

Standing up for Hertfordshire's countryside

David Rusling
Stevenage Borough Council
Daneshill House
Danestrete
Stevenage
SG1 1HN

Our Ref:

Your Ref:

20th November 2019 (by email)

Dear Mr. Rusling,

Application No. 17/00862/OPM

Erection of 800 residential dwellings, creation of a new local centre, provision of a primary school, provision of landscaped communal amenity space including children's play space; creation of new public open space together with associated highways, landscaping, drainage and utilities works. This application is accompanied by an

Environmental Statement

on Land to the North Of Stevenage Stevenage Herts SG1 4DE

Stevenage Council inadvertently neglected to advise us of the amendments to this application and we are grateful that you have agreed to accept this late response.

We objected strongly, at the Examination in Public of the new Local Plan, to the removal of this site from the Green Belt and will not repeat those arguments here, except to say that we consider the decision to do so a retrograde step which will cause irreparable damage to the social, cultural and historic importance of 'Forster Country'.

In our objection letter to the original version of this application, we expressed concern at the prematurity of the application, sustainability issues, the transport assessment and the loss of best and most versatile land.

We accept that following the adoption of the Stevenage Local Plan, this site is now partially removed from the Green Belt, designated for housing and covered by Policy HO3 in that Plan. However, having considered the revised documents accompanying the application, our concerns regarding sustainability, transport assessment and the loss of best and most versatile land remain and we expand on them below.

Sustainability:

In assessing its sustainability, this site cannot be considered in isolation. Apart from other proposed residential development in Stevenage, there are also substantial developments proposed in both North Herts and East Herts which are in close proximity. Cumulatively, these will have a significant effect on social infrastructure and transport movements.

Consideration of this is not adequately done in the analyses accompanying the application and the Council should require a clear statement on these impacts before determining the planning balance.

Since the submission of the original application Stevenage Council has adopted a zero carbon target by 2030 and conformity with the Climate Change Act 2008. The applicant's response is to state, in paras. 0.4.13 and 14 of the Addendum to the Environment Statement, that *"Rather than considering the effects of climate change in a standalone chapter, the issues of mitigation (carbon reduction) have been considered ... by each specialist consultant and where relevant presented within the ES."* However we have been unable to find much of substance which addresses the issue of climate change in the amended Environment Statement or examples of proposed mitigation. We note that both The Friends Of Forster Country and Luton Friends of the Earth have made detailed responses on climate change and the implications of Section 14 of the National Planning Policy Framework and we endorse their comments.

We also note the concerns expressed by Thames Water, the Environment Agency and the Lead Local Flood Authority regarding inadequate information on disposal of foul water and flooding mitigation measures, all of which also impact on sustainability.

Transport Assessment:

The approach to the transport requirements generated by the development inevitably feed directly into sustainability and climate change. The amendments do little to address that point apart from the potential inclusion of charging points for electric cars. A much more ambitious approach including designs, infrastructure and supportive measures and targets to shift to sustainable travel patterns is required with respect to planning for a climate emergency. Some inspiration may be drawn from developments shortlisted in the 2019 Awards of Transport for New Homes (winner due to be announced 20th November - <http://www.transportfornewhomes.org.uk/transport-for-new-homes-award-shortlist-announced/>). As mentioned above, the application pays little regard to the impact of the close proximity of other proposed developments in both Stevenage and North Herts in its modelling.

At the present time the junction between North Road, Chancellor's Road and Coreys Mill Lane is congested, with the resulting queue often constant, blocking right turning vehicles. All roads from the proposed development exit on to North Road and will exacerbate this problem. The NHS Trust have pointed out that almost all traffic from Lister Hospital also exits on to North Road and have questioned whether the proposed access points to the development are in the correct place. Rather than demonstrate adequate proposals to address these problems the Transport Assessment continues to state that *"No other highways improvements are proposed to mitigate the development's impacts, as it is considered that such improvements would encourage increasing use of the car."* (para.7.3.12).

The amended Framework Travel Plan says the “*The local centre will not generate vehicle trips and as such it is suggested that a separate travel plan for the local centre is not required.*”(para 1.1.6). There is no demonstration of how the conclusion that people would only access the local centre on foot or by bicycle was reached. That assumption proved not to be the case at the Great Ashby local centres in Canterbury Way and Whitehorse Lane, so why should it be different here where the situation is identical?

At present the pedestrian links from Great Ashby to Lister Hospital, John Henry Newman School and Sainsbury’s are not direct. This could easily be rectified by providing a dedicated footpath from Weston Road across St Nicholas Meadow to the proposed development but only informal recreational paths are shown on the masterplan.

Best and most versatile land:

The use of best and most versatile land for agricultural purposes has a clear and long-term impact on sustainability and the economic and environmental objectives of the NPPF.

Para 10.1.3 of the amended Environmental Statement now acknowledges that over half of the site falls into Grades 2 and 3a Agricultural quality (i.e. best and most versatile land) of which 46% will be lost. No evidence has been presented as to how this loss can be mitigated because “*its inclusion in the Local Plan, in the knowledge that it would incur a loss of best and most versatile agricultural land must still be considered consistent with the guidance in NPPF.*” (para. 10.1.5).

We fail to see how this is effective use of land, as required by section 11 of the NPPF, particularly para. 118(b), or is in conformity with either the Government’s ‘Guide to Assessing Development Proposals on Agricultural Land’ published in January 2018 or the 21 July 2019 revision of National Planning Practice Guidance, which is clear that best and most versatile soil ‘is an essential natural capital asset.’(Reference ID: 8-001/2-20190721).

For the above reasons we consider that the Council should reject this application.

Yours sincerely,

David Irving