

Standing up for Hertfordshire's countryside

James Chettleburgh
Development Management
Stevenage Borough Council
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Our Ref:

Your Ref:

20th March 2019 (by email)

Dear Mr Chettleburgh,

Application No. 19/00123/FPM: Erection of 133 dwellings with associated amenity and open space provision, landscaping and access. Land To West of A1(M) and south of Stevenage Road, Todds Green, Stevenage Herts

CPRE Hertfordshire object to this application as an isolated unsustainable development. It would be contrary to the emerging local plan policy and premature in that it relates to a potentially much larger but as yet uncommitted, development in the current designated Green Belt to the West of Stevenage.

CPRE Herts have objected to the release of all the Green Belt land to the west of the A1(M) as inappropriate and because very special circumstances have not been demonstrated. The North Herts Local Plan is submitted, but not approved and the emerging Stevenage Plan, currently subject of a Holding Direction by the Secretary of State, has safeguarded this land as an access corridor (Policy IT2) in the event that the wider land release is approved.

When Stevenage BC assessed the site in December 2015 as part of its Green Belt Review the site (Ref 629) wasn't allocated for residential but for access. If developed in isolation for residential the assessment said:

“development would be unsustainable due to its separation from existing facilities within the urban area”

CPRE Herts would object that this is exactly what is now being proposed. The scheme in its location is therefore unsustainable as it is being developed in isolation.

The application would be contrary to the emerging Local Plan Policy HO2 which requires masterplanning of whole site at outline stage prior to the submission of any detailed development proposals. No large-scale masterplanning for the West of Stevenage site has taken place.

It would appear from the submissions that the scheme has not been Design Reviewed and it is demonstrably the case that it lacks the necessary strategic design approach. Furthermore,

it totally undermines a masterplan approach and represents a poor quality piecemeal approach to the west of Stevenage area.

The Local Plan allocation is premised on the provision of access to a wider masterplanned scheme. The lack of any through access, which would potentially be delivered as part of a wider masterplan scheme, means that it would be impossible to deliver new passenger transport services to the proposed development. No new active travel routes are proposed to connect the site with the main town nor are cycling routes provided for within the proposed layout (planning these in isolation of a wider masterplanning process is unlikely to be successful)

Stevenage Local Plan safeguarded this site to provide a sustainable travel corridor (para 8.15). Two strategic vehicle access points in the local plan are proposed for west of Stevenage but the Todds Green site is not proposed as one of them (Policy IT1). The Local Plan states (para 8.15) that the existing road network in this area will not support a significant access point but the site could provide a sustainable transport corridor.

The development would provide a play area, severed from housing by the main access road, but otherwise no new services or facilities, so residents would have to make inconvenient and longer journeys to the existing town east of the A1M, with greater dependency on the private car to access them.

The Travel Plan aims to increase sustainable travel modes by 15% over a period of time but due to the site's isolation, lack of local services, patterns of high car use will become established from the outset

The site is furthermore highly constrained by its close proximity to the A1(M) due to noise and air pollution. The submissions suggest highly compromised living conditions with few external garden areas achieving reasonable tranquility and with mechanical ventilation proposed for dwellings where NO2 concentrations exceed desired levels. The provision of a substantial and dominant noise barrier 9m high itself will be visually poor, create a prison like enclosure and it is unrelieved by any associated wide and open landscaped areas.

It is worth considering the layout of housing areas east of the A1(M) in Stevenage which were generally done with a setback of at least 50-60m with wide landscaped verges. These were done at a time when traffic levels were much lower and knowledge of the harm from road traffic and noise and air pollution was less well understood.

If the site were being considered, as intended in emerging policy under a masterplan for a wider area, with aspiration to high quality place making, the qualitative deficiencies due to air and noise would on design grounds alone lead to a very different approach to layout and placemaking, more in tune with the aspirations of the NPPF.

The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of

sustainable development, creates better places in which to live and work (NPPF para 124)

The development of the site is a poor design approach and unsustainable development contrary to the NPPF. By way of comparison the masterplanning exercise underway for the village of Knebworth, just 2km south of Stevenage and close to the A1M, as part of its Neighbourhood Plan, systematically identified constraints of noise and air pollution and proposed new development areas that are kept well away from the A1M (see pages 47 to 51 of the Knebworth Aecom Masterplanning and Design report).

<https://www.knebworthparishcouncil.gov.uk/uploads/aecom-report-knebworth-final-lowres.pdf>

Even if the NPPF presumption in favour of Sustainable Development applies, due to the lack of a 5 year housing land supply, and this may be related to the current holding direction on the Local Plan, the development should not be approved. By its isolated location, the environmental constraints of the site and the poor design quality of the proposal it represents unsustainable development contrary to the NPPF.

Yours sincerely,

Tim Hagyard
Planning Manager