

## **EAST HERTFORDSHIRE DISTRICT PLAN EXAMINATION: PART 2 - November 2017**

### **CHAPTER 5 – BISHOP’S STORTFORD**

#### **Statement from CPRE Hertfordshire**

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, Planning Consultant of Campaign to Protect Rural England Hertfordshire (CPREH).
2. This statement complements our original representations on Chapter 5 of the Pre-Submission East Herts District Plan, which still apply, and seeks to address the Inspector’s questions as set out in her Matters and Issues, Part 2 document (ED127) on Site Allocations.
3. This statement addresses issues on Chapter 5 – Bishop’s Stortford; in particular, Policy BISH1 (c), Policy BISH5, Policy BISH11 II (b) and Policy BISH12 IV (c).
4. The inspector’s specific questions about this proposed site allocation need to be considered in the context of national planning policy, and in this respect CPREH’s continued objection to the overall level of development proposed by the Council in the Submission Plan and in subsequent submissions to the Examination is also relevant.
5. As made clear in our original representations and our Statement for Part 1 to the Examination, the excessive housing target proposed by the Council should be significantly reduced because of the great harm that would otherwise be caused to the Green Belt, and because the amount of land that the Council proposes to remove from the Green Belt is both unjustified and unnecessary.
6. CPREH considers that a reduction of several thousand dwellings from the proposed housing target is both justified and achievable in order to be consistent with national planning policy as set out in NPPF paragraph 14, and section 9 on Green Belt.
7. In particular, CPREH maintains that the Council has failed to give proper weight to national policy in respect of Green Belt in identifying the land to the south of Bishop’s

Stortford for approximately 750 new homes, a new employment area and a new neighbourhood centre together with associated infrastructure.

## **Introduction**

8. CPREH considers that the Plan is not justified and is not consistent with national policy in respect of the Council's overall proposed housing requirement / target set out in the Plan's Development Strategy and in policies DPS 1 and 2, as explained in some detail in our representations on Chapter 3 of the Plan, and on DPS 1 in particular.
9. This statement does not specifically concern itself with the first sentence of the Inspector's Question 3 with regard to the number of homes and other infrastructure proposed, but relates to the method of site selection, the choice of the area for the allocation ahead of other potential options and the alteration of the Green Belt boundary.

**Question 3(second sentence): Is the site selection methodology robust and transparent?**

**and**

**Question 6: BISH5 – is this the best option for Bishop's Stortford having regard to loss of Green Belt?**

10. The issue CPREH has with this site is not only the loss of Green Belt on the southern edge of Bishop's Stortford but also the very serious risk of settlements along the London Road from Harlow through Sawbridgeworth to Bishop's Stortford merging into an urban corridor of development. The allocation of BISH5 should therefore been seen in the context of other developments in the Green Belt, north of Harlow (Gilston Area – policies GA1 and GA2) and north and west of Sawbridgeworth (SAWB2, SAWB3 and SAWB4).

11. A fundamental flaw in the Plan is a lack of vision for Green Belt in the District as a whole. This would be improved if the Plan included a map or diagram showing the cumulative impact of all proposed Green Belt development site allocations.
12. The site was proposed for partial development in the draft of the previous local plan but was retained wholly in the Green Belt in the Adopted Local Plan 2007. Plans for a school on part of the site were subsequently dismissed on appeal in 2012. The planning history on the site has upheld its important Green Belt status, which CPREH considers should be upheld again in this examination of the Plan.
13. The Green Belt Review assessed the land which comprises BISH5 as playing a major part in checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment. CPREH also considers that there would be an impact on the Green Belt purpose of preventing neighbourhood towns from merging with one another.
14. The Green Belt Topic Paper (TPA/003) Table 4.1 summarises the suitability of HERT3 as 'Low' as areas of search for development in Green Belt terms. Paragraph 4.23 goes on to say that allocating Green Belt land for development adjoining existing urban areas is less harmful than allocating more isolated sites. Whether on the urban edge or on an isolated site, the stated exceptional circumstances, to be mainly 'to meet housing needs', is not an adequate justification for loss of Green Belt.
15. The various Council documents do not provide a comparison between the damage to the countryside from developing in the Green Belt to the south of Bishop's Stortford compared with other site allocations or other options. CPREH does not consider that the Council has identified the likely adverse impacts, let alone justified them.
16. The Planning Minister's letter to the Council last year (Appendix 5 to our Matter 2 Statement) indicated that where Green Belt constrains a council from meeting Objectively Assessed Need (OAN) the potential existence of exceptional circumstances could be considered. Paragraph 83 of the NPPF considers that Green Belt Boundaries should only be altered in exceptional circumstances but in the same letter reference above, the Minister says that permanence is an essential

characteristic of Green Belt only in ‘*very exceptional circumstances*’ may it be necessary to consider a Green Belt boundary adjustment.

17. Policies BISH5, BISH11 and BISH12 do not adequately highlight or control the impacts that would result from the development of these sites. The lack of Masterplanning that has been undertaken prior to the submission of the Plan now relies on the preparation of a Masterplan setting out the relationship between the site and the countryside to the south.
18. In order to avoid the damaging landscape and other impacts of extending Bishop’s Stortford to the south, beyond its well defended Green Belt boundary, CPREH considers that the Council should do more to identify the potential contribution of brownfield and other previously developed land in the District to meet the needs of the Housing Market Area (HMA).
19. CPREH considers that insufficient attention was given by the Council to the option of concentrating a greater proportion of development within the district’s principal towns and villages, to include regeneration and redevelopment of underused land, and encouragement for change of use of suitable land for residential purposes, as a way of reducing the amount of land greenfield land needed for housing, and in particular to minimise the amount of land that should be taken out of the Green Belt. A key Green Belt purpose is to ‘*assist in urban regeneration, by encouraging the recycling of derelict and other urban land*’ (NPPF paragraph 80, CPREH emphasis). Failure to fully acknowledge the likely scale of windfall development, and capacity of existing previously developed land, risks the unnecessary loss of countryside and Green Belt in particular, in this case to the south of Bishop’s Stortford.

### **Summary and Conclusions**

20. The Council’s only explanation for ignoring Green Belt and countryside impact and to explain why Bishop’s Stortford South was chosen in comparison to other potential options is the general assertion that the best locations to meet their full OAN are near to existing towns, in this case Bishop’s Stortford.
21. There is nothing in the Council’s evidence to demonstrate the existence of the exceptional circumstances necessary to adjust the Green Belt boundary to the south

of Bishop's Stortford. Instead, they should be prioritising brownfield sites in existing settlements to fortify the Green Belt.

22. CPREH does not consider that the Council has justified, or even identified, all the likely adverse impacts on the countryside and communities, or the Green Belt in and around the proposed site, and therefore parts of Chapter 5 of the Submission Plan are not justified and are not consistent with national policy, and should be removed from the Plan.

23. Policy BISH1 (c), Policy BISH5, Policy BISH11 II (b) and Policy BISH12 IV (c).and the associated paragraphs should be removed from the Plan and the Key Diagram, Figure 5.1, amended to remove reference to development proposed in the Green Belt at Bishop's Stortford South.

24. CPREH accordingly asks the Inspector to find the Plan's proposals for the removal of land from the Green Belt to the south of Bishop's Stortford, as set out in Chapter 5, and specifically policy BISH5 unsound.