

Focus of this submission:

We contend that the EHDC District Plan is unsound for reasons outlined in this statement, and our earlier Regulation 19 submission. This statement looks to address various issues raised, discussed and left somewhat hanging during Part 1 (Weeks 1 and 2) of the EIP, as they affect EOS1. These, in our opinion require further clarification by the Council through the Enquiry process. It is our understanding, that through you madam Inspector, Programme Officer Louise St John Howe, has agreed that our representation may be considered in Part 2 as part of the site specific consideration of EOS1, currently scheduled for 9th November.

As we are unable to seek representation, PACE is happy for Aston, and/or Walkern Parish representatives to talk to these issues on our behalf, if required on 9th November. Each has a copy of this submission.

Issue 1. How and why was the allocated site chosen ahead of other potential options particularly having regard to Green Belt boundaries, landscape character and demands on infrastructure?

We look forward to receiving the Council's response when this site specific site is discussed. Hitherto it has not responded to the same question put to it by PACE through Datchworth and Aston's District Councillor, Mr Tony Jackson. Save to say that the site is required to meet its District wide housing need and can be fully developed with the first five years. It is contended that the former point has no relevance and should not be considered as a determinant in defining exceptional circumstances for building on Green Belt.

Most commentators at the Enquiry support our view that the site cannot be fully developed within the first five years of the plan. Indeed given key matters yet to be agreed, and uncertainty with regard to funding and agreement on essential infrastructure works, it is doubtful whether a start on site could occur much before 2018, let alone the completion of 255 homes as suggested by the Council. This issue is further developed in Issue 2 below.

During consideration of Matter 5: (points 1 - 4 inc.) Green Belt Release - exceptional circumstances (Policy DPS3) the Council seeks to assert that 'exceptional circumstances' for development in the Green Belt includes the notion of meeting a very significant share of the District's total housing need through Green Belt release.

This is not consistent with LPPF or Ministerial guidance. The Council has failed to demonstrate that it has exhaustively examined all other potential locations prior to its current Green Belt proposals. With regard to EOS1, the Council has similarly failed to demonstrate that insufficient consideration has been given to the land being of 'paramount importance' in terms of Green belt; It has failed to demonstrate why it chose this site over other less valued locations, brown field and other sites outside of the Green Belt. It relies entirely on an argument that EOS1 offers a more sustainable solution. This matter is picked up under Issue 2 below. **For these, and other reasons we contend therefore the plan remains unsound.**

Issue 2. Is it deliverable, having regard to the provision of the necessary infrastructure and facilities

During discussion of Matter 5: (points 5 - 7 inc.) The Green Belt - site selection process (Policy DPS3) the Council argues that EOS1 provides a sustainable solution. We contend that this is not the case: Its potential selection will generate infrastructure demands which cannot be met by development interests without an increase in density, and a downsizing of the neighbourhood centre facilities as suggested by the Hertfordshire Design review Panel (22nd September 2016).

The proposed modifications to Gresley Way will also inhibit County Highways/SBC's strategic highway considerations to alleviate traffic congestion within Stevenage, as it impacts the town centre and the A602 (Monkswood Way roundabout). The road is currently part of that consideration.

Based on publicly released documents PACE is of the view that considerable work is required to assess whether essential infrastructure works can be appropriately funded and commissioned to ensure delivery of this site. We request that the Enquiry tests provision for the secondary school needs of Gresley Park students, and whether essential highway infrastructure works and build rates will indeed be achieved within the critical first 5 years assumed by the Council – a key component for its rationale to include EOS1 very late in its plan development.

A) Secondary education provision remains uncertain

In ED131 Statement of common ground EHDC / Pigeon Land - Appendix 5 states ... This development whilst located in East Herts would look to Stevenage for secondary provision. This development would therefore form part of the Stevenage secondary strategy, however ...

ED140 EHDC / Stevenage MOU. Paras 5.8 – 5.13. Para 5.9 acknowledges that *"... no additional capacity exists in Secondary schools within Stevenage, and no new provision was made within the Stevenage Borough Local Plan ... to meet the needs of the Gresley Park development."* Para 5.11 states *"EHDC will continue to work with HCC, and Stevenage and North Herts Councils to ensure the educational needs of this development are met."*

ED135 EHDC / NHerts MOU - Paras 5.12 to 5.14 suggests only that HCC (Education) commits the three local authorities of Stevenage Borough, North Herts and East Herts to *'continue discussions to find a solution to this issue.'*

Pigeon Land has only advised only that it will make 'a contribution' to additional secondary school provision. It is suggested that this notional statement of goodwill should be tested and the basis, and amount of its contribution determined to enable this matter to progress with a degree of certainty.

The lack of any firm identification of how the secondary school needs of Gresley Park residents are to be met impairs the soundness of the East Hertfordshire District Plan.

B) Essential highway related matters, and the extent of work required will inevitably delay site delivery

ED131 - EHDC's / Pigeon Land's Statement of Common Ground, Appendix 10, looks in detail at the design of the three roundabouts on Gresley Way between Lanterns Lane and the Stevenage / Walkern Road roundabout. It is clear that the extent of work required, see Pages 44-47, is substantial and will need to be effected to enable access to the proposed three separately development locations to commence.

The document also acknowledges that design work has yet to be undertaken on the four remaining road junctions on Gresley way, south of EOS1 between Lanterns Lane and the A602.

In Appendix 4 to the same SoCG, HCC Highways comments that *"The principle of a three junction access strategy ... appears to be satisfactory in capacity terms ... However, the Highway Authority will require further testing on the wider highway network examining a three junction access strategy using the Stevenage & Hitchin Urban Model (SHUM)".* It also comments that *"As set out by the Highway Authority, the model which has previously tested a two junction access strategy, identified some attendant effects of the development as causing some traffic to reassign, or 'rat-run' away from Gresley Way. The addition of a further junction in the model, whilst likely to produce similar results, could nevertheless potentially increase such behaviour on the wider highway*

network". It continues "The modelling work also included the Lanterns Lane junction, which whilst operating within theoretical capacity, revealed an increased level of delay, particularly for vehicles exiting Lanterns Lane. The latter junction will require further modelling and likely mitigation measures."

The extent of outstanding design and other highway related matters requiring attention suggests that delivery of the site within the significant first five year period is highly problematic.

C) Pigeon Land's build rate is questionable

PACE supports the views of the representatives during week 1 of the Enquiry. They commented that Pigeon Land's, and the Council's figures (ED143) suggesting that 255 houses would be constructed in both 2018 and 2019 was highly optimistic, given outstanding issues, detailed planning matters to be determined, and accepted building sector completion rates.

In order to accelerate delivery Pigeon Land have suggested that it will use three separate developers / house builders to work concurrently on EOS1. We are unclear how Pigeon Land intend to manage or let contracts for the essential development of on-site highway, sewerage and drainage works.

The Council were unable to confirm whether agreements are already in place between Pigeon Land and three required house builders. That question remains hanging, as of today.

Context of this submission

PACE (protecting Aston's [and wider] Community Existence) was formed in 1997 in response to that year's EIP, with its focus on potential development west of Stevenage. PACE supported Hertfordshire CC's, EHDC and Stevenage Borough Council's (SBC) position on that. PACE has recently worked closely with Aston Parish Council, Aston Village Society, Walkern Parish Council and Walkern Action interests as well as adjacent residential interests on the easterly boundary in Stevenage regarding this proposal by East Herts to develop EOS1.

It has done so since February 2016, when EHDC belatedly advised it was minded to reverse decades of policy consideration to include, what is now referred to as EOS1, in its Regulation 19 Consultation response. Current EHDC policy for this category 3 location is a 'presumption against any development'. PACE submitted its response to the Regulation 19 Consultation under ID reference 1031892. A personal complimentary submission was also made under ID reference 1037512.

PACE has helped facilitate wider community engagement through its dedicated website www.sayno2gp.online and Facebook page <https://www.facebook.com/sayno2gp/>. The latter has helped engage many interested residents on the western Gresley Way boundary in Stevenage. This was important we suggest, as the Council failed in its duty to effectively consult with potentially affected residents within Stevenage (those in Stevenage Borough most adjacent to EOS1).

You will be aware of the significant public interest and concern on both sides of the Stevenage/east Herts boundary, generated by the Council's proposed development of EOS1. Comments made by those with an interest in it during the Regulation 19 Consultation exceeded those of East of Welwyn Garden City, Hertford, Stortford and Buntingford combined. Comments made were second only to those on Gilston /Harlow, with its significantly larger household build proposal. The Facebook page, designed in part to engage residents in Stevenage, has some 540 followers. Whilst not an earth shattering number, this needs to be put in context of similar Facebook pages for Gilston with 436 and East Herts own page of 708.

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20th October 2017