

Standing up for Hertfordshire's countryside

Ms Jenny Pierce
Senior Project Officer
Policy & Implementation
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford, SG13 8EQ

Our Ref:

Your Ref:

20th February 2019 (by email)

Dear Ms Pierce,

Application Ref 3/19/0118/OUT - Hybrid planning application: Outline planning comprising: (i) Planning permission for construction of the spine road, site accesses, drainage infrastructure and ancillary works and (ii) Outline planning for the erection of up to 618 homes, primary and pre-school, up to 1 no. 80 bed care home and up to 50 assisted living homes (C2 use), neighbourhood hub comprising shops (up to 658 sqm of A1-A5 uses), community facilities (up to 400 sqm of D1 use), Travelling Showpeople site, public open space, landscaping, drainage infrastructure, all associated and ancillary development. Detailed planning permission for construction of the spine road, site accesses, drainage infrastructure and ancillary works on Land East Of Stevenage (EOS1) Gresley Way Stevenage

General

CPRE Herts strongly objected to the removal of the Gresley Park site from the Green Belt and the loss of open countryside. CPRE Herts also objected that it was not involved when the site was reconsidered as part of the Secretary of State's Holding Direction of 2018. CPRE Herts has not been party to discussions on the masterplanning of the site although local stakeholders such as the Parish Councils have been. The site is now allocated and a masterplan, prepared by the developer, was approved by East Herts Council in September 2018. The masterplan is a material planning consideration.

While CPRE Herts regrets the allocation, given the fact of development it also considers the details of the development, its layout and relationship to Stevenage, the countryside and other rural villages to be extremely important. CPRE Herts seek for the development to be designed to prioritise:

- Promoting access and enjoyment of the countryside for all
- Exploiting landscape views from within the site for the enjoyment of the countryside by all
- Delivering real biodiversity gains and being sensitive to wider landscape impacts of development
- Promoting walking and cycling including greenways away from polluting / noisy traffic routes
- Achieving distinctive character and quality place-making

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President:
Sir Simon Bowes Lyon, KCVO
Chairman: *Richard Bullen*
Registered Charity 1162419

Place-making / Design Process

The fact that a hybrid application for outline permission with the first details limited to construction of the main spine road, accesses, drainage infrastructure and ancillary works indicates a low priority to place-making. The details are for practical purposes as early technical approval is desired by the developer e.g. spine road adoption by the highway authority. The application is nonetheless filled with documentation including detailed layouts and justifications. This is both confusing and unsatisfactory.

The correct approach to place-making is holistic and does not begin with determining a spine road and access points in isolation. It is unsatisfactory for the final layout of the scheme and the built environment to then be pre-determined by the position of these details while excluding layout as a consideration. CPRE Herts therefore objects that the layout of the site, its buildings, uses and character areas are not being submitted for determination at this stage. In design and place-making terms the application is flawed. Layout details at least should be formally submitted for consideration or the application withdrawn.

It is acknowledged that the location of the spine road follows an approved masterplan. However that layout was not referred back to the Herts Design Review Panel in spite of their strong encouragement. In fact, neither the submitted Design and Access Statement (Section 4) nor the Statement of Community Consultation make any reference to the December 2016 assessment by the Design Review Panel in spite of its highly relevant observations and the weight it should be given. This is inconsistent with the advice of the NPPF para 129 that such advice be considered as part of the planning process.

“In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels” (para 129 NPPF)

The submitted documentation makes no mention of the Herts Design Review Panel. Given the importance of the site, the landscape and its controversial allocation this would be anomalous and inconsistent with the provisions of section 17.6 of the newly adopted East Herts District Plan 2018.

The Panel made significant objections to the original scheme layout by its letter of 9th Dec 2016 (released under FOI requests). For instance, that the scheme was “inward looking” and disconnected by barriers of planting blocks. That the neighbourhood centre would be more viable if brought closer to Gresley Way as part of reconnecting the site with Stevenage. The spine route was criticised as being too sinuous. The bus routes and siting of the school might also be reviewed to tie them in to Stevenage better. To quote their letter:

“Critically, if the development is to be successful it must be seen as an extension to Stevenage, not an isolated inward-looking suburb. Radical measures need to be taken to link the development both physically and psychologically to the adjoining neighbourhoods to the west of Gresley Way, by reducing the severance of the tree

belt and bund, by calming traffic speeds on Gresley Way, and by maximising linkages for cyclists and pedestrians into existing networks.”

It would appear the applicant is playing down the earlier design criticisms and not explaining how, if at all, they have been addressed. They are showing a lack of transparency.

Detailed comments

The detailed elements are for the spine road and other associated works only but it is important as part of any outline consent to ensure key matters are not compromised. Like the Design Panel, CPRE Herts is concerned that the site is designed to look inwards and might become exclusive, even gated. Effectively a new barrier between the town and the countryside. The retention of almost all the bunding encourages this insularity. Gresley Way has always been a harsh physical barrier to accessing the countryside for people within Stevenage. The development encroaches former Green Belt but provides an opportunity to better connect the town with the countryside beyond. As a key principle the development has to integrate, as fully as possible with Stevenage and enable access and enjoyment of the wider countryside. This accords with NPPF para 118 which says planning decisions should:

“encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside”

In our view, the following detailed points should be addressed:

- Gresley Way itself should be calmed and crossed at several points.
- Open space in the development should come into full public access, preferably public ownership and enjoyment by ramblers, cyclists, joggers, dog walkers etc.
- The open spaces should be integral to movement through the scheme and link across and beyond the site to the countryside and surrounding neighbourhoods. (e.g. The indicative eastern linear park does not)
- Key highway routes should be adopted to secure public access.
- A more effective grid within the site is recommended to enable movement and connection
- Rights of way through and around the site should be safeguarded and extended to integrate the area with its surroundings and promote access and enjoyment of the countryside. Local Plan Policy CFLR3. This needs to go beyond the masterplan (Page 6 Movement and Connections) which seems to only provide internal circular routes rather than routes which make real connections beyond the site boundary or opens the site up to those from outside.

Key elements of the ROW improvement would be:

1. An east-west bridleway across the northern part of the site linking the junction near to Uplands with the B1037 Stevenage Road to Walkern as part of a future cycleway (S106 funding in the Froghall Lane development, Walkern)
2. A continuous greenway recreational route along the eastern edge of the site, for health and activity as well as access to the countryside, exploiting the identified views over the landscape.
3. Bridleway 21 in the south should link to extended Rights of Way on the east side of the site and eventually link with Walkern to the north and Stevenage.

Summary

CPRE Herts strongly objected to this site's development within the East Herts District Plan and the loss of Green Belt. This was repeated by the site's inclusion within the EHDP notwithstanding revisions to ONS Household Projection figures for 2018 and the Secretary of State's holding direction. Development is now regretfully going to happen in one form or another.

In its detailed planning, development needs to provide real quality and promote access to the countryside. It has to give value back to the people of Stevenage who are objecting in significant numbers. CPRE Herts seriously questions whether it is appropriate to proceed with limited details of the spine road, access and drainage infrastructure alone. These elements will dictate so much of the remaining layout while avoiding proper consideration.

Legitimate questions have already been raised by Herts Design Review Panel to the spine road, internal barriers, the siting of the school and the neighbourhood centre. Confusingly, full layout details are in the submitted documentation. East Herts Council should immediately seek agreement that layout be considered as part of an amended application. The 2016 comments of the Herts Design Review Panel appear to be being disregarded in the submitted documentation as well as any opportunity for the Panel's further scrutiny. The Council should arrange referral back to the Panel if the applicant will not approach them. Anything less would be inconsistent with the importance of the site, the emphasis on quality of development within the East Herts District Plan and the provisions of the NPPF (Para 129).

CPRE Herts remains concerned that the development retains an inward-looking character and needs to more clearly demonstrate successful wider integration. In order to meet the provisions of the NPPF and Local Plan policies to prioritise walking and cycling, a comprehensive network of active travel routes for walking, cycling and recreation as part of the development is needed. Public open spaces and public rights of way that link with its surroundings and allow people to move easily through and around the development are critical to this. There are currently too many gaps in provision, no proposed extensions to rights of ways and retained barriers to movement. The commitment to this should be

secured in principle by additions to the proposed S106 agreement as well as by being able to consider full layout details at this stage.

Yours sincerely,

David Irving

Enc: Letter of Herts Design Review Panel. 9 Dec 2016 (Redacted)