

Stevenage Core Strategy and Development Management Policies consultation

Response by CPRE Hertfordshire

CPRE Hertfordshire has the following comments on the Stevenage Core Strategy and Development Management Policies consultation document (January 2010).

Quantum of Housing

As the Council notes in para.1.22 of the consultation document, the East of England Plan identifies Stevenage as a key centre for development and change, and outlines the main requirements on the Borough set out in Policy SV1 of that Plan. It is in that context that we have reviewed the Housing Targets included in the consultation.

We did not find it easy to determine and reconcile the housing targets which are being proposed by the Council in the document as presented. While we were ultimately able to work out the proposed targets and to reconcile the figures with the proposals in Policy CS02 – Housing Development Strategy, to do so required extrapolating and comparing information contained in sections 1, 2, 4 and 5 of the consultation document, together with references to the East of England Plan and the joint Stevenage and North Herts Action Plan (SNAP) documentation. A clear table (possibly amplifying that in para. 5.20) would have been of considerable benefit in presenting and assessing the proposals.

We have no specific comments to make on the overall number of dwellings proposed up to 2021 (i.e. those included in this document together with those proposed in the SNAP area) which, taken together, are in line with the East of England Plan requirement.

However, we consider any projections from 2021 up to and beyond 2026 to be premature in the light of the current review of the East of England Plan, and that there may be a need to immediately revise the figures in this document in the light of that review (in the case of scenario 4 of the review, to revise the figures downwards, not up).

Housing Strategy

We welcome the Council's intent to adopt a sequential approach to development (Section 'c' of Policy CS02 Housing Development Strategy), and its statement in para. 4.14 that it "*will maximise the use of previously developed sites in the town centre, the Old Town and the New Town neighbourhoods.*"

However, we do have concerns that the same section states that the Council "*will give priority to previously developed land and new neighbourhoods*", and the statement in section 'f' which says that it will "*support applications for housing development on unallocated sites where they are in suitable locations*". We trust that the Council's intention is to resist all development on greenfield sites until previously developed sites have been exhausted.

In the sequential context it is not clear how "*new neighbourhoods*" is to be defined. Does it mean ongoing development in existing "new town" neighbourhoods, or that permissions will

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be granted for any new “*neighbourhoods*” identified in the Area Action Plans. This point should be clarified in the Core Strategy.

We also consider that there is scope for the Council to achieve more than 45% of new homes within the Borough boundary on previously developed land (Section 'd' of Policy CS02) and we comment on this further under Housing Density below.

Nor is it clear how Policy CS02 will relate to the Housing Development Strategy policies being developed by North Herts Council. Both sets of strategies will have to be reconciled in order to ensure that compatible approaches are taken both within the Borough and within the SNAP area. Objective SO04 “*To set a framework for working with North Hertfordshire District Council to deliver new neighbourhoods in that district.*” needs to be expanded to make this point clear. We do not think that it is sufficient to simply state (in para 5.33) that the Council is “*committed to working closely with North Hertfordshire District Council*”.

We also welcome Policy DM02 on the use of windfall sites and the recognition of potential housing gain from conversions contained in para. 10.14. We do have concerns, however, that conversion of larger houses will only be permitted “*where a need for additional housing stock exists*”. Presumably the Council does not intend this to be interpreted as no larger house conversions will be permitted until all other avenues of achieving the housing targets have been exhausted?

We recognise the aspiration of the Council to maintain a network of green spaces, in line with the original New Town ethos, and that it also appreciates that “*some areas of open space in the town are ... not used by members of the public or are of particularly poor quality, and that “in some instances, it may be acceptable for these sites to be developed for alternate uses*”. It would have been useful to have seen a schedule of which areas the Council has identified. Without knowing where these areas are, it is impossible to comment on either their suitability or the contribution which they could make to meeting the housing targets.

Similarly we have concerns regarding Policy DM10 Redundant School Sites, which states that “*school playing fields and their ancillary facilities will be required to be retained for open space uses*”. Not every redundant school playing field is necessarily required (or in some cases, appropriate) for retention as open space and the Council may be unnecessarily limiting the amount of available land for housing through this policy.

Housing Mix

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Again, we welcome the intent of Policy CS12 Housing Mix to address existing imbalances in the housing stock by delivering a full range of homes in terms of tenure, type and size.

Given the repeated statements that there is a serious shortage of affordable homes within the Borough, we are surprised that the Council has set a low target (35%) in this area, and 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.*” As no evidence is actually presented in the consultation document, it is difficult to determine what this statement actually means. Similarly it is hard to comment on section 'c' of Policy CS12 which says that the Council will base its requirements for housing mix on the findings of the most recent Strategic Housing Market Assessment, when those findings are not outlined in the document. 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%.

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. While we appreciate the desire to attract ‘high earners’ to the Borough from a local economy perspective, we are not convinced that the provision of housing of this type will necessarily effect the decision of companies to locate to Stevenage, and no evidence is presented in the documents to support this assertion. Consequently, we are concerned that the Council places such emphasis on this factor throughout the consultation. 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. In that sense, the Strategy is unbalanced.

We are particularly disturbed by the proposal that sites for aspirational homes “*will be permitted as an exception to national policy guidelines*” (para 12.57). There is no justification put forward for this, and such an approach has the potential to set undesirable precedents, both within Stevenage and the rest of Hertfordshire. Not least, the provision of large homes on large sites would have consequences in terms of housing density and the most efficient use of scarce land resources.

In our view, the provision of ‘high end’ housing is a matter for market forces to initiate, and there is no justification for Stevenage to ‘invent’ its own policy on this issue.

Housing

Density

Throughout the document the Council emphasises its desire to maintain the vision and values of the original New Town masterplanners, and it is right and proper that it should do so. However, it also appears to take the view that this can only be done by maintaining the status quo within the Borough boundaries.

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In particular, the Council states that because “*Stevenage is a planned New Town. ...very little brownfield land will be available*” (para 5.26) and “*the original masterplan for Stevenage involved building at relatively low densities of 25 - 30dph in order to incorporate wide roads, gardens and green spaces*” (para 12.54).

As the Council notes in para.12.55, the Government have indicated that a density of 30dph should be the minimum, and the East of England Plan urges local authorities to build at the highest possible density while retaining the character of the area.

It is not true that in the planned New Towns very little brownfield land is available. On the contrary, in the first generation New Towns such as Stevenage, because development took place over a comparatively short period in the 1950s and 60s, many sites are now becoming prime for redevelopment. Nor is it true to say that redevelopment cannot be achieved at higher density without detriment to the character of the area. Examples of substantially higher densities while retaining the New Town ethos can be cited in Runcorn, Welwyn Garden City and other New Towns.

We urge the Council to look more critically at its density figures and more creatively at its ability to achieve higher densities within its existing boundaries.

Green Belt

The Council makes play of the fact that Stevenage is ‘underbounded’, by which we assume it means that the urban area is closely restrained by the Green Belt boundary. As stated above, it does not then automatically follow that “*very little brownfield land will be available*”, or that additional green belt reviews are required beyond those identified in the East of England Plan.

The Council’s Policy CS03 Green Belt, therefore, makes proposals which we do not consider to be justified, and we certainly do not accept the assertion that it will “*establish defensible long term boundaries which allow scope for the continual growth of the Stevenage built up area to at least 2031*” (section ‘a’).

Nor does it follow that “*Keeping (the existing) boundary would stop us from meeting our housing targets.*” Given that the bulk of the new housing to serve Stevenage is being met in North Hertfordshire through the SNAP process, this is manifestly untrue.

We accept the need to create a new Green Belt boundary to the west and north-west of the Borough. This is in accordance with the East of England Plan and is being addressed through SNAP. However, there is no requirement in the approved Regional Spatial Strategy for a review of the Green Belt to the east or south-east of the Borough, as envisaged in sections ‘b’ and ‘d’ of Policy CS03 and paras 4.12. and 5.37. The East of England Plan does not identify a

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need for this in order to meet the housing targets, nor is there any justification presented for it in this document.

Specifically, it is proposed that land would be taken out of the Green Belt south of the A602 at Bragbury End. This land lies between the A602 and the railway line. This will result in ribbon development between Bragbury End and at least Hooks Cross. This is not a defensible Green Belt boundary and will probably lead to further pressure to continue ribbon development beyond Hooks Cross to the end of the Watton at Stone by-pass.

We note the Council's intention in section 'e' of Policy CS03 to "*decide applications for development in the Green Belt in accordance with national guidance*". Unfortunately, there is no clarification on how this can be reconciled with its policy that Aspirational Homes "*will be permitted as an exception to national policy guidelines*". This clarification is needed, as homes of this type are more likely to be built on Green Belt sites in the countryside than on brownfield land in the Borough.

Proposed Northern Relief Road

We note a passing reference (para 4.35) that a "*Northern Relief Road will provide access to the new neighbourhoods at Stevenage North and at the north-east of Stevenage from the strategic road network*". This is presented as a fact. We are not aware of any 'official' proposal for a northern relief road around Stevenage, or that there has been any public consultation on such a proposal.

Once again, as with other proposals in this consultation, there is no justification put forward for this road. It was not something which was included in the SNAP consultation. The most that the SNAP Key Issues and Options paper says about it is (para 54): "*There may or may not be advantages in providing a new northern distributor road*". This proposal should not appear in the Stevenage Core Strategy unless and until a decision is taken to take it forward in the next stage of SNAP.

Conclusion

As indicated above, we consider this Core Strategy and Development Management Policies document to be unsound in a number of respects. In some instances, there is a lack of conformity with the approved East of England Plan. In others, insufficient or unclear evidence or justification for the proposals has been presented in this consultation document. Other proposals are contrary to national guidance. We consider that these issues should be addressed before the document is submitted to the Secretary of State.