

# Knebworth Parish Council

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**Chairman:** Mr R Willcocks

**CLERK TO THE COUNCIL**

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14 September 2023

Dear Sir,

**23/01552/0P Land South Of Watton Road Knebworth**

**Outline planning permission for up to 200 dwellings (including affordable housing), structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters reserved except for means of access.**

## Introduction

1. Knebworth Parish Council (the Parish Council) objects to the outline application for up to 200 dwellings on Land South of Watton Road.
2. The Parish Council notes the reduction in the number of dwellings proposed in accordance with the adopted Local Plan. The stopping up of the vehicular access at the Primary School on Swangleys Lane in line with our feedback on the 2021 application is welcomed for safety reasons, but the consequential problem of through traffic from Datchworth has not been addressed.
3. There remain serious issues with the application relating to accordance with planning policy, the lack of comprehensive assessment of cumulative traffic impact across the village and solutions to the problems that will result from the development proposed, the sustainability of the proposal, and the lack of community engagement. Each of these is discussed in detail below. A summary of the objection is provided in Appendix A.
4. The Parish Council remain aggrieved that neither an individual Masterplan for the site nor a Masterplan that considers the impact on the village of all development recently completed, approved and proposed (particularly KB1 and KN2) has been prepared with input from local residents or the Parish Council. Instead, a Design Review has been undertaken behind a closed door. However, the Parish Council acknowledge the correspondence replying to our concerns, received from Nigel Smith.

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## Knebworth Neighbourhood Plan (the KNP)

5. For the avoidance of doubt the KNP is an adopted neighbourhood plan that forms part of the Development Plan for North Hertfordshire.
6. At the heart of the KNP is its vision statement. This outline application and the indicative masterplan that is presented with it, fails to propose a distinctive layout retaining the character of the Garden Village, and fails the tests of a sustainable development and does not provide services and infrastructure that embrace our values.
7. Objective Q is to *“Support and encourage use of sustainable modes of transport including ensuring access roads through new developments are suitable for bus routes and prioritise active travel”*. This is a primary objective in relation to this application and voices the aspiration for major new developments to be served by public transport.
8. The KNP Vision, relevant Objectives and a list of relevant KNP Policies is provided in Appendix B.

### Reference to the KNP in Planning and Affordable Housing Statement (Planning Statement) and Design Access Statement (DAS)

9. We note several policies from the KNP have been referenced (copied) into the Design & Access Statement page 12. However, we cannot see evidence of how these have been further applied or referenced in the proposals. Therefore, we ask that the planning authority conducts a full, documented assessment of compliance against KNP as part of the adopted Development Plan.
10. We note that the Planning Statement has referred to the KNP Policy KBB8 Land East of Knebworth in paragraph 5.11.7. The KNP Policy KBBE8 refers to land allocated in the Local Plan as site KB4. The policy contains a list of criteria with which development on the land east of Knebworth (KB4) should:
  - a. be developed at densities that respect local character and Knebworth's Garden Village context;
  - b. seek to improve pedestrian access and safety along Watton Road and Swangleys Lane;
  - c. provide a green buffer to open fields.
11. Whilst we recognise that the DAS has evolved and has developed the concept of “place making” in line with KBBE5, we do not believe that it is adhering to KBBE4 Design. KBBE4 states *“All development must demonstrate good design. Development must respect local character, which includes Knebworth's Garden Village context. New development should incorporate sensitively designed car parking, bin storage, cycle storage and electric charging for bicycles and motor vehicles.”*
12. The evolution of the site design since the initial application, as stated in the DAS page 36, has moved away from the Garden Village principles. The DAS page 36 states there was previously *“Too much emphasis on Lutyens' plan for Knebworth and Garden Village principles which are ‘of their time’.*” This change is clearly not in line with the KNP vision, objectives or policies.

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13. Whilst we recognise that the Masterplan is indicative, it has been through a Design Review process which has removed the Garden Village feel. The Parish Council expects the planning officer's assessment, committee report, and planning conditions requested, to reflect the changes required to bring the Masterplan design in line with the KNP as well as other parts of the Development Plan.
14. Whilst we welcome the allocation of allotments to the north of the proposed development, south of Watton Road, we do not believe that 0.13 Ha is a sufficient contribution from KB4 towards an estimated need for 1.5 Ha in line with the Neighbourhood Plan policy KBW5. Although garden size of the new homes is still to be determined, the trend is for smaller gardens which would not accommodate growing food, thereby exacerbating the need for allotment space.

## North Hertfordshire Local Plan (the Local Plan)

15. The most relevant planning policies in the Local Plan are SP9 and KB4.

### Policy SP9

16. A Strategic Masterplan is required to consider the cumulative impact of more than one site, to support a co-ordinated and integrated approach to place-making and design, as stated in SP9 b). This application does not meet that criterion.
17. KB4 is one of three major sites in Knebworth in the Local Plan which will result in an additional 584 dwellings. This represents a 38% increase in the 2,002 homes in Knebworth as of 2011, stated on pages 228-9 of the Local Plan, being made up of the 584 for KB1, KB2 and KB4 and 175 completions and permissions granted to date.
18. Nothing in this application addresses the ongoing issues with east-west travel across Knebworth which is severely restricted by the presence of the East Coast Main Line which bisects the Village, and the A1M which further reduces route options.
19. In addition to the three sites not yet developed (KB1, KB2 and KB4), site KB3, which was identified in the emerging Local Plan identified for mixed development of 14 dwellings and retail, is a fully occupied development of 47 assisted living flats with retail units below. There were no infrastructure improvements from this development, and it has had a significant impact on the 'high street'. A further planning application (20/01526/FP) for 4 apartments which have been built directly opposite the access to Lowe House with a total loss from both developments of up to 8 on-street parking spaces.
20. Despite the Parish Council frequently reaffirming their willingness to actively participate in masterplanning for the individual sites, as well as in the strategic masterplanning necessary to ensure a co-ordinated and integrated approach, we have not been invited to the table for the first of these and the strategic masterplanning engagement has failed to materialise.

### Policy KB4

21. This policy lays out explicit site specific criteria for the application site. This includes, amongst other requirements, a *"Transport Assessment to consider the cumulative*

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*impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures.”. This criterion has not been met as discussed in the Traffic Impact Section.*

## KB4 Masterplan Framework Document

22. The Masterplan Framework has been submitted with the application and despite this being an outline planning application, the land owners consider the content to represent how they would like their land to be developed. We therefore have some comments on the Framework document and make reference to these issues in the final section of this objection [Planning Conditions](#).

### Movement and Access Framework

23. The section of the site north of Swangleys Lane and a small section of the site south of Swangleys Lane is accessed via a road described as ‘Proposed Primary Street’. The width of the carriageway in this section is specified as 6.2m and is wide enough to accommodate buses to serve the new homes. However, beyond Swangleys Farm southwards, the width of the carriage way is reduced to 5.5m. This would not accommodate buses. Neighbourhood Plan Policy KBT1 encourages the provision of sustainable transport modes to new development, and this includes the wish for large new housing sites to be served by buses (in accordance with Planning Conditions paragraph [83](#)).

### Focal Space

24. There are few ‘Garden Village’ principles remaining in this Masterplan Framework following the Design Review. This is very disappointing. The Masterplan Framework now refers on page 10 to the proposal seeking to ‘incorporate elements that are a nod to the past...’ and that consideration of the Design Review Panel’s guidance has resulted in ‘a less formal layout’. The Framework goes on to say, on page 11, that the existing Garden Village areas of Knebworth are ‘immediately recognisable’, and on page 18 that they ‘have a distinctive character’. We had hoped that this significant new development area would also have a distinctive character and be immediately recognisable as being part of Knebworth.
25. Within the Focal Spaces section of the Framework, a key design principle is to “create the perception of public gardens – a characteristic feature of garden villages”. When preparing the Neighbourhood Plan, Knebworth’s public garden spaces were valued by residents. Some fall within Character Areas and others are designated Local Green Spaces. This feature should be conditioned (in accordance with [Planning Conditions](#) paragraph [84](#)).

### The Illustrative Masterplan

26. Section 7 of the Framework refers to parts of the illustrative Masterplan which demonstrate Garden Village landscape design principles, Garden Village dwelling design and traditional building materials characteristic of Garden Village areas of Knebworth. In order to ensure that reserved matters applications do not reduce this development to standard National Design Guide Principles creating a sense of place

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that has no relevance to Knebworth, these features of the illustrative Masterplan should be retained (in accordance with [Planning Conditions](#) paragraph 85).

## Traffic Impact

27. The additional cumulative traffic impact on the village and increased risks to pedestrian safety for users of the adjacent primary school, are the major concern of the Parish Council and of residents. This was highlighted at a public meeting on 6 October 2021 when 98 residents attended.
28. Progress has been made with proposals to improve safety near the school in discussions with HCC, as documented in the applicants Transport Assessment pages 15-16, including the stopping up of Swangleys Lane. An alternative access for KB4 residents to/from Woolmer Green and Datchworth, rather than adding to adding to public safety and air quality issues at the Watton Road / B197 junction, has not been considered.
29. The Parish Council raised the matter of the inadequate Transport Assessment in their response to application 21/02586/OP. That was two years ago. The intervening time has been more than adequate to conduct a comprehensive Transport Assessment including the cumulative impacts of KB1, 2 and 4, to support this and subsequent planning applications.
30. The updated Transport Assessment is predicated on an inadequate survey and flawed modelling. Neighbouring housing sites, some of which are already impacting on the B197 include:
  - Woolmer Green sites with access onto the B197 - Welwyn Hatfield Local Plan site allocation HS15 for 150 homes and adjacent car showroom site 35 homes; Entech site (app 6/2017/0848/MAJ) for 70 homes
  - Bragbury End, which is at the end of Watton Road – Stevenage Local Plan site allocation for 550 homes
  - Codicote site with access onto B197 – North Hertfordshire Local Plan site allocation for 363 homes.
31. The Framework Travel Plan also has weaknesses. These two documents together cannot be relied upon to meet the requirements of Local Plan Policies in SP9 and KB4, the Transport Objectives of the Neighbourhood Plan or ensure compliance with the National Planning Policy Framework (NPPF). The Transport Assessment and Framework Travel Plan are inadequate.

## General Inadequacies of the Transport Assessment and Framework Travel Plan

32. The Framework Travel Plan page 4 identifies benefits of successfully implanting the plan will reduce vehicular traffic on local roads, particularly at peak times, reduce noise and air pollution, and increase accessibility whilst reducing congestion. These claims are unsubstantiated and the current development proposals, despite the good intentions of the Travel Plan, could more reasonably be expected to create the opposite.

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33. The Framework Travel Plan, also on page 4, proposes a baseline travel survey of residents' trip-making behaviour be carried out three to six months after the occupation of the 50<sup>th</sup> dwelling. Such an ex post facto impact assessment after full planning permission is granted and the site part-built, will be too late. The Framework Travel Plan and its impact should be modelled accurately now. Its claims should include the cumulative impact of KB1, KB2 and KB4, along with the other Local Plan housing sites allocations, planning applications and sites under construction.
34. Both the Framework Travel Plan and the Transport Assessment are fundamentally flawed by being based on the 2011 census data for Knebworth and traffic surveys carried out in June 2019 (Transport Assessment paragraph 6.2.1). The census data is 12 years old (pre-Covid) and the survey was taken during Covid. In the intervening years, travel to work modes and working patterns have changed. A planning application for 200 homes should be based on up to date traffic surveys and not data that is over four years old.
35. Train journeys from Knebworth Station have decreased by 43.5% from the base data period 2018-19 levels (561,724) to latest data 2021-22 (317,220) (see Appendix C). In addition, changes to the service have resulted in commuters from Knebworth driving into Stevenage for faster trains (reported in the [Welwyn Hatfield Times](#) 07.08.23). The Travel Plan will have no impact on this behaviour.
36. Traffic surveys used as base data were from four hours on a single day (Thursday 6<sup>th</sup> June 2019 07:30-09:30 and 16:30-18:30) (see Transport Assessment pages 121-125). This data is not a statistically valid sample representative of the changing conditions e.g., A1M congestion, or journeys switching to vehicles on dark winter days and poor weather. Nor did it represent the busiest time of the day around the school i.e., school pick up time 15:00-16:00.
37. The modelling up to 2028 uses the assumption that the north-south flows on the B197 have been constant at 2019 levels and there is no indication that the wider impact from developments on the edge of Knebworth Parish have been factored in. This assumption ignores the [Hertfordshire County Council Local Transport Plan \(LTP4\)](#) page 26 which predicts that car trips in peak periods will increase by 17-18% across the county.

## Traffic Impact on the London Road (the High Street) the New Access Proposals

38. The new access proposals will result in traffic from Watton Road, Swangleys Lane east of the village, and KB4 converging onto the Watton Road / B197 roundabout, yet the Transport Assessment page 31 concludes that "*There are no material traffic impacts associated with the proposal.*". The Parish Council disagree with this modelled assessment.

## Invalid A1M capacity assumptions

39. The basis of the applications traffic impact is a traffic survey carried out on 6 June 2019. It assumes that the A1M Smart motorway improvement will proceed, reducing traffic on the B197. In April 2023 new smart motorways were removed from government road-building plans due to financial pressures and lack of confidence felt by drivers ([Department for Transport 15.04.23](#)). This is now not the case and thus is an invalid assumption for the modelling.



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40. Improvements on the A1M between junctions 6 & 7 cannot be assumed. Plans were approved to widen the A1M to three lanes in this section over thirty years ago, with compulsory purchase of land in place. However, these plans did not come to fruition.
41. Whatever happens with the A1M, the B197 will continue to be under stress unless some form of relief route for Knebworth village centre is provided. The Transport Assessment model assumption on page 23, that north south flows on the B197 have been kept constant at 2019 levels (during Covid when traffic flows everywhere fell) are not substantiated or based on evidence.

## Inadequate assessment of traffic impact around the Watton Road B197 junction

42. The Local Plan paragraph 13.205 recognises the issue with capacity at this junction “*the junction of Stevenage Road/London Road/Watton Road and Station Road, is a known pinch point*”, as does the Neighbourhood Plan.
43. Traffic arising from KB3 was ignored in the Transport Assessment because it is a site of 47 assisted living flats. However, deliveries, fire engines and ambulances requiring access to the site are unable to park off-road due to the low arch, are causing congestion on the B197. Parking for this development is on-street adjacent to the Watton Road roundabout.
44. The Transport Assessment states that, by 2026 the Watton Road B197 roundabout will be at capacity. However, the assessment does not explicitly reflect additional traffic from neighbouring developments being built and already occupied (see paragraph 30 above).
45. As of August 2023, gas works have meant the flow on this roundabout is constrained by a 4-way traffic flow control system. This has caused tremendous congestion in the village centre and in the neighbouring unsuitable residential roads used to avoid the junction, such as Pondcroft Road, Park Lane and Deards End Lane. Whilst this is not caused by KB4 development, it demonstrates the fragility of the current situation with regards to making significant changes at this junction and the inability to cope with significantly more traffic.

## Implications from the LCWIP consultation on the B197 / Watton Road junction

46. On 27<sup>th</sup> June 2023 the NHC Cabinet reviewed the consultation feedback on its Local Cycling and Walking Infrastructure Plan (LCWIP). As a result of the consultation the plans relating to Knebworth have been scaled back. The minutes of the Cabinet meeting note:
  - a. “Very strong opposition to the proposals for the London Road High Street; the removal of parking would significantly impact local businesses/trade.
  - b. Support for interurban proposal via Stevenage Road but concern around current condition of footway/roads and traffic speeds
  - c. Lack of routes to outlying towns and villages, such as Codicote, Welwyn, Oaklands, Woolmer Green etc.”
47. These have implications for the deliverability of the sustainable transport objectives stated in this planning application; another reason the Transport Assessment and Framework Travel Plan why need to be re-assessed.

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## Traffic Impact – Air Quality

48. The cumulative impact of traffic from the proposed developments in and around the village will have a severe negative effect on traffic, causing congestion within the village, impacting air quality. Unfortunately, the comments from North Herts Public Health and Air Quality team are reliant on guidance from HCC Highways that the predicted traffic levels generated by occupation of the site which have been used to predict the impact on current levels of regulated air pollutants. HCC Highways comments are not yet available.

## Traffic Impact Detail - Swangleys Lane

49. Swangleys Lane is narrow, has twisting alignment and has a steep gradient. High hedges on both sides of the road which restrict visibility and there is a bend, where Swangleys Farm buildings restrict the forward visibility.
50. The Masterplan, accompanying this application, shows Swangleys Lane to be closed to vehicular traffic just before Swangleys Farm. Vehicles accessing or leaving Swangleys Farm wishing to travel north or west would have to travel through the new residential area to Watton Road.
51. Although the stopping up of Swangleys Lane is welcomed by residents of the lane and school representatives, the additional pressure on Watton Road is cause for great concern.

## Traffic impact detail - Watton Road

52. Watton Road is an unlit lane which is a busy east-west route which runs from Knebworth to Bragbury End, Stevenage. It is a thoroughfare for traffic from Stevenage to Knebworth Station, the A1M and other east / west routes to Luton and Stansted. The main issues are:
- Watton Road within the current village boundary had traffic calming measures installed, speed bumps and road narrowing, over twenty years ago to help with road safety.
  - Approximately ten years ago, double yellow lines were laid on the north side of the road to create passing places to try to prevent blockages which were occurring due to the level of traffic.
  - Vehicles park on the north side of the road, restricting the width to one lane. Vehicles use the passing places; however, congestion still occurs which results in impatient drivers driving onto the narrow southern footpath. Additional traffic will increase safety issues.
  - Within ten metres of its junction with the B197, London Road / Stevenage Road and Station Road, there are road restrictions. Sometimes vehicles queue on Stevenage Road to turn into Watton Road but are unable to do so because of the volume of traffic and the current restrictions. This impacts traffic flow.



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## Pedestrian, Cycle and Public Transport Access

53. The Transport plan refers to pedestrian and cycle access via Watton Road, Old Lane and Swangleys Lane. There is no footpath beyond Bell Close on Watton Road, so there are safety issues for pedestrians. The missing footways are shown quite clearly on page 43 of the AECOM Knebworth Masterplanning and Design Final Report prepared to accompany the KNP. The application has not assessed the pedestrian safety of this route through to the village centre but is assuming that it is accessible. Watton Road is also dangerous for cyclists, being narrow and unlit.
54. There is currently no bus service operating in Watton Road, the nearest stop is on Stevenage Road, 400m from the Watton Road Access, necessitating provision of safe pedestrian access to Stevenage Road. The lack of an east-west or north-south route through the development is presumably why there are no proposed bus routes to serve KB4. Provision of an access road through, or adjacent to, KB4 could accommodate public transport and would increase sustainability. This is articulated in KNP Objective Q and Policy KBT1.
55. In the KNP, Traffic, Transport and Parking Chapter 9 the Parish Council noted their support for proposals that encourage a change of travel mode away from the private car to more sustainable forms of transport.
56. In the Submission KNP, the Parish Council stated the wish that through the development of KB4, the opportunity should be taken to utilise existing narrow country lanes, e.g., Old Lane as pedestrian/cycle routes. It is noted that this opportunity has been taken.

## Sustainability

57. The occupants of 200 homes on KB4 and their estimated 449 occupants (using the same ratio as documented for Knebworth in the Local Plan, will make demands on the village infrastructure e.g., doctors' surgery, dentist, primary school etc. These are considered below. The Parish Council do not believe that the application is making any sustainable proposals to mitigate the impact of this additional housing on village infrastructure and therefore is not meeting the requirements of the Local Plan Policy SP9 c) iv. and v. which require walkable locally accessible community, employment and retail facilities and positively address cross boundary infrastructure matters. These include:

### Doctors Surgery

58. The KNP describes the issue in detail in section 7.2.1. We do not believe that this application is making sufficient provision for GP healthcare. One significant concern of the existing Practice is the number of new developments for the elderly within the boundary area. There are three nursing homes, a retirement complex of 26 homes for the over-60s Lowe House which has 47 assisted-living apartments. Each patient is allocated a premium by the NHS, and this will provide more income through capitation fees, however, this is unlikely to be sufficient to fund an additional GP and elderly patients often have significant health issues.
59. The Knebworth Surgery is joined with Marymead in Stevenage, and it is often easier to get an appointment at Marymead than Knebworth Surgery. For anyone with mobility

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issues, the impractical journey by public transport involves taking a bus into Stevenage Bus terminal (3 miles) and then out to Marymead (2 miles).

## Employment

60. The site does not propose any long-term employment opportunities, therefore there will be a need for many to travel to work, unless the detail of the homes to be provided facilitate 'working from home'. The KNP, Policy KBLE4: Community businesses highlights the need for and encourages the provision of flexible buildings to accommodate small businesses and community shops on major residential sites such as KB4. Because of the outline nature of this planning application, there is no evidence that this need has been recognised.

## Schools

61. The proposed new homes represent a growth of half a form entry for primary school children at c. 90 children. We believe that this application has insufficient primary educational provision in the vicinity. The insufficient capacity at the existing primary school was confirmed by primary school representatives at the Public Meeting the Parish Council held on 26<sup>th</sup> July 2023.
62. Access to the existing primary school has not been fully considered and both the school and the Parish Council have continued concerns about safety for pupils. A solution to this may be an additional access via the south west corner of KB4.
63. The new primary school proposed on the KB2 site. The school would be located to the far west of the village near the A1M. It is at least a 1.3km walk from the western edge of the proposed KB4 site to the proposed new primary school. Therefore, we do not believe this is a feasible or timely alternative for primary provision to serve the residents of KB4.
64. The current HCC allocations policy for school places may result in children living in KB4 being driven to an alternative primary school in Stevenage, Woolmer Green or Datchworth. This increases the use of less sustainable transport. Development of sites in Woolmer Green and Bragbury End, Stevenage will increase demand for primary school places. This does not appear to have been factored into the overall provision of primary school places in Knebworth.
65. Secondary school children currently attend many schools in Stevenage, Hatfield, Hitchin, Welwyn Garden City, Baldock. All secondary school age children will need to travel to school. It is not clear whether this has been factored into the Transport Assessment modelling.

## Public transport

66. The Transport Plan refers to bus services which serve the village and the sustainability of those services. However, the current public transport provision to and from Knebworth is as follows:
  - The service between Stevenage and St Albans via Lister Hospital (on average two per hour from early morning to late evening) takes an hour from Knebworth to St Albans compared with a twenty minute drive.

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- Knebworth to Luton via bus is a 67 minute journey compared with a 25 minute drive. There are four buses a day to Luton between 10:00 and 17:00 but only three buses back to Knebworth between 09:00 and 13:00, with four buses on Saturday and no service on Sunday.
  - Between Knebworth and Hertford there are two buses per day which originate in Hertford and turn round at Stevenage, the last bus being at 13:20. The journey takes 40 minutes whereas the equivalent car journey takes just fifteen minutes.
  - Knebworth has its own railway station to travel north / south only, although its use has substantially reduced post-Covid and the service worsened.
67. Despite being advised of the limited public transport options in our objection to the previous outline planning application, the applicant continues to state that “there is no need for residents to rely on a car” on page 19 of their updated Transport Statement. The conjecture is meaningless in Knebworth. Time is an important criterion for transport choice, not everyone is prepared or able to set aside several hours a day travelling using public transport. Knebworth is in a semi-rural setting which should be respected in the Transport Assessment.

## Community Facilities

68. There are existing allotments adjacent to the site. The application proposes that these are enlarged, which the Council supports, and will contribute to the health and wellbeing of the community. The Neighbourhood Plan seeks 1.5 Ha. of allotment land across KBI, 2 and 4; the application proposes 0.13 Ha. (Design and Access Statement p. 59) for this site. Because of its proximity to the existing allotments this is a preferred site, and the Parish Council would welcome an enlarged provision.
69. The current access path to the allotments from Watton Road, following the boundary of 32 Watton Road/boundary of KB4, is still not shown in the Design and Access Statement, but should be retained. If it is not, residents will have to walk further along a pathless Watton Road to enter the development to gain access to the allotments. The new combined site should have a mains water supply.
70. There is no evidence in the application documents of any other community facilities or contributions towards community infrastructure. The KNP Policy KBW1 Community Facilities and Services is supported by extensive research and summarised in section 7.2. This section identifies the community priorities in terms of additional local facilities, to be provided through new development. They include a centrally located community leisure facility providing a purpose built multi use indoor sports hall with gym and dance facilities, all weather-pitch, changing rooms, storage, meeting rooms and associated administration and parking facilities; this could be a shared facility with the proposed school(s) and used by other village organisations. This facility has been noted at point 4 of the Action Plan Appendix D. The KB4 development must contribute to the provision of this facility.
71. Knebworth Football Club, with a current membership of around 350, both male and female of all ages, highlighted the lack of facilities in Knebworth. This is based at the Recreation Ground currently, in the vicinity of KB4. They have identified the following as necessary facilities to maintain or improve the sports provision in Knebworth:

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- All-weather pitch to increase local capacity
- Clubhouse/social hub - to provide a social space.
- Suitable ground grading for FA Cup - to raise the standards
- Indoor sports hall - to provide suitable local facilities

## Local Community Engagement

### Applicant Engagement

72. The applicant has submitted a Statement of Community Engagement, as required. Engagement comprised Drop-in session on three consecutive days in the first week of the 2021 school summer holidays, the most popular time for trips away. The number of residents who engaged in this consultation is undeclared.
73. Despite the statement being updated, the updates relate only to the applicant's submission to Design Southeast (Design Review Panel) in early 2023. This has resulted in material changes to the Illustrative Masterplan, as described in the application's Design and Access Statement page 36. The Design Review Panel was behind closed doors and did not include the Parish Council, a disturbing matter which has been raised separately with the District Council. There has been no community engagement since July 2021 with residents or with the Parish Council. This is despite significant changes between the original and new outline applications.

### Parish Council Community Engagement

74. The Parish Council facilitated a Public Meeting on Wednesday 26<sup>th</sup> July 2023 to promote public awareness of the proposals and listen to feedback. No representatives of the landowner or promoter of the application attended. In summary:
- a. Over 100 residents of Knebworth and Datchworth attended.
  - b. There was considerable negative feedback about closing Swangleys Lane, primarily from Datchworth residents and Parish Council.
  - c. Several people proposed a link road via KB4 to Woolmer Green as an alternative to routing Datchworth traffic through the development.
  - d. When and where new school places for residents of KB4 would be available was queried, given, as stated by school representatives, the current school is at capacity.
  - e. Criticism was levied at lack of a masterplan for the village which could tackle cumulative impact on key road junctions and ensure comprehensive community benefits resulted from the development.

### North Herts Council Community Engagement

75. We welcome the suggestion by the Strategic Planning Manager, that the active involvement of the Parish Council "works best where they have their own Community Review Panel". A design review panel of any sort should be undertaken before an outline planning application is submitted. Our own research suggests that such a

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community panel should be part of a broader community engagement strategy. The District Council should update its Statement of Community Involvement to clearly promote such panels. Perhaps then, parish council's and other community groups may become aware of their benefits.

76. In relation to KB4 and all other significant developments in Knebworth, the Parish Council is well placed to provide local knowledge and to represent the community. In addition, the Steering Group formed to prepare the Knebworth Neighbourhood Plan included leaders of each of the four policy areas who have their own specialisms in addition to their local knowledge. A Community Review Panel would be easy to form for Knebworth. This would ensure that schemes do not get to the stage of submission of an outline application, before the community have played an active role in the composition of that developer's masterplan.

## Planning Conditions

77. The Masterplan submitted with the application should be labelled as indicative only. A new comprehensive Masterplan, prepared with input from the Parish Council, in line with the KNP design intention, goals and policies should be prepared as a condition of outline permission being granted. The applicants' Planning Statement paragraph 5.11.7., "...this application is made in outline with all matters reserved except for access, therefore any masterplans for the site are indicative." Due process to prepare a masterplan in accordance with the District Council's Local Plan Policy SP9, the June 2022 Design Review Protocol, and the masterplanning approach and principles agreed at Cabinet in March 2021, must be followed when preparing a Masterplan which will guide reserved matters applications.
78. Allotment Provision should be provided in accordance with KNP Policy KBW5. The existing, direct path to the allotments, adjacent to 32 Watton Road should be retained. The retention of the path would reduce the distance pedestrians would need to walk on a road with no footway to reach the new combined allotment site. Alternatively, a new access immediately adjacent to the existing one would be required.
79. Community Facilities such as sports provision to accommodate football noted above in paragraph 71 should be identified and could be achieved through a combination of S106 funding and gifting of suitable land. A condition dictating the quantity and quality of Public Open Space to be provided should be identified clearly.
80. Future Reserved Matters Applications should be conditioned to be in accordance with the Development Plan, including the KNP Policy KBBE8 and other relevant policies in the KNP.
81. Primary School Expansion must be provided for in the comprehensive revised Masterplan for KB4, to address the current under provision and distance of KB4 from the proposed primary school provision on KB2.
82. Pedestrian and Cycle Access to the village along Watton Road and Swangleys Lane require improvements to ensure safety and encourage use.
83. Width of Primary Streets should be 6.2m minimum so as not to preclude a sustainable public transport service.

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84. Focal Spaces as identified on the Masterplan Framework submitted with the outline planning application should be retained as an important feature of the development proposal representing a characteristic feature of the garden village.
85. The Illustrative Masterplan in Section 7 of the Masterplan Framework notes the aspects of the design proposal that reflect Garden Village design principles. The retention of this intention should be conditioned to ensure the proposal has a distinctive Knebworth character.

Yours sincerely

*Jodee White*

Jodee White  
Clerk to the Council



## Appendix A

### Summary of Objection

The following issues have been identified with outline planning application 23/01552/OP and are listed in the order they are discussed in the full letter of objection:

1. Based on a Masterplan with no public input
2. Not in accordance with the Vision and Objectives of the Knebworth Neighbourhood Plan (the KNP) and contrary to Policies KBBE4, KBBE8 and KBW5 among others
3. Contrary to Local Plan Policies SP9 and KB4
4. Illustrative Masterplan shows reduced width of Proposed Primary Street, south of Swangleys Farm, which is too narrow to support bus provision to the development.
5. Contains no cumulative traffic assessment or solutions
6. Relies on the flawed assumptions and inadequate surveys for the Transport Assessment
7. Puts forward a weak Framework Travel Plan not properly modelled
8. Assumes 'no change' to the traffic conditions on the B197 since 2019
9. No recognition given to scrapping of 'smart' motorways and the impact from traffic through Knebworth avoiding the motorway
10. Impact on scale by of the LCWIP recommendations for the 'high street' announced by HCC, not taken in to account
11. No air quality impact assessment of cumulative traffic increase
12. Multiple unresolved capacity issues for Watton Road from KB4 and re-routed Datchworth traffic
13. No public transport provision for KB4 and unresolved safety issues for pedestrians and cyclists
14. Inadequate consideration of current health provision relying on car trips
15. No new employment opportunities
16. Insufficient primary school provision
17. Over reliance on poor public transport provision to support sustainability claims
18. Aside for a minimal extension to the existing allotments and some green space, there is no provision for community facilities
19. No public engagement has been carried out before submission of this application

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## Appendix B

### Knebworth Neighbourhood Plan, Vision, Objectives and Policies

#### Vision Statement:

Knebworth aims to be a vibrant and inclusive village community, a great place to live that is distinct and separate from its neighbouring communities. A place that aspires to good design and improved environmental performance where everybody has access to green spaces. A community that will accommodate sustainable growth and development in its population, services and infrastructure that embraces our values, has the minimum impact on local nature and wildlife and that ensures Knebworth's fundamental rural character is maintained.

#### Relevant Objectives to the access proposals, transport assessment and indicative masterplan:

A. Maintain the distinctiveness and separation of Knebworth from nearby towns and villages

F. Ensure all new developments are inclusive and accommodating to the different needs of local residents including affordability and accessibility

H. Require all new development to be of high-quality design and contribute towards Knebworth's character by being sympathetic to design of surrounding areas

I. Retain the architectural character of the Garden Village, conservation areas and other heritage assets

L. Ensure that all current and future community facilities, amenities, medical resources and service provision are inclusive, easily accessible and do not diminish in terms of quantity and quality to serve the growing population

Q. Support and encourage use of sustainable modes of transport including ensuring access roads through new developments are suitable for bus routes and prioritise active travel

#### List of key relevant policies:

KBDS2 Density of Housing Development

KBBE1 Housing mix

KBBE4 Design

KBBE5 Masterplanning and Placemaking

KBBE8 Site KB4 Land east of Knebworth

KBW5 Allotments

KBEF1 Biodiversity

KBEF4 Flooding and Drainage

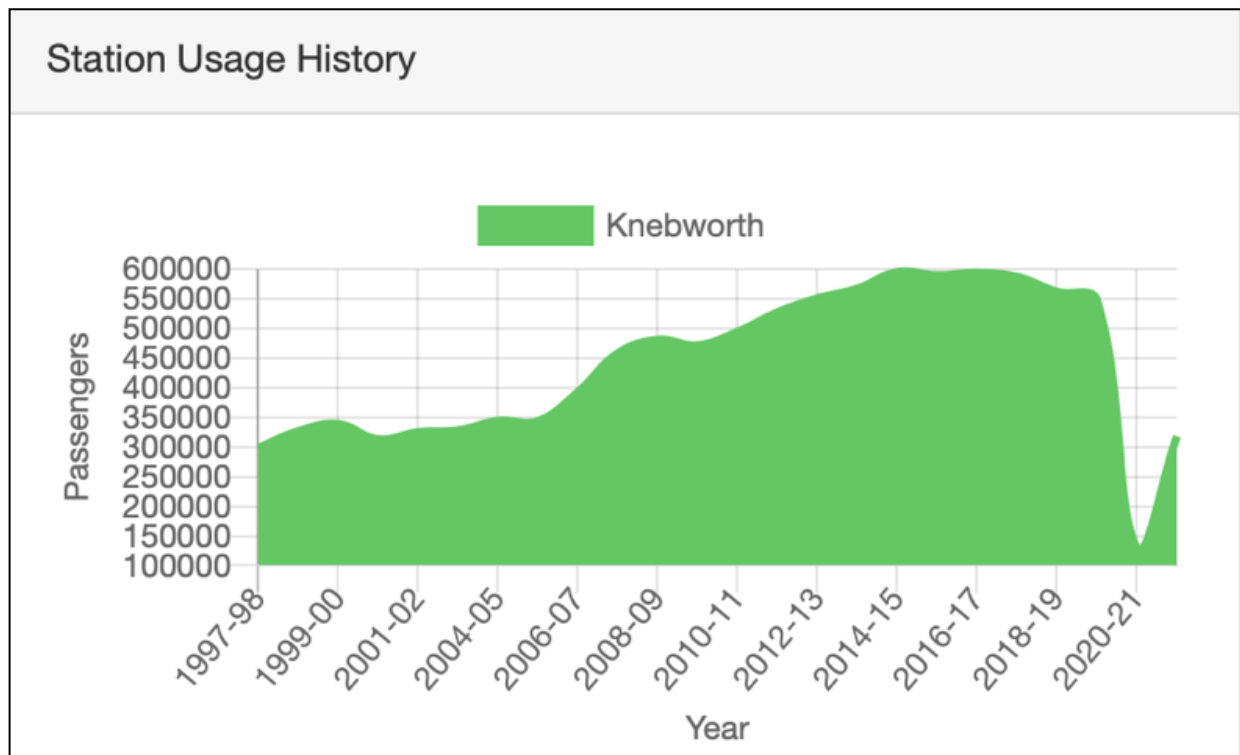
KBT1 Sustainable Modes of Travel

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## Appendix C

Table 1: Use of Knebworth Station by Year



Source: [Railway Data UK](https://www.railwaydata.co.uk/)