

EAST HERTFORDSHIRE DISTRICT PLAN EXAMINATION: PART 2 - November 2017

Statement from CPRE Hertfordshire

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, Planning Consultant for Campaign to Protect Rural England Hertfordshire (CPREH).
2. This statement complements our original representations on Chapter 12 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 12 – East of Stevenage.
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 East of Stevenage for 600 homes and 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. The number of homes proposed for East of Stevenage is not specifically discussed in this objection. It concentrates instead on the allocation of the site and the loss of Green Belt.

Question 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?

10. CPREH considers that the decision to propose the allocation of this site was based on availability for development and its promotion by those with a land ownership or financial interest in the site, rather than any plan preparation principles or methodology. In paragraph 12.1.2 of Chapter 12 it states that land to the east of Stevenage was assessed through the plan-making process. However, Policy EOS1 Land East of Stevenage was not assessed on its own, only as part of a larger area of land east of Stevenage, which was rejected prior to the Preferred Options consultation and therefore not consulted on. Site EOS1 was put forward by the landowner in response to the 2014 Preferred Options consultation and this appears to be the principal reason for the proposal.
11. The Green Belt Review (GBR/001) concluded that the area within which EOS1 sits was of 'paramount' importance to two relevant green belt purposes: to check the unrestricted sprawl of large built-up areas and; to assist in safeguarding the countryside from encroachment. It does not consider that the Green Belt in this area makes a contribution to the preventing the merging of towns and as with all development in the Green Belt, does nothing to encourage the regeneration of urban areas enclosed by the Green Belt (see paragraph 22 below).

12. The development of EOS1 would reduce the gap the strategic gap between Stevenage and the village of Walkern. CPREH is of the view that the longstanding Green Belt purpose of preventing neighbourhood towns from merging applies equally to the merging of towns and villages. This interpretation of national policy was accepted by all parties at the recent appeal hearing for two applications for a proposed solar farm near Sawston in neighbouring Cambridgeshire (Appeal references APP/W0530/W15/3012014 and APP/W0530/W15/3013863). The Secretary of State, in dismissing the appeal said that a major contributory factor in his decision was the conflict with this Green Belt 'purpose' as the development would reduce the gap between the villages of Sawston and Babraham.
13. The Green Belt Topic Paper (TPA/003) Table 4.1 summarises the suitability of EOS1 as an area of search for development in Green Belt terms as 'Very Low' (CPREH emphasis). 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 satisfy short-term housing needs in the absence of reasonable alternatives, is not an adequate justification for loss of Green Belt.
14. The various Council documents do not provide a comparison between the damage to the countryside and communities in East Herts and Stevenage, 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. The communities of Aston and Walkern have been extremely vocal in their objections to this site allocation at the only opportunity that has so far been available to them, the Pre-Submission Consultation.
15. The Planning Minister wrote to all MPs on 07/06/16 reiterating that, "*Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.*" (CPREH emphasis). There were nearly 200 objectors to the inclusion of EOS1 as a site allocation during the Pre-Submission Consultation, overtaken only by the number of objectors to the Gilston Area allocation. It is quite clear that local people do not support the change to the Green Belt boundary to the east of Stevenage.

16. One of the objectors to the EOS1 site allocation on their borough boundary was Stevenage Borough Council, commenting that the Plan was neither sound nor positively prepared. CPREH draw your attention to the fact that the Memorandum of Understanding between Stevenage Borough Council and East Herts District Council was only signed after the Examination of the Plan had commenced (on the 3rd October). Although both Councils agree that a sustainable level of development to the east of Stevenage should be supported, there is no agreement on how sustainability can be achieved.
17. The development of Land East of Stevenage would not be consistent with paragraph 34 of the NPPF, "*Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.*" Homes on the site will be 5kms from the town's railway station and will be heavily reliant on private cars to reach services and employment areas. A development of 600 homes is insufficient to support shops (other than a small general store) or employment uses on the site, which will mean new occupiers will be heavily reliant on private cars to reach services and centres of employment.
18. 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.
19. The current Green Belt boundary along Gresley Way, which includes planting along the ridgeline, has matured over 40 years, ensuring that no part of Stevenage is visible from the Beane Valley (other than a small gap where the B1037 enters Stevenage. Later tree planting, which took place in the 1990's is not along the ridgeline and is limited to single trees in hedges to the south east and southern boundaries of the allocation site. No amount of tree planting will hide a housing development on the upper slopes of the Beane valley between Stevenage and

Walkern from users of this considerable District landscape asset. Statements from the Parishes of Walkern and Aston, among others provide more detail on the potential landscape impact of EOS1.

20. Other impacts of development on this prominent green field site in the Beane Valley would include the paraphernalia associated with domestic use of land, light pollution from street lighting, the visibility of other infrastructure to support power and telecommunications. The impact of around 1,400 residents and their cars on the already busy roads and lanes in this part of East Hertfordshire will be compounded by the development of the site on the west side of Walkern (Land South of Froghall Lane) which has permission for a residential development of up to 85 homes.
21. Policy EOS1 itself does nothing to highlight or control the impacts that would result from the development of the site, emphasising the lack of preparation involved in the promotion of this site allocation. The lack of Masterplanning that has been undertaken prior to the submission of the Plan now relies on the developer to prepare a Masterplan setting out the relationship between the site, landscapes and heritage assets and other settlements such as Walkern.
22. In order to avoid the damaging landscape and other impacts of extending Stevenage to the east, into East Hertfordshire beyond its well-defined and long-established 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).
23. 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 in the East Herts parish of Aston.

Summary and Conclusions:

24. The Council's only explanation for ignoring Green Belt and countryside impact and to explain why the Land East of Stevenage 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 Stevenage.

25. 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 east of Stevenage. Instead, they should be prioritising brownfield sites in existing settlements to fortify the Green Belt.

26. 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 Chapter 12 of the Submission Plan is not justified and is not consistent with national policy, and should be removed from the Plan.

27. CPREH accordingly asks the Inspector to find the Plan's proposals for the removal of 37 hectares of land from the Green Belt to the east of Stevenage, as set out in Chapter 12, including Policy EOS1, unsound.