

**North Hertfordshire Local Plan
Further Examination Hearings**

MATTER 25 (Site WY1)

Tuesday 24th March 2020

Statement by Jed Griffiths MA DipTP FRTPI

On Behalf of Wymondley Parish Council

February 2020

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP on behalf of Wymondley Parish Council. It has been compiled in response to an invitation by the Examination Inspector to submit further material on matters to be considered at the further hearing sessions in March 2020. It addresses issues and questions raised by the Inspector in respect of Matter 25 – new land proposed for allocation through the main modifications.
2. A number of main modifications were put forward by the Council to include within the Local Plan some new areas of land for development which were not included in the plan when it was submitted. This statement deals with one of the modifications (MM384) which proposes to extend site WY1 at the village of Little Wymondley. At the Regulation 19 stage and during the Examination, the Parish Council and other representors have objected to the allocation of site WY1 in the Local Plan. Where appropriate cross-references will be made to previous statements and other documentation. The main purpose of this statement, however, is to focus on the issues and questions raised by the Inspector in the schedule of January 2020.

Q25.1 (a) is the inclusion of the new area of land necessary for soundness?

3. From the detailed wording of MM384, and the accompanying maps, it would appear that the change in the site boundary is not significant. The scale of development proposed (300 dwellings) has not changed. It is questionable that the extension is required for soundness purposes – in previous representations the Parish Council has questioned whether the site is required at all.

Q25.1 (b) is the new site proposed deliverable?

4. In its supporting statement, the Council maintains that the extended site is deliverable. Reference is made to the Statement of Common Ground that was agreed in November 2017 between the Council and the previous site owner (ED50). More recently, a Memorandum of Understanding has been agreed between the District Council and County Highways about the Transport Assessment referred to in the amended policy. The amended policy also states that a flood risk assessment will be carried out.
5. Although the site owners and developers have confirmed that the site is available, there are doubts about its deliverability. Ultimately, this will depend on improvements to the transport system, to support a development which is likely to be highly car-dependent. The policy is speculative on this point.

6. As the Parish Council and other representors have confirmed, Little Wymondley has experienced regular incidences of flooding, especially on Stevenage Road in the centre of the village. Consultation on this issue is not enough – there is no certainty that the necessary improvements can be delivered.

Q25.1 (c) is the inclusion of the new area of land justified and appropriate in terms of the likely impact of the development?

7. It is difficult to understand why the area of land has been proposed in the Main Modifications, other than it has resulted from the agreement between the Council and the site promoter (ED50). The Parish Council notes the detailed landscape assessment in Appendix 4 of ED50. In terms of the overall impact of site WY1 (including the extension), the Parish Council refers to its previous representations on this issue.

Q25.2 (a) Do exceptional circumstances exist to warrant its allocation?

8. The extended site is currently in the Green Belt, but was shown in the original policy WY1 as part of an area of Urban Open Land. The Parish Council notes that the proposed amendment to the Green Belt boundary is unchanged by the Main Modification. The original objections to the policy remain, however. In the Parish Council's view, there are no exceptional circumstances which would justify the release of the site for development.

Q25.2 (b) what is the nature and extent of harm to the Green Belt of removing the new area of land from it?

9. As shown in the "before and after" maps, the removal of the extension from the Green Belt could be assessed as having a minor effect. The Parish Council, however, would remind the examination of its original objections to site WY1 and the scale of development proposed. This would have a major impact on the setting of the village and the green envelope surrounding it.

Q25.2 (c) to what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practical extent?

10. The Parish Council finds it difficult to envisage how the impacts of the development could be reduced or ameliorated. The extension would not in any way reduce the impact of 300 dwellings on the village.

Q25 (d) If this new land were to be developed as proposed, would the adjacent Green Belt continue serve at least one of the purposes of the Green Belt, or would he Green Belt function be undermined by its allocation?

11. If the new area of land were to be included in the development area, the adjacent area would continue to serve at least one of the purposes of the Green Belt. In overall terms, however, the Green Belt function in the parish as a whole would be undermined by its allocation. As pointed out elsewhere by the Parish Council, the village is in a very sensitive gap between Stevenage, Hitchin, and Letchworth Garden City. Proposed developments at Graveley and the northern edge of Stevenage also exert pressures on the openness of the Green Belt.

Q25.2 (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?

12. In paragraph 16 of their paper, the Council have explained that the boundary of the Green Belt will be along the line of the A602 bypass. The rationale for this is clear, but there is no guarantee that this would prevail. If Little Wymondley were to be categorised under Policy SP2 (MM010) as one of the five “villages for growth”, the Parish Council would be concerned that further developments would occur, with extensions to the Green belt to the east or west of the village.

Q25 (e) Are the proposed Green Belt boundaries consistent with the Plan’s strategy for meeting identified requirements for sustainable development?

13. This question does not apply to MM384.

Q25 (f) has the Green Belt boundary around the new land been defined clearly?

14. The Green Belt boundary is unaltered in MM384, but the Parish Council maintains its strong objection to policy WY1 – and therefore to MM384. The preferred extent of the Green Belt boundaries is set out in the approved Neighbourhood Plan, “made” by the District Council in September 2019.

Jed Griffiths

Hertford

24th February 2020

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