



**Barkway Village extra evidence against inclusion of BK3**  
**due to the omission of required consultation.**

The Local Plan must be **robust** and Barkway Parish Council believes it fails this test in the case of BK3.

In NHDC's rejection of the Rand Brothers planning permission for their part of BK3 it was pointed out by Hertfordshire Council for the Protection of Rural England (para 3.12) that "the site was only identified for consultation in the Local Plan in the Autumn 2017 round of consultation." It had previously been repeatedly rejected. Therefore, this evidence should not be considered to be out of the 'objection submission time'. The sequence of events outlined below identifies how BK3 was never fully consulted upon in its present form, so breaching NHDC Statement of Community Involvement, Regulation 19 September 2015 (Appendix 1).

BK3 was originally 2 separate plots in all the SHLAA's revisions from 2009 to 2016.

In the 2008 revision of the SHLAA, only 4 sites were noted as being available in Barkway.

In the 2009 SHLAA revision, an additional 7 sites were added, including sites 19 (land west of Cambridge Road) and site 22 (land east of Royston Road) were first included in the SHLAA as being available and deliverable.

2009 SHLAA

These sites were

- 17 Land east of Burrs Lane
- 18 Land east of Cambridge Road
- 19 Land west of Cambridge Road
- 20 Land adjacent to Lane Farm, Gas Lane
- 21 Land north of Nuthampstead Road
- 22 Land east of Royston Road
- 23 Top Field Royston Road

The Original 4 sites

- BK01 Garages r/o Windmill Close
- BK02 Land off Windmill Close

BKr03 Land north of Windmill Close

BKr04 Land off Cambridge Road

However, In the 2010 and 2011 SHLAA revision it was noted that:

Assessment update 2010 in relation to sites 17 and 22 <b>"Significant expansion relative to size of village. Barkway [is]not a village with sufficient facilities to support major growth".</b>	Assessment update 2011 in relation to sites 17 and 22, <b>"Barkway [is]not a village with sufficient facilities to support major growth".</b> And, in particular to 19 and 22, this would involve <b>"Significant expansion relative to size of village. Barkway [is]not a village with sufficient facilities to support major growth."</b>
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In the December 2012 revision, 5 sites failed one of the tests, 4 failed to respond to the survey (sites 17, 18, 21 and 22) and BK01 was removed due to its lack of viability.

In June 2013, during the representation for the SHLAA, the agents of the owner of plot 22 (Strutt and Parker) stated that now the land was available for use for housing.

The 2013 revision was released in March 2014 and had the additional site 203, land south of Ash Mill.

Once again 4 sites failed one of the tests, 20 and 22 failed to respond to the survey, BKr01 was removed for being unsuitable and site 203 was too close to the poultry farm.

In November 2014, another revision of the SHLAA, stated as in the March revision that the same four sites failed one of the tests.

In the December 2014 Preferred Option Document, Barkway was down to two sites of sustainable growth of 32 dwellings, BK1&2, not including any other developments which have taken place since the SHLAA revisions began. Barkway Parish Council deemed these to be both sustainable and achievable.

In 2016 the latest revision of the SHLAA was released. Sites 17, 18, 21, 22, 203 and an additional site 308 (land adjacent to Barkway Golf Club) were added back to the SHLAA.

The reason for inclusion of these other sites was stated in paragraph 4.6. "Sites from the 2014 SHLAA which failed one or more of these tests were not carried forward into this study for re-assessment unless:

- The site owner or promoter challenged the findings of the 2014 SHLAA through a response to the Local Plan Preferred Options consultation; or
- New information had come to light in the intervening period which has led to a re-appraisal of previous findings."

So, despite two revisions showing no response from land owners, in *this* revision any previous failures to meet the selection criteria were discounted. Suddenly Barkway was going from 32 additional dwellings to potentially 182. (Since 2011, some 30 new houses have been built.) Including these, the proposed additions would increase Barkway's size by 65%.

It was at this point, in the NHDC Proposed Submission, October 2016, that Plots 19 and 22 were joined into one entity forming BK3.

In the 2010 and 2011 revisions Barkway has the following quote in the SHLAA:

**"Barkway [is] not a village with sufficient facilities to support major growth".** And, with particular reference to 19 and 22, this would involve **"Significant expansion relative to size of [the] village. Barkway [is] not a village with sufficient facilities to support major growth."**

So, what has changed? There has been no increase to services and the furniture refurbishment business mentioned in the 2009 SHLAA has closed. It was replaced by different operations twice, both of which ceased trading.

**Following the Proposed Submission of October 2016, the Parish Council was not consulted on the inclusion of BK3. Consequently, we contend that the Local Plan is not robust as it was not subject to a proper consultation process following the revision of the SHLAA and no representation was requested from the Parish Council or our District Councillor on its inclusion.**

#### **Appendix 1. North Hertfordshire District Council**

##### **Statement of Community Involvement September 2015**

**Draft Plan (Regulation 18 ) & Publication (Regulation 19)** Each development plan document will be published for a formal consultation period. Written representations will be invited on the content of the documents subject to consultation. At this stage the consultation period will be advertised and the documents circulated to all the statutory consultees. The council will prepare a summary of the representations which will be presented to the Inspector at the examination.

Consultation Commentary:

The draft will be subject to involvement by the general public, community organisations and stakeholders. Consultation will take place for a minimum of four weeks. We will publish the consultation documents on the council's website and place them in the local libraries. All comments will be considered and amendments will be made to the final document if that is appropriate.

The Rev'd Sonia Falaschi-Ray MA BSc  
For and on behalf of Barkway Parish Council and Villagers