

NHDC Core Strategy Preferred Options consultation September 2007

Comments by CPRE – The Hertfordshire Society

Spatial Strategy (paras 2.16 - 2.20)

Generally, we accept the broad strategy set out in this section, with the following reservations.

The settlement hierarchy table states "development allowed" for Knebworth, Codicote, Ashwell and the identified villages. This should be qualified as "limited development allowed within village boundary", for the reasons we give in the *Knebworth, Great Ashby and rural area adjoining Stevenage* section .

Para 2.19: We welcome the proposal to extend the Green Belt in the area between Stevenage and Luton – whether or not the possible expansion of Stevenage and Luton into the existing Green Belt takes place.

We question the need for green belt reviews around some of the villages (presumably the Excluded Villages in the current Local Plan). Further development in those villages should be limited to the area currently excluded from the Green Belt.

Discounted Options (paras 2.21 – 2.23)

Para 2.23 states that all the options listed in para 2.21 except the proportionate growth of the towns and villages and the options relating to West Stevenage and Great Ashby have been discounted. We consider that the option of increasing the density of urban development should be explored further. It may be that some existing urban areas or parts of towns lend themselves to higher densities than exist at present.

Baldock discounted options (paras 2.25 – 2.27)

We support the discounting of the options to develop in the Weston Woods area to the south of Baldock and the green wedge area along Clothall Road. We also support the proposed bunding to the east of the town where the bypass and Royston Road meet.

While we understand the reasons for including the areas between Wallington Road and Cambrai Farm and the bypass in the preferred options for housing development, we are concerned that this development should not be taken right up to the bypass, but should leave an 'amenity gap' between the development and the bypass.

Hitchin discounted options

We strongly support the discounting the option of expanding Hitchin to the south west (and the implied southern bypass of the town). Such expansion would lead to coalescence with Gosmore and further erosion of the Green Belt in the narrow gap between Hitchin and Stevenage which is already threatened by Stevenage expansion.

Royston discounted options (paras 2.32 – 2.35)

We support the discounting of options to develop the areas to the north west and south east of the town for housing, but to allow some additional employment development to the north west.

We support the preferred option of discounting development in the area west of the town, between the bypass and Baldock Road. We are opposed to the possibility of allowing Royston Town football club to relocate to this area, considering the impact football stands and floodlights would have on the nearby Therfield Heath SSSI.

Spatial analysis and key issues

Hitchin, Letchworth Garden City, Baldock and surrounding area

Key issue 5: Green Wedges (paras 3.24 – 3.26)

We consider that the Green Wedges in and around Hitchin, Letchworth and Baldock (and not just in the Green Belt as suggested by the key to Figure 2) should be given the highest possible level of protection from development. Preventing the coalescence of these towns is a fundamental purpose of the Green Belt between them. That and maintaining the public open space within them are crucial to maintaining the character of this part of the District.

Key issue 6: Housing (paras 3.27 – 3.39)

Para 3.39: We accept that some additional housing could be provided in those villages which have a certain level of facilities. We expect the development boundaries around the identified villages, within which development may occur, to be fairly tightly drawn, and that development would not normally be permitted outside those boundaries.

Knebworth, Great Ashby and rural area adjoining Stevenage

Key issue 12a and para 3.64: Knebworth

This section proposes that Knebworth should be allowed to grow a modest amount to take advantage of existing facilities. However, the need for Knebworth to grow does not appear to be supported by the evidence in, for example, the Housing Background Paper. Paragraph 4.77 of that paper states that proportional growth at Knebworth would require 178 dwellings on greenfield sites, but that the limitations of the primary school and the sewerage system effectively preclude development. Figure 12 allocates zero greenfield housing for Knebworth, and shows that 1298 dwellings (more than the required 1027) can be provided on greenfield sites without any greenfield housing at Knebworth.

We strongly support the statement in the Core Strategy that any expansion of Knebworth must not erode the very narrow bands of green belt countryside separating it from Stevenage and Woolmer Green. This implies that any expansion that takes place will be to the east and/or west of the village. The Transport and Utilities Constraints background paper identifies three possible greenfield housing sites at Knebworth – Gypsy Lane, Swangleys Lane and Watton Road. However, these three sites appear to be ruled out by education and sewerage deficiencies.

It is not at all clear from all this what the Council is actually proposing for Knebworth. The table at Appendix 1 of the Transport and Utilities Constraints paper shows a combined upper estimate of capacity of 741 dwellings for the three sites referred to above. This is way in excess of the proportional growth requirement of 178 greenfield dwellings for Knebworth, and should therefore be discounted.

The far west of the district adjoining Luton

Key issue 15: The Chilterns

We welcome the commitment to protect the Chilterns AONB and other parts of the district with similar characteristics. This probably justifies a policy in its own right.

The objective of this policy could best be achieved by making reference to the *Joint Character Area 110: Chilterns* defined by Natural England. In Key Issue 15, at the end of sub-para a), after "quality" add "*by reference to policies in PPS7*" and replace sub-para b) with "*adopt similar standards of development in that part of Natural England's Joint Character Area 110: Chilterns which lies within the District*".

The south around Kimpton, Codicote and Whitwell

Key issue 17 and para 3.83

It is not clear why the issue of replacement dwellings appears only in this one of the five 'small areas for spatial analysis' sections of the document. The issue is not exclusive to the southern area, and would be better dealt with as a separate policy.

Chapter 4.0 Managing Environments

Para 4.3: We support the signing of the Nottingham Declaration.

Para 4.5: In SO/B in paragraph 2.14, the wording used is "... protect or enhance the existing natural and man-made environments". In paragraph 4.5, a different wording has been used in SO/B, ie "safeguard". This is different, and "*protect and enhance*" should replace "safeguard" to allow for positive environmental management including habitat restoration and re-establishment as proposed in Policy ENV3 of the draft East of England Plan.

Paras 4.7 - 4.15 and the Policy Wording: This section of text focuses almost exclusively on the protection of the historic environment and goes into considerable detail on this, for example in 4.9 and 4.10. Other aspects of environmental management set out in the draft East of England Plan, for example relating to Green Infrastructure, Landscape Conservation, Biodiversity and Earth Heritage and Woodlands, should be given equal weight.

Omitted policy: Tranquillity

We suggest that an additional policy or objective should be inserted in the Core Strategy, possibly in the *Managing environments* section, to take account of the concept of tranquillity. Details are contained in the CPRE publication *Mapping Tranquillity: Defining and assessing a valuable resource* (available through the CPRE website link <http://www.cpre.org.uk/library/campaign/tranquillity>).

Core Policy B: Design and Sustainability

There should be an additional policy which seeks to improve the sustainability of existing developments, through promotion of retrofitting of measures for water and energy efficiency and conservation, microgeneration of renewable energy and similar.

Core Policy C: Settlement hierarchy

In the light of our objection to Core Policy E about rural exception sites, the last paragraph of draft Core Policy C and paragraph 5.11 should be deleted.

Core Policy D: Rural area and Green Belt

Para 5.18: There are two editing errors in this paragraph. Policy C8 in line 1 should presumably read Core Policy F, and policy C5 in the penultimate line should read Core Policy C.

More needs to be said in this policy about the criteria to be used in carrying out the proposed green belt reviews. Any review of the Green Belt should take into account the extent to which the land in question contributes to the purposes of including land in Green Belts given in PPG2 para 1.5. In particular, the land should be assessed on a comparative, qualitative basis for its value in checking unrestricted sprawl, preventing coalescence and safeguarding the countryside from encroachment.

We strongly support the intention to provide compensatory green belt in the area between Stevenage, Luton and the A505.

Core Policy E: Exception sites in the rural area

We OBJECT to this policy as set out.

Rural Exception Site Policy is defined in PPS3 paragraph 30 as being intended to enable small sites to be used specifically for affordable housing in small rural communities, that would not normally be used for housing because they are subject to policies of restraint. Draft Core Policy E and its supporting text seeks to extend the scope of 'exceptions' policy to other forms of development as well as housing and appears to extend it from small rural settlements to all settlements. The draft policy contains few of the detailed safeguards listed in Policy 29 of the current Local Plan, which we believe are crucial to the successful application of rural exception site policy.

In our view, this policy should be restricted to affordable housing to meet proven local needs in rural areas only. All other development should be judged in accordance with the 'normal' planning policies that apply, and not on the basis of 'exceptions' policy. If there is an identified need for some community or employment facilities in or on the edge of settlements, this issue should be dealt with under subject-specific or area-specific policies.

Core Policy F: Provision and distribution of new housing

We welcome the declared intention in para 5.26 of following a hierarchy of making the primary emphasis previously developed land, followed by appropriate greenfield sites within existing settlement boundaries, followed by sites adjoining those settlements with sufficient facilities to accommodate growth. In this regard, we would like to see the Council go as far as is permitted by government policy in following the sequential principle of 'brownfield first, greenfield last'.

In accordance with paragraphs 54-57 of PPS3, the Council will have to identify sufficient specific deliverable sites for the first 5 years from the date of adoption of the plan, followed by a further supply of specific, deliverable sites for years 6-10, and where possible for years 11-15. We would expect that the first 5 years' supply would be made up of previously-developed sites and sites which already have planning permission, before greenfield sites are considered.

The fact that greenfield sites identified in the plan are available and deliverable simply because landowners/developers are pressing for their development should not be used to justify 'queue jumping' or 'cherry picking'. Under paragraph 70 of PPS3, where LPAs have an up-to-date 5-year supply of deliverable sites,

applications coming forward for sites allocated beyond the 5-year period should be viewed unfavourably.

The last paragraph of draft Core Policy F deals with the provision of infrastructure. We would like to see the words "before the development is occupied" inserted after "will be put in place".

Core Policy G: Affordable housing

We SUPPORT this policy to ensure an appropriate proportion of affordable housing is provided. In particular, we welcome the reduced site size thresholds and increased percentages of affordable dwellings specified in the policy.

In the light of our comments on Core Policy E (above), we consider that the last sentence of Core Policy G is superfluous. Rural Exception Site policy should stand in its own right, and there is no need to cross-reference it to Affordable Housing policy.

November 2007

CPRE—The Hertfordshire Society
31a Church Street
Welwyn
Herts AL6 9LW

Phone: 01438 717587
Fax: 01438 714984
Email: office@cpreherts.org.uk