

North Hertfordshire have produced a Local Plan which is now undergoing PUBLIC EXAMINATION.

In 2018 when the draft plan was produced, the plan stated that Barkway was a “village for growth” and included site BK3 , for up to 140 homes within the plan.

Following a series of hearings at which Barkway Parish council made representations against the inclusion of BK3 , in 2020 the Planning officer for NHDC wrote to the Inspector requesting site BK3 be removed from the Local Plan – after further sessions in February 2020, and the publication of the Schedule of Further Main Modifications, site BK remained in the plan

I write to lodge my continued OBJECTION to the inclusion of land identified as BK3 in the proposed NHDC local Plan 2011-2031 and FAILURES in the EXAMINATION in PUBLIC PROCESS with leave this plan.  
UNSOUND

My continued OBJECTION is based on a number of new issues which have arisen as a result of the INSPECTORATE investigation into the SOUNDNESS and ROBUSTNESS of the LOCAL PLAN.

1) TRANSPARENCY of the Process

The Inspector and NHDC has a legal obligation to ensure his examination of the plan is transparent, and has failed in 3 areas to comply with this requirement.

- a. There has been no PUBLIC CORRESPONDENCE between the INSPECTOR and NHDC on the DRAFT SCHEDULE OF FURTHER MODIFICATIONS – only NHDC Planning Officer’s assertions that the INSPECTOR has agreed to the SCHEDULE OF MODIFICATIONS
- b. NHDC requested the INSPECTOR to REMOVE BK3 from the LOCAL PLAN, however the INSPECTOR has DECLINED to do so without PUBLISHING the reasons for his DECISION,
- c. There has not been a FAIR OR PROPORTIONATE opportunity for BARKWAY PARISH COUNCIL or the PUBLIC to put the case for the EXCLUSION of BK3 from the LOCAL PLAN.

I SUPPORT NHDCs REQUEST TO REMOVE BK3 FROM THE LOCAL PLAN based on the EVIDENCE NHDC Planning officers PROVIDED to the INSPECTOR

2) ENLARGEMENT of BK3 to include land owned by HERTS COUNTY COUNCIL

There has been NO CONSULTATION over NHDC’s pragmatic approach to dealing with the strip of land owned by HCC and designated for future EDUCATIONAL (sic SCHOOL) REQUIREMENTS

HERTS COUNTY COUNCIL has ASSERTED their requirement that this land REMAIN designated for EDUCATIONAL PURPOSES and have NOT REQUESTED this AMENDMENT  
Should BK3 be developed under its initial perimeter it WILL create an ISOLATED of development DETACHED from the body of the village, and lead to POOR INTEGRATION into the community, and against the PRINCIPLES of SUSTAINABLE DEVELOPMENT as set out in the NATIONAL PLANNING POLICY FRAMEWORK.

Whilst the enlargement of BK3 to include the HCC owned land, may be practical for NHDC to overcome the problem of this HCC land, HCC have asserted it is required for their purposes, therefore this MODIFICATION, which was undertaken WITHOUT CONSULTATION, must BE REMOVED.

3) Figures for Housing Allocations, Completions and Permissions.

- a. MM010/FM039 states the number of homes to be delivered in Barkway in the Local plan period is 208. NO EVIDENCE has been provided to justify this figure. This figure is

critical as Barkway has been identified as being suitable to support HIGHER levels of housing than CATEGORY A villages on the basis that the number of homes expected to be delivered is GREATER THAN 200. BARKWAY PARISH COUNCIL, has from the OFFSET argued that the designation of BARKWAY as a “VILLAGE FOR GROWTH”

- b. MM217/FM113 contains a table of Sites, Completions and Permissions for Barkway and contains errors. NO DETAIL OR EXPLANATION OF HOW THESE NUMBERS WERE ARRIVED AT HAS BEEN PROVIDED OR ANY JUSTIFICATION GIVEN

	Plan	Modification	Correct figures
Total Allocated Sites	173	173	160
Completions and permissions	31	57	57
Total allocated completed and permitted	204	230	217

4) Section 106 Contribution to provide School Transport

The CONTRIBUTION from DEVELOPMENT OF BK3 is mentioned three times in the SCHEDULE of FURTHER PROPOSED MAIN MODIFICATIONS . BARKWAY PARISH COUNCIL have already been consulted on how Section 106 contributions could be used to OFFSET the NEGATIVE IMPACTS OF DEVELOPEMTN OF BK3 and have an agreement in principle with the developer to improve leisure facilities in BARKWAY. The INSPECTOR has suggested S106 contributions, might provide a school bus service between Barkway and Barley schools. SCHOOL TRANSPORTATION IS ALREADY PROVIDED. Provision of a further bus service would NOT BENEFIT BARKWAY and would be AGAINST THE EXPRESSED WISHES OF BARKWAY.

MODIFICATIONS THEREFORE WHICH SHOULD BE DELETED .

- 1) MM215/FM111: (in relation to BK2). Contribution towards travel by sustainable modes of transport between Barkway and Barley Schools.
- 2) MM216/FM112 (in relation to BK3). Contribution towards travel by sustainable modes of transport between Barkway and Barley Schools.
- 3) MM215/FM111 (in relation to Para 13.39). Contribution to support sustainable travel between the two sites should be secured from new developments – THERE IS NO DEVELOPMENT PROPOSED IN BARLEY

I submit therefore that the EXAMINATION In PUBLIC has been FUNDAMENTALLY FLAWED and the continued INCLUSION of BK3 in the NHDC LOCAL PLAN is INCORRECT and as a result creates a PLAN WHICH IS NOT SOUND, ROBUST OR SUSTAINABLE.