

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

Q1. Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?

Effect of the legal challenge to the current Plan

In our view, it is premature and unreasonable to review the location of new housing and jobs from 2011 onwards (effectively reconsidering the second half of the existing Plan period) when decisions have not yet been taken about the appropriate level of housing growth and the need for a strategic review of green belt boundaries around Hemel Hempstead and Welwyn Garden City/Hatfield following the successful legal challenge to the current Plan. The result of the High Court decision is that the housing allocations for Dacorum and Welwyn Hatfield and the likely need to meet part of those allocations by expansion into St Albans District have been struck from the Plan and are to be re-determined.

Obviously, some housing allocation will be made for Dacorum and Welwyn Hatfield for the period 2011 – 2031. This is likely to be at least the 6,300 and 5,800 dwellings respectively proposed in EERA's Draft Plan (2004), and could be as high as the 12,000 and 10,000 respectively sought by the Secretary of State. Until the necessary work in accordance with Article 5.1 and Regulation 12(2) has been carried out, no-one knows. Yet this Review is proposing allocations of between 6,080 and 12,300 dwellings to Dacorum and between 4,780 and 13,000 dwellings to Welwyn Hatfield (depending on which of the four presented scenarios is selected) for the period 2011 – 2031. In addition, it is being suggested that St Albans's allocation might be increased to 16,480 dwellings for that period.

We do not see how justifiable allocations to Dacorum, St Albans and Welwyn Hatfield can be made without knowing the results of the re-determination of the existing Plan. The conclusion we are led to is that, rather than 'repair' the existing Plan, the Secretary of State will impose unreasonably high growth levels on those three authorities under this Review in order to compensate for the 'loss' resulting from the High Court decision.

Other considerations

Even Scenario 1, which proposes the lowest rate of growth of the four scenarios, is excessive and undeliverable, in our view. This is basically a 'roll forward' of the current Plan rates and distribution of growth. Yet the existing planned rates are not being achieved, and are not likely to be for some time due to the recession.

Even though we are now eight years into the initial Plan period, there is still no clear indication of when and how the infrastructure needed to go with the planned rates of growth will be funded and provided. We cannot reasonably be expected to plan for even higher rates of growth without some definite answers on this.

The growth rates are based largely on economic forecasts and demographic trends. These are notoriously difficult to forecast and are subject to unforeseen changes, and can also be influenced by shifts in government policy. In our view, more account needs to be taken of the environmental and infrastructural capacity of the region in determining the most appropriate growth rate. This points to a lower growth rate than the 26,060 new homes per annum proposed in Scenario 1.

Q2. Do you have any comments on the four growth scenarios?

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

Scenarios 3 and 4 in particular will have a significant effect on the character and quality of life in Hertfordshire. We are told that the driving factor in Scenario 3 is not growth capacity but the economic potential to create more jobs, and that extra growth is distributed to those areas where there is forecast to be a demand for additional workers. This represents a ‘double whammy’ for Hertfordshire: more housing is needed to accommodate additional workers to fill existing job vacancies; and even more economic development is proposed because the area is economically buoyant.

This, together with the inevitable impact of these scenarios on the Green Belt referred to under Question 4 below, and the likely detrimental effects of the proposed growth rates on the environment, biodiversity and landscape character of the county, demonstrates that the Government gives economic growth and prosperity precedence over environmental and green belt policy considerations. This is a short-sighted and unsustainable approach, in our view, since it under-values the contribution that a healthy environment and accessibility to open countryside makes to the overall quality of life.

There are startling discrepancies in the residential growth allocations being given to the various local authorities in Hertfordshire under Scenarios 3 and 4 compared with Scenarios 1 and 2. This is shown most vividly in the tables in paragraph 3.4 of the Sub-area Profiles for London Arc East and London Arc West respectively. Under Scenario 3, the housing allocations for Dacorum, St Albans and Welwyn Hatfield districts would be more than double what they are under scenarios 1 and 2, and those for Broxbourne, East Hertfordshire, Hertsmere and Three Rivers would significantly increase. Those for North Hertfordshire, Stevenage and Watford, on the other hand, would remain the same or even decrease (under Scenario 4). How can these differences possibly be justified? The Three Rivers – Dacorum – St Albans – Hertsmere – Welwyn Hatfield – Broxbourne – East Hertfordshire belt (the “London Arc”) is precisely the area that is under the greatest pressure for development and suffers the most traffic congestion and environmental pollution overall.

Replacement of Milton Keynes & South Midlands Sub-Regional Strategy

Paragraph 2.4 of the consultation document states that the Revised Plan will formally replace the Milton Keynes South Midlands strategy within the East of England area and replace appropriate parts of that strategy within a new sub-regional section for the Luton, Central Bedfordshire and Bedford Borough area. Policy 2(a) of MKSMSRS, dealing with the Luton/Dunstable/Houghton Regis and Leighton Linlade growth area, provides for a review of green belt boundaries around Luton, Dunstable and Houghton Regis to focus on two areas of search, including one to the east and south east of Luton (popularly referred to as East of Luton). This area is mainly in North Hertfordshire District.

The Luton and South Bedfordshire Joint Committee charged with taking forward the relevant parts of the MKSM strategy through the local development framework process, produced a Core Strategy Preferred Options document in April 2009 which included an option to deliver 5,500 dwellings in an urban extension to the East of Luton. This proposal has provoked huge opposition from interested parties and the general public. Luton Borough Council has recently resolved to withdraw its support for the East of Luton option, in which case the Joint Committee may have to reconsider the preferred options in the Core Strategy.

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

The proposed East of Luton urban extension area is immediately adjacent to the Chilterns Area of Outstanding Natural Beauty and mainly comprises land of equivalent value to the AONB. The proposal is associated with a proposed Luton Northern Bypass which would cut through the AONB and a proposed Eastern Bypass for which no proper justification has been provided. It seems highly unlikely that sufficient public or private sector funding will be found for these projects.

In these circumstances, we consider that it would not be appropriate for the East of England Plan Review to carry forward automatically the provision in MKSMSRS for an urban extension of Luton into the Green belt in North Hertfordshire. Further careful consideration needs to be given to whether this is a suitable and sustainable option before the commitment is renewed.

Q4. Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?

Green Belt

The impact of the scenarios on the Green Belt is not discussed in the consultation document. Policy SS7 of the existing Plan calls for strategic reviews of green belt boundaries in four areas of Hertfordshire, and states that sufficient land should be identified to avoid the need for further review to meet the development needs before 2031. The policy also calls for compensating strategic extensions to the Green Belt in East Hertfordshire and North Hertfordshire respectively to be identified. This work has hardly got off the ground yet. The reviews concerning Hemel Hempstead and Welwyn/Hatfield have been put back as a result of the successful legal challenges to those proposals. Stevenage and North Hertfordshire Councils have got no further, publicly, than carrying out a Key Issues and Options consultation on their joint Stevenage and North Herts Action Plan (November 2007) which identified six huge Areas of Search for Housing Development in the Green Belt around the north and west of Stevenage. East Hertfordshire Council have not even produced any public proposals for accommodating the massive North of Harlow extension into the Green Belt.

Yet we are now being asked to contemplate even higher rates of housing and economic growth in Hertfordshire that will have the effect of pushing back green belt boundaries even further. This makes a mockery of the existing Plan Policy LA1 for the London Arc which puts the emphasis on retention of longstanding green belt restraint and urban regeneration, including the promotion of greater sustainability within the built-up areas.

The current Review needs to demonstrate that the impact of the new proposals on the Metropolitan Green Belt has been fully assessed, and that the damage that will inevitably be caused to the functions of the Green Belt in Hertfordshire is acknowledged. We do not believe that there is any justification for further green belt reviews at this stage. If there are to be such reviews, there needs to be some indication of where compensatory green belt might be provided, although we have little faith in the capability of new green belt to compensate adequately for the primary function of the Metropolitan Green Belt in checking the outward sprawl of Greater London.

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

Previously developed land

Policy SS2 of the Plan calls for priority to be given to the re-use of previously developed land in and around urban areas, with a target of 60% of new development to be on brownfield land. This is low compared with recent historical performance. The consultation document (paragraph 4.18) suggests that there is a relatively limited stock of previously developed land. This is a misconception: newly redundant land and buildings are becoming available all the time. In our view, the opportunity should be taken in this Review to increase the target for the re-use of previously-developed land to 70% of new development.

This should be reinforced with a renewed commitment to ensuring that brownfield land is developed before greenfield. Given that this has to be reconciled with the requirement for an adequate supply of housing land to be available in accordance with PPS3, there needs to be some generic policy on phasing introduced to ensure that prime greenfield sites are not 'cherry picked' at the expense of brownfield sites.

Affordable housing

Policy H2 of the existing Plan sets a regional target of 35% of new housing development to be affordable. This means allowing developers to build two market houses for every affordable one. The Government appears to be wedded to a policy of relying on developers to fund a major share of affordable housing, yet this policy has failed in the past and seems likely to continue to fail in the future. The result will be that we are saddled with an unreasonably high level of provision for housing generally, in the simplistic belief that the more houses are built, the more affordable they will become. This is an incredibly optimistic view of the housing market that fails to take account of factors such as the availability of finance for buyers, the type of housing built and the 'rationing' of release of housing by developers.

The Government needs to find an acceptable and robust way of providing subsidised affordable housing to meet the undoubted need, without allowing all the market housing that is being proposed.

Landscape character

Although the only nationally protected landscape in Hertfordshire is a small part of the Chilterns AONB, much of the undeveloped area of the county is pleasant, rolling countryside deserving of greater protection as a spiritual, recreational and tourism asset. Policies ENV1 and ENV2 in the existing Plan call for the development of policies and strategies on Green Infrastructure and Landscape Conservation respectively, but this work is still in its early stages, and local areas that may justify some kind of increased protection and/or enhancement have not yet been identified. One possible area justifying designation is the Lilley Bottom valley to the east of Luton, between the A505 at Lilley and Breachwood Green, which shares many of the characteristics of the adjacent Chilterns AONB.

The growth scenarios in this Review, particularly Scenario 3, threaten these areas of relatively unprotected landscape character and tranquillity. If great care is not taken, new development will destroy some of the qualities that make this an attractive area in which to live in the first place.

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

Q7. Do you have any comments on the sub-area profiles?

As part of this Review, in September - October 2008, EERA invited developers and landowners to submit development proposals to help meet the growth needs of the Region to 2031. This 'call for proposals' was to take the form of new proposals for sustainable communities or urban extensions of between 2,000 and 10,000 dwellings. Paragraph 2.1.e of each of the London Arc East and London Arc West sub-area profiles states that this call was made to assist the testing of options for growth and does not confer any special status on the proposals or any guarantee that they will be allocated for housing or obtain planning permission. However, it is clear from the Call for Proposals Schedule that this exercise is intended to provide a robust evidence base and that the sites proposed should be capable of being delivered, in order to meet the statutory requirement for the Review Plan to be 'sound'.

Eighteen 'call for proposals' sites in Hertfordshire are listed in the two London Arc sub-area profiles. These add up to a minimum of 81,060 and a maximum total of 86,560 dwellings. This compares with a total of between 75,460 and 106,880 proposed in the consultation document.

We contend that the result of the 'call for proposals' exercise does not provide a robust evidence base for this Review. First of all, some of the proposals overlap, so the actual totals are somewhat lower than appears to be the case. Secondly, many of the sites put forward are undeliverable in the sense that they have already been considered and rejected by the local planning authority or there are insurmountable planning objections to them. The following comments on some of the proposals illustrate the point:

- North Harlow (sites CP49, CP54, CP68 and CP89). These overlap with each other to some extent and cover the area already accounted for (10,000 dwellings) under the existing Plan. Realisation of all these sites would take out most of the Green Belt between Stanstead Abbots/ Hoddesdon to the south west and High Wych/ Sawbridgeworth to the east, and would push development deep into the designated Rural Area to the north which we were led to believe from the existing Plan would be designated 'compensatory' Green Belt.
- Stevenage North (CP7 and CP26) and East (CP25). Stevenage and North Hertfordshire Councils have already identified (in their SNAP proposals) massive 'areas of search' around the north and west sides of Stevenage in response to the requirements of the current Plan. Sites CP7 and CP26 fall almost wholly within these areas of search. Site CP25 is effectively an extension of SNAP North East area of search around the east side of Stevenage. Expansion of Stevenage to the east was effectively ruled out by the SNAP consultation document. Site CP7 largely comprises the Forster Country area that Stevenage Borough Council proposes to safeguard from development by making it a country park.
- South West of Hitchin (CP16). This site is similar to the group of sites around the west and south of Hitchin proposed in the recent North Hertfordshire District Council Land Allocations Additional Suggested Sites consultation. If this and the other sites around Gosmore and St Ippolyts, together with parts of the SNAP North West and West areas of search, were to be allocated for development, there would be coalescence of the towns of Stevenage and Hitchin.

East of England Plan Review 20 2031- Consultation September 2009
Response by CPRE Hertfordshire

- Hatfield West (CP12). This site mainly comprises the former Hatfield Quarry. Immediately to its north is the Symonshyde Farm mineral extraction site which was granted planning permission in 2004 and is likely to be active for at least 14 years. Immediately to the east, between site CP12 and the built-up area of Hatfield, is the former British Aerospace site now owned by Arlington's which contains mineral reserves expected to take at least 10 years to extract. It is inconceivable that massive housing development on site CP12 would be permitted while these mineral extraction sites were still active. Moreover, development of this site together with other sites between St Albans and Hatfield that have been proposed in the two Councils' Core Strategy consultation documents would result in the coalescence of the two towns.
- Knebworth (CP75). These sites around the village of Knebworth are partly contiguous with and partly additional to the five sites promoted in the NHDC Land Allocations Additional Suggested Sites document. They would represent a massive expansion of Knebworth into the Green Belt, and site 1 and 5 which extend into Welwyn Hatfield District would cause coalescence with Woolmer Green.

The inevitable conclusion is that this premature review of the RSS is a 'top down' exercise being driven by central government, primarily on the basis of population and household formation projections and forecasts of economic growth which may or may not be highly optimistic. In order to try to justify housing targets that are being imposed from the top down, a bogus 'call for proposals' has been conducted that has produced the usual wish list from landowners and developers anxious to take advantage of the situation created by government.

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