

NORTH HERTS SUBMISSION LOCAL PLAN 2016

GRAVELEY PARISH COUNCIL REPRESENTATIONS

Introduction

Graveley Parish Council (GPC) objects to the Proposed Submission Local Plan (the Plan). In providing our comment we have sought to follow the layout in the Online Response format, detailing the section and policy and question numbers in Part B of the Council's Publication Stage Representation Form.

Our specific representations accompany a Single Part A form and single Part B, sections 9 (notification) and 10 (signature and date), on behalf of GPC.

In summary our objections are as follows:

Inappropriate Core Strategy Direction for Growth resulting in heavy reliance on Green Belt to deliver Assessed Housing Need with no prioritization of Brownfield sites. This is contrary to National Planning Policy and considered to be Unsound.

Release of land from Green Belt requires "exceptional circumstance" which should be justified on a site by site basis. This NHDC has not done, seeking instead to use a blanket justification in their background studies to do so in respect of housing and other development needs, not only for North Herts but Stevenage and Luton as well. Green Belt will contribute some 80% of development land which is excessive and contrary to recent planning decisions.

Excessive level of development proposed, the nature of development in the form of large Strategic Sites on Green Belt, focused on existing urban areas thereby extending urban sprawl, destroying countryside, valuable agricultural land as well as the setting and special character of several communities such as Baldock and Graveley, all of which is contrary to NPPF 80. As noted in our comments to SP16, approval of development to the north and north-east of Stevenage will facilitate significant future development/harm on/to Green Belt.

As proposed, NS1 will result in the coalescence of Graveley with Stevenage, this is contrary to recent planning decisions and results from a misinterpretation of planning law on the part of NHDC. It is also contrary to a number of NHDC's proposed planning policies.

NHDC has assumed that all Objectively Assessed Housing Need must be met in full, despite valid exceptions in NPPF 14 and 47. The level of development proposed is incorrectly described as being for "local needs" whereas the Stevenage and North Hertfordshire Strategic Housing Market Update reveals that 63% of proposed housing is for inward migration.

We accept that there is a need for some development to meet future housing need but consider a figure of around 10,000 to be more appropriate (please see commentary on SP8 for rationale/calculation).

Given the level of development proposed it is concerning that the decision to undertake the "Submission Consultation" was only taken by Cabinet and not the full Council, particularly as a potential conflict of interest may exist for Cabinet members in maximising revenues through seeking approval of a higher housing figure than District Councillors representing their constituents might consider appropriate.

Chapter 4 - Strategic Policies

3) Policy SP1 a: Sustainable Development in North Hertfordshire

4) *Not Sound - Not consistent with the NPPF.*

5) SP1 a will result in excessive development on Green Belt, a significant increase in urban sprawl, with increasing congestion on the district's road network and the destruction of the character and historical setting of local communities subject to strategic site development.

The Local Plan is based on an inappropriate Core Strategy Direction for Growth. The latter was originally determined in 2007 under the former East of England Regional Spatial Strategy legislation. On its revocation NHDC had the opportunity to reassess its search area to take into account the NPPF's prioritization of the use of Brownfield sites for development and the protection of Green Belt in identifying land for future development but chose not to.

Core Planning Principles state that planning policies and decisions should “encourage the effective use of land by reusing land that has been previously developed (Brownfield land)” (NPPF 17), provided that it is not of high environmental value (NPPF 111).

The decision to focus development around the principal four towns in North Herts and Stevenage, all of which are tightly bounded by Green Belt meant that de facto Green Belt would be the primary source for development. No attempt has been made to prioritize Brownfield sites. Commentary in SP1(a) that “new development making use of previously developed land where possible and in SP8.11 (d) “target the completion of 20% of new homes over the plan period on previously developed land” merely serves to underline the inadequate efforts of NHDC to identify Brownfield sites and the strong reliance on Green Belt land. (Please comments in SP2 regarding inappropriate strategy and direction of search)

2,042 Brownfield sites were identified as qualifying sites in the 2012 SHLAA (not included in NHDC's evidence base) of which only 300 are proposed for development. This figure of 300 excludes any Brownfield development in respect of HT11 Hitchin Churchgate, LG19 The Wynd and LG20 Gernon Road as relevant information is not available.

Table 4 of Specific sites passing the SHLAA tests by type (Strategic Housing Land Availability Assessment 2016 Update page 15) reveals that 82% of the 15,548 sites were Green Belt compared with 4% for Brownfield sites. Green Belt development increases to 85% if land West of Stevenage, sufficient for 3,100 dwellings, which it is proposed to take out of Green Belt and Safeguard” to meet possible Future Need (by Stevenage?),” is also included.

Whilst the policy expresses support for protecting the environment and for focusing development on existing settlements, there is no explicit emphasis on maximising the use of Brownfield land (SASEA Table 29). NHDC has confirmed that it does not have or maintain a register for Brownfield land. Such Brownfield land as have been identified have been limited to its direction of search rather than proactively seeking to identify and priorities Brownfield sites across the whole of the North-Herts district before falling back on green field and Green Belt sites.

6) NHDC should undertake a new search across the whole district to identify new Brownfield sites, including current employment areas, where their location or limited utilisation at present would render the sites suitable for housing development.

7) Yes – wish to participate

8) To emphasise the importance of the constraints imposed by Government Planning Policy.

3) SP2: Settlement Hierarchy

4) Not Sound. Not consistent with National Policy.

5) (i) **Inappropriate Development Strategy:** NPPF 17 sets out the twelve core planning principles to good planning. The first of these states it should “be genuinely plan-led, empowering local people to shape their surroundings”. NHDC has failed to do this. The plan, which lacks the support of a large number of residents and district councillors (see below) is opportunistic, reliant on developer proposals with no original independent / strategic view on the part of NHDC.

The Planning Practice Guidance notes on Housing and economic land availability assessment: Stage 1 Identification of sites and broad locations states that “Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area” NHDC primary strategy has

been to simply rely on a Call for potential development sites rather than actively seek sites, relying on developers and landowners to drive development within the district.

The Direction of Search for development was established in 2007 under the East of England Plan (EoEP), which locally sought to promote the expansion of Stevenage with all development forming an extension of its urban fringes into North-Herts. The EoEP was revoked in January 2013 (Local Plan 1.25) but NHDC did not take the opportunity to review their housing strategy at that time to determine if a more appropriate Direction of Search might be found.

The EoEP called for the building of 15,800 houses in North Herts on land principally around Stevenage. Sites around Stevenage included North of Stevenage (1,000-1,700), GA1 (350) and GA2 (600), NES (5,700) and West of Stevenage (3,100), totalling at that time up to 11,450 homes. Under the present proposals the material reduction in proposed building around Stevenage is directly attributable to two factors: (1) the land owner of NES refusing to sell his land (resulting in the huge development at Baldock) and (2) the decision to "Set Aside under Safeguard" the West of Stevenage to meet future development needs after 2026.

This lack of an adequate strategy is supported by the *SASEA Report 4.3.1 Housing Location* which states

"The option to build a new settlement has not been pursued. This is because no options for new settlements have been put to the Council and with the amount of deliverable land submitted as part the local plan process by developers and landowners, compulsory purchase would not be considered in the public interest." Satisfying NHDC housing needs primarily from Green Belt is also not in the public interest.

The above is in contrast to strong pressure from local residents and pressure groups since 2012 for NHDC to explore the creation of a New Town as a possible solution (wholly or in part) to its Assessed Housing Needs and to minimise its reliance on Green Belt development.

(ii) Lack of Support for the Local Plan: Contrary to the NPPF 150 NHDC's Plan does not "reflect the vision and aspirations of the local community or NPPF 69 that ". Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see."

In response to its December 2014 Consultation NHDC received 8,000 comments from the public the bulk of which objected to Plan.

Secondly strong opposition exists within North Herts Councillors to the plan. The proposed Local Plan has not been approved by North Herts Councillors, it has only been approved by Cabinet. The Council Meeting which took place on 20th July 2016 was to confirm finalisation of the Local Plan documentation for formal approval by Cabinet. At that meeting an external barrister, Suzanne Ornsby QC was present to explain to councillors the consequences of not having a local plan in place, something they should have been well aware of already. Finally one conservative member informed the meeting that on a previous occasion he had voted against the plan and had been informed that were he to do so again he would be expelled from the Conservative group. 5 conservative councillors did vote against the plan and a further 3 abstained, while other members were known to be very uncomfortable with the plan.

We are concerned that a conflict of interest may exist between the level of development proposed and Government incentives for Local Authorities to approve new develop in the form of the Housing Bonus Scheme. In the Report on the North Hertfordshire Local Plan 2011-2031 made by David Levett to the full council, in point 11.6 he advised that were the plan not to be approved it would stop current annual payments of around £2 million per year which if not received would require additional efficiencies or income generation. These comments would suggest that maximizing development levels is the driving priority for NHDC Cabinet rather than a balanced Plan seeking to meet the future housing and development needs of the district and provide for a reasonable level of inward migration.

Given the above potential conflict of interests and the importance and impact of the Local Plan on the district it is concerning that the decision was not taken by the full council. In light of this we believe that the decision to approve the Local Plan should be formally submitted to the full council for approval and if approved a new consultation undertaken.

6). *Inappropriate Development Strategy*: The present Plan's focus, results in an over-reliance on inappropriate development on Green Belt to meet housing need. NHDC should undertake a new search across the district (including employment areas) to identify new suitable Brownfield sites to reduce development pressure on Green Belt land.

7). Yes

8). Suitability of Search Criteria is of primary importance to the viability of the resulting Plan

3) Policy SP2 - part 2 of Policy for Category A villages. Settlement Hierarchy

4) *Not Sound - Not consistent with the NPPF*

5) Category 'A' villages listed in Policy SP2 that are currently 'washed over' by Green Belt should not be included in the Policy because the Plan, and evidence directly referred to in the Plan, does not set out any exceptional circumstances for their individual or collective removal from the Green Belt as required by paragraph 83 of the NPPF.

The Local Plan proposes to remove Graveley from the green belt. To do so it must show exceptional circumstance exist specific to Graveley to justify this course of action (NPPF 83). NHDC has not done so. As part of the existing Green Belt, its boundaries are "established" permanent boundaries as defined by NPPF 79 and 83 and must meet the higher standard of Exceptional Circumstance to merit removal.

NHDC in its evidence in *North Herts Green Belt Review 2016, page 69, para 60* states " In order to ensure compatibility of the proposed settlement hierarchy with Green Belt policy, the following villages (Figure 4.1) are appraised for their contribution to the Green Belt and thereby the case for their potential in-setting" does not qualify as relevant exceptional circumstances.

Table 20: Graveley: Analysis of Contribution to Green Belt Purposes is fundamentally flawed. Graveley's location has clearly been an important factor in restricting the urban sprawl of Stevenage to the north of the town (something NHDC has supported strongly in the past) and therefore must be considered to make a strong contribution to Green Belt purposes. The same would also be true of its role in safeguarding the countryside from encroachment.

As noted in SP16 recent decisions by the Secretary of State confirms coalescence as a concept applies to both settlements and towns and therefore Graveley's location as the first settlement north of Stevenage on the B197 defines the surrounding Green Belt land to the south of the village. The first two points above (preventing sprawl and safeguarding of the countryside) are sufficiently important to warrant Graveley being rated as making a Strong Contribution and therefore being retained within Green Belt.

6) Remove new Category "A" villages in the Green Belt from the Policy.

7) Yes

8) Impact and vital importance to Graveley Village.

3) Sp2 paragraph 4.11 Settlement Hierarchy

4) *No Sound: Not Positively Prepared.*

5) Inappropriate development strategy resulting in a development focus on Green Belt. Cumulative impact of development around Stevenage and North-Herts towns north of Stevenage through the use of Strategic Sites and industrial development, particularly the BA10 site, but without seeking to prioritize identification / development of residential Brownfield sites. Existing infrastructure is inadequate and requires improvement just to cope with the current population.

6) Amend strategy to include proactive search of Brownfield sites across North Herts to relieve pressure on Green Belt development and achieve a more balanced distribution of required development.

7) Yes

8) Adverse Impact of current Policy on Graveley and its locality.

3)_Policy SP5 a: Countryside and Green Belt.

4) **Not Sound: Not consistent with the NPPF: Not Justified**

5) Removal of land from existing Green Belt requires NHDC to demonstrate that exceptional circumstances exist to warrant said removal (NPPF 83). *Meeting assessed housing need has been adjudged by Government not to meet the exceptional circumstances criteria.* Proposed changes in the Local Plan are to existing Green Belt boundaries and therefore the criteria of "exceptional circumstances" apply.

From reading of the NPPF as a whole, the mere fact that there is objectively assessed need (e.g. for housing) which cannot be met from non-green belt land, cannot automatically constitute exceptional circumstances. Otherwise Green Belt policy would not be a reason given in paragraphs 14 and 47 for not meeting that need in full.

The "Exceptional Circumstances" cited as justification for development of Green Belt detailed in the *Housing Background Paper : 5.52* (the substantial contribution of strategic sites (and other Green Belt sites) to overall housing numbers and to the initial 5 year land bank constitute exceptional circumstances to justify Green Belt development) are not considered sufficient to constitute exceptional circumstance.

The Plan does not meet the 5 Year Supply of Identified Deliverable Land Requirement.

NHDC's Plan indicates a land bank coverage of 5.5 years (*Housing Background Paper 2016, page 34, Table 10, 5 Year Land-Supply 1st April 2016*). Stated projected delivery over the 5 years to 2021 is 3,734 dwellings. NHDC in its calculation of 5 year supply of deliverable land has had to include projected allowances for sites which have yet to be identified/confirmed totalling 610 sites (windfalls :250 and small sites:360). Excluding these projected assumptions would reduce land bank coverage to 4.54 years and as such the Plan would fail the 5 Year Land Bank requirement.

Access issues relating to site GA1 (contributing 230 houses) noted below in 13 Communities: Great Ashby and North-East of Stevenage. GA1/GA2 may further exacerbate this issue

NB The Land Bank figure has been incorrectly calculated and should be 3,418 which would improve coverage on the adjusted basis to 4.57 years.

Reference to the *Infrastructure Delivery Plan, Table 4.6: Local Plan growth target phasing* page 25 details delivery of only 2,472 houses (including windfalls) which equates to 3.6 years on an adjusted basis.

The contribution by Strategic Sites in the first 5 years of the plan to 2021 totals a modest 440 houses (50 in 2020 and 390 in 2021). Infrastructure constraints associated with the Ryes Mead Sewage Works limit any real contribution by Strategic Sites before 2022/2023.

6) Completely new policy wording would be required to reflect NPPF. New amended NHDC Local Plan strategy required.

7) Yes

8) Correct Interpretation of NPPF fundamental to application of Government Planning Policy

3)_Policy SP5, paragraph 4.53: Countryside and Green Belt,

4) **Not Sound: Not Consistent with NPPF: Not Justified**

5) 4.53 contends that “Exceptional Circumstances” exist to support the review and change of boundaries to enable development to meet locally identified needs” however the paragraph does not go on to detail the exceptional circumstance, which NHDC considers to exist to justify removal of land detailed in SP5a from Green Belt as required by NPPF 83.

The Housing and Green Belt Background Paper 4.21 describes NHDC’s OAN as both ‘acute’ and ‘intense’ but disregards the caveat in NPPF 14 regarding specific policies within NPPF which may indicate that development should be restricted.

Secondly, it is incorrect to describe the proposed development as being for “locally identified needs”. *The Stevenage and North Hertfordshire Strategic Housing Market Update, Figure 20: Assessing total need for market and affordable housing (Source: ORS Housing Model)* reflects that 63% of total household growth to 2031 of 19,522 is in respect of migration into the Stevenage and North Herts area with in excess of 80% of total development taking place on Green Belt.

6) None of the land in any of the proposed site allocations in the Green Belt, whether a strategic or local allocation, should be removed from the Green Belt because exceptional circumstances for doing so have not been set out in the Plan as required by national planning policy.

7) Yes

8) Important matter of principle in respect of the application of Government Planning Policy

3) SP7 Infrastructure Requirements and Developer Contributions

4) Not Sound: Not Consistent with National Policy: Not Justified.

5) (i) The Local Plan fails to meet the NPPF 14 criteria that development be sustainable.

Policy SP7 requires development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development. This includes provision of facilities and infrastructure for new residents, addressing cumulative impacts that might arise across multiple developments and avoiding placing unreasonable additional burdens on the existing community or existing infrastructure.

Recent changes to government legislation, limiting developer contributions to site specific issues (the application of the 'rule of 5', the rule which prevents the collection of more than 5 obligations towards a project or type of infrastructure) and requiring project viability, will significantly limit the extent of this source of financial support to resolve the cumulative adverse impact of proposed development on existing infrastructure issues.

Local Plan proposals entailing a concentration of development mainly to the north of Stevenage (Baldock, Letchworth but also Royston), on multiple strategic sites is contrary to the stated objective of SP7 of avoiding placing unreasonable additional burdens on the existing community or existing infrastructure.

Existing infrastructure is already overstretched, roads are heavily congested, the recently expanded Lister Hospital is already experiencing capacity issues and limited school places is forcing parents to travel long distances to take children to school.

Implementation of the Local Plan would be irresponsible before fundamental infrastructure issues have been resolved. Strategic development may contribute towards an improvement in primary school places but the lack of secondary schooling will remain an issue.

Resolution of infrastructure problems per se is not the direct responsibility of NHDC. Their responsibility is to ensure that the level of development undertaken is not only sustainable but that it can be delivered on a timely basis and will not materially impact or worsen the lives and environment of the existing community. If it cannot do this then the plan must be deemed to have failed. The wording of SP7 above recognises this in its requirement that the impact of cumulative developments should avoid placing unreasonable burdens on the existing community.

From the information provided it is also unclear as to how proposed infrastructure improvements detailed in the Local Plan will be funded.

(ii) Existing Road Network requires major improvement to address current congestion let alone cater for growth proposed under NHDC and Stevenage Local Plans.

The SASEA report under 7.4 Strategic Cumulative Effects concludes that despite a number of “Upper Tier Local Authorities plans for road improvement to the A1 (M) and the district’s road network “there are likely to be residual effects in terms of traffic congestion and associated pollution”. While under 2.6 Key Sustainability Issues, Table 6 Land Use and Development Patterns, page 14, of the same report notes that “The density of traffic on the principal road network is high and increasing but the rural nature of the District makes the provision of sustainable travel modes more challenging.” Indeed increasing road congestion is such that major improvements to the road network are required to cater for existing traffic volumes let alone any increase resulting from Local Plans proposed by NHDC and Stevenage.

Modelling of the district’s road network has focused on the A1 (M) and major Principal (A) roads. Planners have not adequately recognised the importance of the B road network in relieving heavy congestion pressures on the principle roads and the A1 (M) in particular. Both the B197 and the B656 serve as alternates to the A1 (M) and are classified as such by Herts Highways, with the villages of Graveley to the North of Stevenage and Knebworth to the south of Stevenage for the B197 and Codicote on the B656 being pinch points for traffic at peak travel times and suffering a constant stream of traffic at other times.

Significant housing development is currently being proposed by a number of Local Authorities within the Stevenage HMA which must also be taken into consideration in assessing the road network capacity, for example proposals to build 12,500 houses by Welwyn and Hatfield will significantly increase road congestion on the A1 (M) at junction 6, and especially around Codicote and Knebworth.

As noted in the *Infrastructure Development Plan 5.1* “Improvements to the transport network will be crucial in facilitating the development identified in the North Herts Local Plan; particularly the delivery of the strategic sites” and will (5.2) “need to take place against the background of the requirement to tackle issues with the existing road network, and alongside the promotion of sustainable means of travel and the minimisation of congestion and emissions”.

(iii) Proposed SMART road improvements to the A1(M) are not considered sufficient to address current and future road congestion.

Please see Policy T1 for commentary

(iv) Local Plan development to the north of Stevenage will have a Severe Impact on traffic flows on the B197 and for the Village of Graveley.

Please see Policy T1 for commentary

(v) Provision and Financing of Adequate Healthcare going forward is uncertain given the funding and staffing crisis in the NHS.

As noted in the *Infrastructure Delivery Plan*, 7.53 the limited availability of information, at this stage, makes a comprehensive assessment of future secondary healthcare requirements difficult.

Primary Care and adequacy of doctors to patient numbers and surgeries is also an issue at present within the district.

Existing capacity issues at the recently upgraded Lister hospital (completed 2014) with regard to the provision of services and the ability of the hospital to expand on its present site in the future to accommodate increased patient numbers and new treatments raise serious questions as to the

adequacy of Secondary HealthCare which East and North Herts Trust will be able to provide given the significant increase in population within its catchment area proposed under various Local Plans.

East and North Hertfordshire NHS Trust provides secondary care services for a population of around 600,000 in East and North Hertfordshire as well as parts of South Bedfordshire and tertiary cancer services for a population of approximately 2,000,000 people in Hertfordshire, Bedfordshire, north-west London and parts of the Thames Valley. There are approximately 720 beds at the Lister Hospital.

Following a recent reorganisation, the Lister is now the main hospital for the Herts and South Beds area. Despite a recent £150 million upgrade the provision of A&E services and ambulance queuing continues to be a problem, with the hospital itself graded at its most recent CQC review as Requiring Improvement.

Proposals under the Stevenage Plan envisage housing and industrial development up to the hospital's boundary. Land to the rear of the Lister site is currently used for staff car parking, however to mitigate a serious shortage of parking spaces for staff (The Lister employs 2,700 staff), it is likely that a multi-story car park will be built to alleviate the significant parking problems in the surrounding residential area. The Stevenage plan allocates a 2.4 hectare field next to Lister's current staff car park which could be used but issues relating to sharply different land levels between the two sites (restricting connectivity between the two sites) and two sets of pylons running through the field may restrict if not deter future expansion in this direction.

6) Reduction in proposed level of development to more accurately reflect local needs and reduce pressure on local infrastructure. Utilisation of West of Stevenage site to dilute the impact of development to the north of Stevenage

7) No

8) No

3) Policy SP 8, and paragraphs 4.85 to 4.93 - Housing

4) Not Sound: Not consistent with the NPPF: Not justified

5) The Local Plan states that all of the district's assessed Housing needs - and some of Luton's - must be met by the Plan. This directly conflicts with National Policy. NPPF 14 states that there is a presumption in favour of sustainable development "Unless specific policies in this Framework indicate development should be restricted", one of the restrictions being Green Belt land. This stance has been confirmed in NPPG paragraph 045 ID 3-045-2014141006 and numerous statements by various ministers from the Department for Communities and Local Government

It is therefore concerning that given the Plan's heavy reliance on Green Belt to meet its housing requirement NHDC has ignored paragraph 045 ID 3-045-2014141006. This guidance note states that having identified its housing need the Local Authority should take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

Housing targets are not justified by sound evidence. Proposed development is excessive and goes significantly beyond that required to meet local needs. The Local Plan should reflect current and future housing need of the district, NHDC's plan does not do this, 63% of proposed development is for people moving into North Herts from out of area.

As noted in comments in SP5 above use of Green Belt to meet housing targets is only permitted in exceptional circumstance. It is considered that reasons detailed in the *Housing and Green Belt Background Paper: 5.52* are not sufficient to constitute exceptional circumstances.

We accept that there is a need for some development to meet future housing need but consider a figure of 19,050 (including West of Stevenage which currently it is proposed to Set Aside for future use) to be excessive. Realistically much of new development is to support London's housing shortage.

Given affordable housing need is driven by the overall level of development, what level of development could be appropriate?

Recommendation: As currently proposed 37% of development relates to NHDC own requirements (5,180 houses), which is suggested as NHDC portion of an amended housing target. Based on an affordable housing criteria of 33% of target this equates to affordable housing of 1,709 houses (781 to cover existing shortfall and 928 for housing growth) and 3,471 market housing. To accommodate the inward migration a figure of 5,180 houses (affordable housing 1,709: market housing 3,471) at 100% of NHDC own local development requirement for the period would seem reasonable. This would result in a reduction of 3,630 houses which could be used to reduce Green Belt development.

To further reduce development on Green Belt, rather than setting aside West of Stevenage to support future development the site be used to meet NHDC current need. (Please refer to *Policy SP8 (e) (ii) and paragraph 4.104 and 4.105 below*)

The above would reduce total development to 10,360 houses, a reduction of 35% on current proposed development and 46% if West of Stevenage is included and reduce Strategic Site (all Green Belt) development (including WoS) by 52%.

6) The housing target in Policy SP8 should be reduced following a detailed analysis of the elements of the Council's overall housing need assessment to determine the scale of housing need that is justified, given the specific Green Belt, AONB and other NPPF footnote 9 constraints that apply to the District.

The proposals in parts 'b', 'c' 'ii', and 'c' 'iii' for Strategic Sites and other proposals for the removal of land from the Green Belt, and the related supporting text should be deleted from the Plan.

7) Yes

8) Impact and importance to Graveley Village

3) Policy SP8 (e) (ii) and paragraph 4.104 and 4.105: Housing

4) Not Sound: Not consistent with NPPF: Not Justified

5) Removal of land for 3,100 houses from Green Belt for development after 2026 is unsound because it is both unjustified and inconsistent with National Policy as set out in the NPPF. No exceptional circumstances have been cited or justification provided.

It is currently proposed that West of Stevenage be set aside to meet possible future Unmet Housing Need. Originally the setting aside of WoS was as a precautionary measure for Stevenage which currently does not have an "Unmet Housing Need (NHDC Local Plan 2.39).

If land West of Stevenage is to be removed from Green Belt it should be used to meet NHDC's current housing need thereby permitting the release of a number of other sites around Stevenage and reducing the Local Plan's excessive use of Green Belt.

Stevenage under its Local Plan is proposing to develop 1,350 dwellings on land adjacent to the WoS site. Release of WoS now would permit an enlarged joint development with Stevenage, subject to a single Master Plan, permitting improved infrastructure planning / facilities and create a greater sense of community. The enlarged development of 4,450 dwellings would be of sufficient size to help resolve / finance current road access problems posed by the isolated position of these two sites west of the A1 (M).

In response to existing heavy traffic congestion on the A1 (M) and in the surrounding road network Highways England is proposing improvements to the A1 (M) and junctions 7 and 8. Were the enlarged development to be brought forward Highways present proposals would require amending and it would no doubt increase the costs involved but the issue of access will have to be resolved at some point in the future anyway and the increase costs could be mitigated by developer contributions.

Development of WoS would mean other developments on Green Belt around the fringes of north Stevenage, namely NS1 (900 houses), GA1 (350 houses) and GA2 (600 houses), south of Little Wymondley (300 houses) and Knebworth (663 houses) would not need to be proceeded with in order for NHDC to meet its housing target of 13,800 houses. It would also help reduce traffic congestion north of Stevenage, which given the heavy concentration of development in that area would be a strong positive.

6) Part “e” (ii) of the Policy and its supporting text should be deleted.

7) Yes

8) Proposed policy amendment would materially alter level and profile of development within North Herts.

3) SP8 d, Housing

4) **Not Sound: Not Consistent with National Policy: Not Effective.**

5) As noted in SP5 the Plan does not meet the 5 Year Supply of Identified Deliverable Land Requirement.

The target of 20% housing from previously developed land is insufficient and as noted in *Table 4 of Specific sites passing the SHLAA tests by type (Strategic Housing Land Availability Assessment 2016 Update page 15)* only 4% of the 15,548 sites were Brownfield sites (please refer to comments in SP1). The target for housing from previously developed land should be increased to say 40% with a minimum of say 30%. This would reinforce the need to identify additional Brownfield sites to reduce pressure on Green Belt.

6) *Change in strategy* to increase Brownfield search / development to support 5 year land bank supply and support reduction in Green Belt development.

7) No

8) No

3) Policy SP16, and paragraphs 4.195 to 4.201: Site NS1 North of Stevenage

4) **Not Sound: Not consistent with NPPF: Not Justified.**

5) (i) **Development of NS1 is contrary to NPPF 79:** Use of Green Belt to meet housing targets is only permitted in exceptional circumstance. It is considered that reasons detailed in the *Housing and Green Belt Background Paper: 5.52* are not sufficient to constitute exceptional circumstances. **Not Consistent with National Policy: Not Justified**

Approval of NS1 will help planners justify the releases of a further 7,235 Green Belt sites identified in Stevenage’s 2015 Green Belt review for development post 2031 to facilitate a further increase in Stevenage sprawl. (*Review of the Green Belt around Stevenage Part 2: Site Assessment and Capacity Testing Table 3.1 Indicative Development Capacity of Parcels Recommended for Release, page 41*)

(ii) **Meeting assessed housing need has been adjudged by Government not to meet the exceptional circumstances criteria.** The NPPF makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Proposed changes in the Local Plan are to existing Green Belt boundaries and therefore the criteria of “exceptional circumstances” apply. **Contrary to National Policy: Not Justified.**

(iii) **Incorrect Assignment to NS1 of a “moderate contribution to Green Belt”** in the *North Hertfordshire Green Belt Review 2016* to justify removing NS1 from Green Belt.

The review confirms Study Area 15 (“Overall makes a significant contribution to Green Belt purposes, helping to prevent sprawl and encroachment, and maintaining the separation of towns”) and sub-area

15c (making a significant contribution, important part of gap separating Stevenage, Hitchin and Letchworth”) both strongly fulfil Green Belt criteria.

The above is in stark contrast to the “moderate contribution” assigned to the NS1 and site 353 (both of which are part of sub-area 15c) on *page 109 of the North Hertfordshire Green Belt Review 2016* and reflects treatment of NS1 as effectively part of the Stevenage urbanisation. This treatment is viewed as self-serving to support approval of the NS1 site, rather than objective – preventing urban sprawl by Stevenage is the issue and objective of the site as currently categorised as Green Belt.

Please note Study Area 15 is described as Jack’s Hill, this categorisation is incorrect as it ignores the fact that the principal settlement in the study area is in fact Graveley. Graveley and the Green Belt around the village have to date effectively prevented urban sprawl by Stevenage something, which NHDC has strongly upheld until now.

(iv). Coalescence with Stevenage is Contrary to National Policy (NPPF 80).

In justifying inclusion of NS1 in the current plan, NHDC cites the *Stevenage Borough Local Plan 2011-2031*, 2016 (NHDC Local Plan 4.195) to support its decision. Stevenage in identifying and justifying NS1 as a suitable area for Stevenage expansion in its “*Stevenage Green Belt review*” argues that given the wording in NPPF 80, coalescence only applies to Towns rather than Settlements and “Thus villages and hamlets, which are often” washed over” by Green Belt, do not fall within this definition” (*NPPF 80, Stevenage Green Belt Review Part 1 para 2*).

This assumption conflicts with a Parliamentary response given by Nick Bowles (Parliamentary Under-Secretary of State for Communities and Local Government (Hansard 13 May 2014: Column 238WH) who stated

“To return to green-belt protections, the national planning policy framework is clear on the importance of those protections, the permanence of green-belt land and its role in preserving the openness of the countryside and **in preventing settlements from merging** (emphasis added)”

This view is also supported by three recent decisions in

- a) Suffolk Coastal DC v Hopkins Homes Ltd and Richborough Estates Partnership LLP v Cheshire East BC, where the Secretary of State upheld the Inspectors view (John Chase) that the loss of the gap between the surrounding settlements involved physical intrusion into an area of countryside, and contributed to coalescence and loss of independent identity. This was contrary to those policies of the NPPF which recognised the different roles and character of different areas, and carried significant weight against the proposal.
- b) Langley Burrell, Chippenham: A proposal for 500 new homes, primary school, employment, leisure and retail uses in open countryside in Wiltshire was refused for its cumulative environmental harms despite being considered to be located in a less sensitive landscape without “value” and one which would make a significant contribution to the housing shortfall in the area. The inspector held that his main concerns were the impact of the proposal on the character and appearance of the area, nearby heritage assets and the identity of the adjoining village.
- c) Sawston Solar Farm Limited APP/W0530/W/15/3012014. The Secretary of State confirmed the examining Inspectors decision (ref 3012014 15/6/2016) *that* It would lead to encroachment into the Green Belt and countryside that would result in the coalescence of the villages of Sawston and Babraham through a loss of visual separation.

NHDC’s stance that the prevention of coalescence only applies to towns is **not justified**.

(v) Development of NS1 is contrary to policies contained within NHDC’s Local Plan, Spatial Vision 3.6, third point states “New Developments will be well integrated into settlements: respect local distinctiveness”: and point 4 “help maintain and enhance the vibrancy of existing settlements”. These statements conflict with the proposed merging of Graveley Village with Stevenage. It would also be **Contrary to SP9, 4.115** which seeks where possible to enhance the existing character of both the

urban and rural areas to maintain the quality of the District's environment: **ENV2/Policy D1**: the object of which is to "Protect and enhance the historic character of North Hertfordshire's towns, villages, hamlets and landscape by promoting good design that creates a distinctive sense of place" and **Policy D1** to respond positively to the site's local context. **Not Positively Prepared.**

(vi) NS1 is Contrary to Land Study Recommendations: Graveley is a village of around 200 houses. The new development, including the Stevenage site will create a development of 1,700 houses. It is highly doubtful that the impact of such a large joint development can be adequately mitigated given its position on the Graveley Village boundary.

The NS1 development proposal conflicts with the 2011 Land Study Report which described developments of greater than 5 hectares as not appropriate for the site (This report was commissioned by NHDC but is no longer available on their web site) and is also contrary to the Housing and Development Strategy Policy HDS4: Density, which calls for "development to respect any established character of the area."

Appendix 6 of The SASEA Report, page 150 of the appendix, section 3(b) Protect and enhance landscapes, references the Land Study of 2011 and confirms development greater than 5 hectares would not be appropriate.

Thirdly a response to a NHDC 2014 consultation noted

"Describing Graveley the *February 2010 Land north of Stevenage: Landscape Sensitivity Study* (page 48, point 4.27) "only small scale levels of development could be accommodated without fundamentally altering character (either settlement character or wider landscape character, or the sense of separation between the village and Stevenage)."

This wording is no longer included in the version of the quoted report available on NHDC's website.

(vii) Proposed boundary to the north of NS1 is not defensible and is contrary to NPPF 85's requirement that boundaries should be clear, using physical features that are readily recognisable and likely to be permanent. **Contrary to National Policy: Not justified.**

NS1 includes a new site, 353, to create a new boundary North of Stevenage, justified on the basis that as part of the boundary will be along hedgerows it will be more defensible than the previous proposed boundary which was set some 400 metres from the village boundary.

The proposed boundary after initially following the village boundary along an old, unkempt garden hedge full of holes and in need of replacing, then wanders off across a field with no reference to contours or other defining features. The resultant boundary is weak and unclear and is likely to be the subject of pressure in the future for further realignment or large-scale change and gives no confidence in its permanence. This is in contrast to the strength of the NS1's southern boundary which comprises a double row of mature trees along the whole site's southern border.

(viii) Development of NS1 is Contrary to NPPF 132 which states that "Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". **Not Justified.**

The NS1 boundary as proposed seeks to switch the emphasis of development away from Graveley's Conservation Area, west towards the B197. This change in emphasis does not change the fact that development will extend to the Village Boundary thereby impacting the setting of the village and resulting in the coalescence of a thousand year old village, mentioned in the Domesday Book, with a modern urbanisation. Maps detailed in the Heritage Assessment of North Stevenage, Appendix B do not reflect the village boundary or residential housing on the village boundary.

(ix) The new boundary conflicts with SP16, 4.197 which seeks to "preserve the setting and separation of Graveley Village and its Conservation Area. **Not Justified**

(x) Contrary to the Graveley Village Plan 2010 (http://www.graveley.org.uk/graveley_plan.asp). Graveley residents overwhelmingly expressed "a wish to protect the character and identity of

Graveley village, keeping it separate and distinct from Stevenage. Any green spaces in the village should be preserved and a green belt kept around the village to prevent Graveley being swallowed up by Stevenage expansion.

(xi) No Duty to Co-operate to Support Stevenage Development south of NS1. Originally proposed in order to comply with the "Duty to Co-operate" legislation to help Stevenage meet its housing need, as noted in paragraph 2.39 of NHDC's Local Plan document, Stevenage can now fully meet its housing need without assistance from North Herts and therefore development of this site is no longer required. **Not Justified.**

(xii) No Contribution of NS1 to the required 5 year supply of deliverable land until 2024 due to infrastructure constraints (upgrade of Ryes Mead Sewage Treatment Works) restricting commencement of development.

(xiii) SP8, 4.92 states development of NS1 will be wholly to meet the housing needs of North Hertfordshire. Given the site when developed will be included within the Stevenage urbanisation and that in the Council's own assessment that : 'the site is poorly related to North Hertfordshire's main towns and villages, thus may not meet North Hertfordshire needs in the most efficient way.'*(NHDC Housing Options Feb 2013)* development of this site is inappropriate in meeting the housing needs of North Herts.

Secondly as noted in SP8, proposed development is excessive and goes significantly beyond that required to meet local needs. The Local Plan should reflect current and future housing need of the district, NHDC's plan does not do this, 63% of proposed development is for people moving into North Herts from out of area. **Not Justified:**

6) The Policy and supporting text should be deleted.

7) Yes

8) The significance of the impact on Graveley Village: Flawed Green Belt assessment: Important matter of principle in relation to Government Planning Policy.

Section Three- Develop Management Policies

3) ETC1/ETC2 Employment Areas

4) Not Sound: Not consistent with National Policy: Not Justified

5) As part of a renewed search NHDC should review existing industrial/employment areas to identify new Brownfield sites for development to reduce pressure on Green Belt thus fulfilling one of the main criteria of Green Belt.

The Plan's policies seek to protect all employment land, including offices, from changes of use or redevelopment for residential use, this is not consistent with government policy to prioritize Brownfield development through the recycling of urban land or with the recently introduced Permitted Development Rights for the change of use of offices. Stevenage in drawing up its current Local Plan identified some 3,000 dwellings through the conversion of office space within the town centre.

Given NHDC's heavy reliance on Green Belt to meet its housing need, the Plan should encourage the use or redevelopment of suitably located employment sites to meet its housing need

6) These policies should be amended to allow suitably located employment sites adjacent to existing residential areas to be used for residential development.

7) Yes

8) To reinforce importance of Government Policy in utilising Brownfield land as a means of relieving pressure on Green Belt development.

3) Countryside and Green Belt: CBG2 Exception sites in rural areas:

Adjoining Category A villages will be granted where: b, c, d, e

4) *Contrary to National Policy: Not Justified.*

5) The combination of CGB2 and HS2 paragraph 8.17 is to remove any protection to residents from a decision by planners and developers to concentrate development of affordable housing on the edge of the developments, particularly Strategic Developments. Such development would be contrary to NHDC's stated vision (Local Plan 3.6) of "New development well integrated into settlements: respect local distinctiveness" and HS3 8.21 regarding lower housing density on the periphery to mark the transition to the rural area beyond.

Location of modest levels of affordable housing on the edges of Category A villages, unless specifically related to that village's local needs, will be contrary to ENV2 and ENV3.

The effect of the above two policies conflicts with NPPF 58 which states development should aim to ensure that development "respond to local character and history, and reflect the identity of local surroundings and materials" and it ignores NPPF 66 which requires applicants to work closely with and take into account the views of the community.

6). CGB2: Wording be included to prevent the concentration of affordable housing on the edges of Strategic Sites next to A villages.

7) Yes

8) Importance and impact of issue to Graveley Village.

3) Policy HS2: Affordable Housing 8.17

4) *Contrary to National Policy: Not Justified.*

5) Please refer to CBG2

6) Delete paragraph.

7) No

8) No

3) HS3: Housing Mix paragraph 8.21

4) *Not Sound: Not Justified.*

5) This policy is weakly worded and offers no protection to residents of rural communities and settlements bordering Strategic Site development. Pressure from developers and the evident determination of NHDC to push through their proposed development regardless of strong local opposition to achieve their housing targets mean proposed developments will be susceptible to upward pressure on housing numbers/densities and may result in development which does not respect the established character of the area."

Policy D1 : Sustainable Design, paragraphs 9.2 requires development to respond positively to the site and local context while 9.3 requires a Landscape and Visual Impact Assessment to be undertaken to assess the significance and effect of development proposals on the landscape and people's views and visual amenity, neither of these policy requirements however would necessarily prevent inappropriate development

6) The wording of 8.21 be amended as follows "Development on the periphery of settlements should be at a lower density to mark the transition to the rural area beyond (i.e. removal of the word "generally")

7) No

8) No

3) Policy T1: Assessment of transport matters

4) *Not Sound: Not Positively Prepared*

5) (i) Existing Road Network requires major improvement to address current congestion let alone cater for growth proposed under NHDC and Stevenage Local Plans.

Please refer to SP7 commentary point (ii).

(ii) The cumulative impact of Local Plan developments to the north of Stevenage will have a “Severe Impact” on traffic flows on the B197 and for the Village of Graveley. The B197 is a single lane carriage way constrained by the Village of Graveley and cannot be widened to accommodate any future increase in traffic volumes. At present the B197 is subject to heavy traffic flows at peak times through Graveley, with traffic queuing back to Jack’s Hill and often beyond to the A505. This has resulted in an increase in pollution in the village (noise and fumes) and increased driver frustration and aggressive driving.

These heavy volumes originating from Baldock, the Baldock Bye-pass, Great Ashby via Church Lane and Letchworth/Willian via Graveley Lane to the B197 have been exacerbated by changes in the road layout at the junction of North Road / Graveley Road on the B197 to accommodate increased traffic flows from junction 8 A1(M) associated with the expansion of Lister Hospital.

Traffic modelling undertaken to assess the impact of proposed development highlights Graveley’s position at the confluence of the non-primary road network around the A1 (M) to the north of Stevenage. The following junctions have been identified as problem junctions requiring upgrading (*Aecom Report “Preferred Local Plan Model Testing- Problem Locations” 05/07/16*):

Graveley Road/ North Road: The B197 is the main road linking Stevenage, A1(M) junction 8 and Baldock. The priority junction has been identified as problematic in the AM peak as large queues and delays occur on the junction approaches and North Road traffic is opposed by large volumes of traffic using the B197.

Currently Herts Highways have classified this junction as hazardous due to the frequency of accidents at this junction requiring the attendance of the emergency services.

Graveley Lane/B197 which is used to travel between Stevenage and Hitchin (to avoid junction 8 A1 (M)) and traffic travelling from Letchworth through Willian to Stevenage.

A1 (M) J9 / Letchworth Gate / A505 in Letchworth:

Traffic from Letchworth, Baldock and from Royston via the Baldock By-Pass utilise the B197 to travel to Stevenage avoiding the A1 (M) congestion. Traffic volumes are likely to rise significantly from the 31,490 southbound and 30,744 northbound weekly volume measured by Police Traffic Management through Graveley for the week commencing 21/07/16, as planned new residential development totalling 6,162 homes and the proposed 20 hectare industrial estate BA10, adjacent to the Baldock By-Pass are completed.

Traffic flows between Stevenage and Hitchin via Graveley Lane to avoid congestion at A1 (M) junction 8 will also increase to reflect the 1,700 house development (North of Stevenage joint development by NHDC/SBC) to the south of the village and the new industrial site EC1/4 planned on land near the Lister Hospital under Stevenage’s Local Plan, which will also utilise the B197.

Development proposals at GA1 and GA2 totalling 950 houses will further exacerbate the Church Lane rat run issue (please see comments 13 Communities: Great Ashby and North-East of Stevenage.GA1/GA2 below). Proposed changes to the road network at GA1 development will also provide improved access for other Great Ashby residents to travel via Graveley and Weston to avoid heavy congestion at peak times travelling towards Stevenage.

Proposed improvements to the A1 (M) and junctions 7 through 10 will help improve congestion management, but unless the A1 (M) is expanded to 3 permanent lanes and a hard shoulder, they will only be sufficient to address current traffic volumes, given the latter’s strategic importance to national traffic flows between London and the north of England, which will also increase as economic growth picks up.

NB: The effect of improvements to the two Graveley junctions noted above will be constrained by the nature of the B197 itself.

New development on the scale envisaged will despite proposed improvements to roads in North Herts result in further significant congestion to an already heavily congested road network.

6) Reduction in proposed level of development to more accurately reflect local needs and reduce pressure on local infrastructure. Utilisation of West of Stevenage site to dilute the impact of development to the north of Stevenage.

7) Yes

8) Direct and important impact on Graveley Village.

13 Communities

3) Graveley and North of Stevenage.

4) **Not Sound: Not Justified**

5) (i) Proposed Settlement Boundary is too restrictive and does not extend to existing development within the village. As drawn the settlement boundary does not adequately provide flexibility for future growth of the village. Removal of Green Belt protection for the village opens up land between the proposed settlement boundary and NS1 to future development.

(ii) As noted above in "Policy SP2 - part 2 of Policy for Category A villages" NHDC through the Local Plan is seeking to remove Graveley's Green Belt status. To do so would be contrary to national policy and is likely to cause significant harm to the Green Belt and its purposes.

6) The settlement boundary needs to be redrawn to include existing housing within the village. This will allow villagers to have a say in where future development takes place through the preparation of a Neighbourhood Plan. Graveley's Green Belt status, which should be extended to include the land between the village boundary and NS1 and should be retained.

7) Yes

8) Importance and direct relevance to Graveley Village.

3 Great Ashby and North-East of Stevenage.GA1/GA2

4) **Not Sound: Not Justified**

5) Significant access issues to GA1. As noted in the conclusion to the attached report prepared by Transport Consultants, PTB Transport Consultants Ltd, in respect of the current planning application for the GA1 site on behalf of GPC, Great Ashby Community Council and Weston Parish Council, the impact of development of GA1 (and GA2) on Church Lane (known as Back Lane towards Great Ashby) is likely to be severe (pursuant to NPPF 32). The report also highlights a number of other issues with the local road network and the assessment undertaken on behalf of the developer.

GA2: No planning application has currently been made but given the close proximity of the two sites comments regarding the limitations of the local road network above are likely to be applicable.

6) Limitations to the road network may mean GA1 will not be deliverable and will therefore impact NHDC 5 year Land Bank.

7) Yes

8) Yes impact on traffic congestion, road safety and the Graveley Conservation Area.
