

East of Stevenage

Assessment of Land according to the purposes of Green Belt

On behalf of **Pigeon**



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Contents

- 1 Introduction 1**
 - 1.1 Purpose of the Report 1
 - 1.2 Disclaimer 2
- 2 The Site and the Council’s Local Plan 3**
 - 2.1 The planning status of the Site 3
- 3 Green Belt assessment of the Site 4**
 - 3.1 Introduction 4
 - 3.2 Consideration of site’s contribution to Green Belt 4
- 4 Other sites 8**
 - 4.1 Introduction 8
 - 4.2 Sworders proposed site 8
 - 4.3 Warner Smith proposed site 8
- 5 Conclusions 9**
 - 5.1 Conclusions on the Pigeon Site 9

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1 Introduction

1.1 Purpose of the Report

- 1.1.1 Peter Brett Associates LLP has been commissioned by Pigeon Land Ltd (Pigeon) on behalf of Hythe Ltd (The Landowners) for whom Pigeon act as promoter, to prepare an assessment of the Land East of Stevenage, to be referred to hereafter as the Site, according to its performance in relation to the purposes of the Green Belt.
- 1.1.2 Land East of Stevenage lies in the administrative area of East Herts District Council.
- 1.1.3 Pigeon is promoting the Site for residential development through the emerging East Herts Local Plan and the site is one that the Council as local planning authority is currently minded to include as an allocation in its Local Plan as part of the supply intended to address the identified housing need. The Council has established that not all of the provision it needs to make can be made within the boundaries of the existing built up area and so must look for land beyond the settlement boundaries. Land around Stevenage is designated as Green Belt and so the Council is proposing making changes to the Green Belt through the Local Plan, as national policy provides for. The 'exceptional circumstances' such a change requires are present in the Council's view because of the housing need and the extent of the Green Belt.
- 1.1.4 PBA has previously undertaken an assessment of the Green Belt across the whole of the District on behalf of East Herts District Council (EHDC). This was undertaken in 2015.
- 1.1.5 In common with established practice in undertaking Green Belt assessments, the District-wide work in 2015 divided the area into strategic land 'parcels' which on an initial assessment including the use of previously identified Landscape Character Areas, appeared likely to reflect current and possible future Green Belt boundaries. These parcels were individually assessed according to the performance of the land parcels in terms of the contribution the land makes to the purposes of the Green Belt. The 2015 report and all of PBA's Green Belt assessment work acknowledges that, following the initial identification of parcels and their assessment, a further round of assessment might establish whether there are areas within the parcels that perform differently according to those purposes than the parcel as a whole.
- 1.1.6 This report primarily concerns the Site as a small sub-area of the much larger area considered and reported as Parcel 2 in the 2015 PBA Green Belt Review. A further part of the report considers other areas promoted by other participants in the East Herts local Plan process. Such an assessment in relation to the previous reporting of particular land parcels is what is reported here.
- 1.1.7 PBA did not consider other matters that would be material in the identification of development land through the Local Plan in its previous review of the Green Belt in East Herts District, and does not do so now in this work for Pigeon. The report is confined to the consideration of the proposed development site and the other sites referred to in terms of Green Belt policy which is set out in the National Planning Policy Framework (the Framework).
- 1.1.8 We do however note the interpretation of the relationship for plan making purposes between Green Belt policy and other high level policy that is usually followed and that is reflected for instance in the note on the PAS website¹ which in effect says that local plans should identify the most sustainable locations for needed development, including housing, unless the effect on the overall integrity of the Green Belt would outweigh these choices. We note that this position is

¹ Planning On the Doorstep: The Big Issues – Green Belt
<https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

reflected by some Planning Inspectors reporting on the examination of local plans, most succinctly by the Inspector for the Lichfield Local Plan who commented that:

*'I can find no justification in the Framework, in Planning Guidance or indeed in the case of I M Properties for the proposition that Green Belt land should be released only as a last resort. This would be to accept that sustainability is the servant of Green Belt designation - which it is not. On the contrary, as has already been established, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development.'*²

1.1.9 This interpretation is noted here because it is very relevant to the Council's position and to the use of the findings of this assessment.

1.1.10 This note deals with:

- The site and how it is dealt with in the Council's emerging Local Plan - section 2;
- The further assessment of the site in Green Belt terms - section 3;
- The assessment in Green Belt terms of other sites that have been promoted on the edge of Stevenage - section 4;
- Conclusions - section 5.

1.1.11 These matters are addressed in the sections that follow.

1.2 Disclaimer

1.2.1 PBA have not engaged with the Council in any way for the purposes of preparing this report.

1.2.2 This report has been prepared for the joint benefit of Pigeon and the landowner and the contents should not be relied upon by others without the express written authority of Pigeon. If any unauthorised third party makes use of this report they do so at their own risk and Pigeon owes them no duty of care.

² Report to Lichfield District Council by Robert Yuille Msc DipTP MRTPI 16 January 2015

2 The Site and the Council's Local Plan

2.1 The planning status of the Site

- 2.1.1 East Herts District Council is preparing a Local Plan for its area. In accordance with the Framework the Council is seeking to identify enough suitable, available and developable land to meet the identified housing need for the District over the Plan period. The Site is currently included amongst the possible development sites that the Council has identified to make up its proposed supply and is included as an allocation in the East Herts Submission District Plan (November 2016).
- 2.1.2 The reasons for the identification of the site are set out in the Council's 'Settlement Appraisal' document which explains how matters moved on from the Preferred Options District Plan which did not include any land East of Stevenage. The explanation for this progression provided by the Council is that the East of Stevenage Area of Search did not perform well according to the criteria used when the Council was seeking locations where a new settlement of approximately 5000 new homes could be accommodated, but was acknowledged after representations were made by Pigeon to be an area where a smaller development would be appropriate and could be accommodated. The inclusion of such sites amongst the proposed supply for the Plan period would add considerably to the flexibility in the Local Plan and greatly increase the confidence in being able to implement the Plan housing need.

3 Green Belt assessment of the Site

3.1 Introduction

- 3.1.1 This section of the report sets out the assessment in Green Belt terms of the Site, identified as EOS1 in the East Herts Submission District Plan (Nov 2016). The site lies within parcel 2 in the PBA Green Belt Review undertaken for East Herts District Council in 2015.
- 3.1.2 The methodology used in the 2015 Green Belt Review was essentially to consider the performance of each of the parcels in terms of the contribution they currently make to the fulfilment of each of the purposes of including land in the Green Belt set out in the National Planning Policy Framework using criteria to interpret the purposes and to assist in making a consistent and comparable assessment. The five purposes of Green Belt from the Framework are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and spatial character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.1.3 It was decided that only the first three of the purposes would be used in the assessment for the reasons set out in that report, together with the fourth purpose if this were relevant to any part of the area being assessed. The purposes are not given numbers in the Framework but in this report are referred to for convenience numerically in the order in which they appear in the Framework.

3.2 Consideration of site's contribution to Green Belt

The site in the context of Green Belt Reviews (2015)

- 3.2.1 The Site is within the area identified as Parcel 2 in the PBA 2015 Review. The full parcel covers an extensive area adjoining and just beyond the eastern edge of Stevenage. The site lies within the north-western part of the parcel adjoining the defined settlement edge.
- 3.2.2 With regard to the first Green Belt purpose ('to check the unrestricted sprawl of large built up areas'), the previous Review concluded that the land comprising Parcel 2 provides 'a strong distinctive edge and containment to the town' and that the Green Belt edge is well defined along the settlement edge. Consequently, the parcel was assessed as being of 'Paramount' importance in respect of this Green Belt purpose.
- 3.2.3 In respect of the third purpose ('to assist in safeguarding the countryside from encroachment'), the countryside was noted as having a strong unspoilt character with a well-defined structure and with little/no sense of encroachment due to the well contained nature of the urban edge. Consequently, the parcel was also considered to be of 'Paramount' importance in respect of this Green Belt purpose.
- 3.2.4 The parcel was not considered to make contributions to the fourth purpose ('to preserve the setting and special character of historic towns'). Neither was the parcel considered to make contributions to the second purpose ('to prevent neighbouring towns from merging'). This is

important since whilst there is no suggestion of any differing importance of the purposes in the Framework, this purpose as the most spatially specific is often regarded as the one to be most strongly defended.

- 3.2.5 Overall the parcel was considered to have Low suitability as an area of search for new residential development.

Other assessments

- 3.2.6 Stevenage Borough Council has had a Green Belt study undertaken. The site fell within the north-western part of the large parcel E4 in the Stevenage Green Belt Review (Amec Foster Wheeler; 2014/15). This stated for parcel E4 that:

'The combination of topography, large-scale open fields, distant views and no immediate visual connection with the urban edge of Stevenage to the west, give this segment a strongly rural character and openness. As such the segment is an important part of the Green Belt to the east of Stevenage. Roads (albeit of varying size) form strong boundaries to this segment.'

- 3.2.7 The report concluded it made a 'Contribution' to limiting sprawl, a 'Significant contribution' to preventing encroachment, and 'Limited' contributions to preventing the merger of towns and 'the setting of settlements' (assumed to be an interpretation of the fourth purpose). At this strategic level, there is therefore a significant degree of consistency with the findings of the 2015 PBA Review, though we would query the use of the term 'limited' which in common meaning is something more than nothing, whereas 'none' is considered to be a more realistic assessment of the contribution to these two purposes.

- 3.2.8 The Stevenage Review then looked at parcel E4 in more detail with the northern part of parcel E4 sub-divided into two smaller parcels with the site forming parcel E4(i) where it was noted that the sub area is:

'Characterised by large scale open fields which forms part of the plateau between the Beane Valley and Stevenage, this parcel makes a contribution to containing the easterly edge of Stevenage, but has been subject to extensive boundary planting which contributes significantly to its visual containment.'

- 3.2.9 The parcel was assessed as making a 'Contribution' to the first and third purposes and 'Limited contribution' to the second and fourth purposes.

- 3.2.10 EHDC considered the site further as part of their work on the emerging Local Plan; the supporting Settlement Appraisal document noted (para. 4.2) that structural planting on ridgelines has created 'a well-contained site with a relative sense of enclosure' which separates it from the Beane Valley noting that, consequently, 'the smaller parcel has a more limited role in preventing urban sprawl as there is a clearly defined edge to the site', noting 'the structural planting makes the site physically and visibly removed from the Beane Valley'.

- The East Herts Landscape Character Assessment (2006) identifies an extensive area along and flanking the Middle Beane Valley (LCA 39). Key characteristics include (as relevant):
- Strongly undulating west-facing slope;
- Sharp transition to ridge to east and to urban edge to west
- Built edge of Stevenage generally well concealed and contained by mature and semi mature woodland;

- Woods located to the tributary valley heads and on the upper slopes adjacent to Stevenage;
- Large fields and arable cultivation;
- Few settlements; and
- Expansive views from the edges to the Beane Valley.

3.2.11 It notes that:

- *'The overwhelming impressions here are of remoteness, tranquillity and continuity, a sense that nothing has changed much over the centuries';*
- The area is quite widely visible due to its sloping landform and elevated position;
- It offers extensive views across the Beane valley;
- There is a high level of containment of the edge of Stevenage; and
- Despite the proximity of Stevenage to the west there is very little visual impact from the town.

3.2.12 The impact of built development is noted as being 'low', whilst the landscape is 'open and coherent'. Landscape condition is noted as 'good' and there is a 'moderate' strength of character, leading to a strategy to 'conserve and strengthen' landscape character.

3.2.13 The 2006 Stevenage Landscape Sensitivity and Capacity Study (Halcrow; 2006) identified the site as Local Landscape Character Area 6 – Chells Manor Farmlands which was assessed as being of 'Moderate' sensitivity and 'Moderate' capacity for urban extension. A simple analysis plan of the area was provided (although we find that this is rather 'coarse' and does not reflect accurately some of the localised characteristics of the site, such as the extent of the valley slopes and ridgeline defining the western edge of the wider Beane valley landscape which creates a misleading impression of some of the site's characteristics). A simple development strategy plan was prepared which identified a broad framework for development based on landscape and visual considerations.

PBA Green Belt assessment of the site (2017)

3.2.14 We visited the site on 6 June 2017 and have made a strategic assessment of the Site's contribution to Green Belt purposes. Our conclusions are as follows.

Green Belt Purpose 1: To check the unrestricted sprawl of large urban areas

3.2.15 Our findings are consistent with our previous work for the larger parcel; i.e. the site makes an important contribution to the fulfilment of this purpose. This is because the land adjoins the edge of the built-up area which is extremely well contained from the site, making the site completely distinct from the edge of the Stevenage at Gresley Way. However, the existing tree belts that contain parts of the site (either fully or partially) from the wider landscape beyond do provide potential alternative boundaries that, either in their current state or with further reinforcement, can form a well-defined robust alternative Green Belt boundary to the edge of the settlement/proposed allocation (more on this below).

Green Belt Purpose 2: To prevent neighbouring towns merging into one another

3.2.16 Similar to the wider assessment, the Site makes no contribution to this purpose as it does not lie between towns. Development within the site would result in a slight reduction in the physical

separation between Stevenage and the settlement of Walkern to the east, but Walkern is a village rather than a town so following the correct interpretation of the Green Belt purpose, this has no bearing on the application of the Green Belt policy. Even if Walkern were to be considered relevant to this purpose, the two settlements are visually quite separate due to intervening topography and vegetation so that development of the Site would not lead to a merger either physically or perceptually, and would therefore make no contribution to this purpose.

Green Belt Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.2.17 The Site is devoid of existing development and there is no existing sense of encroachment. It is perceived as being completely separate from the eastern edge of the town and has a very strong, unspoilt rural character. As such, the Site's overall contribution to this purpose is high. However, as noted above, the wooded tree belts that subdivide the site provide substantial screening to internal parts of the site (as well as providing layers of screening to the existing edge of the town), and hence there is the opportunity to create new credible and defensible boundaries to a changed Green Belt some distance from the current edge of Stevenage and providing for development within the Site.
- 3.2.18 This is true to a lesser extent in parts of the south eastern and north eastern fields where the vegetation on the eastern site boundary is slightly less robust (and at a lower level in places) leading to some limited long distance views outwards to the wider countryside beyond. However, the Initial Landscape and Visual Assessment (baseline March 2017; James Blake Associates Ltd.) examines existing views towards the site from more distant locations on the eastern side of the Beane valley and shows that, from the viewpoints examined, the site appears to be visually well contained by either topography, vegetation or a combination of both. It is also noted that the related Concept Masterplan incorporates a strategy of retaining the boundary and intervening tree belts, supplementing these in places with planting in open space and landscape buffer areas, notably on the north eastern and south eastern sides where these outward views exist, and by proposing lower density residential development with enhanced tree cover in adjoining areas. Therefore, there appears to be scope to provide development that is generally well contained, limiting encroachment to the more immediate area, and ensuring that the site's containment is enhanced by supplementary structural planting (which may be carried out early on) and careful masterplanning of the development.
- 3.2.19 Our consideration of the Site's suitability for development is set out in the Conclusions to this report, Section 5.

4 Other sites

4.1 Introduction

- 4.1.1 Other sub areas identified within the larger parcels in the 2015 Green Belt Review have been put forward by other land promoters for consideration through the East Herts Local Plan. Whilst carrying out the further review of the Site for Pigeon these have also been considered and are commented upon here.

4.2 Sworders proposed site

- 4.2.1 This site also lies within parcel 2 identified in the PBA 2015 Green Belt review. A site location plan is shown in **Appendix A**. It comprises an area of open arable land that is distinct from the edge of Stevenage, being separated from it by the robust woodland belt along the east side of Gresley Way. In contrast with the proposed site allocation to the south, which benefits from significant structure planting and existing vegetation along its outer, eastern side, this site forms part of the wider arable landscape that stretches away to the east and south east. Although the land lies within a shallow depression at the head of a dry tributary valley of the Beane valley it has a strong sense of openness forming part of the wider, open landscape context of the valley. Whilst the boundary to the west is defined by vegetation along the north east boundary of the proposed East of Stevenage allocation site, and the north by Stevenage Road with Box Wood beyond, the southern and eastern sides are not defined by any feature.
- 4.2.2 There is a consistency in the findings of the Green Belt assessments (undertaken by PBA for East Herts and Amec for Stevenage) which finds that this land forms part of a wider area extending into the Beane valley that makes a significant contribution to Green Belt purposes (notably purposes 1 and 3). As such it is our opinion that the site is not suitable for removal from Green Belt, and is not supportable in landscape terms.

4.3 Warner Smith proposed site

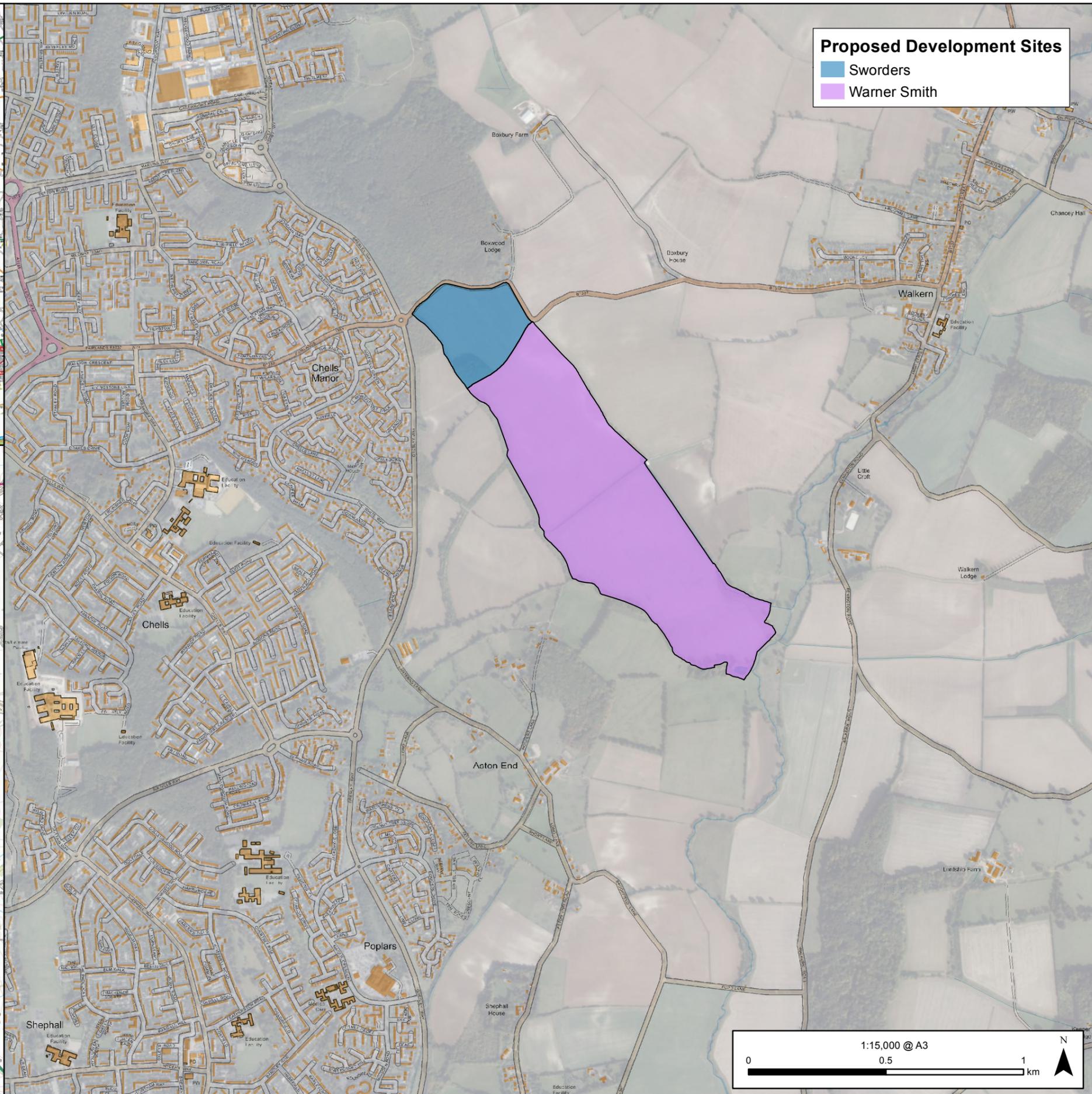
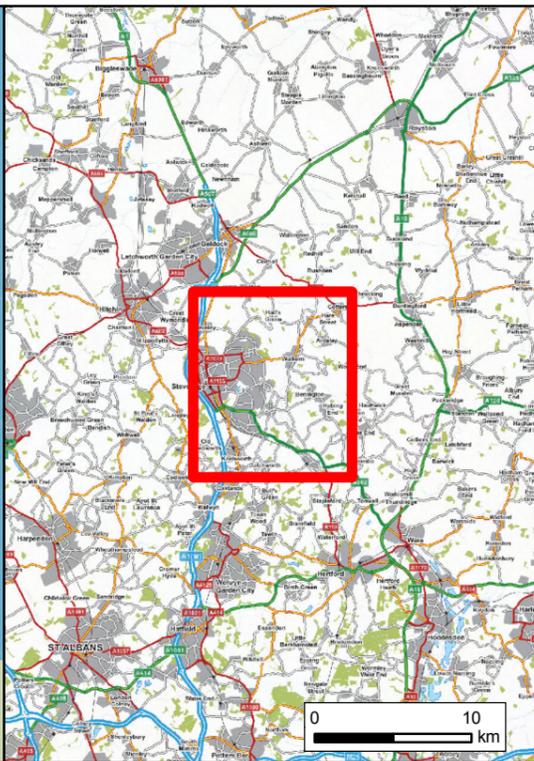
- 4.3.1 This promoted site extends across open sloping arable fields east and south east of the proposed East of Stevenage allocation site. A site location plan is shown in **Appendix A**. As such it 'steps' beyond the structural planting which encompasses much of the proposed allocation site and forms a visually integral part of the attractive, expansive landscape of the Beane valley, extending across visually exposed slopes. It falls within parcel 2 identified in the PBA 2015 Green Belt review as being of particular importance to Green Belt purposes 1 and 3 (as set out earlier in section 3). The Site is visually exposed with the north and north eastern boundaries not defined by any robust features; the south eastern side is formed by a hedgerow.
- 4.3.2 Our findings are the same as for the Sworders site referred to above. The site is not suitable for removal from Green Belt as it would extend well beyond the recognisable and developing boundaries of the proposed allocation site, into a landscape that forms an integral part of the Beane Valley and would lead to a clear encroachment into the countryside and be perceived as unconstrained growth (sprawl). Nor is it supportable in landscape terms.

5 Conclusions

5.1 Conclusions on the Pigeon Site

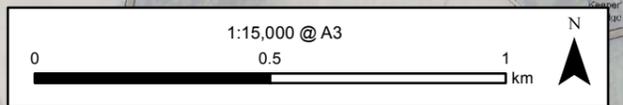
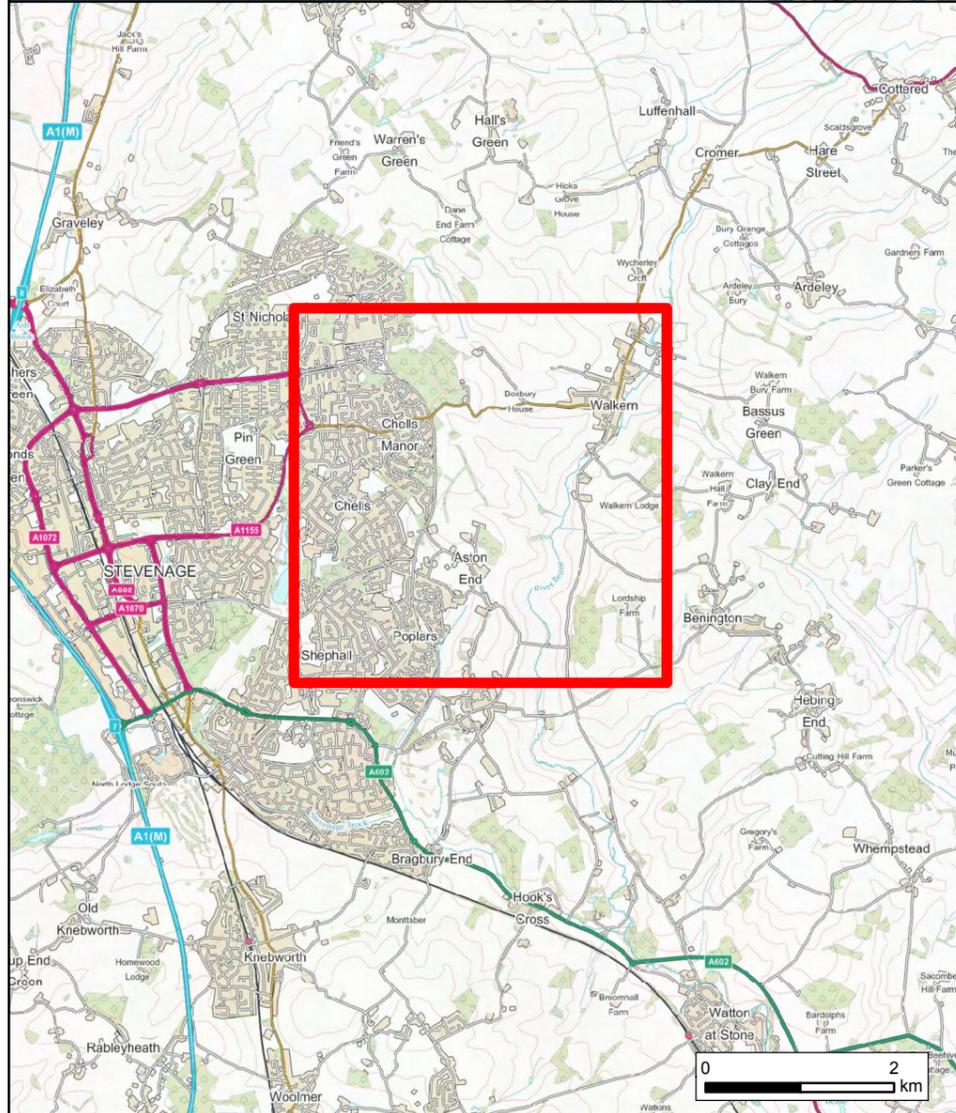
- 5.1.1 The proposed East of Stevenage site is part of a much larger parcel of land which has, in a previously undertaken Green Belt Review, been assessed as providing a significant contribution to the fulfilment of the first and third purposes of the Green Belt at Stevenage and in East Herts District. Examination of this smaller area shows that, whilst it lies beyond Gresley Way which currently defines the eastern edge of the town, it is well contained and benefits from structural woodland belts that provide containment from the wider, more open landscape of the Beane valley beyond.
- 5.1.2 The proposed Local Plan allocation of the Site by East Herts District Council reflects a need for the Council to identify land beyond the existing settlement boundaries to address the identified housing need; the appropriateness of seeking sites on the edge of Stevenage as a highly sustainable location; the consequent need for change to the Green Belt; and the opportunity the Site offers to take land out of the Green Belt that makes a more limited contribution to the overall role of the Green Belt than the originally assessed wider area.
- 5.1.3 The proposal by East Herts District Council is specifically predicated on the ability to identify a sub area of the original much larger parcel that is largely contained by the existing structural planting and internal tree belts, with the vegetation on the outer boundaries of the development site forming a suitable alternative, enduring Green Belt boundary to the present boundary.
- 5.1.4 Whilst we note that parts of the outer developing woodland belts allow some distant views over the Beane valley, the baseline landscape and visual assessment shows that the Site appears to be well contained from public view. With careful masterplanning combined with appropriate woodland management and reinforcement of peripheral vegetation where required, the Site's containment can be reinforced still further.
- 5.1.5 Of the various sites considered in this report, it is our considered view that the Site offers the best prospect of accommodating development (subject to the 'exceptional circumstances' test), without material harm to the relevant purposes of the Green Belt.

Appendix A Sites Location Plan



Proposed Development Sites

- Sworders
- Warner Smith



STEVENAGE GREEN BELT

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Client **PIGEON** INVESTMENT MANAGEMENT

12/09/17
 Drawn: DRL
 Checked: SJ

Sites Location Plan

Figure 1 Rev A

