

**Stevenage Core Strategy DPD Examination
Written Statements from CPRE Hertfordshire (Representor No 341498)**

Matter 1: Housing Demand and Supply

Is the Core Strategy and Development Management Policies DPD (“the plan”) based on sound evidence of housing demand and supply, notwithstanding the RSS housing target?

1. CPRE Hertfordshire has not challenged the quantum of housing proposed within the Stevenage Borough boundary for the 20-year period 2001-21. At 6400 dwellings (320 p.a.), this is consistent with previous studies and evidence, although *it more than meets the requirement to provide at least 6000 dwellings over the 25-year period to 2026* in order ‘just to meet the increases and changes in the existing population of Stevenage’ (Submission Core Strategy, para 5.17).
2. We do however particularly challenge the quantum proposed for 2021-6. We find no justification for an increase to 375 dwellings per annum (dpa) for this period and little evidence for it presented within the Submission Core Strategy (CS) itself. Even the (now defunct) East of England Plan Review was intending to recommend a continuation rate for Stevenage of 320 dpa for the period 2021-31 in its Option 1, the Scenario which the East of England Regional Assembly would have recommended to the Secretary of State had that process continued. The proposed housing quantum post-2021 is important because of the serious effect that a higher figure would have on the Green Belt and on the undeveloped countryside within the Borough.
3. Having said that, the total housing growth promoted in the CS is in fact still much greater than is required to meet the needs of the existing population, since Policy CS02 proposes that 8300 new dwellings should be accommodated within the Borough boundary to 2026 (albeit with major Green Belt releases – see our Statement on Matter 3 *Housing Provision and Distribution*). It is clear that Stevenage BC is pursuing without justification an expansionist strategy which goes well beyond meeting its own needs and which has serious consequences both for the future of the Green Belt and for infrastructure.
4. It follows that the quantum of housing proposed in the Core Strategy within the Borough boundary to 2026 is far in excess of what is required to meet the needs of the Borough and that this renders the Core Strategy unsound.

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Matter 2: Cross-boundary issues and relationship with neighbouring authorities

How does the plan relate to those of neighbouring authorities; are cross boundary issues adequately addressed; and is there the necessary commitment from relevant bodies to ensure the plan can be implemented?

Stevenage and North Herts Area Action Plan (SNAP)

1. CPRE Hertfordshire entirely agrees with North Herts DC that any assumptions previously made by Stevenage BC in respect of SNAP cannot be assumed to be any longer valid, given that work has for the time being ceased on the SNAP proposals. These, if and when revived, are unlikely to continue in their present form or using the housing targets previously used.
2. This is not to say that there would ultimately be no urban expansion at all north or west of the present built-up area of Stevenage within the Borough boundary. But Stevenage BC cannot sensibly pursue a policy of urban expansion to the north or west of the town, other than within its own boundaries, until agreement is reached with North Herts DC. *Any Stevenage Core Strategy which relied on North Herts' co-operation would be unsound until agreement in principle had been reached between the two Authorities.*
3. Even a northern expansion confined within the Borough boundary would need its access routes and other supporting infrastructure to be reassessed since it could no longer rely on such being provided within North Hertfordshire.
4. As we understand it, outline permission for the proposed urban expansion of 3600 dwellings West of Stevenage (of which only 1900 would be within the Stevenage BC boundary) has been given on call-in by the Secretary of State but that this is the subject of a legal challenge. Although West of Stevenage forms part of SNAP, the Core Strategy (CS) needs to take account of the possibilities (a) that the legal challenge is successful and that development West of Stevenage is thereby severely delayed (and/or otherwise significantly amended); and (b) that the legal challenge fails and that the full West of Stevenage proposals go forward as planned. Unless this is done, *a Core Strategy which is either dependent on an uncertain legal outcome or ignores it completely cannot be considered 'sound'.*
5. Notwithstanding the above remarks, there is an apparent inconsistency between 15300 (= 12500 + 2800) total dwelling provision for SNAP for 2001-26 in the CS para 5.52 and the 13000 (= 5000 + 2500 + 5500) in para 5.53. (Para 5.53 agrees with the Key Diagram.) These figures are, of course, for Stevenage and North Herts added together.

South-east of Stevenage

6. We argue in our Statement on Matter 3 *Housing provision and distribution* that the proposed additional development to the SE of the town, subject to Green Belt release in the Bragbury End area, is not necessary, and also that it was the subject of a subtle change to the Submission CS on which the public were not consulted. Nevertheless, there is no equivalent to SNAP in respect of urban expansion to the SE of the town and there is no evidence presented in the Submitted CS that joint working with East Hertfordshire DC on extending this over the boundary has even begun.

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Matter 3: Housing Provision and Distribution

Question 8: Is the plan clear about how much residential development will be provided for, in which locations, and over what timescale? What is the timing of the proposed Green Belt review?

Table 2

1. Our principal arguments concerning housing quantum and our assertion that Stevenage Borough is proposing an over-supply of housing for the period to 2026 are made in our Statement on Matter 1.
2. The Core Strategy (CS) Table 2 divides the number of dwellings remaining to be allocated, after deducting completions and outstanding permissions, into three AAP areas (Town Centre, Old Town and SNAP) and a fourth category whose sites are distributed elsewhere in the Borough and which will be identified in the Site-Specific Policies DPD.
3. We believe that it is insufficient to 'sweep up' all remaining allocations which are not the subject of the three specified AAPs into one category in Table 2. In particular, given the proposals for Green Belt release to the SE of the town in the Bragbury End area, the number of dwellings proposed here should be separately identified in the CS. Although CPRE Hertfordshire opposes an allocation on this site on the ground that it is not needed and that exceptional circumstances have not been demonstrated, a proposal for releasing land from the Green Belt is a strategic matter and sufficient detail should therefore be provided in the CS. Should development proceed at Bragbury End, then it should be the subject of its own AAP.
4. We have discussed the status of SNAP in our Statement on Matter 2. However, whilst Table 2 sets out proposals for allocations in that part of the SNAP area which falls within the Borough boundary for both 2001-21 and 2021-26, it does not differentiate between that part of SNAP which is subject to legal challenge (part of the West of Stevenage area) and the remainder. We believe that the entry for SNAP in Table 2 should at least be divided between West of Stevenage and the remainder of SNAP in order to provide greater clarity once a decision on West of Stevenage had been reached.
5. Better still, given that the 'new neighbourhoods' in SNAP are all strategic proposals and are identified on the Key Diagram as three major urban extensions (MUAs), Table 2 could usefully provide the housing numbers for each of these separately, for those parts of the two MUAs that lie within the Borough boundary (the third MUA, area 'C', is wholly within North Hertfordshire). We note that the housing numbers given on the Key Diagram for the three SNAP 'new neighbourhoods' include both the Stevenage Borough and the North Hertfordshire components, whereas Table 2 can, of course, only include proposals within the Borough boundary.
6. We note from Table 2 that provision is made (2001-26) for 1300 dwellings in the Town Centre Area Action Plan (AAP) and for 1200 dwgs in the Old Town AAP. These, together with the 234 dwellings completed or having the benefit of planning permission in the SNAP area (within the Borough boundary) and 1505 on other sites, total 4239. Given the requirement to provide only 6000 dwellings to 2026 to meet the town's own needs (see our Statement on Matter 1), land for as few as 1761 dwellings needs to be found on other sites (whether within SNAP or elsewhere) to ensure that the CS is sound.

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Windfall and other allowances

7. We strongly believe that both a windfall allowance and an allowance for outstanding planning applications should be included in Table 2. Although PPS3 (June 2010, para 59) discourages windfall allowances without adequate justification, CPRE Hertfordshire believes that Stevenage can indeed justify such an allowance, given that it is 'hemmed in' by Green Belt on all sides and would find it difficult to meet all its housing needs without encroachment on the Green Belt. The inclusion of a windfall allowance, based on 'historic windfall delivery rates and expected future trends' as per PPS3 would reduce the number of greenfield sites needing to be allocated in the Site-Specific Policies and SNAP AAP DPDs and also reduce the area of land to be released from the Green Belt. That such sites will come forward is acknowledged in CS para 5.29, 5th bullet-point. Similarly, an allowance for outstanding planning applications (using a figure of less than 100% since some permissions may not be implemented) would also be realistic with similar beneficial consequences for site allocations (avoiding, of course, any double-counting).

Green Belt review

8. Policy CS3a states that a review of the Green Belt will be carried out. If this is to be a true 'review', then the outcome should not be prejudged. However, CS3b clearly does prejudge the outcome by stating that new Green Belt boundaries will be set. The contrast is with para 4.12 which at the Pre-Submission stage confirmed that new boundaries would be set to the W and NW of the town but that those to the SE would be subject to a 'local review'. This was subsequently changed in the Schedule of Proposed Changes *on which no public consultation was carried out*.
9. Although the Key Diagram shows lines of 'Green Belt review', the existing land benefiting from Green Belt designation is not shown as it normally would be for a Key Diagram. Any revised Key Diagram resulting from the Examination Inspector's recommendations should separately show the existing Green Belt as well as proposed boundary changes (if any). Although a Core Strategy cannot indicate precise boundaries (that is for AAPs and Site-Specific DPDs to determine after consultation and Examination), it should provide sufficient information to enable the Council's proposals to be assessed strategically. (A further defect of the Key Diagram is that the legend does not show the meaning of the diagonal hatched areas.)
10. CPRE Hertfordshire would accept a new Green Belt boundary to the west and north-west of the town provided that this did not affect any Green Belt land outside the Borough boundary – although we would wish as little land as possible to be excluded from the designation. The question of Green Belt boundaries in this area was to be addressed through SNAP, although, as we have argued in our Statement for Matter 2, this issue cannot be settled unless and until SNAP negotiations with North Herts DC have recommenced and been concluded.
11. There was no requirement in the former Regional Spatial Strategy for a review of the Green Belt to the east or south-east of the Borough, as envisaged in CS Policy CS03 (b) and (d) and paras 4.12 and 5.37. The second sentence of para 5.43 of the Submission CS (now amended in the Proposed Further Changes) was blatantly incorrect in respect of Green Belt review in this area. Furthermore, para 4.12 in the original Submission CS (i.e. before the May 2010 *Schedule of proposed minor changes*) clearly differentiated between the firm

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proposals to set new Green Belt boundaries to the W, NW and N of Stevenage and the proposal to carry out a 'local review' of Green Belt boundaries to the SE of the town. The point of a 'review' is that its outcome should not be prejudged. The proposed Change No. 5 in the May 2010 *Schedule of proposed minor changes* is far from 'minor': this is a strategic issue and as such should have been subject to public consultation. This makes the CS unsound in respect of this issue.

12. The CS proposes that land be taken out of the Green Belt south of the A602 at Bragbury End, lying between the A602 and the railway line. This would result in much-despised ribbon development between Bragbury End and at least Hooks Cross. This would not be a 'defensible Green Belt boundary' and would probably lead to further pressure to continue the ribbon development beyond Hooks Cross to the northern end of the Watton-at-Stone bypass. Furthermore, the proposed development in this area is not shown on the Key Diagram, merely that there would be a review of the Green Belt boundary here.
13. One has to ask why should any new Green Belt boundary be any more 'permanent' than the existing one. PPG2 says that GB boundaries should 'endure' (para 2.8) and that, once approved, they 'should be altered only in exceptional circumstances' (para 2.6). Such 'exceptional circumstances' have not been demonstrated in respect of the Green Belt boundary to the SE of the town, given that the CS already proposes more housing than is necessary to meet the town's needs.

Question 9: Will the distribution of new homes and choice of sites maximise the opportunities to create more sustainable development patterns, and minimise the impact on the Green Belt?

Distribution of new housing and choice of sites

14. The more development is pushed to the periphery of the town, the less sustainable it becomes. Edge-of-town sites offer fewer public transport destination opportunities (buses tend to favour radial routes) and are further from the railway station. Furthermore, residents on the edge of town are just as likely to drive to other towns for their shopping and leisure needs as they are to travel into Stevenage town centre. (This would be especially true for West of Stevenage if a link is made to the A602 Little Wymondley Bypass.) Existing urban sites should therefore be maximised on these sustainability grounds.

Priority for previously-developed land (PDL)

15. CPRE Hertfordshire welcomes the Council's intention to adopt a sequential approach to development (Policy CS02(c)) and its statement in para. 4.14 that it *will maximise the use of previously developed sites in the town centre*. However, both texts place urban PDL and 'new neighbourhoods' on an equal footing when it comes to the sequential approach. 'New neighbourhoods' are by definition greenfield sites (see CS Glossary) and we strongly believe that PDL should be given priority over these too, in the true spirit of the sequential test.
16. A timid approach to maximising urban PDL sites is likely to increase the amount of Green Belt land required for development. Whilst avoiding both 'town cramming' in existing residential areas and the development of public (green) open space, we believe that the Council has not demonstrated a sufficiently aggressive approach in maximising the use of

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urban PDL for residential use. We find in the Town Centre and Old Town AAPs, for example, a reluctance to use the space above several public car parks for residential purposes (or mixed use including an adequate percentage of residential): this can be achieved without loss of car parking spaces. As a result, the Town Centre and Old Town allocations to 2026 of 1300 and 1200 dwelling units respectively appear remarkably low, even having regard to the findings of the SHLAA.

Redundant school sites

17. We note CS Policy DM10. However, it is too easy for the Education Authority or other school body to relocate a school to a greenfield (and almost certainly Green Belt) site forcing the previous school to become redundant and making it ripe for development – a neat way of causing an effective loss of Green Belt without actually building the housing in the Green Belt, as has happened elsewhere in Hertfordshire. The Education Authority then benefits from the sale of the former school land for housing. Policy DM10 concentrates solely on the potential loss of community activities (and we support the Council's concerns here) but does not emphasise sufficiently the implications for the Green Belt resulting from school relocation.
18. We cite by way of example a new school being provided in Stevenage's Green Belt, allowing the former school site to be redeveloped. Earlier this year, Herts County Council granted itself planning permission (in the face of much local opposition) for the relocation of the existing Thomas Alleyne School in Old Stevenage to a new site in the Green Belt at Great Ashby. According to the Overarching Case Report in support of the application, the proposals involve the expansion of the adjacent Barclay School on to part of the existing Thomas Alleyne site and the disposal of the residual part of the latter.
19. Policy DM10 therefore needs expansion to provide that permission for school construction on a Green Belt site would normally be refused if this meant relocation from an urban site.

Northern Relief Road

20. We note references (para 4.35, Key Diagram and Policy CS05) to a Northern Relief Road to provide access to new neighbourhoods North of Stevenage, although other road proposals and options in the SNAP Key Issues and Options document 2007 are not referred to in the CS. CPRE is concerned that such proposals foster car-dependency in any new neighbourhoods that they would serve. In any case these new roads are entirely dependent on SNAP and until the future of SNAP becomes clearer, it would be unsound to include the Northern Relief Road or any other similar links in the CS.

Question 10: Are the affordable housing targets and thresholds soundly based and supported by a viability assessment?

Affordable housing

21. Given the repeated statements that there is a serious shortage of affordable homes within the Borough (e.g. CS para 2.17, bullet-point), we are surprised that the Council has set a target as low as 35% (para 4.13 and Policy CS12(a)). We find it hard to equate this target with the statement in para 7.27 that the "*evidence shows that building all of our new homes as affordable housing would not meet demand.*" If the need for affordable housing is as acute as the Council says it is, we would expect the minimum target to be at least 40%.

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22. Having said that, if affordable housing is needed, then arrangements should be made to fund and to build affordable housing rather than to over-inflate the provision of market housing in the hope that that would deliver the affordable housing needed. If affordable housing targets were not met during the 'boom' years of the early 2000s, how much less are they likely to be achieved during more straitened times.

Housing mix

23. At the other end of the affordability spectrum are the larger houses which the Council refer to as "aspirational", which it defines as being detached houses in excess of 100sq m sited on large plots. Whilst the desire to attract 'high earners' to the Borough is noted from the perspective of the local economy, the particular provision of housing of this type is unlikely to affect the decision of companies to locate to Stevenage, and no evidence is presented to support this assertion. Housing of this size and type is already available from the existing stock both within the Borough and in adjacent authorities, and any higher prices in the latter are unlikely to be a deterrent to the managers and professionals that the Council is seeking to attract. In the CS, the Council places disproportionate emphasis on this factor. The largest section of Policy CS12 is devoted to aspirational housing, as well as paras 2.17, 4.13, 7.32, 7.34, 7.36 and 12.57; this is more than for any other form of housing, including affordable housing. This makes the Strategy unbalanced and unsound. Furthermore, this aspirational housing represents a squandering and an inefficient use of the scarce land resource in an area where the Green Belt is already under pressure. Average densities should be in excess of 30 dwellings per ha on all housing development sites, with any exceptional cases of lower density fully justified on environmental or heritage grounds alone.