



Louise St John Howe  
Programme Officer  
North Herts Emerging Local Plan Examination  
PO Services  
PO Box 10965,  
Sudbury,  
Suffolk  
CO10 3BF

**NHDC Emerging Local Plan Consultation**

Representation by: Save Our Green Belt

NAME: Mr Adrian Hawkins OBE - Chairman

EMAIL: [info@save-our-green-belt.org](mailto:info@save-our-green-belt.org)

5<sup>th</sup> January 2021

Dear Mr Berkeley,

**Examination in Public – Matter 30 Barkway and site BK3**

We refer to your request for further comment in respect of the above matter.

It appears as with much of the NHDC Local Plan that aspects of the plan are contrived such as to make some sense as a plan and I fear that we are now starting to see the result of this artificial arrangement coming apart at the seams.

1. Barkway is an area defined in the NHDC as a “village for growth” as being one of 5 villages selected by the NHDC “for growth” alongside Codicote, Knebworth, Ickleford and Wymondley.
2. Barkway is the only “village for growth” elected, that has sites proposed in the local plan that are not in land protected by the green belt.
3. Barkway and site BK3 is one of the largest non-green belt sites in the entire Local Plan.
4. The NHDC have proposed they will deliver 85% of their new housing developments on land protected by green belt. The NHDC consider, as a material justification, that no other sites outside of the green belt have come forward for consideration. This appears to be the only reason that the NHDC have submitted as justification of the “exceptional circumstance” to remove sites from the green belt.
5. The NHDC now wish to remove site BK3 from the Local Plan despite this obvious “need” for sites and for sites not being available outside the green belt. This action revokes any credibility of the suggestion that the NHDC have the necessary “exceptional circumstances” for the release of any other sites in similarly designated “villages for growth” in hitherto protected green belt land.
6. There are similar aspects of other sites identified in “villages for growth” that present the same issues as now indicated by the NHDC in their desire to remove the Barkway BK3 site from the Local Plan.
7. Wymondley and Codicote for example, have been identified as requiring a similar School and relevant FE (form entry) provision, where there exists no final decision as to its provision, yet the NHDC continue its demands for these villages to continue their relevance as “villages for growth” within their Local Plan.

8. The assessment of sites should include their “sustainability” and to this end it is unclear that any “village for growth” is able to meet the necessary criteria, given the uncertainty suggested by the NHDC relative to School and FE provision.
9. The case for exceptional circumstances for the release of the green belt protection from land elsewhere must be predicated on all other non-green belt land being thoroughly considered and assessed.
10. The NHDC argue that the retention of the concept of the “villages for growth’ is essential for their achievement of a “5YHLS”, yet they are content to see the removal of this site delivering 35 units in 2025-26 and 35 units in 2026-27. We note that according to ED/215, the Council has a housing requirement for the years 2025-2030 of 6720 and an anticipated supply of 6761. Removing Barkway would therefore appear to mean that NHDC does not have a 5YHLS in this period. The Council should confirm. If it is relaxed about this prospect, this calls into question its justification for not removing any Growth Village sites in the Green Belt earlier in the plan period. That is justified by NHDC on the basis that they are needed to maintain a rolling 5YHLS (although for reasons set out by SOGB in response to ED/215, the Council is not in fact correct in that assertion in any event). In this respect, we agree with the submissions by Town Legal, that the proposed removal of Barkway cannot be seen in a vacuum. Removing these units may mean that sites in the Green Belt (which are being removed on the basis that they are needed to maintain a rolling 5YHLS) cannot be removed since the spare capacity will have been lost through the removal of Barkway (a non-Green Belt site).
11. Overall, this lack of consistency in the approach by NHDC to their “villages for growth” concept makes their plan unsound.
12. The SOGB group contend that there are no “exceptional circumstances” for the inclusion of any green belt sites within the “villages for growth” identified within the NHDC Local Plan and consequently they should all be removed from the plan and all the sites returned to a Category A status as proposed by the NHDC for Barkway.

We appreciate your consideration of these issues.

Yours Sincerely,

Adrian Hawkins OBE

Chairman - Save Our Green Belt Group

[info@save-our-green-belt.org](mailto:info@save-our-green-belt.org)