settlement which grew up along the High Street (B656). The wider parish also includes parts of the Ayot St Lawrence and Old Knebworth conservation areas, and also parts of the Ayot House and Knebworth Park designated historic parks and gardens.

Housing

- 13.77 Four sites are allocated in and around Codicote village for an estimated 315 new homes. A further 49 homes have been built or granted planning permission with the parish since 2011.

Ref	Local Housing Allocations and site specific criteria	Dwelling estimate
CD1	<p>Land south of Cowards Lane</p> <ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon Hollands Farm Meadow Local Wildlife Site and adjoining priority 	73 homes

	woodland habitat	
CD2	Codicote Garden Centre, High Street	54 homes
	<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat; Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles 	
CD3	Land north of The Close	48 homes
	<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Address existing surface water flood risk issues through SuDS or other appropriate solution; Sensitive incorporation of Footpaths Codicote 007 and 008 as perimeter features around the site and a connection from the High Street to the wider countryside; Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate approach to nearby Grade II* listed The Bury; 	
CD5	Land south of Heath Lane	140 homes
	<ul style="list-style-type: none"> Land broadly to the east of the current alignment of footpath Codicote 014 to be reserved for expansion of the existing school; Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon nearby features of biodiversity interest including: <ul style="list-style-type: none"> Codicote Lodge Icehouse & surrounds Local Wildlife Site; Heath Plantation Local Wildlife Site; Meadow NW of First Spring Local Wildlife Site; and Priority deciduous woodland habitat adjoining the site; Sensitive incorporation of existing rights of way, including footpaths Codicote 014, 015 & 016 as green corridors through the site connecting the existing village to the wider countryside; Proposals to be informed by a site-specific landscape assessment, particularly ensuring development at the south-west of the site does not encroach beyond acceptable limits into longer views across the Mimram Valley; Lower density of development to southern edge of site to respect 	

	local character; and • Sensitive treatment of Heath Lane frontage to minimise impact upon nearby Listed Buildings.
Total allocated sites	315 homes
Completions and permissions	49 homes
Total allocated, completed and permitted	364 homes

13.78 A site adjoining the existing Gypsy and Traveller site at Pulmore Water has been identified for six additional pitches.

Ref	Site	Pitch estimate
CD4	Land at Pulmore Water, St Albans Road	6

Economy

13.79 The facilities of Codicote are designated as a village centre under policy SP4. Proposals in this area will be determined in accordance with our detailed policies. The extent of the village centre is shown on the map in Appendix 4.

Infrastructure and mitigation

13.80 The existing 1 FE Codicote school regularly fills most of its available places from the local area. Its current site is physically constrained. Expansion of the existing primary school is required to accommodate demand from the additional residential development that is planned in Codicote.

13.81 Our transport modelling does not identify a requirement for any specific mitigation measures in Codicote. However, there can be localised pinch points on the High Street, particularly at peak times or when delays or incidents on the A1(M) result in the B656 being used as an alternate route between Welwyn Garden City and Hitchin.

13.82 Sites in Codicote will need to ensure that any transport assessments appropriately take these issues into account and contribute reasonably to any necessary mitigation measures which may seek to address these issues.

13.83 Codicote lies within the Thames Water area and the water company have identified localised constraints in wastewater infrastructure. Prospective applicants should work with Thames Water, and together, identify the likely cumulative nature of infrastructure required.