**Chapter 12 East of Stevenage v 3**

The plain text below is copied from the EHC’s consultation document: APC proposed comments are shown in ***Aerial Italics Bold***.

Our answers to the mandatory questions which appear at the start of each section are;

Do you consider the proposed Pre-Submission District Plan to be:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Legally Compliant | Yes |  | No | ***X*** |
| Compliant with the Duty to Co-operate | Yes | ***X*** | No |  |
| Sound | Yes |  | No | ***X*** |
| Positively Prepared | Yes |  | No | ***X*** |
| Justified | Yes |  | No | ***X*** |
| Effective | Yes |  | No | ***X*** |
| Consistent with national policy | Yes |  | No | ***X*** |

**12.1 Introduction**

**12.1.1**

Stevenage is a Mark I New Town designated in 1946 as part of the Abercrombie plan for the establishment of settlements around London.  The town has grown in several stages, shaped originally around six distinct neighbourhoods, each with a neighbourhood centre and local schools.  The town is bordered to the west by the A1(M), which facilitated the growth of an extensive employment corridor at Gunnels Wood.  As such, Stevenage is home to many large corporations and a wide variety of small to medium sized employers, making the town a key destination and employment centre.

***We do not believe that we are qualified to answer the mandatory questions but, since we are forced to do so, we have answered as best we can based on our whole response, not on individual parts of it. We have given the same answers throughout.***

***We have made comments about the sections contained in chapter 12 (East of Stevenage) but the full detail of our response is contained in the Arguments Against Gresley Park (GP) which will be e-mailed to EHC separately***

***Stevenage is a major commuter town with large numbers of people travelling south by road and rail to North and Central London and north to N Herts and Cambridgeshire, and east to East Herts and Essex.***

***The town is bordered on the west by the A1(M) – all of the housing is to the east and the north east of the town, employment areas and rail station resulting in very heavy east-west traffic in the morning and west-east in the afternoon.***

***The road and rail infrastructure in and around Stevenage, including the A602 and Gresley Way does not cope with the existing traffic, at peak times. The 600 houses proposed in East of Stevenage and the 550 houses proposed by Stevenage Borough Council (SBC) in the south east at Hooks Cross will make these problems much worse. No plausible solution to these problems has been proposed***

***More detailed comments are made in the paragraphs below***

**12.1.2**

Land to the east of Stevenage was assessed through the Plan-making process for either a new settlement or a major urban extension, but was not identified as part of the Preferred Options District Plan.  The 2014 consultation raised the issue of the potential of a smaller parcel of land coming forward for development.   A detailed assessment of the potential for development in the area has been undertaken which is documented in the Settlement Appraisal accompanying the Plan.

1. ***Overview***

***We believe that East Herts Council’s (EHC) decision to include Gresley Park (GP) in their local plan has been driven by expediency, not sound judgement. It was only proposed at a very late stage in the planning process to enable EHC to meet their 5 year housing targets, after sites near to the A414 were rejected, as a result of objections by Herts Highways.***

***We are aware that, since that time, target housing numbers have risen***

***The GP proposal conflicts with:***

* ***the judgement of one previous Appeal Inspector for the same site***
* ***two Appeals Inspectors relating to the building wind turbines in the Beane Valley***
* ***EHC’s own policies and previous assessments***
* ***Aston Village Plan (endorsed by EHC)***
* ***Stevenage Borough’s previous assessments***
* ***the NPPF***

1. ***Green Belt***

***The proposed site is on Green Belt land which was recently assessed by EHC’s own consultants to be of Paramount Importance, in limiting urban sprawl and protecting the environment (specifically the Beane valley).***

***In a decision on a proposed solar farm near Sawston in neighbouring Cambridgeshire, the Secretary of State (SoS) confirmed the CPRE Hertfordshire’s view that the longstanding Green Belt purpose of preventing neighbourhood towns from merging, applies equally to towns and villages***

***This interpretation of the national policy was accepted by all parties at the Hearing, and the SoS identified significant conflict with this “purpose” in the proposal, which was located between the villages of Sawston and Babraham. This conflict carried substantial weight and was a major contributing factor to the decision to dismiss the appeal***

***This interpretation of NPPF is critical to the villages of Aston End and Aston, which are under severe threat of being engulfed by developments east of Gresley Way, and eventually being absorbed into Stevenage. Stevenage Borough Council (SBC) are on record as saying they would welcome such developments***

***Only 12 of the 71 (17%) EHC green belt parcels evaluated for development by the EHC consultants have similar rating to GP, which makes it even more critical to demonstrate the “exceptional circumstances” needed to justify GP.***

1. ***The Settlement Appraisal (SA)***

***The SA is fundamentally flawed in the following respects:***

* ***The SA assesses 4 strategic options. However, all of these 4 include GP. So no alternatives to GP seems to have been evaluated, even though several of the strategic options assessed have the capacity to absorb the 600 houses proposed in GP***
* ***There would appear to be no data which, site-by-site, defines and evaluates the options involving the use of green belt, and specifically none relating to GP***
* ***There is no explicit listing of the “exceptional circumstances” for using green belt on a site-by-site basis, other than the using the generic argument across East Herts that the housing targets can only be achieved sustainably by using 6 % of the East Herts green belt***
* ***The justification for the smaller site is heavily dependent on the Settlement Appraisal document, which in turn depends on the description of the GP site (plateau, ridge, tree screening etc.) to argue that the impact on the Beane Valley will be limited and contained. This description of the site is fundamentally misleading (none of the statements are true) and they are directly challenged in 12.2.8 below***

1. ***Traffic and Road Infrastructure***

***The proposal will link directly into Gresley Way through at least three roundabouts. Gresley Way is a single-carriageway, heavily used in rush hours, with a speed limit of 40mph. Children crossing Gresley Way to the proposed school, community and health centres will need zebra crossings and speed management measures: none of these are proposed. If they are proposed, then Gresley Way will become even more slow-moving and congested, causing even more “rat-running” through the local villages. The problems of traffic and the inadequacy of the travel modelling undertaken by Aecom is commented on in 12.2.4***

1. ***Aston Village Plan and Localism***

***The GP proposal completely ignores the principles established in co-operation with EHC in the compilation of the Aston Parish Plan 2005, whereby any development encroaching on the Green Belt insulating Aston and Aston End from Stevenage would be resisted. That principle is also a fundamental part of Aston Parish Council’s policies. Both the Parish Plan and the Council’s policies have been subject to public consultation and overwhelmingly endorsed by the Aston residents. The GP proposal therefore ignores localism***

1. ***Summary***

***As a result of all the above, and more detail below, we do not think that the GP proposal is “sustainable”. The ministerial foreword to NPPF says that “The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.” The need to achieve this balance appears throughout NPPF.   
  
The decision to promote development in what is acknowledged to be a rare and treasured landscape and, thereby, to establish a precedent that will encourage future development, not only here but in any other sensitive area, must surely not be “sustainable”.***

**12.1.3**

As a result, a site of approximately 37 hectares of land to the east of Gresley Way, Stevenage has been identified as being suitable and is therefore allocated for development in the East Herts District Plan, to deliver approximately 600 homes within the first five years of the Plan period.  The site will be referred to as Gresley Park.

1. ***Exceptional Circumstances***

***Whilst “exceptional circumstances” have not been defined in the District Plan, we understand that housing need alone does not qualify. The essential EHC argument is that they cannot meet the EHC overall housing target sustainably, without using a significant part (6%) of the Green Belt. This argument is not broken down and justified on a site-by-site basis***

***Even if EHC could demonstrate “exceptional circumstances” the decision to choose this site is not sound. This choice is contrary to the past judgements of three Appeal Inspectors, to EHC’s own assessments and policies, and the view of experts employed by EHC. EHC used Stevenage Borough Council’s (SBC) Green Belt Review as a source for detailed information about this site. However, in their response to SBC’s public consultation, EHC were highly critical of the SBC document and in particularly of its evaluation of land to the east of Stevenage***

***The Minister of State for Housing and Development, Brandon Lewis MP said in a letter to MPs on 7/6/16:***

***“The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and the green belt boundaries should only be adjusted in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for houses alone will not change green belt boundaries”***

***Gresley Park has not been justified by any “exceptional circumstances” provided in the Pre-submission East Herts District Plan and is opposed by all the adjacent Local Authorities including Walkern, Benington, Watton-at-Stone, Datchworth and Aston Parish Councils and Chells manor Ward***

***The Minister’s recent clarification, above, is consistent with the view of the then Secretary of State for the Departments of the Environment and Transport, who in dismissing an earlier appeal for the same site in the 1980s, said, in Para 6 of the Appeal letter:***

***“In addition to the clear Green Belt objection to the appeal proposals, the Secretary of State agrees with the officer's [Inspector] appraisal that the proposed residential development would impinge upon the landscape of the Beane Valley and cause the loss of an area of countryside, and that the traffic likely to be generated by it would be detrimental to the free and safe flow of traffic on the local highway network”.***

1. ***Breaching Gresley Way – a green belt and Stevenage boundary***

***If allowed, GP would breach the existing, well-planned and constructed, Green Belt and Stevenage boundary at Gresley Way.  This was constructed over 30 years ago, when Chells Manor land was transferred from Aston to Stevenage and then developed. A substantial bund, with trees on top, was constructed on the east side of Gresley Way, to visually protect the Beane valley from the Chells Manor development. Gresley Way is broadly at the apex of the western flank of the Beane Valley.***

***In the late 1980s EHC moved the Green Belt boundary from the middle of the proposed GP site to Gresley Way, to create a clear substantial and logical boundary. They now want to move the green belt boundary back to the east into the Beane Valley***

***The new proposal would breach the Gresley Way boundary and replace it with a new man-made boundary which creates a triangular incursion into the green belt, with the eastern boundary now defined by the five lines of trees planted by the land owner in the late 1980s. The southern boundary is not clearly and substantially defined (it is a single tree/shrub line with very little visual containment). This proposed change in the Green Belt boundary would not be clear and logical and is not likely to be permanent. If GP goes ahead it is highly likely that there will be further developments east of Gresley Way – potentially all the way down to the A602. So this change in the GB boundary is contrary to NPPF 85 “When defining boundaries, local planning authorities should.... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”***

1. ***Protecting the Beane Valley***

***The deliberate and unsuccessful attempts that have been made to separate the proposed GP site from the Beane Valley are contrary to EHC policy, expressed in the EHC Landscape Character Assessment, to protect the open nature of the Beane Valley.***

***It is extremely concerning that EHC are not only accepting these attempts, but also promoting them to justify the suitability of the site for development. If this precedent is established it is difficult to see how any GB would be safe***

***The proposed development is not “isolated from the Beane Valley”: it will be widely visible from the Beane Valley and will be seen from parts of Walkern, Benington, Datchworth and Aston End***

**12.1.4**

As the development abuts the edge of Stevenage, the site will need to be planned in collaboration with Stevenage Borough Council.  However, as the site is wholly within the administrative boundary of East Herts District, East Herts Council is the relevant Local Planning Authority. Nonetheless, the Council will work with Stevenage Borough Council, Hertfordshire County Council (in its capacity as education and highways authority), landowners and other key stakeholders to produce a masterplan for Gresley Park.

**12.2 Development East of Stevenage**

**12.2.1**

The main components of the development strategy for land to the east of Stevenage at Gresley Park subject to master planning are expected to consider the following:

**12.2.2 Housing**: Stevenage is home to many large employers and is a key employment destination for residents in East Herts.  As such, housing to the east of Stevenage is well located in relation to the services and employment in the town and would contribute towards meeting the East Herts District housing needs.  The site will provide a new neighbourhood comprising a mixture of house sizes and tenure, including affordable homes, a care home and homes for older people. Stevenage Borough Council’s regeneration ambitions would be supported by dwellings which are attractive to workers who would otherwise look outside the town for their housing needs.  The site will also provide for the accommodation needs of Travelling Show people and make provision for self-build and/or custom-build opportunities.

1. ***GP would be disconnected***

***As stated above, GP will be disconnected from Stevenage footpaths and cycle-ways, and travellers will need to cross Gresley Way to gain access to buses, secondary schools and larger facilities***

***In addition promises of facilities made when Chells Manor was built were never delivered: will this be the same?***

***There is a history of modest density housing proposals, early in the planning process, being overtaken by commercial imperatives, and much higher density being built in practice. If this happens it will have an even more severe impact on the environment (and the Beane Valley in particular) and the local road infrastructure***

1. ***East Herts Housing Demand***

***The proposed 600 houses will not meet EHC demand, which is largely in the south and east of Hertfordshire, around the major Hertfordshire towns. It will largely support the further expansion of Stevenage to the east, making Stevenage even more unbalanced. SBC already has plans to meet the Stevenage demand***

***According to the CPRE: “The Secretary of State, in a recent appeal in Bishop Sutton in Somerset, took the view that to allow a greater proportion of housing development in the Rural Areas (where there was no housing land shortage) solely to make up the numbers for the District as a whole, and particularly in Bath, would be to undermine the development plan strategy of directing the main initiatives for growth to Bath***

***No evidence had been put forward to show that new employment opportunities had been established in the village to match the amount of committed and proposed housing development.***

***The SoS therefore concluded that the proposal would go against the underlying strategic objective of the development plan, to direct growth to locations which can be sustainable in terms of a reasonable match between jobs and dwellings, so as to minimise commuting for work purposes, particularly by car”***

***This judgement would seem to suggest that building on rural green belt would have to be shown to be meeting EHC housing demand: GP would not help EHC it would help expand Stevenage, beyond that currently in the SBC Plan, currently under review table as to who would pay for the school, community centre etc.***

***The GP proposal is essentially based on EHC’s housing need – the non-housing components (Community Centre, School etc) are, with the exception of the travelling show people’s sites, solely associated with GP; they are not required by Stevenage Borough, whose needs are fully met by their own plan.***

1. ***The proposal may well not be built by 2022***

***The assertion made by EHC that the site will be developed by 2022 is not evidenced. The Council’s own Infrastructure Delivery Plan (IDP) v 1 with regard to Gresley Park (East of Stevenage) indicates that just two of the ten infrastructure components needed for delivery are costed. Six of these components are described as being ‘critical’ to the successful delivery of the project. There are no firm indications that either the developer or statutory Authorities (lead Agencies) have or will provide the necessary funding within the proposed timeline***

**12.2.3 for 12.2.3 Education**: the site will provide a two form entry primary school with Early Years Education facilities.  This will meet the educational needs arising from the development as well as providing additional capacity to address wider needs.  Secondary education will be provided at the new school planned for the nearby former Barnwell East Secondary School site, towards which the development will contribute.

1. ***Unfulfilled promises***

***We have heard promises of this kind before. When Chells Manor was built in the 1980s a new Junior School was promised: it was never built.***

***In a meeting between Aston Parish Council and Pigeon there were no offers on the table.***

***There are no footpaths or cycle-ways to enable children/parents to access secondary schools***

**12.2.4 Transport**: the site is well located for access in to Stevenage and beyond via Gresley Way and the A602.  The site is also well located in terms of connecting to existing bus services to the town centre and station.  A route running through the site for bus uses will ensure that all residents are within easy walking distance of bus stops.  The establishment of a bus route through the site at the start of occupation will encourage use of the network.  Cycle and foot links will be provided to connect with the existing network in Stevenage and to the wider countryside.

1. ***The position of GP and the overloaded road infrastructure***

***There are already concerns about the infrastructure, especially road transport, needed to meet SB’s own local plan. EHC themselves have highlighted the inadequate plans for infrastructure in their response to SB Draft Local Plan consultation. Similar concerns have also been raised by the Inspector who is examining SB’s plan. If allowed GP would exacerbate this problem***

***Development west of Stevenage would be much better, as it is much nearer Stevenage Centre. GP will be 4-5 km away from the centre and is isolated: there are no footpaths or cycle-ways connecting Chells Manor and hence GP to Stevenage (as claimed in the Sustainability Appraisal), and Gresley Way will separate GP from Chells and the rest of Stevenage***

1. ***Safety Record of Gresley Way***

***The Secretary of State for the Environment, in rejecting an earlier Appeal to build on what is now called GP, noted that:***

***“The stretch of Gresley Way between the Walkern Road and Six Hills Way has a poor accident record. The introduction of two further access points and additional car movements per day would mean many more turning movements which are potentially hazardous”***

***This comment was made when Gresley Way had a speed limit of 30 mph: it is now 40mph***

***We note that the current proposal now includes three access points, thus potentially making this stretch of road even more hazardous than when earlier considered***

1. ***Flawed Aecom Traffic Modelling***

***APC believe that the modelling undertaken by Aecom on behalf of EHC on the impact of the development of Gresley Park (GP) is fundamentally flawed, and the traffic increase as a result of the development will be much larger than forecast, and consequently the impact on the Stevenage and East Herts local area will be more severe.***

***Our reasons for believing this are as follows:***

***The modellers had no local data to work on: we quote “there were no agreed trip rates for the study area used by any of the local authorities, nor did Highways Agency have an agreed set, at the time the SHUM forecast models were updated, so Aecom used trip rates that were derived using TRICS 6.2 (an industry standard database for development trip generation and analysis”***

***The input data therefore was UK-wide and did not recognise local conditions including:***

* ***GP is at least 4-5 km from the main employment locations on Gunnelswood Rd (including Glaxo-Welcome, MBDA, Astrium, BAE etc.) and buses generally terminate at the bus station, in the centre of Stevenage, so bus journeys to Gunnels Wood Rd are very slow***
* ***Stevenage is a dormitory town with many people working in London and the towns between Stevenage and London and north of Stevenage. There is, as a result, heavy use of Stevenage Station and very heavy traffic between the housing estates to the east of Stevenage and the station and to the A1(M).***
* ***Many Stevenage residents work in Hertford and Ware or use the A10 to commute to London resulting in very heavy west east traffic down Gresley way and the A602***
* ***It is assumed that there will be no school journeys by parents/children: they will all come from within GP. However the proposal is for a 2FE school and the GP take-up will be at most half of this. Aston junior school (2FE) has substantial numbers of car journeys every morning/evening. In addition there will be journeys to the Health and Community Centres***
* ***The model does not include any journeys from GP to secondary schools in Stevenage***
* ***Bus services from Chells Manor to the railway station and Old Stevenage and the Lister Hospital are very limited***
* ***The cycle tracks which are very good throughout most of Stevenage were not extended to the Chells Manor development and GP will consequently not be connected, and will be isolated in terms of both footpaths and cycle-ways***
* ***The modelling takes no obvious account of SBC’s proposal to build some 550 new houses 2.9 miles to the south of GP adjacent to the A602 at Hooks Cross, which will further increase traffic on the A602 and eastern Stevenage environs***

***As a result the peak hour estimates of ca 320 journeys at rush hours in the morning and evening, look far too low for a housing stock of some 600 houses. Based on Aston village practical experience we would expect 2-3 times as many journeys***

1. ***Local Rat-Running***

***The model acknowledges that the increased traffic, and two (should be three) new roundabouts on Gresley Way (not to mention zebra crossings and speed restrictions) will cause travellers to look for alternative routes to their destination. This will mean substantial increases in “rat-running” through Aston End, Aston, Stevenage, Walkern, and Benington to get to the A602, A10 and places east of GP.***

***However the model is not capable of modelling the impact on Walkern, Benington and Watton, we quote:***

***“However the model coverage does not extend in detail to the east of the development site therefore the model is not capable of evaluating the impact of the development within the East Hertfordshire area”***

***In addition, although we are told the model is capable of calculating the impact on Aston End and Aston, we do not believe this has been done***

***\*Although the new development is adding more cars to the network on Gresley Way, the two (***should be three***) new roundabouts make the through route longer in terms of travel time, and therefore less attractive for other longer distance trips, which consequently re-route across the network. The Gresley Way/A602 junction is also over capacity as are sections of the A602 in the Do Minimum which discourages traffic from using this route and causes traffic to divert to travel through local residential areas and villages”.***

***So in summary APC believe there will be much more traffic (perhaps 2-3 times more) than the model suggests and that the increases will have a major impact (as is acknowledged) on local roads as people find alternative ways round congested areas (aka “rat running”) in particular to avoid Gresley Way and the A602***

***Gresley Way has not got a good safety record and we believe the additional traffic will make his problem worse***

***12.2.5*** Mitigation will be required on the highway network, including improvements to the Gresley Way/A602 junction and other local roads as necessary.  The development will need to ensure that existing Bridleways (Aston 004 and Aston 021) are maintained and new routes are provided to connect the site to Stevenage to the west and to the wider countryside to the east.

***The District Plan and the Aecom study underestimate the additional traffic that is likely to be generated by the Gresley Park and Hooks Cross developments and do not offer plausible solutions to the substantial problems that these additional journeys will generate.***

***Both A602/Monkswood Way and A602 Gresley Way roundabouts are acknowledged to be at full capacity during rush hours and need mitigating measures: GP will add to these problems.***

***The Aecom Study says:.***

***“Mitigation in the form of the introduction of a MOVA controlled signal system to optimise flow during peak periods is recommended”***

***However there is no guarantee that this work will be done, and no indication of who will pay for it***

***In addition the problems associated with crossing Gresley Way (a 40 mph, heavily used, single carriageway) have been ignored***

**12.2.6 Other Infrastructure**: waste water will drain to Rye Meads, and new waste water services will be created as part of the development to ensure that the efficiency of the network is maintained and there are no adverse effects on surrounding watercourses.  Sustainable drainage features will also be required on the site.  In addition, a serviced area of land will be required to accommodate a site for Travelling Show people.  If required, a healthcare facility can be provided within the neighbourhood centre.

1. ***Water run-off into the Beane Valley***

***The GP development will create urban run-off which will drain down the west bank aquifer of the Beane Valley, which is a fractured chalk structure offering little resistance, down to the river Beane. This could cause pollution in the river which will be very difficult to eradicate.***

***There is a high profile and nationally supported project to try to restore this very rare river environment. As part of this, Affinity, the company responsible for water supply, has already reduced abstraction from the aquifer that feeds this river and is building a pipeline to provide an alternative source of water to Stevenage. A longer term part of the project has started to restore the habitat.***

***We do not believe this issue has been properly assessed by EHC despite their own concerns about it raised in their response to SB’s Local Plan consultation.***

**12.2.7 Employment and Retail**: The site is well located in terms of access to the Pin Green Industrial Estate to the east of the town and Gunnels Wood to the west via the A602.  Gresley Way is well connected to the town centre via Martins Way.  There will also be employment and retail opportunities within the neighbourhood centre, school and care home provided as part of the development.

***No comment***

**12.2.8 Character and design**: The site is well screened from the wider landscape by the surrounding woodland belts and a ridgeline to the east of the site will shield the site from within and opposite the Beane Valley.    The site’s gentle undulations and existing tree belts and hedgerows will help to define the character of areas within the site. Further planting to define open spaces and outer boundaries would be incorporated into the development.

1. ***Misleading description of the GP site***

***Aston Parish Council (APC) challenges the descriptions of the topography of the site contained in the SA. The site will not be “visually contained” from the Beane valley, as stated in the SA, and in particular we note that:***

* 1. ***The site is not a plateau, it has a 65ft slope (based on OS contours), broadly west – east, across the site***
  2. ***The main topography is dome – shaped with a slowly increasing slope as the land falls towards the river Beane***
  3. ***There is not a substantial ridge line on the eastern side tree boundary: there is a small ridge of 3-5ft, partly constructed by the land owner***
  4. ***The site is only partly screened by the 5 lines of trees planted on the boundary by the land owner some 25 years ago. The trees are 25-30 ft high, but there is a 65ft drop across the site and the houses will be 25ft high or more.***
  5. ***Standing on the higher part of the site, parts of Walkern, Benington, Datchworth and Aston End, together with substantial parts of the Beane valley, can plainly be seen with the naked eye, over the eastern boundary tree line.***
  6. ***As a result the middle-to–upper parts of the proposed houses will be clearly visible from much of the Beane valley***
  7. ***In addition, on the southern part of the site, the tree boundary is very patchy. and only one tree/shrub width, so houses in Aston End and the eastern flank of the Beane Valley can plainly be seen***

**12.2.9** The masterplan will set out a hierarchy of roads differentiating between the central tree-lined avenue, secondary streets and estate roads.  The master planned approach will ensure good quality place-making and the highest quality design and layout across the development resulting in a distinctive character.  An attractive network of connecting paths and cycleways which connect in to the existing Stevenage cycle network will be integral to the character of Gresley Park along with visible and physical connections that provide access to the Beane Valley without prejudicing the strength of the outer boundaries of the site.  This will also enable a range of journeys to be made by foot and cycle providing opportunities for health and leisure activities.

***Promises like this have been made before and commercial expediency has overtaken events. This is what happened in Chells Manor***

***What follows is Chris’s version 2 reasons against GP. I have used all of the material in 1 – 9, but only selectively material from the appendices. These could be put together as a supporting document***

**As at 27th October 2016**

1. We believe that EHC’s decision to include GP in their local plan has been driven by expediency not sound judgement. This decision conflicts with the judgement of three Appeal Inspectors, with EHC’s own policies and previous assessments, with SB’s previous assessments and with NPPF as outlined in the following points.
2. EHC has not demonstrated the “exceptional circumstances” that are needed to remove this land from GB. Whilst what “exceptional circumstances” are has not been defined we understand that housing need alone does not qualify. The GP proposal is essentially based on housing need – the non housing components are, with the exception of the travelling show people’s sites, solely associated with GP; they are not required by SB. see Appendix 1.
3. Even if EHC could demonstrate “exceptional circumstances” the decision to choose this site is not sound. This choice is contrary to the past judgements of three Appeal Inspectors, to EHC’s own assessments and policies, and the view of experts employed by EHC. EHC used SB’s Green Belt Review as a source for detailed information about this site. However, in their response to SB’s public consultation EHC were highly critical of this document and in particularly of its evaluation of land to the east of Stevenage. Further, EHC’s description of the topology of the site is inaccurate. see Appendix 2.
4. If allowed it would breach the well planned and well constructed existing GB boundary and replace it with one that is not and a never could be unless it was subject to major building and earth movement. This would be contrary to NPPF 85 “When defining boundaries, local planning authorities should.... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” see Appendix 3.
5. The deliberate and unsuccessful attempts that have been made to separate the site from the Beane Valley are contrary to EHC policy, expressed in the EHC Landscape Character Assessment, to protect the open nature of the Beane Valley. It is extremely concerning that EHC are not only accepting these attempts but also promoting them to justify the suitability of the site for development. If this precedent is established it is difficult to see how any GB would be safe. see Appendix 4.
6. We have not seen evidence that alternative comparable sites were properly investigated. EHC’s assertion that compared to this site” the majority of the land assessed throughout the district resulted in similar ratings being achieved” is not correct. The EHC Green Belt Review evaluates parcel 2, of which this site is part, as having “Paramount” importance not only to “check the unrestricted sprawl of large built up areas” but also to “assist in safeguarding the countryside from encroachment”. Only 12 of the 71 (17%) parcels evaluated have similar rating.
7. There are already concerns about the infrastructure, especially road transport, needed to meet SB’s own local plan. EHC themselves have highlighted the inadequate plans for infrastructure in their response to SB Draft Local Plan consultation. Similar concerns have also been raised by the Inspector who is examining SB’s plan. If allowed GP would exacerbate this problem. See Appendix 5.
8. The GP development will create urban run-off which will drain down the west bank aquifer of the Beane Valley, which is a fractured chalk structure offering little resistance, down to the river Beane. This could cause pollution in the river which will be very difficult to eradicate. There is a high profile and nationally supported project to try to restore this very rare river environment. As part of this, Affinity, the company responsible for water supply, has already reduced abstraction from the aquifer that feeds this river and is building a pipeline to provide an alternative source of water to Stevenage. A longer term part of the project has started to restore the habitat.  
   We do not believe this issue has been properly assessed by EHC despite their own concerns about it raised in their response to SB’s Local Plan consultation.
9. We do not think that this decision is “sustainable”. The ministerial foreword to NPPF says that “The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.” The need to achieve this balance appears throughout NPPF.   
     
   The decision to promote development in what is acknowledged to be a rare and treasured landscape and, thereby, to establish a precedent that will encourage future development not only here but in any other sensitive area, must surely not be “sustainable”.

**Appendix 1 Conflict with NPPF**

NPPF para 83 “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”Although that has been no clear definition of what constitutes “exceptional circumstances”we understand that housing need alone is unlikely to be sufficient reason and this is what the GP addresses.

Gresley Park will provide;

* Up to 600 new homes (including up to 240 affordable dwellings) – housing need alone
* A new Primary School site including Pre-school provision – only needed by GP. SB does not need it and have recently allowed a nearby site (Aston Vale) that was designated for a school to be used for housing
* Elderly care accommodation including a 60-bed care home and 25 ‘assisted living’ homes – presumably only needed by GP. Locating a facility here to serve EHC’s densely populated areas is not sensible, would be inconvenient to relatives and cause unnecessary traffic movements. SB does not need it
* A new local centre, including convenience retail, and a site for a community building and a new Primary Health Care Centre – only needed by GP. SB does not need it
* Provision for Travelling Showpeople - EHC’s claim that this is the only place where it can be located does not seem credible

SB does not need GP –they have already finalised their plan and it has no dependencies on the EHC plan. There is nothing shown in ED104 Memorandum of Understanding between SBC and East Hertfordshire District Council.

**Appendix 2 Choice of Site Unsound**

**Appeal Inspectors’ Judgements**

There have been three Appeal Inspectors’ judgements against development in this area – one specifically for this site and two others for other sites where the harm to the Beane Valley was a key factor.

**Chells Farm Appeal Inspector’s Report (APP/J1915/A/89/113465, APP/K1935/A/89/113377)**

The inspector rejected an appeal by the developers against EHC’s decision to refuse a planning application on this site for 700 houses. Although the circumstances at the time differ from those of today two very clear and still relevant points were made;  
  
In item 9 “Development on the scale envisaged would result in a large and prominent wedge of building spilling out from Stevenage and intruding into......the Green Belt to the detriment of its open character.”

In item 10 “Much of the proposed housing on this exposed valley side would be visible from a wide area including the village of Walkern; for I think it extremely unlikely that reinforced planting of the existing hedgerows would screen the whole site. ......the proposed development would impinge on the fine landscape of the valley and would mean the loss of an area of countryside that provides visual amenity and is in my opinion worthy of protection for its own sake.”

The inspector also noted in item 12 that the proposed development would have an undesirable impact on Gresley Way “...the stretch between Walkern Road and Six Hills Way has a poor safety record. The introduction of two further access points and, possibly, 3140 – 3770 car movements per day would mean more turning movements which are potentially hazardous.” These points are more relevant today than they were in 1989 – the speed limit has been increased from 30mph (item 5) to 40mph, car ownership has increased, the volume of cars on Gresley Way has increased and the Gresley Park proposal is for three not two access points.

**Application for Three Wind Turbines Appeal Inspector’s Report**

**Appeal Ref: APP/J1915/A/09/2104406**

**Land to the east of Walkern Road and north of High Elms Lane, Benington,**

**Hertfordshire (GR Easting 529526; Northing 221603)**

The appeal was against EHC’s decision to refuse planning permission for three wind turbines. The appeal was dismissed. The location for these proposed wind turbines is on the opposite side of the Beane Valley. The inspector’s report is quite complex but one element of it is consideration of the impact on the Middle Beane Valley (in which the Gresley Park site is located). Of course, the proposed development was for three large wind turbines but we contend that a housing mass of 600 dwellings (50% more than the current total number of dwellings in the whole of Aston parish) would have a much greater impact. The following extracts show the inspector’s assessments;

Item 35 “........ it is remarkable how well screened the large town of Stevenage is by landform and trees although it is only some 3 kms to the west. Together with the sharply defined boundary to the town, and absence of any significant urban fringe, this gives the rural area a seemingly remote and restful quality that belies its real proximity to an extensive urban area. In my view this is a valuable local characteristic that would be harmed by the scale, intrusion and motion of the turbines, a consideration that adds further to objections to them on visual and landscape character grounds.”

Item 37 “.......Furthermore, the harm to landscape character would be exacerbated by their extension of development into an area of sparsely developed landscape which has particular importance because of its proximity to, and contrast with, an extensive urban area.”

Item 113 “....If the turbines would cause significant harm to landscape character, as I believe is the case here..... In my opinion, overall the impacts here would be severe”

**Application for One Wind Turbines Appeal Inspector’s Report**

This similar to the above but the application that had been refused by EHC was for one smaller wind turbine located on land just outside the Green Belt boundary. The appeal was dismissed. As above the report considered impact on the landscape among a number of other considerations.

Item 31 “The turbine would become a defining element in the landscape at a distance of up to 1.5 km in LCAs 39, 70 and 71. The effect would not be uniform, but it would be a noticeable feature up to 3km in LCAs 38 and 40. It would appear subservient and of only moderate significance beyond this distance. There is little to indicate that the landscape has significantly changed in the last 30 years as the appellant suggests and the qualities of tranquillity and peacefulness, whilst they may well be compromised compared to the 18th century, are still important and valued characteristics that would be seriously eroded by this proposal.”

**EHC’s Own Assessments and Policies**

**Herts Green Belt Review (Final)**

(Our highlighting.)

The site is in Green Belt, classified by EHCs own independent consultants PBA as of “paramount importance” to;

Check the unrestricted sprawl of large built up areas

Assist in safeguarding the countryside from encroachment

It states that the overall suitability of land parcel 2 (where Gresley Park is proposed) as an area of search for development is “Very Low” and notes that:

The land creates a strong edge to the town (Stevenage), with land falling away eastward to the Beane valley. Green belt boundary adjoining the town well defined. Outer edge (outside the parcel) reasonably well defined along lanes but poor along field boundaries in some cases

Strong unspoilt landscape; well defined landscape structure of fields/vegetation pattern falling gently away from Stevenage. Little/no sense of encroachment due to a well contained urban edge and area being almost entirely free of development, very slight encroachment on the edge of Aston

**East Herts District Plan Strategy Supporting Document Chapter 4 Places 4.10.2.2**

“The Landscape Character Assessment (LCA) records that there is a remarkable sense of remoteness in this location despite proximity to Stevenage. The LCA notes that the area is characterised by strongly undulating slopes, and the landscape around Aston has an 'ancient' character. Recognising these qualities, the adjacent Chells Manor development in the 1980s followed the ridgeline, accompanied by planting of a new tree belt to screen development from the valley. lt is very difficult to see how similar landscaping work could mitigate the harm of further development, given that the character of the area relies on its openness: the Beane valley is nearly 3km across from the edge of Stevenage to Benington. New development would descend into the valley and severely erode the character of the area.”

**Essential Reference Paper ‘B’ East Herts Council’s Response to Stevenage Borough Council’s Local**

**Plan First Consultation, Summer 2013 items 1.2, 2.8, 2.9, 2.38, especially 2.39 and 2.40.**

2.39 “The East Herts Landscape Character Area Assessment refers to the area as having “a remote character despite proximity to Stevenage”. It also refers to the “network of narrow lanes which links Aston village and Aston End to the encroaching but largely concealed housing development on the edge of Stevenage”. These narrow tree-lined lanes immediately create the sense of a rural character and remoteness. “The overwhelming impressions here are of remoteness, tranquillity and continuity, a sense that nothing has changed much over the centuries. Within the area there are quite extensive views as there is little woodland and the topography is quite simple. This area is quite widely visible due to its sloping landform and elevated position. Despite the proximity of Stevenage to the west there is very little visual impact from the town.” Development which extends up this valley side would breach the clear boundary formed by Gresley Way, would be very visible and would encroach into the remote landscape and the narrow gap separating Aston and its villages from the urban edge of Stevenage.”

2.40” In terms of the Green Belt purpose of protecting the countryside from encroachment, the majority of Green Belt Reviews take into account the rarity and environmental value of the countryside in question. There doesn’t appear to have been this type of assessment. The Beane Valley is nationally recognised as being of particular importance as a chalk stream under considerable threat from the existing abstraction patterns related to the very presence of

Stevenage. The river runs dry too often placing the entire river ecology in danger. Not only is the growth of Stevenage likely to increase this pressure on the River Beane, but to exacerbate this with physical development in closer proximity to the Beane Valley would further harm the environment of the river. The Stevenage Green Belt Review states that this area forms a transition zone between Stevenage and the wider countryside of the Beane Valley. Development here would shift this transition zone further into the valley itself causing considerable visual and environmental harm.

The need for housing growth would not significantly and demonstrably outweigh the adverse impacts of development in this location. As such, East Herts Council disputes the evaluation of this

area of Green Belt to the east of Stevenage and would urge Stevenage Council to consider the suitability of other Green Belt locations before land to the east of the town”

**EHC’s Description of Topology is Inaccurate**

**Observations on Gresley Park Topography and Layout**

**Topology**

**1. East Herts Council documents**

East Herts describe the Gresley Park topography as follows

* 1. **East Herts Council Local Plan, Chapter 12**

12.2.8. Character and design: The site is well screened from the wider landscape by the surrounding woodland belts and a ridgeline to the east of the site will shield the site from within and opposite the Beane Valley. The site’s gentle undulations and existing tree belts and hedgerows will help to define the character of areas within the site. Further planting to define open spaces and outer boundaries would be incorporated into the development.

* 1. **Settlement Appraisal: East of Stevenage Essential Reference Paper B**

4.2 Further consideration of the proposed site in relation to Green Belt purposes has been carried out by Officers as part of this appraisal. Whilst Gresley Way is a strong boundary, the structural planting carried out in the mid-1990s which sits along ridgelines has created a well-contained site with a relative sense of enclosure, distinct from the adjacent broad Beane Valley. The smaller parcel therefore has a more limited role in terms of preventing urban sprawl as there is a clearly defined outer edge to the site. The smaller parcel makes no contribution to preventing the merging of towns. There are two designated Rights of Way through the southern part of the smaller parcel, with access to the countryside to the east of the town prohibited by the road infrastructure of Gresley Way. Whilst the Beane Valley is a rare example of a chalk stream environment, the structural planting makes the site physically and visibly removed from the Beane Valley.

4.6 The commentary for parcel E4(i) states that the parcel is “characterised by large scale open fields which form 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.” Parcel E4(ii) has a similar role as E4(i) and “is characterised by a more enclosed landscape of small fields in largely pastoral use, contributing to a strong sense of visual containment.” The Stevenage Review recommended the release of parcel E4 (i) and the safeguarding of parcel E4 (ii) for future development for 770 and 400 dwellings respectively.

2. **Aston Parish Council Assessment**

1. The west of the site is bounded by Gresley Way which was constructed with a bund and tree planting in the 1980s and provides a substantial boundary between Stevenage and the Beane Valley. This boundary ensures that no part of Stevenage, in this locality, is visible from the Beane valley and has been successfully in place for nearly 40 years
2. A large part of the eastern boundary has substantial tree planting, up to five trees deep, which date from the late 1990s, and these trees have grown to 25-35 ft. high.
3. The south east and south of the site have much more limited single tree/hedge boundaries and, despite some attempts to create earth bunds, dwellings in Holders Lane, Aston End, are clearly visible through these hedges
4. This sites is not a plateau: it slopes from 115m at its highest point, adjacent to Gresley Way, to 95m at its lowest point, in the SE corner of the site, a total slope of 20m or 65ft, west to east
5. The land beyond the eastern tree line slopes slightly more, but it does not constitute a “ridge” as described in 12.2.8. The land is a dome-shaped with the peak around Gresley Way and a gently increasing slope downwards towards the Beane valley
6. As a result of the above analysis, Aston Parish Council challenges the descriptions of the topography of the site contained in the two East Herts documents referenced above. The site will not be “visually contained” and in particular we note that:
   1. The site is not a plateau, it has a 65ft slope, west – east, across the site
   2. There is not a ridge line on the eastern side tree boundary: the topography is dome – shaped with a slowly increasing slope as the land falls towards the river Beane
   3. The site is only partly screened by the more recently planted boundary tree-line. Standing on the higher part of the site, parts of Walkern, Benington, Datchworth and Aston End can plainly be seen with the naked eye, over the eastern boundary tree line, together with substantial parts of the Beane valley. In addition, on the southern part of the site, the eastern flank of the Beane Valley and dwellings in Aston End, off Holders Lane, can plainly be seen
   4. As a result many of the two story houses to be built on the site will be visible from the Beane Valley and parts of Walkern, Benington, Datchworth and Aston End

**Appendix 3 Breaches Existing GB Boundary**

GP will breach the carefully designed eastern boundary of Stevenage constructed in 1984, after changes in the boundaries passed a substantial amount of land from Aston to Stevenage. The boundary was set as the east side of Gresley Way and a large bund was constructed and trees planted on top to screen Stevenage from the Beane valley.

The boundaries of the GP site are not well defined and never could be unless they were subject to major building and earth movement. This is contrary to NPPF 85 “When defining boundaries, local planning authorities should.... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

**Appendix 4 Attempts To Separate Sites From Green Belt Are Contrary to EHC Policies**

The “strategic planting” which has taken place is a deliberate attempt to separate the site from the Beane Valley. EHC have not only accepted this but have also used it to try to justify the suitability of the site for development. This is contrary to its own policy. The East Herts Landscape Character Assessment shows the policy is to “improve and conserve” the area (39 The Middle Beane Valley) in which this site is located - “encourage the conservation of the existing settlement pattern and resist any extensive development which would significantly affect this”.

EHC decision would surely create a precedent that deliberately separating sites from sensitive areas by screening makes them suitable for development.

**Appendix 5 Infrastructure Plans Are Already Inadequate to Meet Stevenage Borough’s Needs Alone**

Although concerns have been raised about a number of aspects of infrastructure the following is solely about road traffic.

Traffic on A602 and at its junctions with other roads, the A1(M) in particular, is already a problem. The SB Local Plan does not include any well defined plans to improve the road system, particularly the A602 and its junctions with the A1(M). It is extremely unlikely that any of the needed improvements will be delivered in the next 5 years.

EHC is aware of this and raised concerns about this in its response to SB’s consultation which is also shownin ED04 Memorandum Under Duty To Cooperate Between East Herts Council and Stevenage Borough Council item 4 (vi) “a large number of projects identified in the Infrastructure Delivery Plan as being essential to the deliverability of the plan do not have sources of funding identified nor secured. Neither is the timing of the delivery of some of these projects known or costed”.

ED111 SBC replies to the Inspector’s Initial Questions - Provisional comments by the inspector of SB’s LP have also highlighted concerns about this. In their answer SB acknowledge the problem and say that they are applying for grants.

We believe that the modelling undertaken by Aecom of the impact of the development of Gresley Park (GP) is flawed and the traffic increase as a result of the development will be much larger than forecast, and consequently the impact on the Stevenage and East Herts local area will be more severe.