

NORTH HERTFORDSHIRE LOCAL PLAN

EXAMINATION HEARINGS

Matter 11: Knebworth

Statement by Jed Griffiths MA DipTP FRTPI

For Knebworth Parish Council

January 2018

Introduction

This statement seeks to amplify and, where appropriate, to update the points made by Knebworth Parish Council in their Regulation 19 submissions on the draft Local Plan. At the outset, it should be noted that one of the sites allocated for development in the Submission Draft Local Plan (Site KB3) has been granted planning permission for development. Planning permission was issued on 8th December for the former Chas Lowe builder's yard for the development of 48 assisted living extra care (Class C2) apartments for the frail elderly, together with three ground floor commercial units (Class A1 or A2) fronting London Road. Consequent adjustments should be made to the Local Plan – these are indicated below.

This statement provides answers to the Inspector's Schedule of Matters and Issues, under each reference number.

11.37: Are all of the proposed housing allocations deliverable? In particular, are they:

a) confirmed by all of the landowners involved as being available for the use proposed?

According to the Strategic Housing Land Availability Assessment 2016 Update (Document HOU9), the three housing allocations are all confirmed as available by the respective landowners.

b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

As pointed out in the Parish Council's Regulation 19 submissions, all of the allocations, both singly and cumulatively, would have a severe traffic impact on the B197, which passes through the centre of the village. There is very little evidence that safe and appropriate can be provided to any of the sites.

For **Site KB1**, the increased levels of traffic generated by an additional 200 dwellings would have a severe effect on the capacity of Park Road/Station Road, which is constrained by the narrow railway under-bridge. On the southern edge of the site, Deards End Lane is extremely narrow and winding, with no pavements for pedestrians. At present, it is used by as a "rat run" by traffic avoiding the village centre – there is a clear danger that this problem would worsen. At the northern end, the lane crosses the East Coast main railway line by a narrow over-bridge, which is a Scheduled Ancient Monument. Any increases in traffic would endanger the structural integrity of the bridge.

Development of 184 dwellings at **Site KB2** would also generate considerable volumes of traffic on Gypsy Lane and surrounding residential roads. The Local Plan acknowledges that the proposals would have a major impact on the Gun Lane railway underbridge, which would provide the main access to the site from the east.

Traffic would pass through the Stockens Green Conservation Area, adversely affecting its character. To the north of the site, the access would be to Park Road, which itself has limited capacity.

To the east of the village, development of the areas on **Site KB4** for 200 dwellings would have a considerable impact on the narrow roads and lanes. Watton Road is already under considerable pressure from “rat running” traffic using it to avoid the southern part of Stevenage. In the countryside between Knebworth and the edge of Stevenage, it is narrow and has a series of sharp bends. At its western end, where it passes through the residential area, traffic calming measures have been introduced to reduce the impact of speeding vehicles.

Old Lane was formerly used as short cut between Watton Road and Swangley’s Lane, used by traffic seeking to avoid the centre of the village. This movement has been prevented by closing the lane to south-bound traffic from Watton Road. Compared to earlier consultation versions of the Local Plan, the housing allocation now appears to include an area to the east of Old Lane., in addition to the area to the north of it. No thought appears to have been given to the impact of the additional traffic on this very narrow thoroughfare.

The area to the south of Swangley’s Lane is also unsuitable for the additional volumes of traffic. The lane is also narrow and winding, with steep gradients to the east. It is heavily used by traffic running from Knebworth to Datchworth and beyond.

Taken together the amount of traffic generated by the proposed developments in Site KB4 would severely affect the character of the rural roads and lanes to the east of Knebworth. There would also be an adverse effect of the capacity of the B197 through the village centre. These proposals are contrary to the policies in the Hertfordshire Local Transport Plan 2011 (LTP3) which seeks to protect rural roads from excess traffic.

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

The cumulative effects of the proposed allocations are set out in the Parish Council’s response to the Proposed Submission Draft (Representation 257). The proposed allocations would result in an increase of over 30% in the numbers dwellings in the village, compared to the 2011 Census.

The concerns about highways and transport are also set out above, in terms of the impact on the capacity of local roads, and on the potential harm to the character of the village and the surrounding countryside. There are no specific proposals in the Local Plan for the delivery of highways infrastructure.

The cumulative effects of the proposals would lead to pressures on the local drainage infrastructure, an issue which is acknowledged by the District Council in paragraphs 13.201 and 13.202 of the Local Plan. The Plan states that “scheme promoters should work with Thames Water”. This gives no guarantee that schemes can be delivered. As pointed out by the Parish Council, Knebworth lies on the edge of the catchment area of the Rye Meads Sewage Treatment Works. Within the catchment, several local planning authorities have prepared Local Plans with large scale housing allocations. There is therefore some considerable doubt as to whether all of these developments could be delivered.

On **Site KB2**, there is currently a balancing pond which takes surface water from the A1(M) nearby. The site analysis recognises there are other surface water flood risks – these cannot be resolved by SUDs alone.

To the east of the village, there have also been many instances of surface water flooding, which would be exacerbated by the proposals for **Site KB4**.

The District Council acknowledges that the village primary school is currently at capacity, and that there are likely to be shortages of secondary school places elsewhere. Therefore, proposals for **Site KB2** have provision for a 1FE primary school and **Site KB4** contains 4 hectares of land for education. Taken on their own, the proposed housing numbers for each of the allocations falls below the County Council threshold for additional school provisions as to whether the allocations are deliverable. In the case of **Site KB2**, the Parish Council believes that the siting of a primary school so close to the busy A1(M) is wholly inappropriate.

11.38: Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

The Parish Council has objected to all of the proposed housing allocations, both in terms of the loss of Green Belt and the likely impacts. If fully implemented, the Local Plan would result in a more than 30% increase in dwellings compared to 2011 – this is far in excess of the proposed increases for any of the villages in the District. In earlier consultation drafts, the numbers of dwellings proposed were far less. The late inclusion of **Site KB4** in the 2016 Sites Review and in the Local Plan exacerbates the impact of housing development on the village, its character and its network of facilities.

All of the proposed sites were classed as Priority 3 in the 2012 SHLAA report.

11.39: Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

The Parish Council submits that none of the proposed allocations are the most appropriate option for the village. There is a reasonable alternative which has been rejected, which is the strategic site to the west of the A1(M) at Stevenage. A detailed justification for the early release of this site is contained in the Parish Council's earlier response (Representation 288) to the Proposed Submission Draft.

11.40: Sites KB1, KB2, and KB4 comprise of land in the Green Belt. For each:

a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?

The Parish Council has consistently argued that exceptional circumstances do not exist for the release of any of these sites from the Green Belt (see Representation 257). These points have been set out in the Hearing Statement on Matter 7, and will have been elaborated during the Hearing Sessions on Matter 7.

The key purpose of the Green Belt has always been to prevent the outward spread and influence of London. The designation of Green Belt along the "Great North" transport corridor was made primarily to serve that purpose. At the same time, it has discharged another important function, which is to prevent the coalition of the towns and villages in the corridor. Protection of the Green Belt around Knebworth is a critical element of that overall strategy.

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

Site KB1 forms an important buffer between the edge of the village and the A1(M). It also prevents the encroachment of Knebworth into the countryside to the west of village. There are also concerns about the effects on the Knebworth Woods SSSI, and an area of ancient woodland adjacent to the proposed development. Both of these areas are protected habitats and the impact of the development would need to be assessed against the provisions of the NPPF (paragraphs 14, 113, and 117).

Site KB2 is also a part of the landscape buffer between the village boundary and the A1(M), and prevents the encroachment of development into the countryside to the west.

Site KB4 causes considerable harm to the Green Belt. The proposed development areas, particularly to the north, encroach on a tract of farmed countryside to the east of the village. This area provides a significant open landscape setting for Knebworth: its removal from the Green Belt would cause considerable harm to the overall character of the area.

At the northern part of the proposed housing areas (SHLAA reference 58), the village recreation ground forms an important boundary feature to the village, with attractive views to the east. Development of the area beyond the recreation ground would also close the gap between the edge of Knebworth and the south western boundary of Stevenage.

c) To what extent would the consequent impact on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

For all three sites, development would compromise the first three of the Green Belt purposes (the others do not apply). Any development in the Green Belt *per se* would affect the primary purpose of checking the outward spread of Metropolitan London. It is difficult to envisage how the impact of development on the other purposes of the Green Belt could be ameliorated or reduced.

d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?

Only three of the Green belt functions actually apply in this part of Hertfordshire:

- checking the outward sprawl of the London metropolitan area;
- preventing neighbouring towns merging into one another, and;
- assisting in safeguarding the countryside from encroachment.

For all three sites, any development would undermine these three purposes to some degree. For sites **KB1 and KB2**, the “adjacent” Green Belt is essentially to the west of the motorway – development of these areas would entail the total loss of Green Belt between it and the current village boundary. The strip of land between the western edge of **KB1** and the edge of the proposed development area is irrelevant and would have no useful function.

On **Site KB4**, the District Council would argue that the remaining areas of Green Belt would help to safeguard the countryside to the east of the village from further encroachment. Erosion of the Green Belt in this area, however, would close the gap between the edge of Knebworth and the Broadwater area of Stevenage. Part of this gap is already occupied by the crematorium on Watton Road.

e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?

With 4.7% of the village housing numbers allocated to Knebworth, it seems inevitable that more housing developments will be required at the end of the plan period. The Parish Council is concerned that a further extension of the settlement boundaries will inevitably be required in subsequent reviews of the Local Plan.

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

From the Sustainability Appraisal it is clear that the District Council consider that Knebworth has many attributes of a sustainable community. Reference is made to the status of the shopping centre, the range of facilities and services, and the access provided by the railway station and the Great North Road (B197).

The excessive amount of development (well over 600 additional dwellings) would exert considerable pressures on these assets, which are already at capacity. There are no proposals for employment in the Plan, which means that there would be high levels of outward commuting. This problem has been highlighted by the recent loss of the Chas Lowe builders' supply yard in the middle of the village. The Sustainability Appraisal refers to the support to the local economy and its facilities and services – these are spurious and unjustified assumptions.

g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid using land which it is unnecessary to keep permanently open?

The eastern boundaries of **Site KB1** abut the Deards End Conservation Area. To the south, the boundary is formed by Park Lane. The actual western boundary is the A1(M), although there is a strip of land between the motorway boundary and the site. To the north, the boundary is less distinct, being on open agricultural land with the Knebworth golf course further to the north.

The western boundary of **Site KB2** is formed by the embankment of the A1(M). To the north there is a narrow tongue of land which lies adjacent to Park Lane. On the northern part of the site, the eastern boundary is defined by Gypsy Lane, which then crosses the area diagonally in a south westerly direction. On the southern part of the site, the western boundary abuts the current settlement edge. The southern boundary of the site is not well-defined, and is merely an extrapolation of the current village boundary.

Site KB4 consists of a series of SHLAA sites which were originally identified in the Housing Options Study 2013. There is also an additional area shown to the east of Old Lane. Commentary on each of these areas is set out below.

On Site 058 (to the north of Watton Road), the bulk of the western boundary adjoins the village recreation ground. This is a well-defined existing boundary, which forms a backcloth to the popular leisure, from which there are extensive views to the open countryside beyond the village to the east. The northern boundary adjoins the Oakfields residential area, and the southern boundary is formed by Watton Road beyond the village. The eastern boundary runs across agricultural land: it is illogical and does not pick up any recognisable physical features on the ground.

To the south, Site 055 (to the north of Old Lane) does have distinctive boundaries on the ground, formed by Watton Road, Old Lane, and to the west by the edge of the current residential area.

The additional site, to the east of Old Lane, is also defined by Old Lane itself to the west, and by Swangleys Lane to the south. The northern boundary is also clearly defined, but the eastern boundary is only partially clear. To the north of Swangleys Lane, it runs across a large agricultural field, and has no distinctive features.

Site 057 (South of Swangleys Lane) is defined to the north and east mostly by the Swangleys Farm complex. To the west it abuts the Haygarth residential area. The southern boundaries are defined by existing hedgerows.

None of the sites avoids land which it is unnecessary to keep permanently open. There are no areas of this type in the Parish of Knebworth.

11.41: Is the proposed settlement boundary:

a) consistent with the methodology for identifying the settlement boundaries?

b) appropriate and justified?

It is assumed that the proposed settlement boundary would follow the edges of the three site allocations. As far as can be ascertained, the boundary has resulted from the cumulative definition of each of the sites. For the most part, the methodology has been consistent, but there are flaws which are described in 11.40 above.

In overall terms, the proposed settlement boundary is neither appropriate nor justified. It is too extensive, because it seeks to accommodate the excessive levels of development described above.

Additional Comment

The Parish Council recognises that some level of housing development should be included in future plans, but this should be appropriate to the natural growth of the settlement. The concerns of the Parish Council are summarised in its Regulation 19 submissions (Representation 257). Imposition of the proposed level of development, with the consequent removal of extensive areas of Green Belt, would place undue burdens on local facilities and services. There appears to be no overall strategy for the future development of the village.

The Parish Council is seeking to address these issues by means of a Neighbourhood Plan. The Local Plan pays little regard to the role of neighbourhood planning in determining the allocation of housing sites in villages. The Inspector is urged to consider the withdrawal of the current policies for Knebworth and to insert a policy which specifies a level of development, and devolves the responsibility for detailed site allocation to the Parish Council via a Neighbourhood Plan.

Jed Griffiths

Hertford

10th January 2017