

Sam Dicocco
Development Management
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

11th February 2022 (by email)

Dear Sam Dicocco,

Application no. 3/21/2939/REM
Land East Of Stevenage (EOS1), Gresley Way, Stevenage
Approval of reserved matters (appearance, landscaping, layout and scale) approved under
outline planning 3/19/0118/OUT for the erection of 253 dwellings.

I write with reference to the above reserved matters application, following previous correspondence. CPRE Hertfordshire objected strongly to both the original allocation of the site in the East Herts District Plan, and subsequent outline application on a number of grounds.

Whilst we believe that these concerns remain valid, primarily the inward-looking, wasteful and banal nature of the proposed development, being effectively a traditional housing estate on the edge of Stevenage, our present concerns relate to recent changes in legislation which we believe should affect consideration of the reserved matters. Accordingly, CPRE Hertfordshire objects to this application on the following grounds.

1. The introduction of the Environment Act 2021, described by Environment Secretary George Eustace as “the most ambitious environmental programme of any country on earth” provides the context for the re-evaluation of development proposals, specifically for development in the form of ensuring Net Biodiversity Gain (NBG) as a statutory requirement. Additional relevant requirements relate to the treatment of water courses, tree planting, waste treatment, pollution and the use of resources.
2. We believe that the use of undeveloped land for new housing places additional responsibilities on developers with regard to the efficient and appropriate use of land which affects open countryside and neighbouring rural areas. The Planning Statement and Design and Access Statement describe a wide range of aspirations relating to the achievement of planning goals and objectives which are expressed in general and unspecific terms and are therefore unexceptional.

3. Further investigation of the specific information provided in the application does not even support the achievement of the initial expectation of the “Masterplan” for east of Stevenage prepared in 2018 in several significant areas. The over-whelming impression of the plans submitted, both in terms of street layout and housing types, is of a standard housing estate with scant attention paid to principles of good urban design, sustainable transport, or the development of a coherent neighbourhood and sense of place.
4. The recently published A Housing Audit for England (2020) undertaken by the Place Alliance and supported by CPRE <https://placealliance.org.uk/research/national-housing-audit/> , identified the lack of design quality in developments on 142 greenfield sites throughout the country, and the criteria utilised in that study would be likely to provide a similar assessment when applied to this application. The lack of ambition with regard to the standard house types proposed together with inadequate landscaping and drainage treatments is most disappointing.
5. There is the opportunity to provide an exemplar development as part of an extension to the original Stevenage New Town, demonstrating innovative design and provision which addresses the challenges of climate change in a sensitive and valued location. The density of housing proposed will not provide the level of population needed to support a viable local centre, even when later phases are developed.
6. Particularly inadequate is the treatment of landscape and open space which arises from the lack of detailed consideration of landscape treatment throughout the proposed development together with the uniformity of housing density. This is particularly significant for a site location which adjoins high quality rural landscape and the suggestion of a “countryside edge” is in no way achieved by the proposals made.
7. Landscape elements appear to have been added as after-thoughts and lack sensitivity and quality. A detailed landscape strategy is required which addresses and enhances the setting of the proposed development as well as promoting biodiversity and sustainable drainage effectively.
8. The implications of the inadequate transport and access links to the west to facilitate usage of Stevenage services and facilities, and the lack of meaningful sustainable transport provision, means that the proposed development will inevitably be car dominated. This will have major and detrimental impacts on the surrounding villages and lanes where congestion and danger for local residents will increase.



9. The proposed development fails in many respects to take account of climate change and carbon reduction requirements in terms of building design and resource use. Enforcement of the requirements of environmental legislation is likely to increase and we urge the Council to initiate further discussions with the developer to review their proposals in this light.

In summary, CPRE Hertfordshire considers that the proposed low density overall as demonstrated in the detailed application is a wasteful use of former Green Belt land and countryside. The National Planning Policy Framework requires the efficient use of land when there is a shortage, such as when Green Belt is released. The Housing Audit referred to in item 4. above shows that low density frustrates good place-making and high quality design.

In our view, the housing densities and layouts proposed will lead to urban sprawl which is particularly inappropriate in this sensitive location, and the inevitably car dominated development as proposed will have damaging impacts on the surrounding highly valued open countryside and villages. The setting of the proposed development places a major responsibility on both the developers and the Council to seek the best possible quality of development.

Yours sincerely,

Chris Berry
Planning Manager