

## **Stevenage BC Core Strategy and Generic Development Control Policies – Preferred Options consultation September 2007**

### **Response by CPRE – The Hertfordshire Society**

#### **Section 1: Core Strategy Policies**

##### **Spatial Vision**

We SUPPORT the Spatial Vision for Stevenage set out by the Council in this document. In particular, we welcome the commitment to making Stevenage a balanced and more self-contained community with a full range of jobs, homes and services. We believe that there is considerable need and scope for regenerating parts of the Borough – not only the town centre and older neighbourhood centres, but also some of the original New Town housing areas that were built at relatively low densities. This ties in with the intention that development in the town should make good use of land and reduce travelling distances.

##### **Strategic Objectives**

Generally, we agree with the aspirations set out in the policies in this section. However, there is a lack of detail or evidence that some of the ‘noble’ aspirations are achievable and, consequently, whether some of the policies in the Strategy are truly sustainable.

For example *Policy SO9 Transport and Utilities* and *Policy CS23 Utilities, Sewerage and Flood Prevention* are not very convincing that the necessary investment is going to be made in transport, water and sewerage facilities to support the massive scale of development proposed for Stevenage and the area of North Hertfordshire earmarked for the expansion of Stevenage.

##### **Sustainability and Quality of Life**

*Policy CS1 Sustainability and Quality of Life*: Generally, we support this policy, subject to the following comments on the bullet points:

- the fourth one: insert “*more*” in front of “*energy efficient*”;
- the sixth one: “*reduce ...more water and waste*” does not quite make sense;
- the seventh one: “*avoid all forms of pollution ...*” is not wholly realistic;
- the tenth one: insert “*valued aspects of*” before “*the built environment*”.

We support the aspirations in *Policy CS2 Balance and Self-containment*.

##### **Housing**

We recognise that because of the current proposals contained in the draft East of England Plan, there is pressure for a review of the Green Belt boundaries to the West and North of Stevenage and, given that the land in question is in North Hertfordshire, the mechanism for addressing this is through the Stevenage and North Hertfordshire Action Plan. We will respond to the consultation on that Action Plan in due course.

However, we believe that, in line with national policy, it is incumbent on both Stevenage and North Hertfordshire to reduce the impact of new development on the countryside and Green Belt by maximising the use of brownfield land and reviewing existing housing densities. Consequently, we do not support the presumption in the Core Strategy that built densities in Stevenage should not increase above current levels and that brownfield targets should be reduced.

***Policy CS6 Brownfield Target***

We do not believe that a perceived lack of brownfield land should result in reducing the target from 60% to 40%. Given that the strategy runs until 2021 and that unforeseen previously-developed sites are always coming available, we consider that the target should be maintained at a high level to encourage maximum use of brownfield land. We do not agree with that the statement made in paragraph 10.48 that the development of brownfield land necessarily leads to “extremely high densities” or places “excessive pressure on local services”. All of the first generation New Towns were built to relatively low densities and others are achieving the national brownfield targets.

We ask the Council to CHANGE Policy CS6 to set a brownfield target of 60%.

***Policy CS5 House Types***

We support the proposal for 40% of new houses to be affordable and the expansion of that proposal to reflect a multiple threshold approach in Policy DC10. However, we have reservations about the proviso contained in CS5 that the Council’s “... desired approach is for the same target to apply to new neighbourhoods in North Hertfordshire.” If the same targets do not apply, we anticipate that two different policies being applied to development in different parts of the same town will be exploited by developers to the detriment of those in housing need. We trust that this will be addressed in the Stevenage and North Hertfordshire Action Plan.

***Policies CS12 Green Links and CS13 Forster Country Park***

We SUPPORT the provisions in Policies CS12 and CS13 and look forward to seeing more detailed proposals to bring these into effect.

However, we would add the proviso that care must be taken to ensure that these initiatives do not lead to increased pressure for development in the Green Belt. It is not acceptable to trade off increased open space within the urban area with reductions in the countryside.

***Policy CS14 Green Belt Review***

Paragraph 13.2 recognises that the Green Belt around Stevenage prevents sprawl and maintains the openness of surrounding countryside and paragraph 13.41 acknowledges the purposes of the Green Belt as set out in PPG2. We set great store by this and expect to comment in more detail when changes to the Green Belt are proposed in forthcoming DPD and AAP documents.

***Policy CS24 Local Delivery Vehicle***

We are disturbed by the Council's comments regarding a Local Delivery Vehicle. Since 1948 the development of Stevenage has been undertaken by a number of different Delivery Vehicles including the Development Corporation, the CNT and Stevenage Borough Council as Local Planning Authority. Another, which best fits changing circumstances, is pragmatic, but also nothing new. What concerns us is the implied reduction in democratic accountability through the transferring of development control powers from elected local government to a partially private sector partnership and the statements made by the Council in paragraphs 10.16 and 17.9 that a new Local Delivery Vehicle is needed to stifle contrary views on how Stevenage should develop and specifically exclude North Hertfordshire and Hertfordshire County Council because they "...both oppose the expansion of Stevenage." As a concept, this is undemocratic and the wording inappropriate in a Core Strategy document.

**Section 2: Generic Development Control Policies**

***Affordable/Social Housing Thresholds***

We welcome the intention to increase the affordable housing targets and lower the thresholds that trigger the provision of affordable housing.

***Policy DC12 Housing Density***

We consider that there is considerable scope for building new housing and regenerating existing areas in Stevenage at much higher than historic levels. Paragraph 18.64 of the document acknowledges that Stevenage New Town was built at relatively low densities and there is a significant amount of space which is not used efficiently.

PPS3 calls for a minimum overall density of 30 dwellings per hectare and indicates that there should be a range of densities across a plan area. Given the relatively low existing densities and that the Council anticipates lower densities being allowed in more 'exclusive' neighbourhoods, we consider that a range of higher densities should be set for some parts of the town and for some of the new housing areas.