East Herts District Council
District Plan

Examination in Public

Hearing Statement by

Andrew Martin – Planning Ltd

On behalf of

Chelmsford City Developments

PART 1

Matters 3 (Employment & Retail) and 5 (Green Belt)

September 2017 | AM-P Ref: 16032

INTRODUCTION

1. This Hearing Statement has been prepared by Andrew Martin – Planning Ltd (AM-P), on behalf of Chelmsford City Developments (CCD).

2. CCD have an interest in Bishop's Stortford Football Club (BSFC) and are the owners of the freehold of the site. Bishop's Stortford Football Club is identified on the Proposals Map and in Policy CFLR1 of the East Herts District Plan Pre-Submission Document (SUB/001) for release from the Green Belt and designation for Open Space, Sport and Recreation uses.

3. This Hearing Statement supplements formal representations made to the District Plan in December 2016 and considers the Inspector's Matters and Issues for Part 1 of the Hearing Sessions (ED117).

4. CCD wish to appear at the inquiry in order to address issues regarding the proposed designation of the site for Open Space, Sport and Recreation uses.

MATTER 3 – EMPLOYMENT AND RETAIL

Employment and retail – DPS1
(Q.5) Is the land identified for class B1/B2 and B8 of the right type and scale and in the right place to support sustainable growth?

5. Bishop's Stortford Football Club is an important and prominent location adjacent to the A120 and close to the M11 Stansted Airport/Bishop's Stortford Junction 8. It lies immediately adjacent to the Woodside Industrial Estate which is allocated for employment use under Policy BISH11. The site's strategic location and neighbouring uses makes it an attractive site for business and new employment opportunities. Employment development on this site, in the event of the Football Club relocating, will provide an opportunity to support sustainable growth of the town and would create an attractive northern gateway feature into the town from the A120. CCD consider that the Council has not given sufficient consideration to the identification of land at BSFC for B1/B2 and B8 uses and the ability of the site to provide suitable employment land within a highly sustainable location.

6. The designation of BSFC under Policy CFLR1 Open Space, Sport and Recreation should be removed and instead the site should be included in Part III of Policy BISH11.

7. The proposed allocation of the site for Open Space, Sport and Recreation is wholly inappropriate. It is located immediately adjacent and accessed via an existing industrial estate and does not perform an open space or recreational function. The existing football club is a commercial body and not open to the general public for sports use in the same way as open playing fields and recreation areas. It serves only paying spectators and supporters to club matches. The site does not conform to the definition of 'Open Space' as set out in Appendix D Glossary to the Pre-Submission Plan. The site's designation for Open Space, Sports and Recreation uses has not been justified and the site can perform a better function for employment related uses.

MATTER 5 – THE GREEN BELT

Green Belt release – DPS3
(Q.4) Are there exceptional circumstances to justify the Plan's alterations to the existing adopted GB boundaries?

8. It is noted that paragraph 83 of the NPPF states that Green Belt (GB) boundaries should only be altered in "exceptional circumstances" through the preparation or review of the local plan. The current adopted Green Belt boundaries in relation to the Bishop's Stortford Football Club site are irrational and do not satisfy the 5 main purposes of the Green Belt, as set out in the NPPF paragraph 80.

9. Evidence base document GRB/001 provides a review of Green Belt boundaries. Whilst it contains no site specific assessment of the Football Club site, it does form part of Parcel 68 of the assessment. This concludes that Parcel 68 is one of the few areas in the district that is ranked 'High' in terms of overall suitability as an area of search. Officers and Members accepted that the site does not function well as an area of Green Belt and does not serve the five purposes set out in paragraph 80 of the NPPF. Furthermore, the existing brownfield nature of the site, its location immediately adjacent to the Woodside Industrial Estate and being bounded by the Strategic road network to the north, east and south renders it suitable for development, not retention as Green Belt.

10. CCD submits that these factors demonstrate exceptional circumstances and justify EHDC's decision to revise the Green Belt boundaries around Bishop's Stortford and particularly at Bishop's Stortford Football Club.

(Q.6) Is the site selection / Green Belt review process robust?

11. CCD supports the removal of the Bishop's Stortford Football Club site from the Green Belt and considers the site selection and Green Belt review process to be robust. This is justified by extensive evidence base documents (including SSS/001 to SSS/017 and GRB/001 to GBR/003) and are supported by EHDC's Sustainability Appraisal (SUB/004).

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