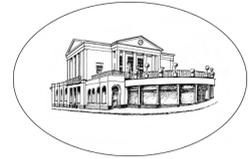


Bishop's Stortford Civic Federation

Registered Charity Number R264557

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EAST HERTS DISTRICT PLAN 2011-2033 STATEMENT BY BISHOP'S STORTFORD CIVIC FEDERATION

Chapter 5 – Bishop's Stortford

Issue 1 What is the basis for the number of new homes?

Issue 3 How and why was this level chosen ahead of other options?

Issue 7 Are the allocated sites appropriate and deliverable?

1. These questions are closely related and we are providing a single response to them.
2. The figures quoted by the Inspector (3729 – 4142) need to be updated. As noted in our objections (20 November 2016 para 20) to the pre-submission consultation version of the plan, the figures should have added to them a proportion of the completions, commitments and windfall allowance for the district. These totalled 5860 dwellings which were not allocated to specific settlements. We suggest that an additional allowance now needs to be made for the following:

Southmill Road 70 (under construction)

South Street 48 (under construction)

Hadham Road 84 (policy BISH 4 – see EHDC updated housing land supply note Sept 2017 ED 130)

Goods Yard 200 (policy BISH 7 – see EHDC updated housing land supply note Sept 2017 ED 130)

BSN say 100 (policy BISH 3)

3. This last point needs further explanation. The permission granted for Bishop's Stortford North (BSN) includes provision of two JMI schools of respectively 1 and 2 forms of entry (FE) on ASR's 3-5. However planning permission has now been granted for a single 3 FE school on allotments which had not been zoned for development under the permissions previously granted. As a result, the land previously set aside for the two schools will now be available for additional housing, and 100 seems a reasonable estimate of the number of extra dwellings which could be accommodated.

4. Adding the above to the higher of the figures quoted by the Inspector gives a total of 4644 new homes. The most recently reported dwelling total for Bishop's Stortford was 14920 in 2011 and this allocation represents a 31% increase. It also represents 25% of the total housing supply for East Herts as set out in the Sept 2017 note (ED 130 Table 1) provided by the Council.

5. Of the lower figure quoted by the Inspector, the possibility of there being no homes under policy BISH 4 is no longer relevant. The County Council are relying on the whole this site being developed (247 dwellings in total) in order to fund development of a 6 FE secondary school on another part of BSN next to the A120 bypass. The site will become available for development when the County Council have completed an exchange of land agreement with the BSN developers. The availability of the Boys High School site for housing (policy BISH 6) is contingent upon the Green Belt site at Bishop's Stortford South (BSS – policy BISH 5) being developed. There is no other location to which the school could move. We discuss these two policies at paras 14-18 below. The remaining variable, the East Herts Council owned site at Old River Lane (policy BISH 8) currently awaits the publication of proposals by East Herts for its future use. For purposes of reviewing the soundness of the plan in relation to Bishop's Stortford we believe that the appropriate dwelling total to use is the higher figure, uplifted as we suggest to 4644.

6. Turning to the basis for allocating this number of dwellings to Bishop's Stortford, much of the total has already been determined by decisions already taken. BSN, Hadham Road and the two sites under construction amount to 2894 dwellings. The Goods Yard site has had a planning application including 680 dwellings refused but the developers are now working on another scheme. This is the last substantial brownfield site in the town and the Civic Federation support its development, though we are likely to continue the debate the amount of housing which the site can support.

7. As we argued in our submission of 20 November 2016, (paras 4 and 9-21) the allocation of housing to Bishop's Stortford over the last 30 years and as proposed in this plan greatly exceeds the requirement that would have arisen from the natural growth in the population, and the town has taken a disproportionate share of the inward migration into the district. The objectively assessed need (OAN) has been derived from a projection of demand within a housing market area covering four local authorities, and the dwelling total for East Herts is a target for the whole of the district – it is not about how it should be distributed within the district.

8. We believe that the schemes already committed and remaining brownfield sites will provide more than enough housing to meet the natural growth in the population of the town with a margin to spare for further inward migration. There is no objective justification for encroaching further on greenfield sites on the edge of town and we do not believe that such an approach would be sustainable.

9. On this point, the Council's sustainability appraisal of the plan (SUB 004) is instructive. Box 6.1 describes the approach to growth within urban areas, growth at villages and greenfield allocations on the edge of the market towns as fairly 'set in stone'. We take this to mean that the previous pattern of development across the district (edge of town urban extensions combined with a highly restrictive approach to any development in villages) was accepted as a given without any consideration as to whether changes in communications and life style patterns will make this approach more unsustainable in the future. Having approached the appraisal with a built in prejudice against rural development, it is unsurprising that the report (Table 7.1) concluded that this was a less sustainable model than the one included in the plan.

10. We disagree. We explain our thinking in paras 22-34 of our objections of 20 November 2016 and give a very brief summary of the main points here.

- The most important aspect of social infrastructure in rural communities is the pattern of family support networks in settlements which span the generations. If the old and the young in particular have to move to town because the villages fail to meet the naturally arising growth in households, those networks are broken up. Visiting Granny in a retirement home or child minding in town while your own children are out at work is just as likely to generate extra car travel as driving to work or the shops.
- The internet makes home working and on line shopping a feasible option for many and so the need to be closer to a range of facilities is less pressing than in the past. Moreover communities which span the generations are more likely to sustain village facilities – the shop, school, GP surgery and even the bus service. Middle aged, middle class settlements will eventually shrivel and die.
- Further edge of town developments in Bishop's Stortford would be intrinsically unsustainable. Many of the residents would be commuters to Cambridge or London, priced into long and expensive daily journeys because of the unaffordability of homes nearer to where they work. Long distance commuting itself is not a sustainable activity, and the town's road system is too congested and the distances too far to make sustainable forms of transport from edge of town settlements to the station a realistic option.
- The OAN as applied by East Herts appears to have an inherent bias towards building what volume house builders want (large greenfield sites) rather than conceding that the present and future pattern of demand might be different from the only product they want to supply.

- While Bishop's Stortford is served by a trunk road and rail corridor, the same is true of Hertford (the A10 and two separate railway lines) which has enjoyed the lowest growth of any town in East Herts. So that argument appears to be no more than a post hoc rationalisation of past policy.
- Past growth in Bishop's Stortford has been accompanied by a loss of facilities – the hospital, job centre, magistrates court and police station have all closed or moved elsewhere. This suggests that further housing growth in urban areas needs to take greater account of where supporting facilities have been located.

11. In conclusion, we believe that there is no objective or rational basis for the dwelling total allocated to Bishop's Stortford. It is simply the result of perpetuating the past policy of 'stuff it in Stortford' to mitigate the housing pressures on the rest of the district, irrespective of where local residents might actually want to live. The alternative, more appropriate to the 21st century, of allocating less to Bishop's Stortford and more to rural East Herts has not been given proper consideration. An arbitrary target of 500 new dwellings in villages was fixed at the start of the process and the fact that 391 are already commitments (updated housing land supply paper Sept 2017 ED 130) suggests that the target was far too unambitious.

12. We therefore suggest that the Bishop's Stortford total should be reduced by 900 dwellings. We think that redistributing them to the rural area would be appropriate, though there may be other alternatives.

Issue 5 Are the allocations BISH 4 and BISH 6 available for development?

Issue 6 BISH 5 Is this the best option having regard to loss of Green Belt?

13. As explained in para 5 above the site at BISH 4 now has planning permission and the only constraint on development is the completion of the necessary land exchange with between the developers and the County Council. Indeed development there may well start before the bulk of BSN has been completed because the infrastructure requirements are much less onerous.

14. Policy BISH 6 requires the policy of developing BSS (BISH 5) to be implemented, since only if this site is developed will there be a location for the Boys High School to move to. There is no other available site in town, and without the development of BSS, the school will have to stay where it is, with redevelopment on site a feasible option which we would support.

15. BSS is currently within the metropolitan Green Belt. This site was in fact only incorporated into the Green Belt in 1979 and confirmed in the 1985 structure plan – it is not part of the immediate post war designation which is argued in some quarters to be too severe a constraint on the development needs of the present century. On the contrary, this designation occurred when it was anticipated that Stansted would become London's third airport, that Bishop's Stortford would provide a significant amount of the housing to support its growth at BSN, and that the town would need to protect the green spaces in and around its boundaries after enlargement.

16. As explained in our objections of 20 November 2016 (paras 45-58) the suitability of this site for development has probably been examined more often and more thoroughly than any other part of the Green Belt in the district. On every occasion it has been deemed unsuitable for development not least by East Herts Council itself and their advisers, Peter Brett Associates. As made clear in the NPPF (para 82) Green Belt boundaries should only be changed in exceptional circumstances. Letters from former Housing Ministers, Brandon Lewis and Gavin Barwell in 2016 make it clear that housing need alone is not a sufficient justification for altering Green Belt boundaries and that, where it is proposed to do so through the local planning process, it should be with the support of the local people. The people of Bishop's Stortford have made it clear through the Neighbourhood Plan for the area and through a subsequent petition against this part of the District Plan that they are strongly opposed to the development of this site.

17. It is for East Herts Council to demonstrate what they regard as the exceptional circumstances which justify the alteration to this particular Green Belt boundary. They have not done so. As discussed in paras 6-8 above, housing need, even if it were a sufficient justification, does not apply in the case of Bishop's Stortford where there would be more than sufficient housing to meet local need and some inward migration without the release of this site. While the Council acknowledge (Green Belt Hearing Statement page 12 para 3) that the entirety of the housing requirement could be met in the two thirds of the district not covered by the Green Belt, they dismiss this as not sustainable without giving serious thought to what makes rural communities sustainable, or what is needed to preserve the quality of life and sustainability of urban communities.

18. We do not believe that any exceptional or very special circumstances have been advanced to alter the Green Belt boundary by releasing BSS for development. On the contrary all the arguments and evidence point to keeping it undeveloped. We would therefore urge the Inspector to recommend that policy BISH 5 is removed from the Plan. This will necessarily require the removal of policy BISH 6 since there would be no question of the school relocating to the site while it is in the Green Belt – they have tried and failed to do that before – and no other site is available for them to move to. However, assuming that the school stays where it is, the Civic Federation would see no objection to part of the Green Belt site being used to provide additional playing fields for the school, and for a policy to be included in the plan which anticipated that possibility.

19. Removal of these two policies would reduce the housing total for Bishop's Stortford by 900. We have suggested that they should be redistributed within rural East Herts but there may be other options. There would also be a number of detailed consequential changes to other parts of the plan which we have sought to identify in our objections of 20 November 2016 (from para 68 onwards).

20. Finally, for completeness on Bishop's Stortford Green Belt issues, we note that a statement was made on behalf of Bishop's Stortford College to the Part 1 hearings, objecting to the inclusion of the town's so called green wedges in the Green Belt and instead arguing that they should be allocated for housing (ID 834625 – Para 5.5). The College happens to own part of one of the wedges. We would be strongly opposed to any alteration to the Green Belt status of these parcels of land. They provide vital areas of green space and recreation between various of the town's extensive new developments. Although the Council's Green Belt advisors (Peter Brett Associates) suggested that they might be preserved by other policies in the plan, our experience has been that all too often the Council has in the past been willing to set aside its own policies in response to pressure from developers. Green Belt status is the safest way of ensuring that these essential amenities are preserved.

BSCF
October 2017

