

c/o The Reading Room
12 High Street
Barkway SG8 8EE

North Hertfordshire District Council,
Council Offices
Gernon Road
Letchworth Garden City

For the attention of Anne McDonald, Planning Officer

20 JULY 2018

Dear Anne

We refer to:

Land between Royston Road, and Cambridge Road, Barkway - Case Ref No: 18/01502/OP

We wish to make the following representation.

OBJECTION

The Planning Statement supporting the application is entirely reliant on the designation of the site for residential development in the Submission Local Plan (site BK3). However, the Submission Local Plan is presently subject to an Examination in Public which has not been concluded. There have been, and continue to be, objections to the designation of this site. Moreover, the Plan has not yet been found sound or adopted. Consequently, the weight which can be accorded to it remains limited. This application must be considered against Local Plan No.2 and the NPPF.

Barkway Parish Council stated in our representation on the Submission Local Plan, that the development of site BK3 would have a harmful impact on the countryside and environment, without adequate justification for doing so; the proposals are of an excessive scale in terms of the size and character of Barkway and is in an unsustainable location, particularly with respect to access to employment, services and facilities without the use of private vehicles. These are all contrary to both policies in the NPPF and Local Plan No.2, and indeed the Submission Local Plan.

The suggested inclusion of this site in the Local Plan, was opposed by our County Councillor, District Councillor and the Royston Area Committee, who submitted an extensive document objection in the consultation period of the Local Plan at proposed stage, and whom are again opposed to this development.

The absence of a five-year housing land supply does not excuse developers from applying the core principles of the National Planning Policy Framework. The NPPF clearly states the "presumption in favour of sustainable development".

It is our consideration that the proposed development is unsustainable in terms of the principles set out in the Framework and that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits when assessed against the terms of the Framework as a whole.

Community Involvement

The Applicant has not made any attempt to consult with either the Parish Council or the Community over this development and instead submits a Community Involvement document which referred to a previous application on just three-fifths of the site, to which there was over a 96% local objection rate.

The original application Ref. No: 16/02759/1 for this part of the land was withdrawn when it became clear that NHDC planning officers were going to recommend refusal. The Applicant has now revised the original plan, offering solutions to some of the finer points of objection, however failing to have offered any resolution to some of the main points raised by NHDC Planning Officers.

“In the opinion of the Local Planning Authority due to the relatively isolated nature of this planning application site, separated from the main body of Barkway village by a reserved school site and indeed from any wider area development scheme between Royston Road and Cambridge Road, if developed in isolation a development scheme of up to 100 dwellings on this site would appear divorced from and poorly integrated with Barkway village. Such a piecemeal form of development would as a result harm the character and appearance of the locality. The proposal therefore conflicts with saved Policy 57 of the North Hertfordshire District Local Plan No. 2 - with Alterations, Policy D1 of North Hertfordshire Submission Local Plan (2011-2031) and paragraphs 57 and 64 of the National Planning Policy Framework.”

The new outline planning application for access and a development of an additional 140 homes is not likely to trigger the need for the school site (see extract from planning application 16/02759/1).

*“Site layout designed to integrate with any future use of adjoining school:
Notwithstanding my wider concern about the piecemeal nature of this development proposal and the fact that as it reported above at this stage Hertfordshire County Council (Planning Obligations team) have stated that this development proposal does not trigger a requirement for the development of a new first school on the reserved school site, this specific design requirement can be controlled through any future reserved matters submission.”*

Development Boundary

In the 2013 SHLAA this site failed the tests for inclusion as a potential site for residential development. Throughout the evolution of the Submission Local Plan, this site was not considered suitable for development until the last minute. Until the final draft, the Council was proposing:

“Two sites are allocated in Barkway for an estimated 31 additional dwellings. Taking into account completions since 2011 and permissions at 2014 the parish is estimated to see 49 additional dwellings over the plan period.”

That estimate then almost quadrupled in the final draft. No explanation has come forward from the Council as to why the site suddenly became suitable, how it overcame the earlier barriers to inclusion, or why it was acceptable to increase the population of Barkway by over 60%.

As the Submission Local Plan has not been approved, the site is therefore outside the Housing Development Boundary, and should be summarily rejected.

We are not opposed to the opportunity to create affordable housing within the village but with all housing (and in particular affordable housing) must come a proportionate increase in sustainably accessible employment and amenities. These are totally absent in this case.

Barkway can expand proportionately with small, sympathetic developments in sites BK1 and BK2, (BK1 is due to commence in the coming months with 12 houses). Other infill developments which have been approved, are being constructed or are already completed but the village cannot sustain this large-scale development.

No evidence had been put forward to show that new employment had been established in the village to match the amount of proposed housing development. Residents would therefore have to commute to work. The development of 140 homes is wholly disproportionate in size to the existing village and will lead to a major increase in the use of private vehicles to access amenities and employment, creating an isolated housing estate on the periphery of the community, a dormitory estate for employment sources elsewhere. The reserved site for a school further separates the development from the village.

National Planning Framework

The Application breaches many paragraphs of the NPPF and, as such, is unsustainable.

NPPF Para 14 Presumption in favour of sustainable development.

The benefit of new homes on this site must demonstrably outweigh their adverse effect.

The application is a proposed development that is on the edge of the current village and separated from it by a site reserved for a possible future school. Its very design makes it an insular development which is not likely to encourage integration with the rest of the community. Barkway is a small village of approx. 330 dwellings with no shops, doctors' surgery or schooling for children beyond year 4 (age 9). This would mean traveling a minimum of 2½ miles for the nearest small convenience store, doctors and even further for higher education, larger shops etc.

There is a limited bus service but no safe well-lit pathways or cycle ways connecting the village to other local villages or towns. The disproportionate size of this development will overwhelm the village, degrading rather than enhancing it. There are no proposals to improve the infrastructure or local amenities. Whilst the Outline Planning Application proposes the provision of a shop, there is no guarantee a developer would build this.

NPPF Para 11 & 109 - Conserving and enhancing the natural environment.

NPPF Para 112 Agricultural land use

NPPF Para 125 Impact of light pollution

The proposed site is Grade II agricultural land, and some of the most versatile in our district. Elsewhere in the district, agricultural land of lower grade on the edge of better resourced villages, has been discounted from the Submission Local Plan.

The site is on the Chiltern Ridge.

The soil grading has consistently been stated as a reason for discounting this site in previous draft Local Plans. The site has been successfully and profitably farmed and contributed to the nation's food supply for as long as living memory.

NHDC have within the Submission Local Plan highlighted the need to protect the East Anglian Heights which include the Chiltern ridge. This application is in clear contravention of NHDC's own policy of protecting this area which, if accepted and developed, would come with associated street-lighting on the ridge itself. This would be visible for some 30 miles to the north.

The above contraventions to NPPF policies are also in contravention of Submission Local Plan Para 3.3 Spatial strategy. Which states

"3.3 Our spatial strategy is one of promoting sustainable development by supporting the use of suitably located previously developed land and buildings and by focusing the majority of development on our towns (including urban extensions) in order to make maximum use of existing facilities, social networks and infrastructure, and maximise opportunities to deliver new infrastructure. It also allows for some growth of our villages in order to allow those communities to continue to thrive"

and para 11.62 which states

"[plans should] Emphasise the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats and promote biodiversity. River corridors are particularly effective in this way."

NHDC landscape Character Assessment for Area 230 Barkway – Appendix A

This document stresses that the Barkway Plateau is of moderate landscape value, and should be improved and conserved

"for large urban extensions and new settlements of greater than 5 ha, this type of development would be inappropriate within this character area, due to its rural and small-scale nature. It would introduce elements that would alter the character and affect the existing key characteristics such as the historic ribbon development form and the small-scale regular pattern of field boundaries. Extensive development could disrupt the rights of way [bridleways 017 and 018] and could reduce accessibility to the countryside."

In addition, Para 17 states

[planning shall] "take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it"
"contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework"

The development of this site therefore would detract from the intrinsic character and beauty of the country side, and permanently remove valuable agricultural land from the food supply chain. A proposed "link" road across the site, would sever bridleway 017, and create an "urban" experience on bridleways 017 and 018, detracting greatly from their current truly countryside experience.

Indeed, in a recent planning application for just 25 homes on the opposite side of Royston Road, the planning officer declined planning application giving the following reasons for refusal:

Application 17/00700/1 (refused)

“1. By reason of its siting beyond the built limits of Barkway; its elevated position within landscape character area LCA 230 Barkway Plateau; and the heavy use of planting to screen the largely open site, the development proposal would fail to positively enhance the wider landscape setting of the village, nor would it improve the character and quality of the Rural Area and, as such, would afford significantly and demonstrably harm to the intrinsic beauty of the countryside. This harm is considered to clearly outweigh the benefits of providing new dwellings on the site.

The proposal is therefore contrary to the provisions of saved Policies 6 of the North Hertfordshire District Local Plan No. 2 with alterations and, Paragraph 17,109, 116, 156 of the National Planning Policy Framework.

2. Given the lack of essential services in the vicinity of the site, the occupiers of the proposed dwellings would be heavily dependent on services provided outside of the immediate area, giving rise to a significant reliance on private transport. In additions to this, the land on which the site is located is Grade 2 agricultural land, which constitutes the best and most versatile land. As well as being harmful to the natural environment, this would amount to development of the land which is both environmentally and economically unsustainable. In the absence of any realistic measures or other reasons which may offset this unsustainable impact, the proposal would be contrary to the objectives of the National Planning Policy Framework, generally and specifically Paragraphs 14, 49 and 112, and to Policies SP1 and SP6 of the Emerging Local Plan 2011 - 2031, and to Planning Practice Guidance - Natural Environment para. 026.”

NPPF Para 17 Core Planning principles

NPPF Para 17 states

[planning shall] *“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”*
“contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework”

NPPF Para 17 states

[planning should] *“support the transition to a low carbon future in a changing climate”* and *“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”*

Far from supporting this, the development of this site shall in fact increase the carbon footprint of our community due to the dependency on private vehicles.

NPPF Para 28. Creation of employment and prosperity.

[Plans should] *“support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings; promote the development and diversification of agricultural and other land-based rural businesses”*

This is also in clear contravention of Submission Local Plan paragraph 4.35

“Beyond our main towns, there is a steady demand for rural employment land and premises. Owing to the size and extensive spread of rural settlements these types of development are best dealt with on a case-by-case basis rather than through allocations, although our general approach will be to direct concentrations of rural business to the Category A villages. There are quite sizeable employment sites in villages such as Ashwell, Codicote, Kimpton, Little Wymondley and Weston which provide rural jobs and should be retained.”

No evidence has been provided by the application that the development of this site will create, beyond the building phase, any new employment. Therefore, these homes should be created in the villages mentioned above, which do provide rural employment. No evidence had been put forward to show that new employment will be established in the village to match the amount of proposed housing development. On the contrary, it stands to jeopardise jobs at Newsells-Park stud farm, the largest employer in the village employing 30-35 locals. Newsells-Park have great concerns over their viability to operate should this site be developed. This is due to the location of the site immediately adjacent to the only area on the estate with soft premium land suitable for the grazing and paddocking of their valuable but very sensitive young foals.

Sustainable Transport

The application goes to great lengths to mention that the connections from the site to the village improve its sustainability and suggests improvements to link limited village amenities for recreation, it does not make any suggestion or recommendation to improve the sustainability of its rural location and the need to travel further afield to access amenities.

NPPF Para 30 Promoting Sustainable transport

This paragraph emphasises that planning should

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Plans and decisions should take account of whether:

the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;

Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

NPPF Para 34 states *“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”.*

NPPF Para 35 states:

“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- *accommodate the efficient delivery of goods and supplies;*

- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
- *consider the needs of people with disabilities by all modes of transport”*

NPPF Para 37

“Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Additionally, Submission Local Plan 3.7 Strategic Objectives, ECON7 Improve access opportunities, minimise the need to travel, and encourage journeys to be made by sustainable means of transport to ease congestion, reduce carbon emissions and the impacts on air quality management areas. “

NPPF Para 95 – the move to low carbon future

The village of Barkway is 5.5 miles from the nearest town of Royston, (village centre to railway station).

The bus stop for public transport and the school bus is located on Royston Road at the ends of Periwinkle and Windmill Close. There is no pavement between it and the new proposed site entrance. The proposal to create one on Royston Road, will remove informal off-road frequently used parking spaces for 6 cars, forcing them to then park on the road—an unopposed re-development of a site on Royston Road, awaiting a planning application decision will create 2 new entrances to be created onto Royston Road, reducing the capacity for on-road parking further for residents to park on – The loss therefore, of this informal parking “lay by” will cause parking issues and restricted traffic movement

Car ownership remains on average at 2 per house hold, and peaks at 1 per adult.

The nearest amenities are in the village of Barley 2½ miles away, where there is a village shop with post office, a further filling station, garage and doctor’s surgery. Even to access these you must use a private car. The Applicant states that 10% of persons commuting from Barkway use the train. They fail to point out that to access the railway station, train commuters are required to use private vehicles.

The Applicant has provided no evidence that there will be any enhancement of public sustainable (sic) transport, or any improvement in the minor roads that provide the connection to the main trunk road (A10) to Royston or Buntingford, to access amenities.

This is in contradiction to Submission Local Plan 3.7 Strategic Objectives Econ 8 –

“Ensure all development is supported by the necessary provision of, or improvements to infrastructure, services and facilities in an effective and timely manner to make development sustainable and minimise its effect upon existing communities”

Transport survey

The transport survey for application (17/00700/1) Land north of Mill croft, Royston Road Barkway agreed broadly with the traffic movements measured on these roads. The traffic surveys were both undertaken in a winter period during which agricultural movement are very low. Neither traffic

study considered two additional grain stores; one at New Farm (planning permission or which has been granted to more than double its size and operations) and one at Rand's grain store. The operations of these create a significant increase in traffic movements during harvest time.

The traffic study for Application 17/00700/1 for 25 houses showed an increase of 24 vehicle movements at peak periods this equates to 0.9 of cars per household, however the application 18/01502/OP, states that for 140 houses there will be just 64 extra vehicle movements during rush hour (0.64 per household), given that there are minimal employment opportunities in the village or public transport connections to larger employment areas, these appear to be very conservative estimates.

We submit therefore that the traffic survey is fundamentally flawed as it relies on data taken in midwinter, on one of the quietest weeks of the year with much reduced traffic levels, does not account for agricultural vehicle movements in Spring and Harvest. These greatly increase traffic numbers. The consultation document is over-dependent on incorrect assumptions regarding the ability of villagers to use sustainable or public transport. It is heavily skewed in favour of the Applicant and does not reflect the true situation in rural villages devoid of daily-needed amenities and places of employment, such as Barkway.

Public Transport

Whilst submitting the timetable for Bus route 331, the Applicant seems unaware that this service was changed in April 2018. The massive housing developments in Buntingford have not resulted in improved bus services, on the contrary, the bus services in Barkway were changed recently with the 331 service from Hertford to Royston, now terminating at Buntingford. The new number 18 service from Buntingford to Royston offers a reduced service that does not enable train commuters to connect early enough to the station in the morning then only offers 1 evening return bus at 17.09.

A connection can be made at Buntingford to link to Hertford, but this will not be possible for linking normal working hours (see Time table below for Monday to Friday Royston to Buntingford)

Bus departures Barkway to Buntingford 0928,1228,1528,1728

Bus departures Barkway to Royston 0711,0841,1001,1301,1601,1801

The service to Royston offers one connection for travel to London prior to 0800, leaving at 0711 and arriving at Royston station at 0730. The same service offers one return bus at 1709 from Royston Station to Barkway - the service terminates before the majority of returning rail commuters arrive at Royston. Private car usage is therefore vital and will increase considerably because of this development. The Applicant states that 10% of residents commute by train. They fail to state that to access the Rail station at Barkway, they are required to use private cars.

Cycling

In order to support their sustainability argument, the Applicant's traffic consultants, Ardent, provided timing estimates for cycling to access amenities, such as the local first and middle schools, the nearest shop, the doctor's surgery and Royston railway station.

They observed that less than 1% of journeys are taken by bicycle.

Ardent have used desk top study methodology to come to their conclusions, rather than considering the actual road condition and topography, which, if this we had been examined in full, would

produce a convincing conclusion of the implausibility of expecting a meaningful percentage of homeowners on this development, to cycle children to Barley School, for years 3&4, or to Royston's middle schools.

Cycling to Royston railway station, in order to catch trains to London and Cambridge is not happening now at any significant level (<0.25% of the current population of the Parish) and no evidence has been offered as to why that might improve.

Whilst the distance is not the determining factor in the low level of cycle to work / cycle to school figures, the topography and narrowness of some sections of road with high banks precluding run-off to a soft shoulder, limits cycling around Barkway to hobbyists/cycling clubs.

Topography:

The route from Barley to Barkway, B1368, 60mph speed limit, undulates steeply 5 times by a difference of 110 feet elevation over a 2½mile distance. This is not conducive for an adult cycle child seat/cart and impossible for most 7-9 year-olds. It has seven 'SLOW' signs painted on the road in each direction indicating that serious or fatal crashes have occurred along its length, even if not in the immediate past.

There are two routes from Barkway to Royston. One along the Joint, which is essentially a single-lane with passing places. It is subject to frequent movements by large agricultural and commercial vehicles as well as the occasional bus. These all occupy the entire width of the roadway. The Joint leads on to the A10, which is a major artery, but in places too narrow for a car to pass a bicyclist without encroaching into the oncoming traffic. Travelling south back to Barkway involves a 255ft climb over a quarter of a mile stretch.

The alternative route between Barkway and Royston is called the Royston Road (C category) passing through the Newsells-Park estate. It contains a double bend up a steep climb with adverse cambers and high side banks offering no escape route for pedestrians or cyclists.

Consequently, the idea that cycling is a viable means of transport for any meaningful numbers of Barkway residents to access amenities is implausible.

In our Emerging Neighbourhood Plan Survey Results, only 2 persons (<0.25% of the population) responded that they cycled to work in the summer months, as in winter, poor visibility and poor road conditions make it unsafe.

Proposed Village Shop

NPPF Para 38 states that

"Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties"

Whilst no shop exists within Barkway, and there is no evidence that a developer would provide a shop on the site, or that it would be sustainable, or sufficiently large to permit a weekly shop, there is a clear contravention to this policy. No feasibility study has been supplied to show that the shop is viable as many people would still be using Barley stores which has the benefit of a Post Office. No consideration has been made on the impact on the village shop (with Post Office) at Barley, which is heavily dependent on custom from Barkway.

Even were a shop to be provided, due to the historic linear nature of the village, visitors to the shop would be dependent on the use of private cars to access it.

Below is the extract from planning officer's comments for application 16/02759/1 (withdrawn)

"7) Provision of local convenience shop:

This outline planning application does seek permission for a local convenience shop. However, there is no clear explanation over the timing of delivery, whether it would be viable without development on the remaining part of the proposed land allocation. And whilst planning conditions and clauses within any necessary S106 Obligation could be drafted which could ensure suitable triggers are in place to ensure the delivery of the convenience no such realistic mechanisms have been put forward within the planning application and at this time officers and the Applicant have not even commenced any realistic discussions over the future details of a S106 Obligation. There would potentially be the need for a start-up subsidy and such a subsidy would be necessary from this proposed development as well as from any development on the wider BK3 land allocation, but with no such planning application submitted there cannot be at this stage any linkages between the two.

Notwithstanding the fact that the proposal specifically proposes a convenience store at this stage the Applicant has not put forward sufficient information to explain whether the store is deliverable or how the local planning authority can ensure its delivery and future longevity. At this stage therefore I can only conclude that this requirement of the proposed land allocation cannot be realistically fulfilled."

Enhancement of the community

NPPF Para 55 Enhance or maintain the vitality of rural communities.

It is our considered opinion that the site will create a disproportionately large isolated estate on the periphery of the village, resulting in minimum integration. There will be no enhancement to the village, or its infrastructure. Instead greater traffic movements of residents commuting to their places of employment on poorly constructed, narrow rural roads which were never designed to deal with high traffic movements.

Education and Schools

NPPF Para 72 – Education

The government places great importance on ensuring sufficient school places are available.

Whilst Barkway C of E First School has capacity for additional pupils, all other children above the age of nine will be required to travel to Royston or Buntingford for middle or secondary education. Both towns are subject to considerable expansion in housing. Barkway First School is now part of a federation with Barley School. Education for years 3 (age 8) and year 4 (age 9) is conducted at Barley - a journey of 2½ miles, with pupils being transported by the school minibus.

Above year 4, education is provided in Royston and Buntingford. Whilst transport is available to Greenway school in Royston, the current feeder school for Barkway, this school is currently undergoing a merger with Roysia and Meridian generating uncertainty in school place numbers. The only other school alternative would be at Buntingford at a cost of approx. £1200 per annum for transport. As a result, parents rely on the use of private cars to transport their children to school for economic reasons. Meridian Secondary School will no longer be providing A-level education. A-Level students are required to travel to Baldock (Knights Templar), Buntingford or Cambridge for further education. The Applicant has provided no evidence that there will be improved transport to school

demonstrate that the present sewage works would be able to deal with the increased loading which the proposed new development would create, nor any plans for an upgrade.

We suggest therefore that this must be considered at the outline planning stage and not left to reserved matters stage.

Water Supply

Any resident of Barkway will inform you that we suffer from variable water pressure, due to poor water supply infrastructure. We experience regular water pressure-drops, to the point where electric showers cut out and have been known to fail completely as a result. This situation has worsened since the development of Royston over the period of the last 3 years and has been acknowledged by water engineers as an on-going problem. The Applicant has provided no evidence that water supplies will be improved to cope with the additional demand, or that water supply companies can guarantee supply. Again, this should not be left to reserved matters application stage to consider.

Summary

It is our firm opinion and belief therefore, when considering this application, within the framework of the NPPF, that if this outline planning application were to be granted, it would create an inappropriate size and rate of growth for the village and is in conflict with the emerging development strategy for the village. It is in contravention of multiple policies within the National Planning Policy Framework, and on land not included in the Local Plan No 2, or currently within the legally defined permitted development boundary and would create a non-sustainable development, isolated from the main village, delivering inappropriately located new homes, remote from places of employment, encouraging the use of private vehicles and an increased burden on the environment, thus far outweighing the benefit when assessed against the Framework as a whole.

Yours Faithfully
On behalf of Barkway Parish Council

Cllr Dr Guiseppe Frapporti
CHAIRMAN

Cllr Dr Bob Davidson
PLANNING AND CORPORATE
GOVERNANCE

for the additional middle and secondary school pupils arising from the site, therefore it must be assumed that there will be an increased dependency on the need to travel by private car to schools.

Infrastructure.

Roads.

The creation of additional traffic movements has not considered the status of the main link from the village to the A10, namely the Joint. This is mostly a single-track rural road, with informal, poorly-maintained passing places, which are required by most vehicles in order to travel in opposing directions safely, let alone when encountering HGV, or construction vehicles.

We refer to the comments of Area Highway Development Control Manager, Consultation Date: Thursday 05 Oct 2017 planning application 17/01925/1 Proposed extension to the existing agricultural building including new grain dryer facilities with associated works including hard standing at New Farm, The Joint, Barkway, Royston SG8 8DU which was granted conditional planning permission.

“Considering that the majority of vehicle movements associated with the site are travelling via The Joint that is a single-track rural road it is proposed that a number of the existing informal passing places that have developed over time along the route to the site are upgraded to provide formally constructed passing places 6.0 metres wide, as shown on Drawing Number H001 Appendix 06 shows seven locations. This will enable HGVs travelling in opposite directions to pass each other. “

This is a clear acceptance by Area Highways that the Joint is not suitable for the increase in HGV movements which the construction phase of the development would require, but also that the main access to the village is a single lane rural road. To date the successful Applicant for 17/01925/1 has not undertaken the works and, following his unfortunate untimely death, it is unclear if these passing places will now be constructed as part of that planning condition.

No preferred route for access has been submitted or agreed, as this outline application does not include any reserved matters.

We would remind the planning officers of the chaos and cost to NHDC, at Pirton, which created a land-locked agreed development, with no permissible route to access the site. We therefore suggest that, given the potential scale of this development, a full reserved matters application with design and an agreed access route and full design is required, and this outline planning application should be refused.

Sewerage

The proposal does not state adequately how sewage will be dealt with. The application submitted simply refers to the drainage plan (ref: 163461-002) and supporting Flood Risk Assessment (Appendix D). The sewage farm is located at the south end of the village. Neither Thames Water nor the Applicant appears to have considered whether the present sewerage system would be able to take the effluent from more than twice as many houses as at present (the current pipe purely serves the eastern side of the High Street) or indeed the difficulties engendered by increasing the sewerage capacity posed by the location of the current sewerage pipe, which runs through all the rear gardens of the houses along the eastern side of the High Street. The Applicant has submitted no evidence to

demonstrate that the present sewage works would be able to deal with the increased loading which the proposed new development would create, nor any plans for an upgrade.

We suggest therefore that this must be considered at the outline planning stage and not left to reserved matters stage.

Water Supply

Any resident of Barkway will inform you that we suffer from variable water pressure, due to poor water supply infrastructure. We experience regular water pressure-drops, to the point where electric showers cut out and have been known to fail completely as a result. This situation has worsened since the development of Royston over the period of the last 3 years and has been acknowledged by water engineers as an on-going problem. The Applicant has provided no evidence that water supplies will be improved to cope with the additional demand, or that water supply companies can guarantee supply. Again, this should not be left to reserved matters application stage to consider.

Summary

It is our firm opinion and belief therefore, when considering this application, within the framework of the NPPF, that if this outline planning application were to be granted, it would create an inappropriate size and rate of growth for the village and is in conflict with the emerging development strategy for the village. It is in contravention of multiple policies within the National Planning Policy Framework, and on land not included in the Local Plan No 2, or currently within the legally defined permitted development boundary and would create a non-sustainable development, isolated from the main village, delivering inappropriately located new homes, remote from places of employment, encouraging the use of private vehicles and an increased burden on the environment, thus far outweighing the benefit when assessed against the Framework as a whole.

Yours Faithfully
On behalf of Barkway Parish Council



Cllr Dr Guiseppe Frapporti
CHAIRMAN



Cllr Dr Bob Davidson
Planning and Corporate Governance