



Campaign to Protect
Rural England

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CPRE – The Hertfordshire Society
Response to Secretary of State’s Proposed Changes to the East of England Plan

Replacement Policy SS3: Key Centres for Development and Change

Object.

Hatfield and Welwyn GC has been added to the list of Key Centres in Policy SS3, but was not included in the list in Draft RSS Policy SS2. We object to this for the reasons given in our objection to Policy LA3.

There is a major infrastructure deficit in Welwyn Hatfield District which cannot be addressed without massive investment that has consistently been refused by the responsible authorities. While the running of the A1(M) motorway and the East Coast Mainline railway through Welwyn Hatfield suggests that the area is well connected to the strategic transport network, there are crippling bottlenecks on these routes that offset this apparent advantage. Without the necessary capital investment, the proposed designation of the area as a Key Centre for Development and Change is unsustainable.

Suggested modification: Delete Hatfield and Welwyn GC from Policy SS3.

Policy SS7: Green Belt

Object.

This policy calls for strategic reviews of Green Belt boundaries in five main areas, all of which are in the London Arc and the Stevenage/North Hertfordshire area just to the north of the London Arc. These reviews are said to be needed to meet regional development needs at the most sustainable locations. We question whether these are really “needs” or whether they are actually “demand”, and we certainly do not accept that the locations identified are “the most sustainable”.

Throughout this document, the term “sustainable” appears to be being used to mean economic and social sustainability. Insufficient regard is being paid to environmental sustainability.

Paragraph 3.30 states that these reviews will result in significant change locally, but can be made without eroding the principles and overall functioning of the Green Belt. We do not agree. The cumulative effect of the reviews across the southern part of the Region, to meet the development proposals set out in Policies LA1, LA2, LA3, LA4, HA1 and SV1, will have a massive impact on the character and quality of life of those areas and will significantly compromise the purpose and functions of this large segment of the Metropolitan Green Belt.

The strategy now proposed will have the effect of simply ‘moving the Green Belt further out’. The compensating strategic extensions to the Green Belt in North Hertfordshire and East Hertfordshire, while they may increase the overall area of the Green Belt in the Region in quantitative terms, will not compensate for the loss of Green Belt in qualitative terms. The present location of the Metropolitan Green Belt is crucial to its primary function of separating important existing settlements.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Policy H1 Regional Housing Provision 2001 to 2021

Object.

The requirement for at least 508,000 dwellings to be built in the Region during the Plan period is an increase of 30,000 (6.3%) over the provision in Draft RSS. The Proposed Changes (paragraph 5.5) emphasise that this should be regarded as a minimum pending a review of the RSS because the figure of 508,000 falls significantly short of what is needed based on the evidence about housing pressure, affordability and household projections. The text goes on to add the rider that the Policy H1 provision should be delivered without breaching environmental limits or infrastructure constraints, but in fact insufficient regard has been paid to these factors in arriving at the requirement of 508,000. The original Sustainability Appraisal (SA) of the Draft RSS (page 61) concluded that: *“The rate and intensity of economic, housing and infrastructure growth envisaged for the region, especially its southern parts is intrinsically damaging to many aspects of the environment and quality of life”*. This was referring to the Draft plan allocation of 478,000 dwellings; the 508,000 requirement will be even more damaging in terms of the environment and quality of life.

Moreover, at the district level, some of the allocations now proposed cannot be achieved without significantly breaching environmental limits and infrastructure constraints. In this respect, Dacorum, Welwyn Hatfield and all the other authorities in the London Arc are particularly hard hit, as the following figures show:

District	Draft RSS	P'd Changes	Difference	% increase
Dacorum	6,300	12,000	5,700	91%
Welwyn Hatfield	5,800	10,000	4,200	72%
Hertsmere	4,200	5,000	800	19%
Watford	4,600	5,200	600	13%
Three Rivers	3,600	4,000	400	11%
Broxbourne	5,100	5,600	500	9.8%

Note: The figures for Dacorum and Welwyn Hatfield include dwellings that will have to be provided in the adjacent St Albans district.

The Levett-Therivel Report, January 2007 (*Review of the Sustainability Appraisal/ Strategic Environmental Assessment of the Proposed Changes to the Draft East of England Plan*) paragraphs 4.14 - 4.28 is quite scathing about the impact of the scale of development proposed for Dacorum and Welwyn Hatfield on the infrastructure and environmental sustainability of these areas. Paragraph 4.25 states: *“... it is not at all clear how such development could be implemented sustainably given the already existing pressure on water resources, traffic congestion, and fundamental changes in landscape character recorded in the original SA, and implicitly supported by the new SA”*. In our view, the Secretary of State has not given sufficient weight to these considerations in arriving at her Proposed Changes.

Suggested modification: Reduce the Dwelling Provision figures for the Hertfordshire districts, in particular Dacorum, Welwyn Hatfield and Stevenage, to a level which does not require major incursions into the Green Belt.

Policy T10: Strategic Freight Movement

Object.

The second bullet point states that provision will be made for at least one strategic rail freight interchange in the region, at a location with good access to the strategic rail routes and the strategic highway network.

This is fine as far as it goes, but no reference is made to the need for green belt, environmental, highways impacts, etc considerations to be taken into account in determining applications for SRFIs. We consider that the policy

should be balanced so that it gives due weight to all the important material considerations that should apply in principle to SRFIs.

Suggested modification: Add the following wording to Policy T10, second bullet point, after "... strategic highway network": "*subject to environmental, green belt, highways impact and other material considerations that apply*".

Chapter 8. Environment

Principles for the management of the East of England's natural, built and historic environment

Object.

We continue to object to the wording of second bullet point: protection and enhancement of nationally and internationally designated areas is a statutory obligation and should not be qualified by 'while meeting social and economic needs'.

Policy ENV1: Green Infrastructure

This remains a very confusing policy in which the concept of 'green infrastructure' is not clearly defined and its scale and scope is expressed in contradictory terms. In the first bullet point of the policy the regional extent of green infrastructure is confirmed, while in paragraph 8.4 it is described as 'a sub-regional network'.

We support the third bullet point which emphasises the economic and social benefits of green infrastructure in addition to environmental benefits.

We regret the continuing omission of a link to Policy ENV3 to ensure that the potential for green infrastructure to contribute to the enhancement of biodiversity is recognised.

We continue to believe that it is unnecessary to list specific and major areas of green infrastructure because this is contrary to the emphasis elsewhere in this policy that all scales of green infrastructure across the region are significant.

Suggested modification: Under "Local development documents should:" add a new bullet point: *Ensure that all green infrastructure fully meets its potential to contribute to the enhancement of biodiversity.*

Policy ENV2: Landscape Conservation

In the first paragraph, the priorities in the Broads should include wildlife conservation.

In the second paragraph, the hierarchical relationship between Countryside Character Areas and Landscape Character Assessments should be explained.

The second and third bullet points are not compatible: if all development conforms with landscape character protection policies, mitigation will not be necessary.

In the final sentence of paragraph 8.10, it should be stated that the adoption of policies based on Landscape Character Assessments at district and unitary authority level is mandatory.

Suggested modification: First paragraph: in the sentence beginning “Within the Broads ...” after “natural beauty” add *and biodiversity*.

In the first bullet point: delete “developing area-wide strategies” and replace it with *designating for each Countryside Character Area in their area a further subdivision into Landscape Character Areas*.

In paragraph 8.10 change “Many local authorities have also published” to *Local authorities should publish*.

Policy ENV3: Biodiversity and Earth Heritage

Object.

In the third bullet point, the emphasis on areas in excess of 200ha is unfortunate because this suggests that areas below this size are of lesser value, despite the statements in ENV1.

Suggested modification: Delete from third bullet point: “... in particular large-scale (greater than 200ha) habitat restoration areas which will deliver human and wildlife benefit”.

Amend the wording of the sixth bullet point to read: *ensuring that all networks of green infrastructure identified under policy ENV1 are designed and managed to maximise their potential for wildlife conservation*.

Chapter 9: Carbon Dioxide Emissions and Renewable Energy

This chapter would be more appropriately titled *Greenhouse Gas Emissions, Energy Conservation and Renewable Energy*. Carbon dioxide is not the only greenhouse gas capable of being controlled. Methane, for example, is 20 times more powerful than carbon dioxide as a greenhouse gas and is produced when organic waste decomposes anaerobically, as happens in many landfill sites and domestic compost heaps.

Policy ENG2: Renewable Energy Targets

Paragraph 9.9 states that locational guidance on the siting of renewable energy installations will only be produced at the review of the RSS. This is unfortunate, as applications are being submitted now for such developments and their appraisal is difficult in the absence of regional locational strategy and guidance. This part of the review should be expedited as far as possible.

Chapter 10: Water

Policy WAT1: Water Efficiency

This policy assumes that the per capita consumption of water across the region will be reduced dramatically. In our view this is totally unrealistic, given that recent figures for household consumption in Hertfordshire are continuing to rise and have reached levels in excess of 150 litres/head/day. The target figure of 110 l/head/day represents a major shift in behaviour and the figure of 80 l/head/day ‘at level 5’ (whatever that means) is only a possibility in a very small percentage of houses.

Policy WAT2: Water Resource Development

In the first paragraph it should be stated that the EU Water Framework Directive will require all surface and ground water to be protected to agreed quality standards. This is in addition to the obligation to protect European and international sites of nature conservation importance.

Much of this policy and accompanying text contains as yet unquantified assumptions which are accompanied by terms such as “a degree of challenge” (paragraph 10.8), suggesting considerable doubt as to whether technically and/or logistically the necessary infrastructure improvements can be made.

Suggested modification: In the first paragraph, between “whilst” and “avoiding” insert *meeting agreed surface and ground water quality standards required under the Water Framework Directive and*.

In the second sentence of paragraph 10.9 change the words “may need to be phased” to *will need to be phased*.

Policy WAT3: Integrated Water Management

Object.

In our view, the significance of the EU Water Framework Directive is underestimated in this policy and accompanying text. The Directive has been in place since 2003, begins to be implemented from 2008 and by 2015 all water management must be fully compliant. The objectives of the Directive are to prevent, inter alia, over-abstraction of water and the deterioration of water status. This means that the ability of water companies to draw down aquifers and deplete surface water networks will be limited and the use of rivers as conduits for both water transport and sewage treatment discharges will also be limited to agreed levels. Development decisions will be required to take into account specifically the impact of the proposals on water resources and proposals which may compromise agreed standards set within the new River Basin Management Plans will generally not be permitted.

Suggested modification: Replace existing Policy WAT3 with *Local planning authorities, the Environment Agency, the water industry and other partners should ensure that their plans, policies, programmes and proposals do not impair water quality standards established in the river basin management plans for their areas set up under the Water Framework Directive, and other water protection strategies and policies in their areas, and do not impact adversely on sites of European importance for wildlife.*

Chapter 11: Waste

Policy WM1: Waste Management Objectives

Object.

We consider that the reference in bullet point 5 to “defining green belt boundaries” in order to accommodate waste management facilities is unnecessary and inappropriate. To single out the green belt in this context implies that locations in the green belt might be among the most suitable for waste management facilities, when in fact there is a host of operational and planning policy considerations to be taken into account in any particular case. In our view, this undue emphasis on the green belt gives a green light to operators who are looking for the easiest and cheapest solution.

Suggested modification: Delete the words “and defining green belt boundaries” from Policy WM1 bullet point 5.

Chapter 13 Sub-Areas and Key Centres for Development and Change

Policy LA1: London Arc

Object

The definition of the London Arc given in para 13.41 of the proposed supporting text should be extended to include the southern part of East Hertfordshire District (in particular the towns of Hertford and Ware, which are closely linked to the rest of the Arc by the main lines of communication). We accept that Chelmsford, Harlow and Stevenage should be excluded from the Arc.

We support the policies of Green Belt restraint and urban regeneration in Policy LA1(1). However, the major exceptions to this approach, at Hemel Hempstead, Welwyn Garden City and Hatfield, directly conflict with the policy of Green Belt restraint. The proposed expansion of these New Towns by up to 10,000 additional dwellings into the surrounding Green Belt will have a massive impact on the character and openness of the central section of the London Arc and will encourage coalescence in this area.

The call in Policy LA1(1) for more positive 'green infrastructure' use of neglected areas in accordance with Green Belt purposes is not understood. We reject the inference that some parts of the Green Belt, particularly on the urban fringe, are neglected and in need of some kind of improvement or 'green' use if they are to be retained as Green Belt. The reasons for including land in the Green Belt are neither aesthetic nor environmental and do not depend on its visual or amenity quality.

Suggested modification: Remove section (2), the exceptions, from Policy LA1. Delete supporting paragraph 13.45.

New Policy LA2 Hemel Hempstead Key Centre for Development and Change

Object.

The proposed overall housing growth of 12,000 at Hemel Hempstead and elsewhere in Dacorum by 2021 is an increase of 5,700 (91%) on the Draft RSS figure. Dacorum Borough Council considers that about 7,000 dwellings could be accommodated in existing urban areas plus some identified greenfield sites. The additional 5,000 will therefore have to be provided mainly on Green Belt land, since all the non-urban land in the District is designated either Green Belt (including the area around and beyond Hemel Hempstead) or Rural Area (where similar restrictive policies apply). Much of the northern part of the District forms part of the Chilterns AONB.

Providing a "significant proportion" (Panel Report para 5.128) of the additional 5,700 dwellings allocated to Dacorum in the Green Belt in St Albans District (which runs right up to the built-up edge of Hemel Hempstead) will significantly reduce the strategic gap between Hemel Hempstead and St. Albans and between Hemel Hempstead and the Green Belt settlement of Redbourn. This is a blatant breach of the fundamental purposes of including land in Green Belts, and cannot be compensated for anywhere else in south west Hertfordshire because the whole of the non-urban area is already designated as Green Belt.

The reference to "sustainable" urban extensions is all very well, but growth on the eastern side of Hemel Hempstead is distant from the town centre and from the railway station which is 6.5 kilometres away on the opposite side of town. The proposed urban extensions will not be truly sustainable, and will add significantly to traffic congestion in the area. Extension of Hemel Hempstead up to the M1 will encourage more car-borne commuting via the M1/M25 by the people who will move into the area to occupy a significant proportion of the new homes built. There will be pressure for improvements to the minor roads running under the M1 and to local feeder roads providing access to junctions 8 and 9 of the motorway.

It is beyond belief that major expansion of the area surrounding Buncefield oil depot is being promoted when the inquiry into the Buncefield disaster has not been completed and the results assessed.

Suggested modification: Reduce the overall housing growth figure of 12,000 for Dacorum to 7,000. Remove the reference to Hemel Hempstead having to extend into St Albans District.

New Policy LA3: Welwyn Garden City and Hatfield Key Centres for Development and Change

Object.

We do not agree that the Welwyn Garden City – Hatfield area is suitable for designation as a Key Centre.

As already identified in the Panel Report, the Area of Special Restraint to the north of Welwyn Garden City has already been factored into the proposals and removed from the Green Belt. The Green Belt between Welwyn Garden City and Hatfield cannot be developed as it constitutes the flood plain of the River Lee and contains major service infrastructure in the form of the natural gas pipelines serving London. That leaves the only possibility of expansion to the west and south of Hatfield, both areas currently within the Green Belt. To the west, the distance between the Ellenbrook area of Hatfield and the Smallford area of St Albans is less than 1 kilometre. To the south, the distance between Hatfield and Welham Green is just over 1 kilometre. In neither case could development of the magnitude envisaged take place without resulting in coalescence, which is totally contrary to the principles and overall function of the Green Belt.

EERA identified that in this part of the Region there is a major infrastructure deficit and that major investment was required to achieve a sustainable transport network. That has been ignored by the Secretary of State, and while accepting the Panel's premise that the first generation New Towns such as Hatfield and Welwyn Garden City have performed well as nodes for economic development, we cannot agree that they are "well placed on strategic communication routes". The A1(M) to the north of Welwyn Garden City and to the south of Hatfield reduces to two lanes. This already causes considerable congestion to the motorway and the roads serving it through much of the day. Motorised traffic is frequently brought to a standstill at peak periods. Without considerable upgrading of the existing road network, that position will be seriously exacerbated by development of the scale envisaged.

Similarly, rail traffic is constrained by the limited capacity of the Digsweil Viaduct and can be improved only by either widening the existing viaduct, building a second viaduct or developing a supplementary rail route from Stevenage, via Cuffley, to Finsbury Park.

The original Transport Investment Policies T15 and T17 included no proposals to address either of these issues, and the substitutions made by the Panel and the Secretary of State do not include anything either. Without work to address these infrastructure issues, the housing proposals are simply unsustainable.

Suggested modification: Remove the designation Key Centre for Development and Change from Welwyn Garden City and Hatfield. Reduce Welwyn Hatfield's housing allocation to 5,800 as in the Draft RSS.

Policy LA4: Watford Key Centre for Development and Change

Object.

The scale of housing (5,200 dwellings) and employment growth allocated for Watford cannot be provided without going beyond the existing built-up area, which already extends beyond the Borough boundary, into the Metropolitan Green Belt in Hertsmere and Three Rivers districts. This implies significant expansion of the

settlements of Bushey, North Bushey, South Oxhey/ Carpenders Park, Croxley Green and Abbots Langley, and their likely coalescence with Watford. This is contrary to the principles and overall function of the Green Belt. The new Greater Watford will effectively join onto the London conurbation, since at present only a very narrow and fragmented strip of Green Belt separates it from north west London.

Policy HA1: Harlow Key Centre for Development and Change

Object.

The proposal in new Policy HA1 for a development to the north of Harlow (in East Hertfordshire district) *“of at least 10,000 dwellings and possibly significantly more [up to 2031] - of a large enough scale to be a model of sustainable development”* is effectively a call for a large new settlement in the Green Belt. (The Panel Report, paragraph 7.32 defines 10,000 dwellings as a large new settlement and 25,000 or more dwellings as a new town.) This development is being promoted as an urban extension of Harlow intended to assist the regeneration and redevelopment of the existing town, but in fact it will function as a separate entity from Harlow, being physically cut off from the town by the barrier of the River Stort flood plain which cannot be built on or easily bridged. The suggestion in HA1(4) that the Stort Valley presents an opportunity to provide ‘green infrastructure’ within the urban extensions glosses over the fact that the Stort valley will divide rather than unify the existing town and a large new settlement to the north.

It is clear from the Panel Report that they understood that a major urban extension to the north of Harlow would not achieve the desired objectives: they say in paragraph 5.86 *“... there is in our view a need for the growth to be of such a form, and carried out in such a way, as to ensure that it is part of the town and does not acquire a separate identity and momentum which could undermine the progress of the town itself”* and in paragraph 5.94 *“... there remain questions about whether the dynamism of relatively self-contained development [north of Harlow] could be made to support the functioning and regeneration of Harlow. The proposed strategy, in relying on “satellite” settlements rather than urban extensions integrated with the town, runs the risk that these will function as rival attractions in terms of the housing market and economic activity”*.

Yet the Secretary of State has chosen to ignore the advice of the Inspectors and has re-asserted the proposal for a major extension to the north of Harlow, increasing the housing requirement for Harlow from 8,000 in the Draft Plan to 16,000 in the Proposed Changes. In our view, it is perverse of the Secretary of State to have gone against the strong advice of the Panel in this way.

Policy HA1(3) seeks to offset the effects of the proposed urban extensions by requiring that the new Green Belt boundaries should be drawn so as to *“... maintain the integrity of the principles of the Gibberd Plan and landscape setting of Harlow and the physical and visual separation of the town from settlements to the west and north”*. This is a contradiction in terms with the requirement to provide 10,000 and more dwellings and strategic employment growth to the north of Harlow, which cannot be achieved without breaching those principles.

The area to the north of Harlow is a narrow strip of Green Belt originally intended to restrain inappropriate development around the villages of Eastwick, Gilston and High Wych. The area to the north of this strip of Green Belt is already designated Rural Area Beyond the Green Belt in the East Hertfordshire District Local Plan and is subject to policies of restraint similar to the Green Belt. The proposed compensating strategic extension to the Green Belt to the north of the new settlement will not therefore have a marked policy effect on the area and will not actually compensate in qualitative terms for the loss of the existing Green Belt.

Suggested modification: Remove the references to an urban extension in East Hertfordshire District and a review of the Green Belt to the north of Harlow. Reduce the housing allocation for Harlow accordingly.

Policy SV1: Stevenage Key Centre for Development and Change

Object.

Overall housing growth of 16,000 dwellings (with about 14,400 still to be built) will have a massive impact, not only on Stevenage itself, but on the Green Belt countryside to the west of Stevenage and between Stevenage and Hitchin and Letchworth/Baldock. The proposed provision of 9,600 of those dwellings outside the Borough boundary in North Hertfordshire District breaches the fundamental Green Belt principles of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment. Extension to the north threatens Forster country and an area of high quality landscape.

The replacement Policy SV1 refers to “sustainable urban extensions”, but this is a contradiction in terms, since the A1(M) motorway which currently tightly constrains Stevenage to the west will present a serious barrier between much of the potential extension area and the existing town. The proposed extensions will not be “sustainable” in their own right, and their contribution to the sustainability of Stevenage will be limited by the difficulties in passing under the A1(M) and providing adequate public transport between the new urban extensions and the town centre facilities and employment areas.

The prescribed continued growth of the Stevenage built-up area until at least 2031, if it is to be at the same rate as that proposed for the period 2001 – 2021, will mean at least another 8,000 dwellings on top of the growth already indicated. This will necessitate a further rolling back of the Green Belt around Stevenage. If this were to be to the east, it would cause Stevenage to ‘swallow up’ the village of Aston and encroach into the Beane valley, both of which consequences are unacceptable. If it were to be to the south, it would cause coalescence with the large village of Knebworth. Further extension of Stevenage to the west and north will not create “defensible” long-term boundaries because there are no obvious natural or man-made boundary features in the rolling countryside.

The proposed compensatory extension of the Green Belt in the gap between Stevenage and Luton will not actually fully compensate for the loss of Green Belt around Stevenage. That area is already designated as Rural Area Beyond the Green Belt in the North Hertfordshire District Local Plan, and as such it is subject to very restrictive planning policies. The proposed extension of Green Belt will therefore have little added value.

Suggested modification: Reduce the housing allocation of 16,000 for Stevenage to a level which does not require major incursions into the Green Belt in North Hertfordshire District. Remove the words “... *sustainable urban extensions will also be required to the west and north including at least 5,000 dwellings at Stevenage West*” from Policy SV1 (1). Remove the sentence “*The aim will be to bring forward development to the west and north together rather than sequentially, so as to facilitate a significant increase in housing delivery as soon as possible*” at the end of the policy. Remove the words “... *which allow scope for continued growth of the Stevenage built up area until at least 2031*” from the end of section (1).