



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"/>
---	-----	--	----	--------------------------

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.

There are no site allocations for new housing within the settlement of Barley, and we therefore object to Paragraph 13.46 of the Proposed Submission Local Plan (PSLP) and the Local Housing Allocations shown on the Proposals Map (Sheet 2, Side B, Royston Area) for the following reasons:

1. Inconsistent Distribution of Growth.
 In selecting an appropriate development strategy for the District for the Plan Period it is important that the chosen strategy draws an appropriate balance between promoting sustainable development whilst also ensuring that development is deliverable such that the District meets future needs of its residents for new homes and jobs. In addition, the Plan must also recognize the needs of local communities within the villages in the District to ensure local services and facilities can be sustained and supported given the predominantly rural nature of the District.

(Continue on a separate sheet if necessary)

Policy SP2 'Settlement Hierarchy' of the Proposed Submission Local Plan (PSLP) sets out the Council's approach of seeking to locate the majority of new development in towns, with the District's villages being split into three subsequent hierarchical categories based upon the scale of development which they may accommodate. Within the PSLP, Barley is identified as a Category A village; the highest category within the hierarchy of the villages. The PSLP deems Barley to be a suitable village for growth over the plan period, yet it has no site allocations within paragraph 13.46 of the PSLP to help support this; unlike many of the other comparable villages. Barley's designation as a Category A village within Policy SP2 is supported by the background evidence provided in the Housing and Settlement Hierarchy Background Paper (Nov. 2014) and re-iterated within the subsequent Housing and Green Belt background paper (2016). The Housing and Settlement Hierarchy Background Paper (Nov. 2014) identified that "*having considered the economic, social and environmental impacts of development in the rural areas, the Council concluded that there is a clear social and economic case for allowing further growth in those villages with schools*" (the Category A villages). This approach is taken forward within the subtext of Policy SP2; paragraph 4.13. The Council has subsequently defined settlement boundaries around each settlement identified within the hierarchy within the PSLP, within which further growth will be allowed. The subtext to Policy SP2 of the PSLP also references the need for villages to grow, outlining that "*it is important to allow growth of the villages in order to allow those communities to continue to function*" (4.11). However, this does not appear to be the case for Barley as the proposed settlement boundary does not allow for any additional growth throughout the entire plan period to sustain the villages services and facilities. The lack of any site allocation within paragraph 13.46 to both sustain and support the village's proportionate growth to 2031 is both surprising and unacceptable, and conflicts with the approach advocated by Policy SP2 of the PSLP.

In a similar manner, Policy SP1 of the PSLP 'Sustainable development in North Hertfordshire' sets out that the Council will "*Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities*". Yet despite Barley being identified as a Category A village and noted as having a good range of facilities, through the omission of any housing allocations within the village of Barley, the PSLP does not support the growth of the village. As a result, the omission of any allocated housing growth for Barley would not provide opportunities for existing or new residents and would not enable growth essential for sustaining key facilities. The lack of any allocated housing growth in Barley, a village which has seen 0% population growth in the period 2001-2011 (Housing and Settlement Hierarchy Background Paper, November 2014), therefore directly conflicts with part (b) of Policy SP1 of the PSLP. For the aforementioned reasons, we therefore object to the lack of any housing allocations within paragraph 13.46 of the PSLP and the omission of any Local Housing Allocations on the Proposals Map given the inconsistent distribution of growth advocated and the lack of any housing allocations for Barley within the PSLP.

The lack of any housing allocations within the village of Barley within paragraph 13.46 of the PSLP and on the associated Proposals Map, demonstrates that the PSLP fails to give adequate consideration to paragraphs 28, 52 and 55 of the National Planning Policy Framework (2012) which all advocate the approach of locating new homes within villages or as extensions to existing villages; thus in turn enhancing or maintaining the vitality of rural communities through supporting the retention of local services and facilities. The lack of any housing allocation within the village of Barley, such to provide for development in accordance with paragraphs 28, 52 and 55 of the NPPF therefore demonstrate that the PSLP is not the most appropriate strategy for the distribution of growth, when considered against reasonable alternatives, based on proportionate evidence. Concerns are also raised with regards to the evidence based used to inform the strategy adopted and ultimate decision regarding the distribution of housing allocations, which is further discussed within section 2.

In addition, the distribution of growth amongst the villages within North Hertfordshire District appears arbitrary with no clear logic as to which villages see more growth than others, with proposed site allocations representing anywhere between 0% and over 52% growth for Category A villages. In the Royston area, the Category A villages of Barkway, Reed and Therfield all have proposed site allocations representing between 5-52% growth on the existing number of dwellings within these villages. Barley, is the only Category A village within this area, to have no site allocations proposed.

Furthermore, the Housing and Settlement Hierarchy Background Paper (Nov 2014) shows that of the 35 villages listed, Barley is one of only five villages (including Ashwell, Whitwell, Kimpton, Knebworth), which has all five of the facilities identified. Within the PSLP, Barley is the only one of these five villages to not have a proposed housing allocation. We therefore strongly object to paragraph 13.46 of the PSLP and the Local Housing Allocations shown on the Proposals Map.

2. Comparison with other villages in the Royston Area.

Barley is a comparatively sustainable village location for growth in the Royston area; it has a good range of services for a village of its size, including a nursery and primary school, village hall, one public house, a surgery (Barley Practice), petrol filling station/garage, local food shop and post office (Barley Stores). In addition, the village Plaistow offers recreational space and includes tennis courts, football pitch and playground and there are sustainable transport options available, including a good pedestrian and cycle network to access local facilities and bus services to the nearby towns. It meets the selection criteria, having a good range of facilities **including a school**, but no site allocations are proposed within paragraph 13.46 of the PSLP. Yet smaller and/or less sustainable villages with limited facilities, such as Barkway, Reed and Therfield, have been identified as villages with proposed housing allocations.

In identifying Barley's role in the settlement hierarchy, the PSLP states that "Whilst Barley is smaller than the neighbouring village of Barkway, it does have a wider range of facilities and so does attract visits from both Barkway and other nearby settlements". It is therefore apparent that the application of the site selection criteria demonstrates that the approach being taken is not consistent. For example, the following provides a brief comparison of the villages of Barley and Barkway based on the site selection criteria in order to demonstrate that Barley is a more sustainable location for development:

Local Facilities:

Barley has more essential facilities than Barkway. Like Barkway, Barley has a primary school, village hall, public house and petrol station, but it also has a surgery (Barley Practice), a local food shop and a post office (Barley Stores). In this respect, with additional key facilities, the village is more sustainable in comparison to Barkway.

Schools:

Barkway V.A First School is a 60-place Church of England School with 32 children on the school roll (November 2016)¹. The school is approximately half a mile away (10 min walk along footpath) from the furthest point of Barkway's two larger proposed site allocations. The school is approximately one-third of a mile (7 min walk along footpath) from the furthest point of Barkway's smallest proposed site allocations.

Barley V.C. First School is a 90-place Church of England School with 38 children on the school roll (November 2016)². The school is approximately 0.3 miles (5 min walk along a footpath) from the furthest point of our client's site, Land east of Picknage Road and Picknage Corner; a notably shorter distance than any of the proposed site allocations in Barkway. In this respect, the Site and village is more sustainable in comparison to Barkway.

Transport:

Barley is located closer to the nearest town of Royston (approximately 3.5 miles away) with easy access onto the B1039 leading into the town. Barkway is approximately 5 miles from Royston via the A10. Both villages are served by the Intalink and Whippet Coaches buses, with both being serviced by route 331 Royston to Hertford, route 334 Standon to Cambridge and route 31 to Cambridge. However, Barley has an additional service to Saffron Walden (444). The bus stop is easily accessible from our client's site, Land east of Picknage Road and Picknage Corner. This further highlights that there is no clear methodology or application of site selection criteria.

Economy:

The PSLP acknowledges that for Barkway "the visible economic activity of the village is limited to a petrol filling station/garage, soft furnishings business and car repairs business" (paragraph 13.38). The only other economic activity referenced is Barkway Park Golf Club, however that is located outside of the village's Settlement Boundary.

In comparison, within paragraph 13.47, the PSLP sets out that "*the economy of Barley is mixed and reflects the relatively diverse range of facilities and businesses that exist in the village*". In addition to the primary school, doctor's surgery, post office and general store, petrol filling station/garage and two public houses, the PSLP references the presence of a coach hire company and livery operation within the village. The economy of Barley is therefore notably more extensive than Barkway. Consequently, the lack of any housing allocation to allow Barley to grow would not only fail to make maximum use of existing facilities, social networks and infrastructure but would also fail to support the economy within the village which allows the community to continue to function.

A further point of note is an inaccuracy within the Sustainability Appraisal and Strategic Environmental Assessment 2014 ("SASEA"); which is incorrect in its site summary of Barley. It states that the village has no shops, surgery or post office and identifies this as a weakness. The village does have these facilities, as noted within the PSLP, which makes the village of Barley a more sustainable location for growth than this assessment suggests. We therefore conclude that the site assessment and evidence base which has influenced the location of site allocations within villages has prejudiced the outcome of the housing strategy for the villages and this has unfairly excluded our Client's land within the proposed site allocations.

The allocation of the site would enable the re-location of the existing village shop to a unit with a greater floorspace and dedicated off-street parking, which would continue to contribute towards Barley's economy. Due to physical constraints, there is no capacity for expansion of the existing village shop such to meet local need. The provision of a relocated and larger village shop would enable the stocking of items as requested by exiting customers and would provide adequate space for a post office. The stocking of additional items, as requested by existing customers, would meet local needs and thereby minimise the need for residents to travel to other settlements; demonstrating that the proposal would constitute sustainable development. 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. The combination of retail unit, in association with much needed dwellings within the village of Barely, would clearly contribute to supporting Barley's economy within the plan period. The omission of the site for allocation, including enabling expanded facilities for the current thriving village shop, therefore contradicts Policy SP4 part b of the PSLP which seeks to "Support the retention and provision of shops outside of identified centres where they serve a local need". Objection is therefore raised to the oversight of our Client's land for allocation.

In comparing the village of Barley and Barkway based on the site selection criteria, it is readily apparent that Barley is a more sustainable location for planning purposes and for development allocation. In considering the provision of local facilities, capacity of primary schools, transport facilities and the nature of the local economy for the villages of Barley and Barkway, the allocation of a vast scale of housing growth (for a total of 173 homes) set out within the PSLP for the village of Barkway, in comparison to the lack of any housing allocations within the village of Barley clearly demonstrates that the site selection criteria does not show that a consistent approach has been taken. Furthermore, the majority of these new homes within Barkway are not anticipated for delivery until 2027 onwards, with the total number of allocated dwellings not anticipated for delivery until 2030. Therefore, the proposed large scale growth of Barkway, to support not only the continued functioning of the community in Barkway but also nearby villages (including Barley) will not be delivered for in excess of 10 years. The allocation of such sites, whilst failing to allocate any sites for housing within the village of Barley; preventing any planned growth for the entire period of the Local Plan, highlights that the housing allocations within the PSLP are inconsistent in achieving the approach advocated by Policy SP2, which specifically acknowledges the importance allowing villages to grow. Objection is therefore raised on this basis to paragraph 13.46 of the PSLP and the Local Housing Allocations as shown on the Proposals Map.

3. Potential harm to Barley's future vitality.

In addition, to have no site allocations in this plan period through to 2031 could be detrimental to the social, economic and environmental sustainability of Barley. In social terms, having no site allocation to further support the local amenities may lead to viable facilities closing, which could impact on the social fabric of Barley. Barley is the only Category A village to have seen 0% population growth in the period 2001-2011 (Housing and Settlement Hierarchy Background Paper, November 2014) and without sufficient population growth, the basic and commercial facilities in Barley could struggle to continue. A village with existing commercial facilities dependent on a local population for trade (notably shops and public houses) should be allowed to grow, in order that the client population for those facilities does not diminish to reduce the viability of those existing businesses.

Furthermore, if schools and facilities are not supported and come under threat of closure, there will be a resultant adverse environmental impact, as pupils would need to be transported elsewhere for schooling and the local population will have to travel to other settlements for its day-to-day needs. The lack of any planned growth could also put local bus services under threat, which could potentially lead to increased car-dependency not only for residents of Barley, but also surrounding villages if bus services were to cease.

Our Client's site would not only deliver proportionate population growth such to support Barley's vitality, it would also contribute to Barley's vitality through the provision of a larger and better located village shop.

4. Growth in Barley can contribute to the 5 year housing land supply in North Hertfordshire.

At present, North Hertfordshire only has a 2.2 years supply of housing land (2015 AMR) and it is not anticipated to reach a five year supply again until at least 2017, albeit with only a 5% buffer and a reliance on green belt releases. With the persistent under-delivery witnessed in North Hertfordshire over the past few years, it would be more appropriate for a 20% buffer to be applied and allocated growth in Barley could help bolster the supply in the early years of the plan.

Our clients land would make a modest, but worthy contribution towards boosting housing supply, which in the absence of a robust five year supply should carry significant weight in the growth strategy and demonstrating a deliverable 5YHLS. Objection is therefore raised to the omission of any housing allocations within for Barley within paragraph 13.46 of the PSLP and the Local Housing Allocations as shown on the Proposals Map.

5. Omission of any housing allocations for Barley within the PSLP including Land east of Picknag Road and Picknag Corner ("the Site").

The aforementioned paragraphs (1-4) demonstrates that Barley should be identified for some proportionate growth during the period of the PSLP and our Client's Land off Picknag Road and Picknag Corner is ideally placed to deliver a 4% increase in the size of the village, which is entirely appropriate for the village.

Within the SHLAA (2016), our Client's land 'Land east of Picknag Road', Barley (formerly sites BL/r02 and 024), is identified as meeting the necessary tests in the SHLAA to be considered for allocation, being potentially suitable, available and achievable and could accommodate up to 18 dwellings, yet the site has not been allocated within the Proposed Submission version of the Local Plan 2011-2031 (October 2016). The Council provides the following justification for the site not been carried forward for allocation: *"This site is currently part of a larger agricultural field and forms an important open space with views through from the Plaistow and village conservation area towards Chishill windmill and the open countryside beyond. Landscape impacts / severs green infrastructure link"* (Preferred Options – Consultation, November 2014).

"This site is currently part of a larger agricultural field and forms an important open space with views through from the Plaistow and village conservation area towards Chishill windmill and the open countryside beyond" (Housing and Green Belt background paper, 2016)".

Any harm identified within the Council's site selection process (within the Preferred Options-Consultation 2014, SASEA, 2014 and Housing and Green Belt background paper, 2016) can be mitigated (should it even exist) and does not outweigh the benefits of the potential development. For example, the background evidence (SASEA, 2014) to the PSLP identified harm to the adjacent Conservation Area and wildlife area as well as adverse landscape impacts but also clearly stated that these can be mitigated through sensitive design. Historic England acknowledged that the site has "the potential to impact on the significance and setting of Barley Conservation Area and other heritage assets", but rather than objecting, commented that "Site-specific policy requirements in the new Local Plan may be appropriate to guide development" (Representations for Housing Options Growth Levels and Locations 2011-2031, Reference LDF/2959 81, Rep No. 81). Other potential harm identified through the reliance on car use and development of a greenfield site (as set out within the SASEA, 2014) applies to the majority of the site allocations within North Hertfordshire's rural villages and Barley certainly does not rank any worse when tested against this criterion and does, we consider, rank slightly higher than the smaller villages due to its existing level of facilities and its accessibility to nearby Royston by public transport. The Site would provide access to suitable and affordable housing, especially for younger families and can help support the local services and vitality of Barley. It has excellent access to green open space (within 400 metres), Barley's local facilities and school, pedestrian networks and sustainable transport modes.

A Master Plan Design Study has been undertaken to address these concerns and demonstrate how the site could accommodate an amount of development whilst maintaining view towards Chishill windmill and responding to the character of the adjacent Conservation Area. Therefore, our Client's Land east of Picknag Road and Picknag Corner is ideally placed to deliver a proportionate amount of housing growth and a shop with the space for a post office during the plan period and should be viewed favourably when compared against the other proposed housing allocations in villages.

We object to the non-allocation of Land east of Picknag Road (formerly Site BL/r02 and 24) within paragraph 13.46 or the PSLP, Policy HS1 and the Proposals Map for the following reasons:

- The Site is more favourable and sustainable than proposed site allocations in the surrounding villages. For example, the allocations in Barkway are greenfield sites which were outside the village boundaries, one of which had a pending village green application on it running until the 25th February 2015 and for which the District Council has advised that discussions are still taking place between the District Council and Parish Council to resolve a way forward. Barkway also has limited facilities and the PSLP acknowledges that *"residents would be likely to travel to either Royston to the north or Buntingford to the south for day to day items"* (paragraph 13.35). Yet proposed housing allocations within Barkway total 173 homes, equating to an increase in excess of 52% in the number of homes in the village. In the nearby village of Therfield, which does not benefit from a food shop or surgery, a site allocation for an estimated 12 homes is proposed within the PSLP. Finally, within the PSLP even the much smaller village of Reed benefits from a housing allocation of up to 22 homes, whilst having far fewer facilities than Barley, benefitting purely from a school, hall and church. It therefore does not follow that Barley should be omitted from contributing towards the growth strategy when less sustainable villages are included with housing allocations.

Within the North Hertfordshire Annual Monitoring Report 2014-2015 (December 2015), of the 40 villages and hamlets in North Hertfordshire, reference is made to Barley being identified as one of 14 villages in the saved local plan that is able to accommodate some level of development. Yet despite this, within the PSLP, no sites are allocated for housing development.

- Part f of Policy SP4 of the PSLP outlines that the Council will “*Support the retention and provision of shops outside of identified centres where they serve a local need*”. This Policy and the sub-text to this policy sets out that “*The Council is committed to protecting the vitality and viability of all centres*”. In response to discussions with Barley Parish Council and the desire to relocate and expand the current village shop, the proposals for the Site include the provision of a shop, of a greater floor space; including space for a post office. As identified within ‘Section 4 - Communities, Chapter 13 Communities’ the range of facilities within Barley make the village of great importance to the surrounding villages and the continuing presence of a shop was seen as the most important facility for retention by residents within the parish in the production of the recent Barley Village Parish Plan (2015). The allocation of the Site to include the relocation and expansion of the village shop would allow for the stocking of items requested by exiting customers. The relocation and expansion of the village shop, with dedicated off-street parking, would therefore continue to serve the needs of both the residents of Barley and the surrounding villages without significant traffic impacts. The allocation of the shop, including the provision of a relocated and expanded shop would therefore accord with Policy SP4 of the PSLP, in meeting the local need for a better located shop with off-street parking and provision of a retail facility of a size which could adequately serve local need without adverse impact upon the local highway network. The lack of allocation of the Site therefore conflicts with the terms of Policy SP4 and as a result the Site should be allocated within the PSLP.
- The SASEA site matrix for the Site makes the following summary: "this site meets the sustainable criteria for providing access to housing (5b) and support for rural services (5a) but does not meet several of the other sustainability criteria, most notable in the fact that it is a greenfield site". However, the majority of village sites selected for development are greenfield, and therefore, the site is of equal standing in this regard.
- We do not support the conclusion of the Site Selection Matrix (2014) which states that the land "forms an important open space with views through from the Plaistow (Playstow) and village conservation area towards Chishill windmill and the open countryside beyond. Landscape impacts/severs green infrastructure link". The Site has a greater affinity with the village than the open countryside beyond and development of the site would therefore provide an extension to the existing pattern of development along Picknag Road and would not unduly impact upon the wider rural character of Barley. The viewpoints are limited and any future scheme can be integrated into the landscape through a suitable design-led approach, as demonstrated by the accompanying Master Plan Design Study.
- There are no technical constraints which would prevent the Site from coming forward for development. The Surface Water Drainage and SUDS Statement produced by EAS identifies that the entire site is situated within Flood Zone 1 and therefore has a less than 1 in 1,000 annual probability of river flooding. The vast majority of the site is identified as being at ‘very low’ flood risk from surface water, however the very northern tip of the site is more prone to such flooding. In response to this, the development has been configured to ensure that housing is sited away from the ditch to the north to minimise any residual risks. The report identifies that the ground is likely suitable for infiltration methods to be employed for surface water drainage and that overall the site has the potential to provide a highly sustainable method of surface water drainage through soakaways and permeable paving. Investigations have also confirmed that there is sufficient capacity within both the water and sewerage network to support a development of the scale proposed. As such, the Surface Water Drainage and SUDS Statement produced by EAS demonstrates that flood risk and drainage issues would not prevent the Site from coming forward for development. With regards to transport impacts and highways, a Transport Statement produced by EAS sets out that number of minor highway improvements are proposed to assist with facilitating the development. These include improvements to existing pedestrian facilities as well as implementation of highway access points to meet appropriate design standards. Subject to these, the Transport Statement concludes that the proposed development complies with transport policy and will make the village of Barley more sustainable. Consequently, the Transport Statement accompanying this representation demonstrates that the scale of development proposed could be accommodated without adverse traffic or highways implications and as such would not prevent the Site from coming forward for development.
- Release of the Site for development would facilitate the proportionate growth of the village to provide both market and affordable housing opportunities. The site has capacity to readily accommodate 12 dwellings as demonstrated by the accompanying Master Plan Design Study.

In conclusion, there are no obvious constraints to delivery of development on the site (previously identified as sites BL/r02 and 024). The site could come forward in the early stages of the plan period, as necessary. It would only need a short lead in time whilst the necessary planning permission is obtained contributing towards the Council's 5YHLS and the development if of sufficient size to trigger the provision of some much needed affordable housing for the village. The status of Barley as a Category A village is wholly justified and supported, however this has not been reflected in the site allocations identified within paragraph 13.46 of the PSLP and implemented through Policy HS1 and the Proposals Map, despite it being one of the more sustainable villages in the District. The methodology applied in selecting sites for allocation seems arbitrary and the evidence base upon which key decisions for housing allocation have been made is flawed. Based on the correct information regarding the services and facilities present within the village, Barley meets the selection criteria for locating development in the rural area and the Site should be allocated for housing development in the PSLP for development during the plan period to 2031.

We therefore object to paragraph 13.46 of the PSLP, Policy HS1 of the PSLP and the Proposals Map showing Local Housing Allocations which fails to identify any site for housing allocation within the village of Barley, despite the clear need for growth in villages such a Barley, in order to ensure the long-term vitality of the District's 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.

The following changes are therefore requested to make the PSLP sound –

- Include land at Picknag Road (1.44 hectares) for housing and retail allocation to be noted within paragraph 13.46 of the PSLP, delivered through Policy HS1 and identified for allocation on the Proposals Map, to accommodate a minimum of 12 dwellings and a retail unit.
- Amend the Proposals Map (Sheet 2, Side B, Royston Area) to include the Site as outlined within the accompanying Location Red Line Plan and Master Plan Design Study by including the Site within the settlement limits of Barley and identification of the Site as a Local Housing Allocation with provision of a retail unit.

(Continue on a separate sheet if necessary)

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.

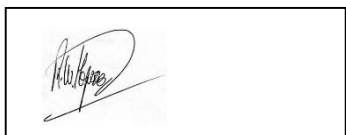
Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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