

## **Representation on behalf of Picture srl**

---

### **Examination of North Hertfordshire District Council Draft Local Plan 2011-2031**

### **In respect of Matter 10 – Stevenage (Great Ashby)**

*Prepared by Keymer Cavendish Limited*

*12 January 2018*

## **Contents**

### **Matter 10 – Stevenage (Great Ashby) – site GA2**

- 1.0 Executive summary
- 2.0 Matter 10.20 – Deliverability
  - a) Availability
  - b) Access
  - c) Deliverability
- 3.0 Matter 10.21 – Justification and appropriateness - impact
- 4.0 Matter 10.22 – Appropriateness vs. alternatives
- 5.0 Matter 10.23 – Green Belt
  - a) Exceptional circumstances
  - b) Potential harm to Green Belt
  - c) Reducing impact on Green Belt
  - d) Impact on adjacent Green Belt
  - e) Green Belt boundary
  - f) Sustainable development strategy
  - g) Definition of Green Belt boundary
- 6.0 Matter 10.24 – Settlement boundary
  - a) Identification of boundary
  - b) Appropriateness and justification
- 7.0 Other matters
  - a) Policy SP8
  - b) Policy SP18
- 8.0 Part C – Development Management Policy
  - a) HS2 – Affordable Housing
  - b) HCA – Shared Ownership and Affordable Homes Programme 2016 to 2021

### **Appendices**

- I Picture landholding
- II Illustrative Master Plan
- III Infrastructure summary
- IV Ecology study
- V Area 16 Green Belt analysis from DOC CG1 (North Herts Green Belt Review July 2016)

## **Matter 10 – Stevenage (Great Ashby) – site GA2**

### **1.0 Executive summary**

This representation relates to Stevenage (Great Ashby), in particular to allocated site GA2. This land is owned by Picture srl who have a signed Statement of Common Ground with North Hertfordshire District Council in relation to the site allocation.

Picture owns Dane End Farm, totalling approximately 100 hectares.

The landowner has worked consistently with the planning authority over the last ten years or so, initially to bring forward a substantial development of 4,000 houses under the aegis of the East of England Plan. More recently, since the East of England Plan was abolished, Picture has maintained a working dialogue with North Herts who finally confirmed an allocation of 600 houses in the proposed Submission Plan published in autumn 2016. Associated with this allocation there has consistently been the offer of a site for initially a 1FE and more recently a 2FE primary school, in line with the larger housing allocation.

While Picture maintains that no secondary school is required in this part of Stevenage (as demonstrated by its retained specialist education consultants) the reservation of a secondary school site of up to 4FE would also be deliverable if the need was convincingly proven by the education authority. A 4 hectare site has been sought to accommodate the school, and would be adequate, but in fact Picture have offered 7 hectares. Playing fields would be provided on adjoining Green Belt land and can be secured through appropriate planning obligations. Any required permission for a material change of use can be secured at the application stage. There is no need to allocate this part of the green belt for playing field use at this point. Such a use would not be contrary to green belt policy as it would not require inappropriate development to be carried out.

The intrinsic character of the site, apart from the unsightly pylons, is the scattered broadleaf woodlands both within and adjacent to the site. These will break up the mass of the development and will provide an attractive place to live. The topography of the site also enables optimal visual containment in that the proposed housing will be developed on land gently sloping towards the existing Great Ashby settlement with farmland and

vegetation on the outer perimeter avoiding encroachment into the broader countryside.

Substantial evidence has been brought by specialist infrastructure, heritage, environmental, ecology, education and Master Plan design consultants to prove that the site is readily deliverable in an entirely policy consistent and acceptable manner.

#### **Infrastructure – Wormald Burrows**

Following extended analysis, full reports under each subject were filed along with our previous representations during the November 2016 Public Consultation. Civil Engineering Consultants Wormald Burrows Partnership have confirmed that a development of 700 residential dwellings, a 4FE Secondary School and a 2FE Primary School can be accommodated on GA2 in Great Ashby in terms of surface water runoff, foul water capacity of the Thames Water system, highway capacity and the local transportation systems. A short statement reporting the conclusions of these studies is attached at Appendix III.

#### **Heritage – Heritage Network**

This report, prepared by the Heritage Network, Specialists in Archaeology and the Historic Environment and filed during the November 2016 Public Consultation, concludes at paragraph 3.57 that there are not considered to be any overriding heritage issues that would prevent the allocation of GA2 for development. Heritage is addressed further under Matter 10.20.

#### **Ecology – Elmaw Consultants**

At paragraph 14.1.10 of their extended ecology study attached at Appendix IV, Elmaw Consulting ecologists and wildlife biologists, conclude that GA2 is not considered ecologically remarkable and that the site specific requirements for granting planning permission can satisfactorily be met.

#### **Education – EPDS Education Consultants**

Paragraphs 5.2.3 and 5.2.4 of the report Stevenage Secondary Education Needs Analysis prepared by education planning specialists EPDS consultants (submitted as part of the November 16 representation) confirm existing school and sites can meet projected secondary education demand, and that in any event North East Stevenage is the wrong location for a new secondary school, when so much development is to be directed to the west and north-west of Stevenage.

## **Summary**

In summary, site GA2 offers a comprehensive small neighbourhood totalling around 57 hectares with:

- 21.5 ha of housing
- 7 ha of land for education including playing fields
- 15 ha of Public Open Space (double the required standard)
- 7 ha of woodland
- 6 ha sterilised by pylons

## 2.0 Matter 10.20 – Deliverability

***Are all of the proposed housing allocations deliverable? In particular, are they:***

***a) confirmed by all of the landowners involved as being available for the use proposed?***

As can be seen from the ownership map attached at Appendix I, Picture owns the whole of site GA2 and also surrounding land. The uses envisaged by the proposed allocation of site GA2 as provided in the Draft Local Plan are confirmed by Picture. The control of the entire landownership and surrounding land enables Picture to provide an emergency access to Weston Road and also offsite balancing ponds in order to optimise the developable area. It is proposed that substantial areas of GA2 will be reserved for Public Open Space and Picture is committed to the provision of an appropriate level of Open Space and other necessary infrastructure to support the proposed allocation. This is identified on the illustrative Master Plan attached at Appendix II.

***b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?***

Picture does not own that part of the pylon corridor connecting to Mendip Way; however, Picture has long been in discussion with the appropriate access holders who include Homes England (formerly HCA) and Croudace Homes. All parties have confirmed their willingness to negotiate access on commercial terms and several of them have expressed interest in participating in development of the site. This will ensure the necessary vehicular and pedestrian links are available to serve the site.

In our representation of November 2016 we stated at paragraph 1.7: *'Keymer Cavendish will ensure that any allocation confirmed in the Local plan is translated into a deliverable housing site.'* That statement was made after many years of experience in delivering the previous phases of the Great Ashby sites and negotiating access to the various phases of development with the relevant access holders (which included the same parties as involved in the current proposed allocation).

Wormald Burrows carried out on behalf of Picture substantial highway analysis which resulted in the traffic assessment submitted as part of the representations filed during the Nov 2016 Public Consultation. The assessment obtained preliminary sign-off by the highway authority which confirmed sufficient capacity of the existing road network to support the

proposed development. A preliminary audit was also signed off by the highway authority on the proposed road access design. More recently in October 2017, Wormald Burrows updated the assessment to take account of more recent traffic surveys as well as updated assumptions on the potentially expanded education provision to be accommodated on site. This update of the traffic analysis is included in the Infrastructure summary note at Appendix III.

There is already a good network of public footpaths throughout GA2 and further foot/cycle links can be formed between the existing housing of Great Ashby and the new development.

***c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?***

Infrastructure summary note at Appendix III is a summary of highways and drainage matters produced by the Wormald Burrows Partnership. As explained previously, the traffic assessment is based on updated traffic counts undertaken in June 2017 to ensure that data was not 'out of time'.

In addition to private vehicles, bus route SB7 will be diverted into the site and there will be a comprehensive network of cycleways and footways.

On drainage issues, Wormald Burrows have undertaken a comprehensive Flood Risk Assessment and have designed balancing reservoirs ponds to ensure that surface water runoff flows will be attenuated before being discharged at greenfield rates. Appropriate provision for foul drainage has also been confirmed with Thames Water.

The Heritage Impact Assessment prepared by Heritage Network has demonstrated at paragraph 3.5.6 that there are a number of designated and undesignated heritage assets that would suffer indirect impacts from the proposed development, but such impacts are not considered to represent a substantial harm to their significance. In particular a planting buffer will be established between built development and Tile Kiln Farm.

From early versions of the Master Plan, CSA Environmental Consultants have consistently proposed a substantial planting screen between Tile Kiln Farm and GA2. This will contain the setting up of the farm complex in a wooded context with more distant views across grassland south west to Tile Kiln Wood. To the east, the protection of Dell Spring as Open Space will also

contribute to preserving the setting, see paragraph 8.49 of Heritage Impact Assessment.

The effect of planting buffers is evidenced on the ground by the tree belt established east of Tile Kiln Wood towards the pylon lines. This was to contain Phase 2 of Great Ashby. Similarly, new planting west of Dane End Farm and the existing Newberry Grove will shield the listed farm complex from development views.

An extended ecology study attached at Appendix IV, including the outcome of a series of detailed on-site surveys on all protected species potentially present on site, has confirmed that there are no barriers to development and there is scope for ecological enhancement and mitigation.

Since the site has historically been part of a large agricultural estate run by the family farm, no contamination issues are anticipated.

A full environmental assessment will be prepared at the planning application stage.

The site is adjacent to strategic infrastructure and all services (water, gas, electricity and telecommunications) are available. Utility capacity assessments show that any upgrades that are required to service the site can be achieved through reinforcement works commensurate with a scheme of this scale.

### 3.0 Matter 10.21 – Justification and appropriateness – impact

***Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?***

There is a chronic shortage of housing throughout the south of England and North Hertfordshire is no different in this regard.

On account of the economic recession after 2008 and because of log jams in the planning system (North Herts last adopted a Local Plan in 1996), housing delivery has been very low and there is considerable ‘catching up’ to be achieved. In the five years 2012 to 2016 North Herts secured 1,455 completions, an average of 291 per year. This is against a current target of 500 houses a year and the new target of 690 a year declared in the Submission Plan.



However, even these levels are to be exceeded following publication of the Department of Communities and Local Government (DCLG) housing figures in September 2017, which allocates a new target for North Herts of 996 houses, an increase of 44% and approximately three times the rate of North Herts' historic delivery. This is shown in Examination document ED3 – Housing Monitoring.

It is relevant to insert the delivery projections for the site, based on the personal evidence and experience of Mr Keymer following development of the early phases of Great Ashby – NES 1, NES 2 and more immediately NES 3, now called GA1.

<b>Great Ashby delivery from 1998</b>					
<b>Site</b>	<b>Sold</b>	<b>Units</b>	<b>PP</b>	<b>Sales</b>	<b>Av p/a</b>
NES 1	1987	c.1900	1996	1998-2006	240
NES 2	2003	c.700	2003	2007-2010	175*
GA1	2010	360	2018	2019-2022	90
GA2		600	2019/20	2022-2026	140**
* 220 in year 1					
** anticipated					

Thus, subject to the timely grant of planning permission, GA2 should be delivering 140-150 houses a year from three outlets on site from 2022 to include both market and affordable housing. Indeed, Homes England have publicly supported the site allocation and already expressed an interest in developing part of the site, as have Croudace Homes and a number of other home builders.

The significant contribution that this site is able to offer to address the market and affordable housing requirements of the District is also complemented by its ability to contribute competitively priced homes. This location in North Hertfordshire (which adjoins Stevenage) is characterised by relatively affordable home prices as compared with the remainder of the District.

Typical house prices 2017			
Stevenage		Hitchin	
Terrace	£273k	+ 41%	£386
Flat	£197K	+14%	£230
Semi-detached	£330k	+38%	£455

As can be seen from the above, Stevenage offers much more modest house prices compared to mainstream North Herts towns such as Hitchin, which assists affordability and mobility within the sub-region for lower income households.

#### 4.0 Matter 10.22 –Appropriateness vs. alternatives

*Are all of the proposed allocations **the most appropriate option given the reasonable alternatives?***

It is an irony of Hertfordshire and many other counties which surround London that the most sustainable settlements are ringed by Green Belt. This is a challenge which has tested all the planning authorities within Hertfordshire, as frequently the logical place for development is on the periphery of well-established settlements which have the benefit of a comprehensive social infrastructure, hospitals, shops, schools, railway stations etc. Indeed, for this very reason, Stevenage was selected as a new town to accommodate substantial growth and it has achieved this, firstly under the Development Corporation and subsequently by private sector expansion up the east side of the town (firstly Poplars, then Chells Manor and, in recent decades, Great Ashby).

It is not a sustainable solution to limit Green Belt releases and to push development further away from jobs and force people to travel further to their place of work. In theory, a settlement such as Royston, which lies beyond the Green Belt, could be further expanded, but settlements such as this are far removed from major employers and simply encourage the need to travel greater distances to places of work, necessitating less sustainable travel and living patterns. It is far more logical and sustainable to make significant releases of Green Belt which endure beyond a single Plan period that enable established larger scale settlements to expand to take advantage of the services they provide.

North Herts have considered the possibility of a new settlement, but as their study states at paragraph 21: 'The allocation of a new settlement would require a considerable amount of time and resources and could necessitate restarting the Plan-making process afresh.'

The appropriate strategy now is one that seeks to take advantage of the sustainability benefits of expanding existing major settlements subject to any subsequent review that concludes that a new settlement or settlements will be necessary to meet longer term need.

## 5.0 Matter 10.23 – Green Belt

***Sites GA1 and GA2 comprise land in the Green Belt. For each:***

***a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?***

Our responses to matters Items 10.20, 10.21 and 10.22 illustrate the exceptional circumstances that exist: in short a chronic undersupply of housing, leaving homes unaffordable to many families, a shortage of affordable housing, overcrowding in existing homes and other factors. With all the major settlements apart from Royston surrounded by Green Belt, the LPA has had to look for Green Belt releases on the periphery of sustainable settlements. The subject site offers substantial sustainability benefits [as identified in DOC OCP7].

### **NHDC Sustainability and Preferred Sites – November 2014**

- The site can accommodate at least a 2FE primary school
- The site will now offer 600 new homes (not 500) including approximately 240 affordable homes
- The site will link into existing green infrastructure
- Local buses will be routed into the site

The weaknesses identified regarding landscape, ecology and drainage have all been satisfactory addressed.

At paragraph 3.3 North Herts state:

*Our spatial strategy is one of promoting sustainable development by supporting the use of suitably located previously developed land and buildings and by focusing the majority of development on our towns (including urban extensions) in order to make maximum use of existing*

*facilities, social networks and infrastructure, and maximise opportunities to deliver new infrastructure.*

This follows into policy ENV1 which seeks to direct development towards the most sustainable locations.

Policy SP8 requires the allocation of 7,700 homes from six strategic housing sites and this requirement constitutes exceptional circumstances and does warrant release of Green Belt.

In the February 2017 White Paper, Question 10 asked: *When carrying out a Green Belt review should LPAs look first at using Green Belt land which has been previously developed and/or which surrounds transport hubs?* The railway settlements of Baldock, Letchworth, Hitchin and Stevenage are all transport hubs and are appropriate settlements for peripheral expansion into Green Belt releases.

The factors above do constitute exceptional circumstances and do warrant the release of Green Belt on the periphery of sustainable settlements in order to perpetuate their organic growth.

***b) What is the nature and extent of the harm to the Green Belt of removing the site from it?***

The area of Green Belt surrounding GA2 is designated in the North Herts Examination document CG1 as **Area 16 – Warrens Green**. The table at page 54 of this Green Belt review document (see Appendix V) summarises the contribution made by this section of Green Belt:

**Check unrestricted sprawl of large built-up areas**

3 – Serves to contain further growth of Stevenage to the north east.

**Prevent merging of neighbouring towns**

1 – Plays no role in preventing merger of neighbouring towns.

**Safeguard countryside from encroachment**

2 – However, the site can be developed with defensible boundaries to safeguard the wider countryside from encroachment.

**Preserve setting and special character of historic towns**

1 – No contribution to setting of historic towns.

### **Overall evaluation and contribution to Green Belt purposes**

Overall makes a moderate contribution to Green Belt purposes, helping to prevent sprawl into open countryside

In conclusion, this area of Green Belt does not prevent the merging of neighbouring towns nor does it make any contribution to the setting of historic ones. Its acknowledged role is to contain the further growth of Stevenage when the strategy of the Local Plan is that Stevenage should expand.

#### ***c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?***

Since 1950 Stevenage has grown hugely but it has not 'sprawled' but rather has evolved with a good network of schools and roads, as well as a substantial hospital to accommodate the needs of a growing population.

Since the 1980s, a number of Green Belt releases have been made on the eastern fringe of Stevenage, firstly to accommodate the Chells Manor development and, more recently, in the 1990s the Great Ashby development. The special wooded characteristics of site GA2 serve to visually contain the site and to limit any impact on the wider Green Belt.

The fifth purpose of the Green Belt, namely assisting in urban regeneration, is not analysed, but in any event Stevenage has taken every opportunity in its Local Plan to develop urban sites, and allocating GA2 adjacent to Stevenage will not in any way threaten those urban developments.

In short, the wider purposes of the strategic Green Belt would scarcely be affected. The development can be managed to minimise any impacts such as they are. A future expansion on GA2 provides an opportunity to meet longer term needs if required and therefore the option remains to provide a defensible boundary to the allocation, or to proceed with further sensitively planned expansion if and when a further review justifies it.

#### ***d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?***

If GA2 is developed or indeed if a wider area of land is released back to, say, Warrens Green Lane, it would not impact on any settlement. Development would be visible from the Thatched Cottage (albeit without harming its

heritage significance) adjacent to Warrens Green Wood and like Chells Manor, Dane End Farm might in time become absorbed within the extended settlement. In short the Green Belt would not be undermined by the allocation of GA2 or by a wider Green Belt release to Warrens Green Lane.

- The main purpose of the Green Belt is to prevent urban sprawl, but releasing GA2 behind long-term defensible Green Belt boundaries would still check unrestricted growth.
- Neighbouring towns would not merge
- The wider countryside would be protected from encroachment
- GA2 will have *no* impact on the setting of historic towns

DOC CG1 (page 110) summarises the site's contribution to the Green Belt:

- *Moderate contribution to GB*
- *No impact on historic towns*
- *Expanding Stevenage towards Weston, not a town*

***e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?***

The north east boundary of GA2 is formed by the transition from contoured land to plateau, effectively forming a slight ridge. The public footpath follows this feature across open ground and this boundary can be reinforced with appropriate planting to form a defensible Green Belt boundary.

It has now become Government policy to review Local Plans every five years, and even if a new settlement is located within North Hertfordshire there is likely still to be a requirement for organic growth of sustainable settlements. If the need for further housing in this location is identified in the next review, it would be appropriate to identify some safeguarded land between GA2 and Warrens Green Lane. If the Inspector is minded to safeguard land in this way, it would be appropriately processed through the Inspector's Local Plans modification procedure.

The Green Belt boundary proposed is, given the topography and its potential treatment, entirely capable of enduring beyond 2031, notwithstanding the capacity of the adjacent land to accommodate an expanded GA2 should the need arise through the next Plan review.

***f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?***

As discussed previously, settlements such as Stevenage are inherently sustainable because of their substantial social and physical infrastructure. The proposed boundary with respect to GA2 is entirely consistent with this aim.

***g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?***

We have already suggested that consideration be given to routing the amended Green Belt boundary along Warrens Green Lane and then westwards along the North Herts District boundary to the valley downstream of the balancing ponds.

The north east boundary of GA2 is formed by the transition from contoured land to plateau, effectively forming a slight ridge. This boundary can be reinforced with appropriate planting to form a defensible Green Belt boundary.

As explained in our Matter 7 submissions, we do not currently have the highways capacity to serve a larger development but we are reasonably confident that a viable solution will be found. Additional vegetation and planting barriers will screen the development from the wider countryside.

## **6.0 Matter 10.24 – Settlement boundary**

***Is the proposed settlement boundary:***

***a) consistent with the methodology for identifying the settlement boundaries?***

On page 110 of the Green Belt Review (CG1), potential development sites are assessed. GA2 is referred to as site 226 – land off Mendip Way. Under the heading Boundary Detail the analysis states '*No boundary currently other than field boundaries which are largely hedgerows.*' Site 322 in the same table concludes: '*Church Lane forms a strong boundary.*' In similar vein, site NES 3 (now GA1) again concludes: '*Strong boundaries in the form of roads.*' If the Inspector is minded to identify some safeguarded land as a modification to the Plan, it seems that the roads around GA2, in particular Warrens Green Lane, might be a suitable long-term boundary.

Picture has the land control to implement advance planting to reinforce this new Green Belt boundary ahead of development.

***b) appropriate and justified?***

Extending Great Ashby to an appropriate boundary in GB area 16 is good planning. It builds on an existing neighbourhood which already has existing community facilities and is well served by public transport. There will be a comprehensive network of cycleways and footways on the site. In addition to private vehicles, bus route SB7 will be diverted into the site.

GA2 is also of sufficient scale to justify the need for a 1FE primary school and further land can be made available to expand the school to 2FE to contribute to meet the existing deficit of primary school places in the locality.

## 7.0 Other matters

**a) Policy SP8: Housing (objection withdrawn)**

- GA2 – about 600 homes (not 700)

**b) Policy SP18**

In our representation on the Proposed Submission Plan in November 2016, we wish to withdraw, reinforce or amend certain submissions.

Firstly we agree that GA2 should accommodate approximately 600 homes.

*a. A site Master Plan to be approved prior to the **approval** of any detailed matters*

This is to allow the submission of reserved matters in parallel with the outline application and Master Plan approval.

c. School site to be located within the northern quadrant of GA2, with the opportunity to create playing fields in the GB, in order to allow access to playing fields and accommodate long term expansion if required without hindering early delivery of housing

k. Existing requirement k. Reads: *Provision of a green infrastructure corridor beneath the current alignment of the pylon lines.*

Amend to read: *It is necessary to respect the residential safeguarding zone beneath/between the pylon lines from built development. Solely for this*



*reason, it is considered that the opportunity should be taken to continue the green infrastructure corridor through the development in addition to the required Public Open Space.*

## 8.0 Part C – Development Management Policy

### **a) HS2 – Affordable Housing**

We still object to the 65% rented tenure split.

### **b) HCA – Shared Ownership and Affordable Homes Programme 2016 to 2021**

The Ministerial Foreword states:

*A Shared Ownership home allows the purchaser to buy a share in the equity while paying rent on the non-purchased share. For many people, this is a chance they didn't have before to get on to the housing ladder – and to go on to purchase further slices of equity.*

*Since 2011, nearly 41,000 affordable homes have been made available through Shared Ownership. Recognising the level of public demand, we want to greatly expand supply. Last year, the government announced £4.1 billion of funding to help build a further 135,000 Shared Ownership homes over the next five years.*

With HCA promoting shared ownership, the rented sector should not dominate affordable housing.