



Parish Council

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Below is the Watton-at-Stone Parish Council 's response to the District Plan.

**Do you consider the proposed Pre-Submission District Plan to be:
Legally compliant**

No

We recognise the amount of work, research, consideration and care which has gone into preparing the Pre-Submission District Plan. We recognise also that the housing shortage in the South East and East Herts more specifically must be addressed and that all communities must contribute to resolving the situation, to the benefit of all.

Our reservations regarding the legality of the Pre-Submission District Plan concern one specific issue. Watton-at-Stone is surrounded on all sides by green belt land. The Pre-Submission District Plan encourages the village to take its own decision about releasing green belt land for development, and to select the land to be released through the process of developing a neighbourhood plan. However, we understand that there is no certainty that this delegation by East Herts District Council is permitted in law – Watton-at-Stone will essentially be a test case. We do not therefore know whether the Pre-Submission District Plan is legally compliant.

Compliant with the Duty to Co-operate

[no comment]

Sound

No

For the reasons explained below, we do not know whether the Pre-Submission District Plan is sound.

**Do you consider the proposed Pre-Submission District Plan to be:
Positively prepared**

No

Again, our reservations and comments are limited to the impact of the Pre-Submission District Plan on Watton-at-Stone specifically.

Watton has been classified as a Group 1 village, judged by East Herts District Council to be sustainable and suitable for development. However, it is surrounded by green belt land, which means that there is currently limited scope for development. Green belt designation is a strong protection which serves specific functions. The green belt land around Watton was judged in the East Herts Green Belt Review by Peter Brett Associates to be of "major" or

"paramount" importance in achieving the green belt objectives of checking the unrestricted sprawl of built-up areas, preventing towns from merging into one another, safeguarding the countryside from encroachment and preserving the special character of our historic village

However, it is difficult to say that the Pre-Submission District Plan is positively prepared, i.e. that it seeks to meet development and infrastructure requirements, because it does not take any decisions about how to resolve the tension between the potential for sustainable development in Watton-at-Stone versus the major or paramount importance of our protected green belt surroundings. This issue has simply been parked by East Herts District Council, with an invitation to the village to take it up itself through the process of developing a neighbourhood plan. In practice, we have decided to develop a neighbourhood plan and are considering the green belt issue, but we note that these sensitive and significant decisions are now being tackled by volunteers who (although we are lucky to have a number of villagers willing to contribute their spare time and relevant skills) do not have access to the professional resources or legal advice on which the East Herts District Council planning team is able to draw.

We note also that the Pre-Submission District Plan has stopped short of assigning a figure for the number of houses for which Watton is expected to make land available. Again, we are not sure that this approach can be considered to be "positive". It makes the issue of whether to release green belt land all the more difficult for the neighbourhood plan team/Parish Council, since we can have no certainty about how much land would be sufficient. Moreover, if insufficient land is made available in the village or more widely in the district, East Herts District Council reserves itself the possibility under the Pre-Submission District Plan of releasing more green belt land in the parish. So although Watton has been passed the decision of whether or not to permit green belt development, we do not have any guarantee that our decision will be the final say.

By not allocating a precise figure to the Group 1 villages in the green belt, it is also not clear whether East Herts District Council has effectively reserved this land as an option for meeting any wider shortfall across the rest of the district. It might have been thought that the intentions about future supply of land for housing should have been particularly clear and well thought out as regards building on green belt land, in order to maximise the protection and preservation of the green belt and the objectives which it serves.

We are also concerned that the Pre-Submission District Plan encourages Watton (and the other green belt Group 1 villages) to consider releasing green belt land to accommodate development where this would contribute to wider sustainability objectives and the delivery of community benefits. The invitation is made in an apparently simple way, to exchange green belt land for funding for infrastructure improvements and community benefits (e.g. through section 106 monies). However, whether development generates any such improvements or benefits beyond what is specifically required for the development itself is not simple. In particular, the policies in the Pre-Submission District Plan regarding affordable homes, the mix of housing types which must be built etc. all impact on the profitability of a development, which in turn impacts on the extent of any section 106 monies which will flow from the development. It is not therefore clear that the choice for Watton is as

simple as releasing green belt land in order to generate community benefits and achieve wider sustainability objectives.

Rather than presenting a clear plan for delivering infrastructure and development requirements, the possible outcomes from the Pre-Submission District Plan for Watton-at-Stone range from limited green belt development in a location of the village's choice with wider community benefits, to an unknown amount of housing being built in an unknown green belt location with no certainty of wider infrastructure and community benefits. The latter could still occur, notwithstanding the best efforts of the neighbourhood plan group and the Parish Council to protect the interests of the parish. This is a very unsatisfactory situation from the perspective of our parish. We consider that greater certainty around the expectations on Watton-at-Stone is required so that we can better understand :

- the extent of expected green belt release
- going forward, how far Watton-at-Stone is meeting – or exceeding – that expectation
- the extent to which Watton-at-Stone's green belt land will be secure once the expected amount of land is released.

Overall, we are seeking to work with the emerging District Plan in the interests of both the village and the wider district, but we need to be sure that the East Herts process is robust and does not leave us vulnerable.

Justified

[no comment]

Effective

[no comment]

Consistent with national policy

No

We understand this soundness requirement to refer to the need for sustainability. Watton-at-Stone was ranked highly as a sustainable village by East Herts, in large part due to the station. However, since the time that the village hierarchy was developed, Govia has released its proposals for train services through our village from May 2018. There remains much uncertainty, but the failure of Network Rail to build the fifth platform at Stevenage means that the future running of our rail service north to Stevenage is in question as from May 2018 when. The proposed replacement bus to Stevenage (and inevitable additional traffic) would exacerbate the already heavy peak-time traffic between the village and Stevenage through Hooks Cross. In the worst case scenario, construction of the new Stevenage platform could take until 2024. We consider that this materially affects the sustainability of the village's transport connections. Moreover, east-west traffic is busy through the village and unrelieved by the by-pass. We have a Victorian sewer running down the High Street and have suffered from localised flooding this year due to inadequate drainage. In short, it is not clear that Watton is in fact as sustainable a location for development as the Pre-Submission District Plan envisaged.