

SNAP KEY ISSUES AND OPTIONS CONSULTATION DOCUMENT

RESPONSE BY CPRE - THE HERTFORDSHIRE SOCIETY

Q1 Do you agree that the boundary for SNAP is appropriate?

No, we consider that the boundary has been drawn too widely, taking into account the factors mentioned in this section and objectives set out elsewhere in this document. At the same time, we acknowledge that the SNAP boundary indicates an area of search rather than an area to be developed in its entirety.

Policy SV1 of the Secretary of State's Proposed Changes to the Regional Spatial Strategy for the East of England (East of England Plan) states that sustainable urban extensions will be required to the west and north of Stevenage, including at least 5,000 dwellings at Stevenage West. This will, of course, require the boundary of the Green Belt around Stevenage to be rolled back. PPG2 *Green Belts* sets out the purposes of Green Belts as being to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration. We expect these principles to be applied as rigorously as possible in planning for the expansion of Stevenage.

Paragraph 25 of the SNAP consultation document states that the location of existing villages around Stevenage was taken into account when drawing the SNAP boundary, and that a conscious decision was taken to exclude Little Wymondley and Graveley. Nevertheless, the proposed boundary touches Little Wymondley and Graveley at a point where the SNAP area is at its narrowest and where the existence of Junction 8 of the A1(M) motorway creates strong pressure for development. If development were to be permitted up to this boundary, it would effectively connect Little Wymondley and Graveley to Stevenage. The SNAP boundary should therefore be drawn back slightly from those two settlements.

Whether or not the SNAP boundary is drawn back in this area, it is imperative that the Green Belt separating Little Wymondley from Hitchin should be retained and that any possible expansion of Hitchin to the south east should be precluded for the foreseeable future. This issue is touched on in the recent NHDC LDF Core Strategy Preferred Options Paper but has not been completely discounted. We consider that the SNAP document should also address the issue, even though it is beyond the proposed SNAP boundary, since the proposals in the SNAP document have wider repercussions that need to be taken into account.

To the west of Stevenage, the B656 Codicote to Hitchin road has been used as the western boundary of the SNAP area. This implies that the land along the western side of the escarpment between Stevenage and the B656 is suitable for development. However, it has previously been established in principle, during consideration of the applications for either 3,600 or 5,000 dwellings at Stevenage West, that development beyond the escarpment would have a significant impact on the Landscape Conservation Area and

would be clearly visible from the Langley valley and in views from the opposite side of the valley (Planning Inspector's report dated 1 December 2004, paragraphs IC.39 – IC.45). This conclusion is supported by the statement in the SNAP document Summary of Sustainability Appraisal (page 71) that “a road connecting [from any new development west of the A1(M)] with the B656 may be quite visible running down the Langley valley and therefore may have an impact on the setting of the area”. If a road running into the Langley valley would be clearly visible, how much more obtrusive would urban development be?

In light of the above, we would urge that the SNAP boundary should be drawn so as to exclude the Langley valley and the more distant parts of the Almshoe valley.

To the south west of Stevenage, the SNAP area includes Newton Wood and Watery Grove, which are designated Sites of Special Scientific Interest (SSSIs) according to the North Hertfordshire District Local Plan (1996). These, together with the adjacent Site of Wildlife Value just south of Norton Green, should be excluded from the area to be considered for development.

To the north east of Stevenage, the SNAP boundary extends beyond Claypits Wood, through Warren Green, along Dane End Lane, to the north western edge of Box Wood. This is a large area that forms part of the Weston Park Landscape Character Area, an area of predominantly chalk plateau characterised by sporadic ancient deciduous woodlands and a network of winding lanes. We are concerned that the proposed expansion of Stevenage should not breach the line of the escarpment in this area and make any north eastwards extension of the built-up area clearly visible from the plateau. We would therefore like to see the SNAP boundary pulled back towards Stevenage, preferably on a line to the south of Claypits Wood, Tilekiln Farm, Longdell Wood and Newberry Grove.

Notwithstanding all of the above, we would be strongly opposed to any proposal that might arise to expand Stevenage to the south or east. We consider it critical that any possible coalescence of Knebworth with Stevenage should be avoided and that the integrity of the Middle Beane Valley Landscape Character Area should be protected.

Q2 Have we got the vision and objectives right?

We think the vision and objectives are about right, although statements such as “each neighbourhood will have a strong sense of community” are perhaps a touch aspirational. You cannot force communities to gel.

Q3 What features of the existing natural environment should be retained during and after the new growth takes place?

It is not possible to generalise. This is so closely linked with the features of individual locations that what is important in one location may not be so relevant in another.

Q4 Where should the new housing be located?

- (a) *West of A1(M) application site*
- (b) *North East Sector*
- (c) *North Sector*
- (d) *North West Sector*
- (e) *Western Sector*
- (f) *South West Sector*

We note from paragraph 43 that the Borough Council estimates that 2,300 dwellings could be provided on brownfield (previously-developed) land, but that further work is being done to assess the town's urban capacity. This issue is not presented in its own right in this document, but it is in the Stevenage Core Strategy and Generic Development Control Policies document (September 2007), where it states in paragraph 10.47 that another 2,500 homes (not 2,300) could be provided on brownfield land. Draft Policy CS6 in that document goes on to set a minimum target of 40% of new housing to be built on brownfield land.

As we said in our response to the Stevenage document, we do not agree that 40% is the best that can be achieved. The national target in PPS3 is a minimum of 60%, and this figure has been considerably exceeded in recent years. We do not see why Stevenage should be such an exception. The New Town was built at relatively low densities, as were all the first generation New Towns, yet others similar to Stevenage are achieving higher targets. In our view, if a concentrated effort were to be made to maximise the use of brownfield land and increase densities by regeneration within the existing urban area, many more than the estimated 6,400 new dwellings could be provided within the Borough. This means that fewer of the 16,000 requirement would have to be accommodated in urban extensions to the west and north.

The following comments on the specific areas of search for housing development shown on Map 2 are made in light of the above:

- a) We accept that the West of A1(M) application site is a fait accompli.
- b) As stated in our response to Q.1, we consider that the North East area should be pulled back to a line south of Claypits Wood, Tilekiln Farm, Longdell Wood and Newberry Grove.
- c) The North area should be drawn back slightly from Graveley and should exclude the area known as Forster Country.
- d) The North West area boundary should be pulled back slightly from Little Wymondley and development concentrated close to the motorway intersection.
- e) The West area should be reduced considerably to exclude the Langley valley and the SSSI/wildlife sites in the southern part.
- f) The South West area could provide an extension of the West of A1(M) application site, with the exclusion of the SSSI/wildlife site part.

Q5 Where should new employment sites be created?

- (a) *No new employment sites within the SNAP area. All new employment for Stevenage should be located within existing employment areas or in the town centre;*

- (b) *Adjacent to Junction 8 of the A1(M);*
- (c) *Adjacent to Junction 7 of the A1(M);*
- (d) *Within the application site west of the A1(M).*

We rank the options in the following order (most preferable first):

- 1 (a)
- 2 (b)
- 3 (d)
- 4 (c)

As indicated in the Summary of Sustainability Appraisal (page 70), options (b), (c) and (d) all have sustainability issues which make them unsuitable for employment development. We therefore favour concentrating employment in the existing employment areas, particularly Gunnells Wood and the Town Centre. These areas are currently offset to the west in relation to the existing urban area, but will be more centrally located if the proposed developments to the west and north go ahead.

Accepting that some brand new employment sites will still need to be created, we think that option (b), land adjacent to the A1(M) Junction 8, is the next preferable choice.

Q6 Should the release of employment land be phased?

Yes, employment land release should be phased. As stated in paragraph 51, it is difficult to predict total numbers of new jobs which will be created. Early release of land when there is no demand risks sterilisation.

Q7 Do you support the improvement of the A1(M) in response to planned growth for Stevenage and elsewhere?

Yes, we support the upgrade of the A1(M) by widening to three lanes each way between Junctions 6 and 8. If improvements are not made to reduce the current bottleneck, traffic will be forced on to rural roads.

Q8 Do you support a new northern distributor road?

No. Past experience has shown that there is then pressure to allow expansion of the towns up to the line of such roads, with the road subsequently put forward as an amended Green Belt boundary. (Bishops Stortford is a prime example.)

Q9 Do you support a road link between any new development to the west of Stevenage and the A602 Wymondley bypass?

No. This would act as a primary access route for Stevenage West, emphasising the A1(M) 'barrier' and reducing the potential for the new development to be fully integrated with the town.

Q10 Do you support new road links between any development to the west of Stevenage and the B656 Hitchin to Codicote road?

No. This would be visually intrusive in the Langley valley, would lead to rat-running (particularly in conjunction with any link to the A602) and increase congestion on the B656. The whole concept of Stevenage West is based on it looking towards Stevenage, so ‘back door’ access should not be provided.

- Q11 What should be the detailed boundaries for a new Forster Country Park?*
- (a) Part of the existing St Nicholas Conservation area immediately surrounding Rooks Nest Farm*
 - (b) The proposed new St Nicholas Conservation Area boundary*
 - (c) From Rooks Nest Farm in the east to the B197 in the west.*
 - (d) Other*

Option (d) Other – The boundary should be drawn to enclose the maximum area (i.e. all of options A, B and C).

- Q12 Where should new development be located during the decade 2021 – 2031?*
- (a) Mostly to the north of Stevenage*
 - (b) Mostly to the west of Stevenage*
 - (c) Equally spread between the west and the north*
 - (d) Elsewhere, for example to the east and/or south of Stevenage.*

This issue of Green Belt boundaries has been presented simply as “where in the Green Belt should we put all new development after 2021?”. We think the issue deserves much more detailed consideration than that. The criteria that the two local planning authorities propose to use to help determine what land should be released from the Green Belt should be set out in consultation documents. These criteria should be based on the purposes of including land in Green Belts given in PPG2.

If the reviews of brownfield land and densities are carried out as we suggest in response to Questions 4 and 30, it may not be necessary to plan for a further 7,000 or so new houses in the Green Belt in the period 2021-2031. The danger of ‘rolling back’ the Green Belt to that extent now is that developers will ‘cherry pick’ the sites that are most attractive to them rather than develop the more ‘difficult’ sites. There need to be firm phasing policies in place in development plans to avoid this, but we can find little evidence of intention to do this in this document.

PPS3 paragraph 55 gives some guidance on how housing land supply should be phased in 5-year periods for at least 15 years from the date of adoption of the plan. This involves showing the expected rate of housing delivery through a housing trajectory for the plan period. Hertsmere Borough Council’s Core Strategy Preferred Options DPD (November 2007) provides a good example of this. Their draft Policy CS3 sets out a phasing policy with the intention of preserving greenfield/Green Belt land as far as possible and

preventing over-development of housing ahead of required infrastructure and community facilities.

Q13 If SNAP contains a policy regulating the density of development in new neighbourhoods, what should it be?

- (a) The Government's minimum density of 30dph*
- (b) Promote a higher figure than 30 dph.*
- (c) Do not specify an average minimum density, leaving it to the development industry to build at the density it decides.*

All developments should be required to meet a minimum density of 30 dwellings per hectare. In some areas a higher density may be appropriate. We do not think it should be left to the development industry to decide.

Q14 Would you support building at densities higher than 30 dph in certain locations?

Yes, there should be a range of densities within each development, provided the minimum density is no lower than 30dph.

Q15 Please suggest a maximum density that you consider appropriate for new developments.

No maximum densities should be specified.

Q16 Which statement do you most agree with in relation to delivering a mix of housing?

- (a) The development industry should be allowed to determine the mix*
- (b) The Councils should set a policy which lists different house types and the proportions for each.*

Option (b). Councils should set a policy. The development industry will tend to follow an opportunist line, not address local need.

Q17 Should SNAP include a policy to redress the existing imbalance of homes in Stevenage? If so, which types of aspirational housing would you like to see provided in the SNAP area?

Yes, provided that such a policy is focussed on meeting local need and addressing affordable housing. We are not convinced by the 'aspirational housing' argument that building larger homes on substantial plots will attract employers to Stevenage. What is needed is affordable housing for the workforce, not executive housing for the management.

Q18 What design features and characteristics would you like to see in the new neighbourhoods?

[No CPRE response]

Q19 Are there any features or characteristics that you would not like included in developments in the new neighbourhoods?

[No CPRE response]

Q20 How should the edges of new development adjoining open countryside be designed?

- (a) Planting with occasional glimpses of built development*
- (b) Strong planting to completely screen the built development*
- (c) Large areas of built development clearly visible*
- (d) Other*

This depends very much on the local situation of each site, and the landscape characteristics of each location. In some places it may be appropriate to have occasional glimpses of development, in others full screening may be required. This question demonstrates a fundamental lack of understanding of the way ‘development’ operates in practice rather than theory.

Q21 How should new development relate to existing settlements?

- (a) Incorporate the existing settlement within the new development with no open space between*
- (b) Ensure that there is physical separation between the existing settlements and new development*
- (c) Allow well landscaped low density development up to the edges of the existing settlement as a transition between old and new*

Like Q.20, this demonstrates a lack of understanding of the on-site practicalities and the importance of local circumstances. In some locations it will be better to incorporate existing settlements into the new developments, in others to maintain a physical separation.

Q22 What percentage of affordable housing should the new housing developments within SNAP be required to provide?

- (1) A minimum of 40%*
- (2) A different affordable housing target*

We would be satisfied if a minimum of 40% affordable housing were to be achieved across the board. For this to happen, however, the two Councils need to address the question of site size thresholds. It is not acceptable for affordable housing targets to apply only to developments of 25 or more dwellings, as suggested in paragraph 85. PPS3 paragraph 29 specifies a national indicative minimum site size threshold of 15 dwellings, and indicates that LPAs can set lower minimum thresholds, where viable and practicable, including in rural areas. We consider that a site size threshold of 5 or, at most, 10 dwellings should be set.

Q23 How would you prefer to see the affordable housing developed in the new neighbourhoods?

- (a) Put all the affordable housing within a new neighbourhood in a single location*
- (b) Develop the affordable housing in small groups within the market housing*
- (c) Mix affordable housing in with the market housing so that they are fully integrated*

Option (c). Affordable housing should be fully integrated with market housing to encourage social cohesion and reduce the ‘ghettoisation’ of rented accommodation.

Q24 What open space character should be required in the SNAP area?

- (a) Maintain the open space character already established in Stevenage across the whole of the SNAP area*
- (b) Establish a different open space character for SNAP*

Neither. As mentioned in paragraph 40, a consistent approach to open space standards is desirable across the whole of the expanded town of Stevenage, including the SNAP area. However, we are not convinced that the existing Stevenage open space standards are appropriate. Consequently, we believe that revised open space standards should be developed for both the SNAP area and Stevenage, which is not an option included here.

Q25 Given the change in their role, what facilities do you think are now needed in neighbourhood centres?

[No CPRE response]

Q26 Should SNAP require the standards in the Code for Sustainable Homes or BREEAM to be met?

Yes. Higher energy requirements should be demanded of all new development.

Q27 Should the policies in SNAP aim to exceed the targets for use of renewable energy set out in the East of England Plan?

No, not at this stage. Renewable energy targets are still subject to debate. EERA have commissioned a study into the viability of renewables across the Region. To set higher, possibly unattainable targets at this stage would be premature.

Q28 Which of the following do you feel we should adopt to encourage people to use their cars less? (List of 14 options)

All of them. None of these options are mutually exclusive. All options to reduce car use should be exploited.

Q29 If additional Gypsy and Traveller sites need to be accommodated within the SNAP boundary, please rank the following options

- (a) Site ST1*
- (b) Site ST2*
- (c) Site NH36*
- (d) Site NH78*
- (e) An extension to the existing site at Dyes Lane*

We do not believe that any Green Belt site (including land that may be released from the Green Belt in the future) should be allocated for gypsy and traveller use.

Q30 Have any important issues not been included in this document?

There is a fundamental need for the objectives and policies in the SNAP document to ‘read across’ with the objectives and policies in the Stevenage Core Strategy and Generic Development Control Policies and North Hertfordshire Core Strategy documents respectively. In this respect, it should be recognised that a slight shift in emphasis or in outcome of some policies in one document can have an effect on policies and objectives in the others.

We believe that if Stevenage Borough Council were to carry out a rigorous analysis of the scope, over the period to 2021 and beyond, for increasing the density of development within the existing town and making more efficient use of previously-developed land, it would not be necessary for so much greenfield/Green Belt land to be considered for development. We have made detailed comments on these issues in our response to the Stevenage Preferred Options consultation document, but it remains to be seen whether any notice is taken.

At the very least, there should be provision in all these documents for phasing development and for regular monitoring and review of delivery performance, in accordance with the requirements of PPS3. This is the essence of ‘plan, monitor and manage’ rather than ‘predict and provide’. We would expect the SNAP Preferred Options document to address these issues.

CPRE – The Hertfordshire Society
Welwyn
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