

Standing up for Hertfordshire's countryside

Planning Policy
Stevenage Borough Council
Daneshill House
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Our Ref:

Your Ref: Summer 2013
consultation

19 July 2013

Dear Policy Team,

Stevenage Borough Local Plan: First Consultation

Thank you for consulting CPRE Hertfordshire on Stage 2 in the preparation of the new Local Plan for Stevenage. We have a number of comments that we would ask the Borough Council to carefully consider during the preparation of the draft Plan, some of which imply a review of the Council's evidence base.

In particular, we are concerned about a number of assumptions that CPRE Hertfordshire does not consider have been justified by the information presented for comment, particularly in respect of the wording of the options on the scale and location of housing and employment development. These concerns are set out below in respect of our principal areas of interest; Housing options, Employment Land options, and Green Belt.

Before setting out our comments on these key issues, we must also highlight a major concern at the Council's invitation of public comment on neighbouring authorities' planning policy frameworks through this consultation. The comments invited by the Council on its preferred option of development outside the Borough's boundary would, if acted upon, require those neighbouring authorities to propose development that would in our view be contrary to national planning policy on Green Belt as set out in the NPPF and reinforced in the ministerial statement of 1 July.

Such an approach by the Council does not seem to fit well with the requirement that the Local Plan, when submitted for examination, can be demonstrated to be deliverable, and is not appropriate at the stage of presenting what should be a range of demonstrably achievable planning options for the town for public comment.

Green Belt

Green Belt appears as Chapter 12, starting on page 133, and as Issue 26 of the consultation document. This is disappointing, as the protection of Green Belts is a core principle of National Planning Policy (NPPF paragraph 17), and in our opinion Green Belt policy should be one of the bases for the Borough's Local Plan, helping to mould policies for development, and should therefore have featured at the start of Part III of the consultation

document. At present the impression is given that Green Belt is to be treated as a hindrance to development, to be adjusted according to other, 'more important' requirements of the town.

Issue 26 on Green Belt, rather than presenting options that reflect the importance of the Green Belt, only presents options that appear to conflict with national policy in one way or another. For example, although paragraph 12.10 points out that the NPPF does not necessarily require the Plan 'to fully meet the objectively assessed needs of the Borough', and that Paragraph 14 of the NPPF specifically expects Local Plans to meet objectively assessed needs '*unless specific policies in this Framework (including policies for land designated as Green Belt) indicate development should be restricted*', this is not followed through to the options. Hence the wording of Issue 26 option 'a' is a concern to us by stating that maintaining the current extent of the Green Belt includes not attempting to fully meet objectively assessed needs. This implies a failure to achieve an essential requirement, which it is not.

Strategic Housing Options

Three options have been set out on the scale of future housing development in the Borough, but these appear to be based on certain assumptions about the current capacity of the town to accommodate an increase in dwellings, that expansion of the built-up area into neighbouring districts is achievable, and that only the Green Belt can provide land for significant new development in the Borough. We question these assumptions, and ask that the Council re-consider the options available in the preparation of the Plan.

For example, in our opinion a realistic and achievable option would be maintenance of the current general extent of the Green Belt in the Borough combined with the more efficient use of non-Green Belt land within the town, including urban regeneration (a Green Belt purpose as stated in paragraph 12.2 of the consultation document), in order to meet as much of the objectively assessed need as is appropriate in the context of current national policy.

We therefore oppose any proposals for major housing development in the Green Belt pending the demonstration that this is necessary in the context of national planning policy, having established the true capacity of the Borough's non-Green Belt area to accommodate housing needs that have been objectively assessed in the light of 2011 National Census results.

The Local Plan should explicitly exclude any proposal, option or support for any development outside the Borough boundary that has not been formally agreed with the relevant district council following public consultation by that council on its own Local Plan proposals.

Employment Land

CPRE Hertfordshire strongly opposes the allocation of any Greenfield Green Belt sites for employment development in the Local Plan. We do not consider that exceptional circumstances exist which justify such proposals. We are particularly opposed to major employment development on Green Belt land west of the A1(M) motorway in the vicinity of Junctions 7 and 8, as this would put at risk large areas of open countryside and cause significant harm to the openness of the Green Belt as well as directly conflicting with Green Belt purposes.

As we have stated above in respect of housing proposals, no proposals for any development outside the Borough should be included in the Local Plan that have not been agreed with the relevant district council following consultation through that Council's own Local Plan proposals.

Finally at this stage, we consider that the further evidence studies that the Council needs to carry out on housing and employment needs as a result of the emerging information from the 2011 census, will assist the Council in reaching a balanced conclusion on the extent to which the Plan should reflect projections based on past trends, in order to prepare a draft plan that is sound, rather than just aspirational.

Yours sincerely,



Steve Baker
Planning Manager