



LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM

North Hertfordshire Proposed Submission Local Plan

Please return this form to North Hertfordshire District Council either by email to : local.plans@north-herts.gov.uk or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

** If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="C/O Peter"/>	<input type="text" value="Robert"/>
Last Name	<input type="text" value="Homent"/>	<input type="text" value="Hopwood"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Partner, Planning"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Doggett Family Trust"/>	<input type="text" value="Bidwells"/>
Address Line 1	<input type="text"/>	<input type="text" value="Bidwell House"/>
Line 2	<input type="text"/>	<input type="text" value="Trumpington Road"/>
Line3	<input type="text"/>	<input type="text" value="Cambridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CB9 9LD"/>
Telephone Number	<input type="text"/>	<input type="text" value="01223 559207"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Robert.hopwood@bidwells.co.uk"/>

Part B - Please use a separate sheet for each representation

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Site

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>

If No, which of the Soundness tests does it fail?

Positively prepared	<input checked="checked" type="checkbox"/>
Justified	<input checked="checked" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National Policy	<input checked="checked" type="checkbox"/>

iii) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
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5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy SP2 sets out the settlement hierarchy for the District to be used when assessing the suitability of a settlement for new development, with the general principle being that those settlements higher up the hierarchy will take more growth than those lower down and that the type of development proposed is appropriate to the scale and character of the settlement and its place in the hierarchy.

Our client supports this approach as it is consistent with national policy and the NPPF's core planning principles of focusing significant development in locations which are or can be made sustainable.

(Continue on a separate sheet if necessary)

However, the NPPF also seeks to promote a strong rural economy and advises, at paragraph 55, that *“to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby”*. This general principle of supporting local services is also endorsed by the NPPG (Reference ID: 50-001-20160519) which advises that *‘It is important to recognize the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements...A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities’*

Due to the lack of any allocations for the village of Barley, identified as a Category A village, our client **objects** to Policy SP2 as it is not consistent with the above national policy and guidance.

Policy SP2 ‘Settlement Hierarchy’ is currently worded to state that “General development will also be allowed within the defined settlement boundaries of the Category A villages of: Ashwell; Barkway; Barley; Breachwood Green; Cockernhoe; Codicote; Graveley; Hexton; Ickleford; Kimpton; Knebworth; Little Wymondley; Lower Stondon; Oaklands; Offley; Pirton; Preston; Reed; Standon; St Ipployts; Therfield; Weston and Whitwell”.

Therefore, whilst Policy SP2 accepts that development may take place in the identified Category A villages, some of these villages have not received any allocations to allow for housing development and growth; either within the defined settlement boundary or on land immediately adjacent to the defined settlement boundaries which can be sustainable. Our client considers that the ‘defined settlement boundaries’ as identified to underpin the settlement hierarchy as set out within Policy SP2, should therefore be amended to allow a greater degree of flexibility in terms of accommodating an appropriate level of rural housing within the village of Barley, which has been identified as a ‘Category A village’; such to support existing communities and rural facilities. The amendment to the defined settlement boundary would not only provide much needed housing within the village but would also enable the relocation and expansion the thriving village shop; such to enable the stocking of items as requested by exiting customers, preventing their need to travelling to other settlements. The relocation and expansion of the village shop would therefore continue to serve the needs of both the residents of Barley and the surrounding villages, without significant traffic impacts.

Our client would like to take this opportunity to identify their land at Picknag Road, Barley as a suitable site to accommodate housing, as well as enabling the relocation of the village shop with off-street parking (see enclosed site location plan). The site is available now and is within the single ownership of our client. Given the consultation that has already taken place with the Parish Council and the preliminary reports undertaken, any residential and retail proposal on the site could be brought forward within a relatively short period of time.

The site currently comprises agricultural land and is located immediately adjacent to the heart of the village, with a part of the site being situated within the defined settlement boundary. The site has previously been identified within the SHLAA (2016) as being able to accommodate up to 18 dwellings and as potentially suitable, available and achievable (site reference BL/r02). The site itself is not subject to any ecological or heritage designations (although its location adjacent to the Conservation Area is noted) and the site falls within Flood Zone 1 where the probability of flooding is low. Barley also benefits from a number of local services and facilities including a first School and nursery, public houses, a shop with a post office, medical surgeries and employment provision at the coach hire company and livery operation within the village. There are also bus services serving the village providing transport both between the villages and to the larger settlements of Royston and Cambridge, where a wide range of other services and facilities are available.

In summary, our client's land at Picknag Road, Barley offers a means of providing a developable, sustainable and suitable residential development on the edge of Barley which would help meet the housing needs of the District and would help ensure the long term survival of the existing services and facilities in Barley. The relocation of the existing shop to a larger facility with dedicated vehicle parking would allow for the expansion of a key local facility, continuing to meet the local need, not only for the residents of Barley but also the surrounding villages.

The PSLP as it is currently worded does not meet the test of soundness as requested by the NPPF, in particular paragraph 182. The PSLP has not been: -

- Positively prepared as it is not consistent with achieving sustainable development
- Is not justified – as to PSLP is not the most appropriate strategy when considered against the reasonable allocations, based on proportionate evidence.
- Is not consistent with National Policy as the plan would not enable the delivery of sustainable developments in accordance with the policies of the NPPF.

Submitted Evidence documents with this representation include:

- Surface Water Drainage and SUDS Statement (by EAS)
- Transport Statement (by EAS)
- Master Plan Design Study (by Bidwells)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination)*. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy SP2 needs to be more flexible towards the provision of rural housing in the District, particularly to enhance or maintain the vitality of rural communities in line with national policy. Sustainable development is a key principle of the NPPF and it is clear that some development distributed amongst rural communities, especially larger villages with a range of facilities and services can be sustainable. Indeed, some village development can help sustain those villages and bring investment to local services, facilities and infrastructure. As part of the proposed site for allocation, the relocation of the existing village shop is proposed, such to provide additional space for this well supported local facility. Conversely, ignoring the role of villages places a strangle-hold on them and prevents investment projects and growth from coming forward to meet local needs.

With regards to 'Category A villages', Policy SP2 'Settlement Hierarchy' fails to provide sufficient flexibility to allow for small scale development on the edge of the settlement. As a result, the sustainability of the villages will be threatened by a lack of development opportunities, especially where no sites are allocated for development within the defined settlement boundary of the villages. This will thereby hinder investment opportunities, to help support and improve facilities. For example, a large number of Public Houses and Post Offices have closed or are struggling to remain viable; more custom to support such facilities would be of benefit and ensure that these facilities can be sustained.

Indeed, such an approach is consistent with paragraphs 55 and 56 of the NPPF which underline the need to plan for housing to reflect local needs within rural areas as well as the need to promote sustainable development within rural areas by locating housing where it will enhance or maintain the vitality of rural communities such as by supporting local services.

Whilst it is understood that the distribution of housing across the hierarchy must be underpinned by the need to provide sustainable development, the Category A villages have a greater role to play in meeting identified housing needs in a flexible and responsive manner, so long as the housing is of an appropriate scale and it can bring benefits to help support service provision within that village. Accommodating additional housing in sustainable village locations would not therefore compromise the overall development strategy or spatial development hierarchy identified within the Plan.

Consequently, Policy SP2 should support development in all of the Category A villages, not just some of those identified and should include for the possibility of development sites at the edge of the village adjacent to the settlement boundary, thus ensuring greater flexibility for the delivery of housing and thereby complying with paragraph 47 of the NPPF and ensuring that the Plan is Sound.

Therefore, our client proposes that Policy SP2, as it relates to Small Villages, is re-worded as

follows (amended wording shown in red):

“General development will also be allowed **within or on the edge of the Category A villages where development would enhance or maintain the vitality of rural communities or** within the defined settlement boundaries of the Category A villages of: Ashwell; Barkway; Barley; Breachwood Green; Cockernhoe; Codicote; Graveley; Hexton; Ickleford; Kimpton; Knebworth; Little Wymondley; Lower Stondon; Oaklands; Offley; Pirton; Preston; Reed; Standon; St Ipployts; Therfield; Weston and Whitwell”.

Please note your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector would be able to come to a considered position on this objection via an appearance at EIP benefitting from a discussion on the relevant planning issues.

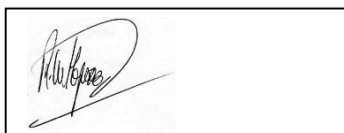
Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Do you wish to be notified when the Local Plan is submitted?

Yes, I do wish to be notified

No, I do not wish to be notified

10. Signature:



Date:

29/11/16