

## **ASTON PARISH COUNCIL**

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### **Re Response to East Herts Council (EHC) District Plan Pre-submission Consultation**

Dear Sirs,

I am writing to you on behalf of Aston Parish Council (APC) in response to the above consultation. We have already responded via the online portal, but we found the structure we had to follow to be constraining, so this letter puts our response in a logical format (viewed from our perspective) and includes general comments about the planning process, detailed comments on Chapter 12 (East of Stevenage) and supporting factual and detailed appendices

We have been actively involved in the EHC Planning Process over the last 5 or so years, have attended many meetings in Wallfields, and provided feedback when asked. However the very late decision to include the Gresley Park (GP) scheme, because of problems associated with the number of houses adjacent to the A414, is especially concerning. This is because it was done without prior consultation (it was presented as a given), and no alternatives to GP were offered, or apparently explored

During the whole of the planning process we have kept Aston parishioners informed, and have held frequent Parish Meetings, and provided regular updates in our Parish News, to keep residents up to date. We have also distributed a survey to all our household asking them how many of their householders (of voting age) supported or objected to the inclusion of GP in the District Plan (DP). We had an excellent response and 98% of the returned surveys objected to the inclusion of GP in the DP. The comments below therefore have the overwhelming support of the Parish

The general views expressed below, about use of Green Belt, about concentrating development around existing urban centres, and the need for New Towns, repeats comments made in our responses to EHC earlier consultations. We believe they are

at the heart of why Gresley Park was proposed so late in the planning process, and why EHC are proposing to use so much of the green belt

## **1. General Points**

### **a. Use of Green Belt**

We disagree with the proposal to use Green Belt land just to meet the housing target. Approximately half of the EHC housing in the DP is proposed to be on Green Belt land (6% of the Green Belt in East Herts), because most of the larger towns, mainly in the south of East Herts, are surrounded by green belt.

We believe that any plan which uses so much Green Belt cannot be sustainable; the reasons for Green Belt are no less valid today than when it was first established. If suitable alternative sites cannot be found then we believe that the housing target should be reduced to a level and time that can be met sustainably. The NPPF in section 14 says that local authorities should try to meet objectively assessed needs, unless this conflicts with specific policies, and Green Belt is one of those policies. We realise that there is ambiguity in the NPPF in relation to Green Belt but believe that the correct approach should be to consider Green Belt as sacrosanct until this ambiguity is completely resolved. We do understand the difficulties EHC face in trying to find a plan that accommodates all of the requirements, but we also believe that planners need to say when this is not possible. It does not require much imagination to see what would happen if the principle of use of Green Belt, solely to meet housing targets, becomes accepted. Any relaxation in standards, not only in those that apply to green space, but also in other areas like car parking space, leads to erosion in the quality of everyday life. This is clearly demonstrated in the suburbs of cities and large towns and this, of course, was why Green Belt was introduced.

### **b. Concentration of development around existing urban centres**

We believe that the strategy to continue to concentrate development around existing urban centres, where the infrastructure is already overloaded and there are no realistic plans to deal with the consequent problems, is misguided and short-termist. We understand that the housing requirement will not go away, unless there is a dramatic change in housing supply or population. But there has to be a better way than trying to cram more people into an already overloaded infrastructure. We believe the answer has to be New Towns

Whilst building round existing towns applies to most of the urban areas in East Herts, and to most aspects of infrastructure, we have used Stevenage and its transport problems as an example, as it is immediately adjacent to Aston and the proposed GP site. Stevenage is a major commuter town with large numbers of people travelling south by road and rail to North and Central London, north to N Herts and Cambridgeshire, and east to East Herts, Essex and the Eastern Corridor. This creates very heavy east-west and west-east traffic much of it carried by the A602 and Gresley Way.

The town is bordered on the west by the A1 (M) and most of the housing is to the

east and the north east of the town centre which makes the town very unbalanced: the proposed GP development will make this even more unbalanced.

## **2. Stevenage Road Infrastructure**

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. Any increase in housing in East Herts and its neighbouring districts is likely to add to this problem. In particular the 600 houses (or possibly more) that EHC propose 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 traffic problems has been proposed.

We have heard a lot about the problems of the A414, but the A602 (the other main east-west A road in Hertfordshire is also at full capacity, but it is not receiving the same attention and investment: it is not clear why. The Herts County Council Transport Vision 2050 contains no provisions for increasing private or public transport capacity of the A602 corridor to meet the quoted increase of 400,000 in population in Hertfordshire.

### **c. Creation of a Hertfordshire New Town**

Instead of ever increasing use of green belt, we believe that the focus should be to create new towns where housing, jobs and infrastructure can be properly integrated and the need to travel can be substantially reduced. Hertfordshire has taken exactly this route very successfully in the past with new towns such as Welwyn Garden City, Letchworth Garden City and Stevenage New Town. We are aware that Gilston is a move in this direction, but it will not deliver the required housing numbers in time to meet the five-year target.

The housing requirements of East Herts and its neighbouring authorities in this planning period total more than 85,000 or roughly the equivalent of a sizeable town (like Stevenage). We understand that this could probably not be done by a single local authority and will take time. When we proposed this in the past it was dismissed as too long term for a local plan, but eight years have passed since we first suggested the idea during your LDF consultation.

## **2. Specific Comments on East of Stevenage (Chapter 12)**

The following comments relate to East of Stevenage and Gresley Park. We believe your last minute decision to include this in your plan is short-termist and unjustified. We feel that you should have already considered options to deal with one of the biggest and well known risks to your plan, the capacity of the A414, and therefore avoided having to make this hasty decision.

- a. 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. This decision conflicts with the judgement of three Appeal Inspectors, with EHC's own policies and previous assessments, with SBCs previous assessments and with NPPF as outlined in the

following points.

- b. EHC has not defined the “exceptional circumstances” that are needed to remove the GP land from GB (a NPPF requirement). Whilst what “exceptional circumstances” are has not been defined in the Plan, we understand that housing need alone does not qualify. However, 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 SBC. See Appendix 1.
- c. Even if EHC could demonstrate “exceptional circumstances” the decision to choose this site is not sound because it will adversely impact on the precious Beane Valley. 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 SBC’s Green Belt Review as a source for detailed information about this site. However, in their response to SBC’s public consultation on their local plan, EHC were highly critical of this document and in particular of its evaluation of land to the east of Stevenage. Furthermore, EHC’s description of the topology of the site is entirely misleading (it is not a plateau, with a substantial ridge and well screened from the Beane Valley. The middle to upper parts of the houses to be built will be widely visible from the Beane Valley, and parts of Walkern, Benington, Datchworth and Aston End. Also Pigeon’s claim that the site can be easily connected to SBC’s footpath and cycle ways is not true. See Appendix 2.
- d. 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”
- e. 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 is particularly important to Aston and Aston End. If GP is approved it will be only a matter of time before there is more development east of Gresley Way, which will lead to the eventual envelopment of Aston End, and then Aston, and the transfer of both of these very old villages into Stevenage

- f. If allowed GP would breach the well planned and well-constructed existing Green Belt and Stevenage boundary at Gresley Way (with its bund and tree screening) and replace it with one that is not well defined, and never could be, unless it was subject to major building and earth movement. This would be contrary to NPPF para. 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.
- g. 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.
- h. We have seen no evidence that alternative comparable sites to GP were properly investigated. The Sustainability Appraisal evaluates 4 strategic options, but they all contain GP, so no alternative has been considered. 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. Aston has in the past transferred huge areas of land to Stevenage: enough is enough
- i. There are already concerns about the infrastructure, especially road transport, needed to meet SB’s own local plan. EHC themselves have highlighted these inadequate plans for infrastructure in their response to SBC’s 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.
- j. The proposed development 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

- k. 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 would 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.

- l. 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 areas, must surely not be "sustainable".

- m. 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

We have taken a close interest in the development of this new local plan since its earliest origins, have attended many meetings and given our views when asked. We have found the EHC personnel to be approachable, hardworking and conscientious. However, we believe that a plan that uses so much Green Belt is not sustainable, an approach that leads to cramming development into already overloaded infrastructure is misguided, that having no mitigation plans for one of the major risks (that the A414 would not have the capacity) is at the least surprising and that the decision to include the Gresley Park scheme so late in the planning process is ill

considered and wrong. Our confidence in EHC's judgement at this time has been severely damaged.

Yours Sincerely

B H Eccles

## **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 there 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 Show people - 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.

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 particular 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”.

## **Appendix 2 Choice of Site Unsound**

### **A: 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 Middle Beane Valley was a key factor.

#### **A(i) 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 the GP site for 700 houses. Although the circumstances at the time differ from those of today, two very clear and still relevant points were made, which are still valid;

*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.

**A (ii) 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 (both in day time, and night time). 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”*

### **A(iii) 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.”*

## **B: EHC’s Own Assessments and Policies**

### **B(i) 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 (which includes the site 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”*

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

#### **B(ii) 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. It 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.”*

#### **B(iii) 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”*

#### **B(iv) 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 below.

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.

## **C: EHC’s Description of Topology is Inaccurate**

### **1. East Herts Council documents**

East Herts describe the Gresley Park topography as follows

#### **a. 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.

#### **b. 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:
  - a. The site is not a plateau, it has a 65ft slope, west – east, across the site
  - b. 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

- c. 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
- d. 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

### **D: GP Is An Inappropriate Location To Meet EHC's Or SB's Needs**

The proposed 600 houses will not meet EHC demand, which is largely in the south and east of Hertfordshire, around the major Hertfordshire towns.

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. It is not clear as to who would pay for the school, community centre etc.

The site is also poorly placed to support the further expansion of Stevenage to the east as EHC said in its response to SB's Local Plan Public Consultation. It would make Stevenage even more unbalanced. 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.

### **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.”*

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.”*

#### **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 SBC 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 SBC's consultation which is also shown in **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 SBC'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.

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 further described below.

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-Wellcome, 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

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.