

MATTERS STATEMENT

**North Hertfordshire District Council
Local Plan Examination**

**On behalf of:
Pigeon Investment Management Ltd
(Representor ID 4490, 4491, 4492, 5799, 5800)**

11 January 2018

Prepared by:
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Associate Director

**Our Reference:
17089**

**Matter 10: The Housing Allocations and Settlement Boundaries:
The Towns
(Stevenage (Great Ashby))**

- 10.20 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?
 - b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
 - c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?
- 10.21 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?
- 10.22 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?
- 10.23 Sites GA1 and GA2 comprise of 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?
 - b) What is the nature and extent of the harm to the Green Belt of removing the site from it?
 - 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?
 - 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?
 - 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?
 - f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?
 - 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?

Introduction

This statement has been prepared on behalf of Pigeon Investment Management Ltd (representing Gary and Hilary Napier) in relation to the forthcoming Hearing Sessions for the North Hertfordshire District Council Local Plan Examination.

Mr and Mrs Napier are the owners of Chesfield Park House and associated land. This land has been promoted for development for many years and throughout this plan process.

Whilst excluded from allocation within either the Regulation 18 or 19 Plan, residual matters pertaining to the delivery of secondary education within the land North of Stevenage have become apparent.

There is an identified need for a secondary school within this area, both to meet the needs of the existing population and the demand arising from the large amount of housing proposed both within the Stevenage Local Plan and this emerging Plan.

To date North Hertfordshire District Council (NHDC) has not made adequate provision for this essential piece of infrastructure, required to mitigate against the impact of the proposed residential development, within its emerging Plan.

The proposed allocations, as currently set out within the emerging Plan, also fail to adequately identify the necessary significant infrastructure requirements associated with the suggested developments to ensure that there is no detrimental impact on the adjacent road networks.

Furthermore, there would appear to be a discrepancy between the intentions of the promoters for NS1 and GA2 and that stated in evidence by the Local Planning Authority, in respect of highways infrastructure and social infrastructure, which requires clarification.

It is therefore contended that the Plan as currently drafted is not based on a sound assessment of infrastructure requirements and therefore fails to adequately provide for a balanced community, but will result in unmanageable demand for school places within the existing, over-stretched infrastructure and will place an undue burden on the sensitive road network.

Furthermore, the policies as currently drafted are likely to result in inappropriate development within the Green Belt, in order to meet the education requirements of the proposed allocation sites.

The Chesfield Park land offers an opportunity to deliver development to the North of Stevenage in a holistic manner, offering connectivity and infrastructure provision without any excessive encroachment into the Green Belt, beyond that already envisaged by the proposed Stevenage and NHDC housing allocations and the earlier SNAP (Stevenage and North Herts Action Plan) project.

As set out in our response to Matter 6, there is an issue of viability that needs to be carefully considered when seeking to allocate the site. The landowner needs to ensure that the retained land is either similarly developed, or remains suitably viable in its own right. The extent of retained land is likely to

be unviable in isolation and as such the entire site is proposed for a mixed use development that benefits the Plan in many ways.

This statement reviews the merits of each proposed site allocation to the north of Stevenage, sets out why the proposed allocations are inadequate and why a holistic approach to development in this location is required and if not addressed at this stage, will need to be addressed within the next Plan period.

The Statement also sets out why the promoted land should be allocated as a main modification to the Plan and will in turn will resolve any issues associated with the requirement to provide adequate educational infrastructure, alongside key infrastructure to deliver the necessary connectivity between North Road (to the west) and Great Ashby Way (to the east), as part of a comprehensive package of uses including a care home village and up to 100 aspirational homes.

As previously noted, the Chesfield Park site is not suitable for development in isolation and is only promoted as a comprehensive site.

Matter 11: Response.

Land to the north of Stevenage has been promoted continually over the last 10+ years for development and growth, seeking to expand Great Ashby.

In 2007 Stevenage Borough Council and North Hertfordshire District Council published a consultation document seeking to highlight key issues and options for development to the north and west of Stevenage. The aim was to prepare a Stevenage and North Herts Action plan, the project became known as SNAP. The consultation document is attached at **Appendix 1**.

Originally envisaged as a result of the East of England Plan, the SNAP project was designed to “allow the housing needs and aspirations of Stevenage to be addressed together with those in the surrounding area of North Hertfordshire.” It was designed to bring out “new employment opportunities and locations to meet the needs of the town and surrounding area.” It envisaged new infrastructure and services being delivered to meet the needs of both new residents of the neighbourhoods created and existing residents in the town and surrounding areas in North Hertfordshire. The key objectives to meeting these targets were: sustainable communities; built environment; housing delivery; natural environment protection and enhancement; climate change and; social and economic benefits.

The SNAP preferred options document (paragraph 9.11) highlights that accesses taken from existing residential roads within Great Ashby would lead to congestion problems on several existing roads, notably Canterbury Way and Martins Way. The Preferred Options (paragraph 9.13) identified the solution as being the inclusion of a northern relief road from a new roundabout at North Road/Graveley Road and continuing around the northern development area, connecting in the west to Fairland Way/Gresley Way.

Of particular note is paragraph 9.14, which states:

“Without the provision of such a link road (at least the stretch from North Road to the development area), it is unlikely that development could proceed without existing roads within Great Ashby/Burleigh Park and within the wider town reaching capacity.”

The Council’s have subsequently opted to move away from this holistic approach to development to the North of Stevenage. There is no explanation for this change in approach, albeit some documentation submitted in support of the emerging Plan continues to refer to the SNAP project. The transport issues identified as part of SNAP have not been addressed and it is therefore submitted that the requirement for east-west connectivity to the north of Stevenage, not currently provided for as part of the submitted Plan, remains.

10.20 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?**
- b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**
- c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

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

Each of these proposed allocations are considered in turn:

Policy SP16: Site NS1 – North of Stevenage:

The Council have yet to produce a fully informed Infrastructure Delivery Plan (IDP) such that the ability to deliver any associated infrastructure mitigation works required to ensure this development can be delivered within the plan period is currently unknown.

The developers own information states that there is a known issue with traffic capacity at the A1(M)/A602 junction and at the junction between North Road and Graveley Road and that improvements are required. The exact mechanism to mitigate against these issues is not known, albeit they suggest funding could come from a variety of sources, Site NS1 being one.

The issues at these junctions are already significant, with an additional 900 units rendering the impact as severe.

The policy, as currently worded, requires the developer to upgrade the junction of Graveley Road/North Road, however, the developers Regulation 19 representations (Transport Representations December 2016 by PFA Consulting) indicate that the developer will make reasonable and proportionate contributions to the upgrade of this junction only. It is questioned therefore, if the Council’s policy

aspirations, over the developers intention, will actually deliver the necessary junction upgrade. If a contribution only is made, it is not clear where the residual funding will come from and therefore whether the junction upgrade can be delivered in a timely manner, thus allowing the development to come forward. Again, this matter requires clarification.

The transport submissions make no reference to the impact on the remainder of the road network into Stevenage itself. North Road provides a key access to Lister Hospital and the main exit from the hospital's multi-storey car park. There are regular queues at the roundabout intersection with North Road and Corey's Mill Lane, as people try to circumvent the A1(M) junction and then move onto the highly congested A602 at a later point. This is a key example of the existing congestion on the road network, without any additional development.

In reviewing the junctions along North Road, given the proximity of the adopted highway to adjacent residential boundaries, there is limited scope for any improvements. Given that a significant number of movements will head into Stevenage, either for the train station, employment or education, the impact on this stretch of the road network needs to be fully understood before development can be deemed to be deliverable.

In the absence of any provision for east-west connectivity (as envisaged by SNAP through the delivery of an east-west link road to the north of Stevenage) within the submitted Plan it is not clear how the impacts identified through SNAP can be adequately mitigated without the inclusion of land at Chesfield Park.

Inclusion of Chesfield Park would provide the necessary connectivity between North Road (to the west) and Great Ashby Way (to the east) as part of a comprehensive package of uses across the site, including publicly accessible green infrastructure, a proposed care home village, aspirational homes and a secondary school site. The care home village and aspirational homes would fund the delivery of a link road, highlighting the importance of these uses to deliver key infrastructure required to address the traffic impacts identified through SNAP and an appropriate level of connectivity for the North Stevenage allocations and the wider area.

The wording of policy SP16 is also considered to be overly vague, such that it fails to ensure that appropriate and adequate social infrastructure is delivered.

Policy SP16 sets out that planning permission for residential development will be granted where site specific requirements are met, including criterion b:

"b. Intergration with adjoining development in Stevenage Borough including site-wide solutions for access, education, retail and other necessary social infrastructure."

It has been confirmed by the Education Authority that 2FE of primary education is required on this site to meet the needs of the development. However, this is not stated in the policy requirement

Whilst it is understood that the development is potentially to be brought forward in tandem with the development to the south, within Stevenage Borough Council, there is no obligation to do so. The policy should be explicit in setting out the infrastructure requirements to meet the needs of this proposed allocation, caveated to state that it is subject to it being brought forward as a cumulative site and appropriate provision being made within that site.

The emerging Stevenage Borough Council policy provides a good basis for the formulation of a more detailed and robust policy that will ensure key facilities are delivered. The policy extract is contained at **Appendix 2**.

Whilst the allocation of site NS1 is supported in principle, the Plan as submitted will not provide the necessary level of east-west connectivity to the north of Stevenage, required to address the highways issues referred to previously. The current policy wording also lacks sufficient detail or mechanisms for ensuring appropriate infrastructure is delivered on site.. The site cannot therefore be considered to be deliverable in the context of the submitted Plan and lack of adequate provision for east-west connectivity.

Policy SP18: GA2 – Land Off Mendip Way, Great Ashby:

The developer's Regulation 19 representations object to the proposed policy, they make it clear that they do not consider there to be a demonstrable need for secondary education provision and that the policy should be amended to require the inclusion of 2ha of education land and approximately 700 residential units as opposed to 600 homes and up to four ha of land for education purposes as currently required under policy SP18..

The developer has provided detailed evidence setting out why they do not consider secondary education is required and as such request that the policy be amended to reduce the education land allocation.

We note, however, that the SoCG between North Hertfordshire District Council and Picture SRL states that the site could accommodate and deliver up to a 2FE primary/4FE secondary all-through school with efficient operation of the transport network.

Having regard to the earlier representations and comments made at the matters session considering delivery, we would suggest that this matter requires clarification to ensure delivery of the necessary infrastructure.

As agreed at the delivery sessions, both the County Council and North Hertfordshire District Council agree that there is a need for 8FE of secondary education within the next plan period in the Stevenage area. The Council presented that 4FE would be delivered to the north of Stevenage.

In its current form, the policy wording does not provide for the delivery of a 4FE secondary school and therefore introduces scope for a further reduced level of education provision to serve the north of Stevenage.

In addition, we note that 4ha of land is not a sufficient land area to accommodate the built form of a 2FE primary/ 4FE secondary school. Having regard to the relevant Building Bulletin (BB103, Area guidelines for mainstream schools, Department for Education, June 2014), a minimum site area of 5ha of land is required for a development of that scale. This position was accepted by the Council in a meeting held on the 24th April 2017 at the offices of Vincent and Goring attended by both North Hertfordshire District Council and Hertfordshire County Council.

We further note that 4ha or 5ha of land would only accommodate the built form, any additional external space or playing fields would need to extend beyond the site allocation and into the Green Belt. Having regard to the shape of the allocation site and its landscape context, these playing fields could be difficult to accommodate and could potentially require third party land that may not be readily available to meet the need. We would therefore suggest that this matter requires clarification to ensure that the appropriate social infrastructure may be delivered.

There is also some debate as to whether playing fields can be considered to be appropriate development in the Green Belt. A court judgment considers the matter (ref: C1/2014/1517 & C1/2014/1530), the Court of Appeal judgment is attached at **Appendix 3**. Whilst there can be scope for a 'very special circumstances' case that could be made and has been made historically, approving the Plan in its current form will, if the Court of Appeal judgment is applied, result in inappropriate development within the Green Belt. Thus, finding this policy sound in its current form could lead to inappropriate development beyond the revised Green Belt boundary proposed.

The statement that a 2FE primary and 4FE Secondary school could be accommodated on the site without impact on the transport network is also of concern. No evidence has been presented that demonstrates this level of school accommodation and 'approximately' 600 residential properties, along with a neighbourhood centre can be accessed via a single main access point and without a detrimental impact on the adjacent road network.

A high level transport assessment for an 8FE secondary school on this site (See HCC Site Search appendices(HCC Regulation 19 response)) demonstrated that existing junctions would accommodate that growth but that they would reach near capacity. The level of traffic movements associated with circa 600 units and a school development are likely to severely impact on the adjacent road network that have limited scope for improvement, particularly given the lack of east-west connectivity to the north of Stevenage that can only be addressed through the inclusion of land at Chesfield Park as part of a comprehensive scheme. We would therefore suggest that this matter requires clarification.

Lastly on education, the allocation of a site for a 2FE primary/ 4FE secondary school is highly constrained. Given the current mechanisms associated with the delivery of new schools, such a constrained and prescribed school formula significantly restricts the likely number of school trusts that will be interested in promoting and delivering a new 'all-through' school via the Education and Skills Funding Agency, as evidenced by Hertfordshire County Council Education whose position remains that the minimum viable secondary school site is 6FE

Notwithstanding this, the policy does not currently make clear that it seeks to deliver a minimum of 4FE of secondary education, simply referring to 2FE primary provision.

In addition, the proposed reinforcement of the Green Belt boundary (criterion g of policy SP18) could prejudice the ability to provide connected playing fields associated with the school, if these are to be provided beyond the allocation site.

Clarification is therefore required on how the scale of education provision, acknowledged to be required by the Council, is to be provided, having full regard to the potential for this to lead to inappropriate development within the Green Belt.

It is also noted that site search work carried out by Hertfordshire County Council Education discounted land to the north and east of GA2 for education use, deeming the location undeliverable due to the costs associated with land acquisition.

Policy GA1 – Land at Roundwood:

A planning application was submitted in respect of this site in July 2016. The scheme proposed 360 residential units, as opposed to the 330 suggested in the proposed policy.

The application is still pending consideration and has been subject to amendments to overcome objections to the proposal.

The scheme is significantly smaller than NS1 and GA2 and as such does not require any specific on site provisions for infrastructure or education, accordingly, the more detailed policy comments associated with sites above, are not relevant in this instance.

Whilst the site will be accessed from Haybluff Drive to the east, to the west, it will be accessed via Calder Way, which is a narrow road connecting Great Ashby to the rural narrow Back Lane/Weston Road. Calder Way has experienced issues historically resulting in speed humps being placed in the road. There is no scope to widen Calder Way and the developer is not proposing to do so.

The allocation of land at Chesfield Park could provide key infrastructure, as part of a comprehensive package of uses, to provide the necessary east-west connectivity thereby addressing the lack of connectivity with GA1 to the northwest of Stevenage.

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

10.23 Sites GA1 and GA2 comprise of 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?***

- b) What is the nature and extent of the harm to the Green Belt of removing the site from it?***
- 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?***
- 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?***
- 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?***
- f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?***
- 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?***

The policies proposed, in their current form, fail to identify the extent or nature of infrastructure requirements associated with the scale of development proposed. With the potential that site GA2 may not deliver the requisite secondary education provision.

The Great Ashby and North Stevenage sites may also require additional development within the Green Belt to facilitate the requisite scale of education provision, as there would appear to be insufficient land identified within the allocations to fully deliver a school, complete with its necessary playing fields, regardless of whether a 4FE or 8FE secondary school is forthcoming.

Due to the nature of the allocations, undue pressure will be placed on existing road networks and residential roads that to date have not been fully considered or explored, such that further evidence is required to demonstrate that these sites are deliverable. In short, the traffic impacts identified through SNAP have not been addressed and the Plan as submitted will not provide the level of east-west connectivity that SNAP identified as necessary.

The SNAP project sought to look at the land to the north of Stevenage in a holistic manner, it proposed the delivery of all appropriate infrastructure, including a link road to the north of the town facilitating a dispersal of traffic ensuring rural roads and existing residential areas were not unduly burdened. The delivery of infrastructure was also assigned to the entire development area, as opposed to individual sites.

Whilst this would incorporate a greater level of development to the north of Stevenage, it is highly likely that this will be required within the next Plan period, if not as part of any early review. In addition, any future growth in housing need within Stevenage Borough will need to be accommodated within the surrounding Green Belt, as land within its administrative area is significantly limited and unsuitable for any further significant growth.

To plan for any such growth now, in a holistic manner, would ensure a cohesive development came forward and given the scale of development that could be accommodated within this northern area, delivery would likely extend throughout and beyond the existing Plan period.

Land at Chesfield Park (circa 45 ha) is put forward as a comprehensive package of uses comprising a 6-8 FE secondary school site, aspirational homes, a care home village, link road and publicly accessible green infrastructure as shown indicatively on the enclosed Concept Plan (**Appendix 4**).

The provision of a secondary school site on land at Back Lane (Chesfield Park) would ensure that there is sufficient secondary education provision to meet the needs of the proposed North Hertfordshire allocation sites and the wider North Stevenage area through the provision of 12 ha (the requisite area for a 6-8 FE secondary school comprising a 4ha build zone and 8ha for outdoor play space), with a further circa 4 ha (amounting to a total of 16 ha of the 45 ha site) that would be reserved for educational use, to provide additional land that may be required to deliver the new school (pending further detailed site investigation), or to meet longer term secondary education needs arising in the north Stevenage area.

The main vehicular access to the secondary school is proposed from the southeast via a new road link to be created from the junction with Calder Way and Orwell Avenue up to the site's eastern boundary, utilising land under the existing power lines to the east of the site. Whilst this will provide the primary vehicular access to the secondary school, connectivity with the proposed allocation sites at Great Ashby (to the east) and North Stevenage (to the west) is required so as to ensure that the school site is accessible from the proposed allocation sites (including cycle and pedestrian connectivity).

The proposed east-west link between NS1 (and HO3) to the west and Back Lane (providing connections with GA1) to the east therefore forms an integral part of the school site accessibility, in addition to addressing the highway issues referred to above.

The site's position on the edge of Stevenage means that it would assist in meeting an identified requirement for aspirational housing within the town, as part of a comprehensive package, and alongside delivery of the new secondary school site. Evidence produced by Stevenage Borough Council (Aspirational Housing Research, 2010 and Stevenage Borough Council Submission Local Plan 2016) identifies the need for a greater number of larger homes to balance out the housing mix within Stevenage, which is heavily skewed towards terraces and flatted accommodation. Land at Chesfield Park, where aspirational homes would be provided at 10-15 dwellings per ha across circa 8 ha, is uniquely placed to meet this requirement which can only be partially satisfied through housing on a conventional housing estate.

The proposed care village would utilise the property and grounds of the existing Chesfield Park House to create a campus style setting and would provide a central care home facility with associated assisted living accommodation. However, in common with the aspirational homes, the care home village would retain and enhance existing landscape features to create a high quality landscaped campus style setting for the provision of specialist care accommodation.

In addition the scheme will make provision for a substantial green corridor (circa 14 ha of the 45 ha site) delivering a publicly accessible Green Belt link between the proposed Country Park and the wider Green Belt to the north.

As outlined above, the site is being put forward as a comprehensive package of uses and it is essential that it is brought forward as a whole package for the reasons set out above. In this regard the land for the secondary school is being put forward on the basis that the full site area is allocated for the care village, aspirational homes, extensive green infrastructure and essential key infrastructure required to deliver the appropriate level of east-west connectivity.

Main Modification

We would respectfully request that the Inspector seek to include the Chesfield Park land within any Main Modifications proposed to the plan, thus enabling appropriate infrastructure to be delivered to the north of Stevenage and a holistic approach to development to be taken, including a northern link road connecting NS1 to GA1. .

As an alternative, we would propose a 'safeguarded' allocation, similar to that proposed for land to the west of the A1(M) at Stevenage and subject to a future early review of the Plan, on the basis that the site is allocated as a comprehensive package of uses.

Associated Matters

Detailed representations on the delivery of this site and what could be accommodated were submitted in respect of Matter 6: Deliverability. We would request that this statement be read alongside the earlier representations made.

Conclusions

In its current form, without further evidence and alterations to the policies as currently drafted, it is not considered that the proposed sites are deliverable and that they will not mitigate against their impact on highway safety and social infrastructure needs. The plan is therefore considered to be unsound as it fails to fully mitigate the impact of the proposed development at north Stevenage.

We consider that the Local Plan can be made sound by the allocation of the Land off Back Lane, Chesfield Park house and associated land, for a mixed use development comprising a 6-8FE secondary school, an assisted care village and aspirational housing, a green corridor and associated infrastructure.

We would welcome a Main Modification to propose the inclusion of this land and are content to have the following elements included within a suitably worded policy:

- The delivery of the site will be subject to a masterplan.
- The delivery of the site will be phased, with the Secondary School land being transferred to the relevant delivery body, as part of a phasing strategy to be submitted to and agreed in writing by the Local Planning Authority. The phasing strategy will identify the delivery of the site's key infrastructure to facilitate the secondary school and provide necessary connectivity to North Stevenage and the wider area.
- Appropriate mitigation, compensation and/or enhancement of key features of biodiversity.
- Provision of a green corridor connecting the Stevenage Country Park to the wider countryside. The extension of the Park would be accessible by the public.
- Provision of a care home village and aspirational homes.
- Density of any residential development (C2 or C3) not to exceed 20dph.
- Structural landscaping to the northern edge of development.

Appendices & Plans

Appendices

- Appendix 1: SNAP Key Issues and Options Consultation November 2007 & Preferred Options June 2010.
- Appendix 2: Stevenage Borough Council: Local Plan policy extract
- Appendix 3: Court of Appeal decision: C1/2014/1517 & C1/2014/1530 [2015] EWCA Civ 10
- Appendix 4: Concept Masterplan

Appendix 1:
SNAP Key Issues and Options Consultation November 2007
& Preferred Options June 2010.



SNAP

Stevenage and North Herts Action Plan

Local Development Framework

**Key Issues and Options
Consultation November 2007**

The logo for Stevenage Borough Council, featuring the word 'Stevenage' in a white serif font with a white swoosh underline, and 'BOROUGH COUNCIL' in a smaller white sans-serif font below it.

Stevenage
BOROUGH COUNCIL

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Introduction

Stevenage Borough Council and North Hertfordshire District Council want your help.

We are starting to prepare **The Stevenage / North Hertfordshire Action Plan**, or **SNAP** for short. When finished, it will contain policies and proposals to be applied to planning applications for development to the north and west of Stevenage.

The answers to the following questions and more are set out in this introductory chapter:

- Why are we doing this?
- Why are we doing this now?
- How can you help?

What is this document all about?

1. Stevenage Borough Council and North Hertfordshire District Council are working together to prepare the **Stevenage / North Herts Action Plan** – or **SNAP** for short.
2. The final version of SNAP will set out planning policies and proposals applying to the area shown on Map 1 (page 7). This area includes land within the administrative areas of both councils.
3. At this stage, we want to hear your views on what SNAP should contain. No decisions have been made yet on either the range or nature of the planning policies and proposals. We want you to help us decide. So to start off, we have identified what we think are the relevant issues that SNAP needs to address. Also, for each of the issues, we have set out various alternative actions which we could take.
4. This consultation document sets out several issues on which we would like your views. Information on how to respond can be found at the end of this chapter.

Why are we consulting you now?

5. There are 2 main reasons:
 - **New planning legislation** has recently come into force which requires us to prepare a set of plans covering the whole of our areas. SNAP is one of these plans.
 - **The East of England Plan**, when it is finally approved early next year, will almost certainly propose large scale growth in and around Stevenage, including land within North Hertfordshire. We need to have a plan containing detailed policies and proposals as soon as possible to help deliver this new development and to create high quality neighbourhoods where people want to live.

The new planning system

6. The new system replaces the old system of Structure and Local Plans. It was introduced by the Government in the Planning and Compulsory Purchase Act 2004 and requires each council in the country to prepare a suite of plans which together is referred to as its **Local Development Framework**. SNAP is part of the Local Development Frameworks of both Stevenage and North Hertfordshire councils.

7. There are other new plans which we have to prepare. The most important is the **Core Strategy**. Both Stevenage and North Hertfordshire have already published “preferred options” for their Core Strategies. Eventually, both councils will adopt Core Strategies and each will contain policies that apply only in their respective administrative areas. Thus, when the Core Strategies are adopted, a range of policies will apply to the SNAP area, but those in the North Hertfordshire Core Strategy will only apply to the area of SNAP within North Hertfordshire while those in the Stevenage Core Strategy will only apply to the Stevenage part of the SNAP area.

Why do we need more policies for the SNAP area? Will they not be already set out in the Core Strategies?

8. Planning guidance from the Government tells us that Area Action Plans like SNAP should provide a policy framework for areas where “significant change” is expected. Significant change is expected around Stevenage due to the emerging strategy in the East of England Plan (see below). Therefore, both Councils have decided to proceed with the preparation of SNAP to help deliver this ‘significant change’.
9. If the two Councils’ Core Strategies contain acceptable policies covering particular aspects of the proposed growth, then we do not need to duplicate them in SNAP. However there is likely to be a need for a number of policies applying only to the SNAP area, to take account of local circumstances. Also, the policies in SNAP must be applied consistently across the whole of the SNAP area – no matter which administrative area a particular site happens to be located in.

The East of England Plan

10. When it is published, the East of England Plan will set out a planning strategy for the region for the years 2001 to 2021. We expect the final version to appear early next year and so the issues in this document are based on the latest draft version available. The latest version was published in December 2006 and is the Government’s Proposed Changes to the original draft.
11. If there are any changes in the final version – for example, amended levels of growth – then SNAP will have to be amended to reflect those changes. All plans prepared by both Councils – including SNAP – must be in conformity with the final version of the East of England Plan.

12. The latest draft identifies Stevenage as a location for substantial growth to 2021 and beyond. Some of the growth will be located within the town's existing built-up area, and therefore outside the boundary of SNAP. This element will be determined by Stevenage BC in its Core Strategy in due course. The remainder of the housing and other growth will need to be located beyond the existing built-up area of Stevenage. This will be within the boundaries of SNAP and will be the subject of the policies and proposals to be included within this Plan.
13. These are the "significant changes" which justify the preparation of SNAP.

Sustainability Appraisal / Strategic Environmental Assessment

14. A requirement of the new planning system is for each new plan to be the subject of a **Sustainability Appraisal (SA)** and a **Strategic Environmental Assessment (SEA)**. These are designed to ensure that the planning policies make the greatest possible contribution to sustainability and that the protection and enhancement of the environment are fully considered.
15. A scoping report on the SA and SEA for SNAP was published in September 2007 which identifies the objectives to be used to carry out the sustainability appraisal and strategic environmental assessment.
16. All our policies and proposals need to be assessed against these objectives. **Appendix 3** at the back of this document sets out a summary of relevant initial comments relating to sustainability appraisal and strategic environmental assessment for the issues and options set out here. The Initial Sustainability Appraisal Report contains more details of this analysis. A further draft SA Report will be prepared at the time of the Preferred Options Consultation.

How do I respond?

17. The two councils are asking for your views on the questions set out later in this document.
18. Your responses should be submitted on or before **5pm, Friday, 18th January 2008**.
19. We ask that if possible, you complete the questionnaire on-line. It can be found at www.stevenage.gov.uk/SNAP or www.north-herts.gov.uk

20. If you would rather complete the questionnaire by hand, it can be downloaded from the websites above or you can use the printed version accompanying this document.

Either e-mail it to snap@stevenage.gov.uk

or post it to:

The SNAP Team
Daneshill House
Danestrete
Stevenage,
Herts. SG1 1HN

21. If you have any queries and want to speak to any of the team members, call us on –

- John Ironside, North Hertfordshire District Council: 01462- 474626
- Karen Allen, North Hertfordshire District Council: 01462 – 474562
- Lisa Cain, Stevenage Borough Council: 01438- 242495

22. And finally, in this section ...

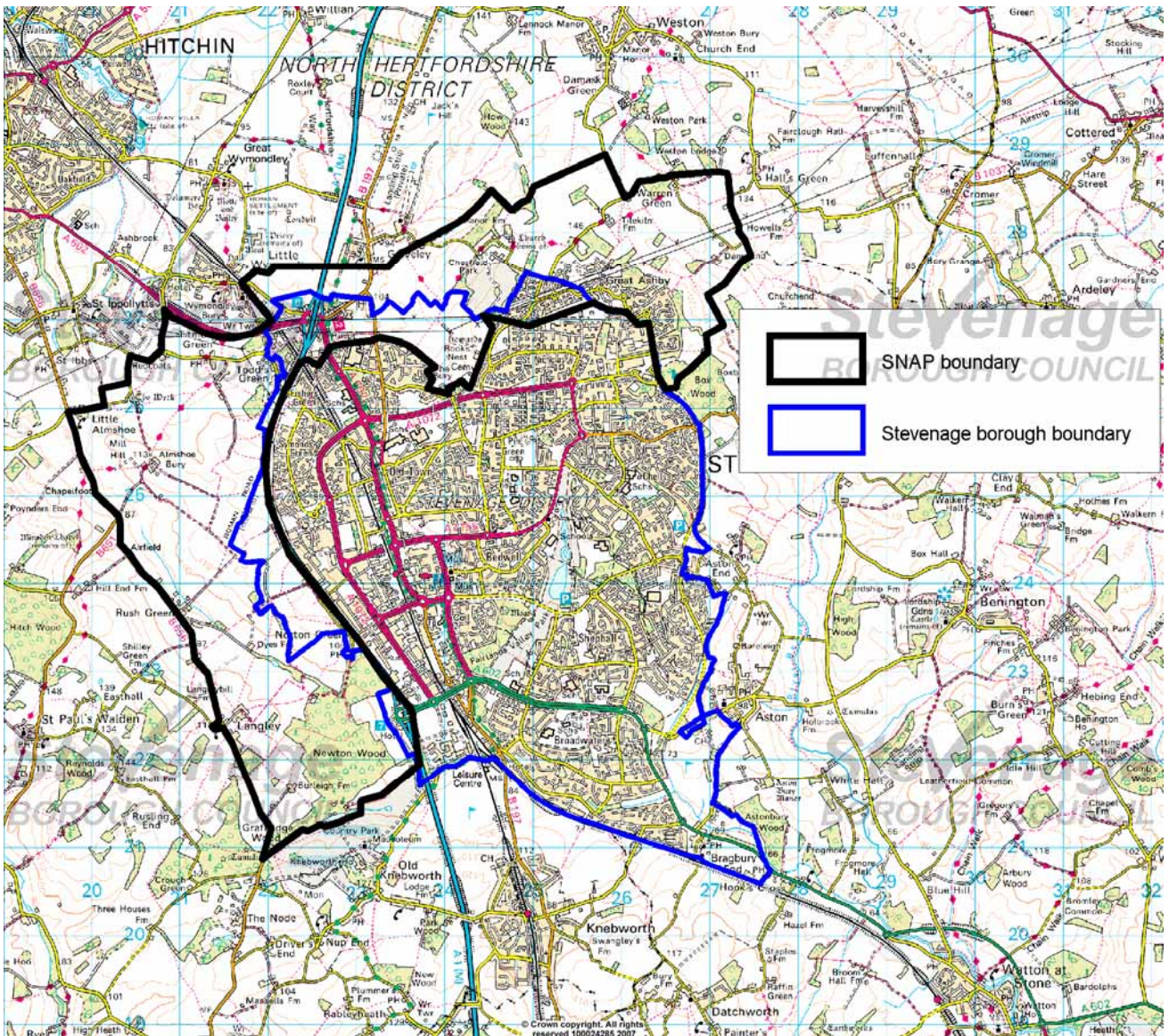
- If you want more detail on the new planning process and how SNAP fits into it, we have included “Frequently Asked Questions” in **Appendix 1** at the back of this document.
- If there are any terms used which you are unsure about or don’t understand, try the Glossary found in **Appendix 2** at the back of this document.
- Although this document is prepared jointly by Stevenage BC and North Hertfordshire DC, Stevenage BC is hosting the relevant documents on its website and responses should be e-mailed or posted only to that council at the addresses given above. The analysis of the responses will be carried out jointly by both councils. This is to avoid the potential confusion of having to merge public responses submitted at two locations.

The SNAP area boundary

23. In order to produce an Area Action Plan such as SNAP, we need to begin with a clear idea of the area it will cover. We have already identified boundaries for SNAP which we feel are appropriate to allow the future policies to be applied successfully. In developing the SNAP boundaries we have taken into account a number of factors.
24. The East of England Plan requires that urban extensions (new neighbourhoods) should be developed to the west and north of Stevenage, partly within North Hertfordshire District. Therefore the SNAP boundary has been drawn to include land to the west and the north of the town. The B656 road forms the western boundary for SNAP.
25. We also considered the locations of existing villages around Stevenage when drawing our boundary. A conscious decision was taken to exclude Little Wymondley and Graveley. Policies for these villages are more appropriately found in the North Hertfordshire Core Strategy. Included, however, are smaller settlements such as Warren's Green, Titmore Green, Todds Green, Norton Green and Langley.
26. There are also a number of significant environmental areas in SNAP, for example Knebworth Woods, which is a Site of Special Scientific Interest (SSSI). Such areas have been included within the SNAP boundary because, in this way, it is easier to protect them by ensuring that any adverse effects of future development are appropriately mitigated.
27. **Please note that, by defining the boundary shown on Map 1, we are not saying that this entire area will need to be developed. The chosen boundary is a policy boundary and not a development boundary. We anticipate that in due course substantial areas within this boundary will still be identified as unsuitable for development.**

Question 1:

Do you agree that the boundary for SNAP shown on Map 1 below is appropriate? If you disagree, please tell us where the boundary should be, which areas should be included or excluded, and why.



Map 1 – SNAP Boundary

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Vision and Objectives

In preparing a new Plan, Stevenage Borough Council and North Hertfordshire District Council have to be clear about what they want it to achieve.

We have agreed a **Vision** setting out our view on what the SNAP area will look like in 2021, the end of the Plan period.

We have also agreed a set of **Key Objectives** which have to be met when SNAP is in operation.

These are set out in this chapter.

Vision

28. The East of England Plan will set out the Regional Spatial Strategy for the years 2001 to 2021. Stevenage is likely to be identified as an important growth point in this strategy and, to meet its growth targets, it will have to expand substantially to the north and west into North Hertfordshire. SNAP is being prepared in a collaborative effort between Stevenage Borough Council and North Hertfordshire District Council to achieve the following vision:

Stevenage will grow substantially by 2021 with new neighbourhoods built to the west and north of the town. The new neighbourhoods created will be vibrant and diverse and will balance environmental protection with the provision of social and economic needs. They will complement and enhance the character of Stevenage and will contribute to the regeneration and growth of the town. A strong sense of community will be created in the new neighbourhoods.

All new development will be of high quality design. Each neighbourhood will have a strong sense of community and a distinctive character. There will be clear physical separation from surrounding villages.

New extensions will allow the housing needs and aspirations of Stevenage to be addressed together with those in the surrounding area of North Hertfordshire. There will also be new employment opportunities and locations to meet the needs of the town and surrounding area. New infrastructure and services will be delivered to meet the needs of both the new residents of the neighbourhoods and existing residents in the town and surrounding areas in North Hertfordshire.

Key Spatial Objectives:

29. Meeting the key objectives below will result in the successful attainment of the spatial vision above.

Sustainable Communities:

30. To deliver a clear planning framework that makes possible the effective long term delivery of Stevenage's growth agenda. To define new Green Belt boundaries which prevent the expanded town merging with nearby villages. To provide a balance between job growth and housing growth to avoid Stevenage becoming a commuter town. To secure reduced dependence on the motor car with new neighbourhoods designed to encourage walking, cycling and the use of public transport.

Built Environment:

31. To encourage the provision of attractive, high-quality built environments with well-designed buildings, extensive landscaping and good layouts that link effectively with existing communities and the surrounding countryside. To ensure that the services and infrastructure of existing communities do not suffer from negative effects due to growth. To seek improvements to the A1(M), local transport links and public transport.

Housing:

32. To secure house types, tenures and densities that meet the needs of the town and surrounding areas in North Hertfordshire, respond to affordable and social housing requirements and redress the imbalance of house types in Stevenage. To ensure new housing incorporates construction methods that make best use of resources and sustainable design measures.

Natural Environment:

33. To protect and enhance the existing environment within the SNAP area by safeguarding open areas of high quality environmental, landscape and wildlife value. To ensure the development of a network of green spaces within the new extensions to the town which are linked to existing green infrastructure beyond.

Climate Change:

34. To require the provision of new development that adapts to and minimises contributions to changing climate. To reinforce the national emphasis on energy efficiency and the use of renewable energy sources. To achieve Carbon Neutral development within the Plan period through capitalising on the opportunities presented by such substantial housing growth.

Social:

35. To ensure the creation of neighbourhoods that satisfy the needs of their residents through the provision of high-quality sporting and leisure opportunities; accessible local health care; safe communities; education and training facilities; a wide range of community and cultural facilities; neighbourhood retail services; and other appropriate services.

Economic:

36. To help create prosperity in and around the town through the provision of sufficient land, buildings and infrastructure to support a substantially expanded, strong and competitive business community. To create new employment areas serving both local needs and the wider area, and a wide range of jobs and training opportunities for residents of the SNAP area, the rest of Stevenage and North Hertfordshire and beyond.

Question 2: Have we got the Vision and Objectives right? Please let us have your comments.

Location

The following chapter covers the theme of Location, and addresses the following questions:

- Where should new development be located?
- Just as importantly, where should we avoid putting new development?

New development - where should we locate it?

37. One of the main roles for SNAP is to indicate which areas are suitable for housing and employment development and those that are not. This chapter sets out a range of issues we need to consider in locating new housing, jobs and other facilities. We have not made any decisions about them yet and would like to know your views.

Protection of the natural environment

38. The Plan area is easily large enough to accommodate all and more of the growth allocated to Stevenage. This enables us to identify several alternative growth locations and consider them as options at this stage. The SNAP area already has a number of established characters and contains many natural features of interest and value. Therefore decisions on where to locate new developments should take these features into account. We know through evidence studies that there are a number of areas of landscape or environmental importance. For example, Knebworth Woods to the south-west of Stevenage is a Site of Special Scientific Interest (SSSI), and the impact of nearby development on it would need to be carefully assessed before making decisions on any housing locations.
39. Just as important as the technical evidence are the features which are important to you. These may be large in scale, for example, the Langley Valley or the land to the north of Stevenage known as Forster Country. They may be much smaller in scale; for example, areas of woodland such as Brooches Wood or High Broomin Wood, wildlife sites or the setting of a building or a group of buildings, for example Chesfield Park. On the other hand, they may be non-physical features, such as an attractive view or a pleasant character. We would like to know which elements of the existing landscape you value and want to see retained.

Question 3 - What features of the existing natural environment should be retained during and after the new growth takes place?

Please list the features you value and try to number them in an order of priority, with no.1 being the feature you value most.

Also, please describe why you value each of the features you have identified.

New housing

40. One of the most important issues we must address in SNAP is where to locate the new housing required in the East of England Plan.
41. The main elements of the proposed housing strategy in the Plan are –
 - At least 16,000 more dwellings within and on the edge of Stevenage must be provided by 2021.
 - At least 6,400 of these new dwellings are to be provided within the Stevenage Borough Council administrative area.
 - Urban extensions are required to the west and north, on land in both Stevenage Borough and North Hertfordshire District.
 - The urban extension to the west should be a minimum of 5,000 dwellings in size.
42. The overall housing target is already part-way to being achieved. Between April 2001 and April 2007, 2,175 houses were completed in Stevenage and within North Hertfordshire at Great Ashby and Burleigh Park. Also, planning permissions were granted for a further 1,225 houses by the two Councils and these are expected to be built and completed before 2021. In total, these account for 3,400 out of the 16,000 target.
43. Some of the total housing figure will be built within Stevenage's current built-up area, largely on brownfield land. The best current estimate is that this source could provide 2,300 more houses. However, the Borough Council are doing further work assessing the town's urban capacity, and it may be that this figure will change during the evolution of SNAP.

44. Adding the totals for completions, commitments and development within Stevenage together gives a total of 5,700 houses. That means the two Councils must plan for 10,300 houses within the SNAP boundary if the East of England Plan's overall housing target is to be met.
45. How much land will 10,300 houses and the associated development, such as schools and open space, occupy – and therefore how much land will need to be allocated in SNAP to achieve the target?
46. The two Councils are carrying out further work to provide a robust answer to this question. This will be available before the preferred options for SNAP are prepared. However a very rough guide can be given by considering the planning application site to the west of A1(M) at Stevenage. Its boundaries are shown on Map 2 on page 18. It is approximately 280 hectares (691 acres) in size and provides sufficient land for the development of some 5,000 homes and associated development (although planning permission for this scale of development was not granted). Therefore to provide 10,300 new homes, we need to allocate approximately twice as much land as this application site. Such an area (560 hectares or 1383 acres) is roughly one fifth the size of the administrative area of Stevenage (see Map 1).

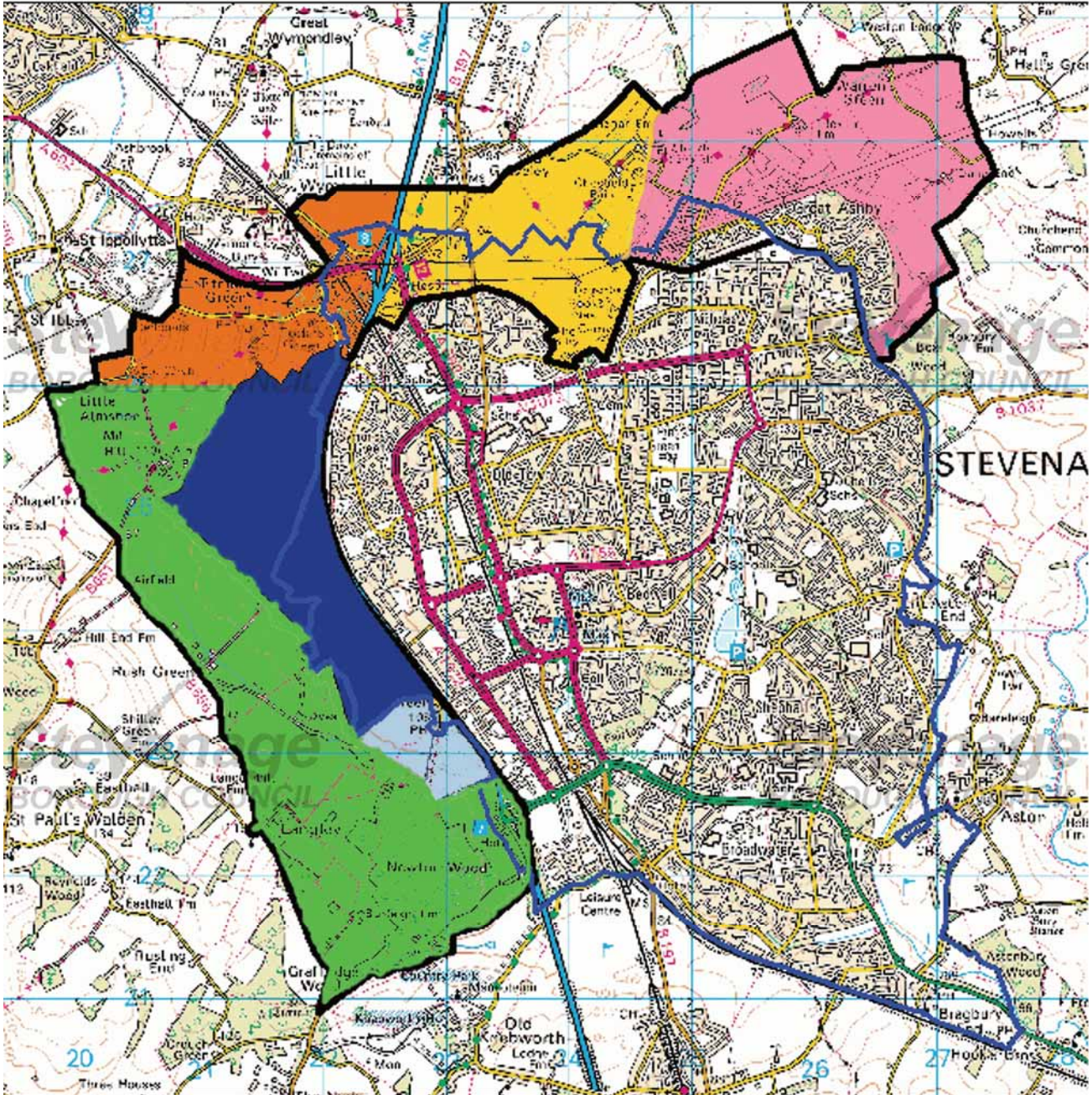
Question 4 - Where should the new housing be located?







Map 2 shows the boundaries of the West of A1(M) planning application site. The remainder of the SNAP area is subdivided into "areas of search" in the form of sectors. Please tell us in which sectors you think the new housing should go by ranking the following list (with 1 indicating the most suitable). However, please note the comment in paragraph 47 below.

- a. West of A1(M) application site (please note that the Secretary of State is minded to grant planning permission for 3,600 homes and associated development here);
- b. North east sector;
- c. North sector;
- d. North west sector;
- e. Western sector;
- f. South west sector.

If there are any sectors you feel are entirely unsuitable or unacceptable for new housing, let us know and tell us why you have come to this view. Also, if there are certain areas within a sector where you think development should avoid, please tell us.

Areas of search for Housing Development



- | | | | | | |
|---|---------------------------|---|---------------------------|--|--------------------------------|
|  | North East area of search |  | North area of search |  | North West area of search |
|  | West area of search |  | South West area of search |  | West of A1(M) application site |

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Map 2 Housing Locations

47. We are not suggesting or implying that any of the above sectors or “areas of search” should be completely developed as a consequence of SNAP. It is entirely possible at this stage to envisage partial development of several sectors, which together would meet the overall housing target. Please bear this in mind in responding to the question above.
48. We are also aware of the impact that new development may have on the existing settlements in the SNAP area. Therefore in questions 20 and 21 below, we ask for your views on how best to tackle new development around or close to existing settlements.

New employment sites

49. Stevenage Borough Council is planning for an overall increase of more than 9,000 new jobs by 2021. Given the number of new homes to be provided, it is important that new jobs are also created to maintain a reasonable balance between the numbers of people employed and those residing in the town. We want to avoid Stevenage becoming a commuter town. Job growth in Stevenage will also provide opportunities for many North Hertfordshire residents to have jobs in a location close to home. It may also reduce long distance commuting from the North Hertfordshire towns. Many of these new jobs will be within the existing built-up area following regeneration of existing employment sites such as Gunnels Wood and redevelopment/regeneration of the town centre. However, in order to meet the desired jobs target, brand new employment sites will need to be created.



An example of a modern employment complex

50. The possibilities of finding new employment land able to deliver job growth within the existing built-up area of the town are extremely limited. Such new sites would primarily have to be located within the SNAP boundary.

Question 5 – Where should new employment sites be created?

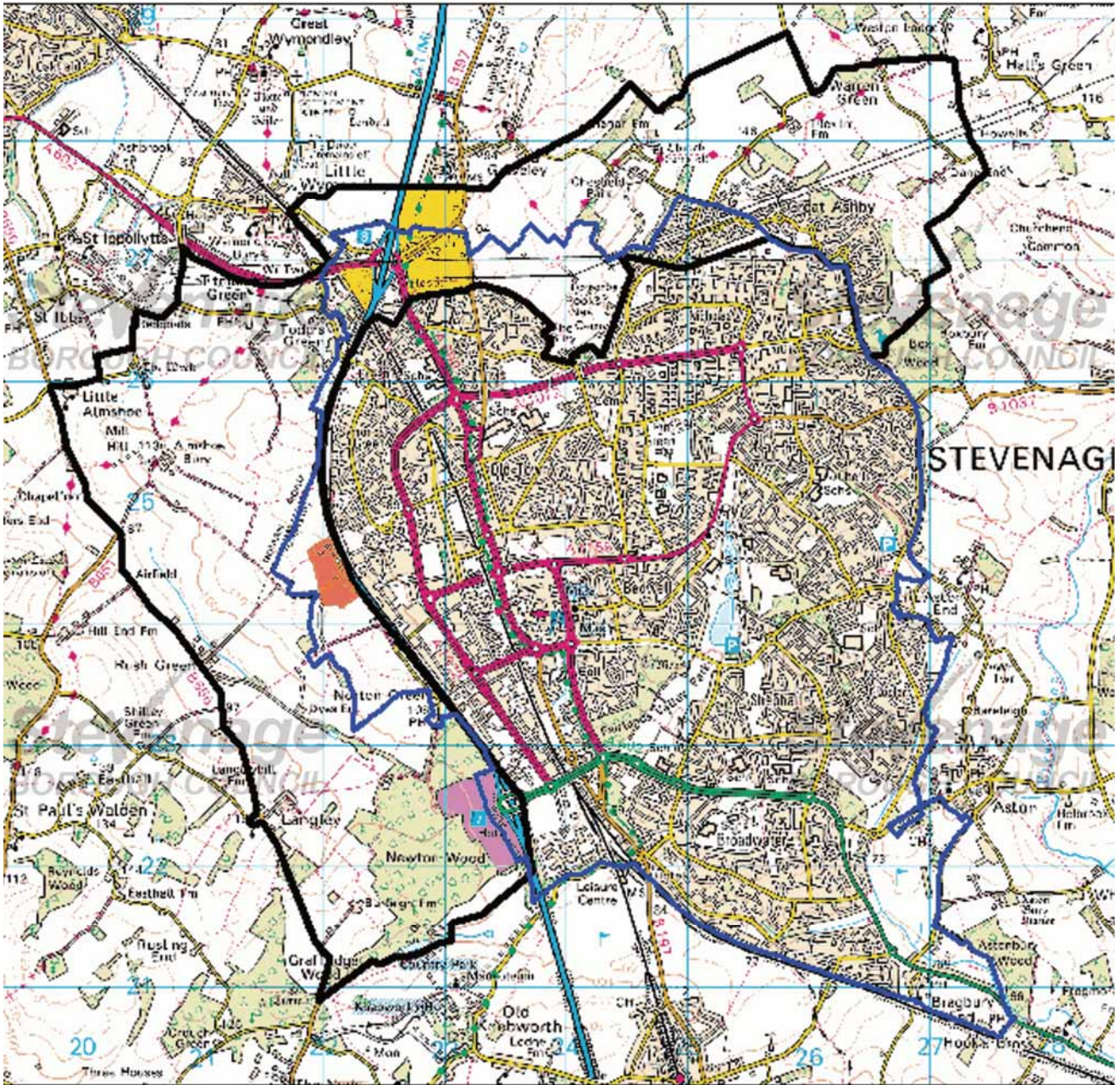
Please rank the potential new employment options set out below (1 being most preferable)

- a. No new employment sites within the SNAP area. All new employment for Stevenage should be located within existing employment areas or in the town centre;
- b. On land adjacent to Junction 8 of the A1(M) (northern Stevenage junction);
- c. On land adjacent to Junction 7 of the A1(M) (southern Stevenage junction);
- d. Within the planning application site west of the A1(M).

If you would prefer to see other potential sites considered, please identify them.

Where possible, it would be helpful if you could explain how you have come to your conclusions.

Areas of search for Employment Development



- Land near junction 7
- Land with the Stevenage West applicationn
- Land near junction 8

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Map 3 Employment Locations

Phasing the release of new employment land

51. It is very difficult to predict the total number of new jobs which will actually be created over a given period. Therefore maintaining a balance between jobs and homes is perhaps ambitious and may not be achieved. If new employment areas are created and the anticipated growth in jobs is not achieved, the result could be either the new employment areas remain unused or underused, or existing employment areas suffer as firms move out to new sites but no replacement firms move in. We need to encourage job growth but in a manner which will not detract from existing employment areas in Stevenage. We therefore seek your views on whether phasing the release of new employment land is an acceptable way forward.

Question 6 – Should the release of employment land be phased?

- a. Yes, release new employment land in phases.
- b. No.

New road schemes

52. Although the two Councils will seek to reduce dependence on the motor car through policies in either the Core Strategies or this Plan, it may be that the new growth around Stevenage will require new local road schemes. No decisions have been made on any of these at this stage. However we would like to hear your views on 4 possible highway issues. You can find a map after question 11 to assist you in identifying the potential location of these schemes.
53. Firstly, traffic congestion on the A1(M) has long been an important issue recognised by both Councils. It is made worse by the carriageway reducing from three lanes each way to two lanes each way between Junctions 6 and 8. There is obvious concern that the additional growth at Stevenage and elsewhere will further increase the problem. We would like to know your views on whether the A1(M) requires improvement, for example by widening. Please bear in mind though that the preparation of SNAP will not be able to resolve any issues relating to the A1(M). However your answers to this question will help the councils in seeking any necessary solutions elsewhere.

Question 7 – Do you support the improvement of the A1(M) in response to the growth planned for Stevenage and elsewhere?

- a. **Yes, I support the upgrade of A1(M).**
- b. **No, I do not think the A1(M) needs upgrading.**

54. Secondly, there may or may not be advantages in providing a new northern distributor road (or bypass) for Stevenage, from the A1(M) Junction 8 or the B197 Graveley Road running eastwards to serve any new northern development areas and possibly also Great Ashby / Burleigh Park.

Question 8 - Do you support a new northern distributor road?

- a. **Yes, I support a new northern distributor road serving new housing north of Stevenage.**
- b. **No, I do not support the construction of a new northern distributor road.**

55. Thirdly, there may or may not be advantages in linking any new development west of the A1(M) to the A602 Wymondley Bypass. This could provide an alternative route into and out of any future development west of the town, providing a new route into Stevenage. It may also have an impact on “rat-running” on country lanes in this part of North Hertfordshire.

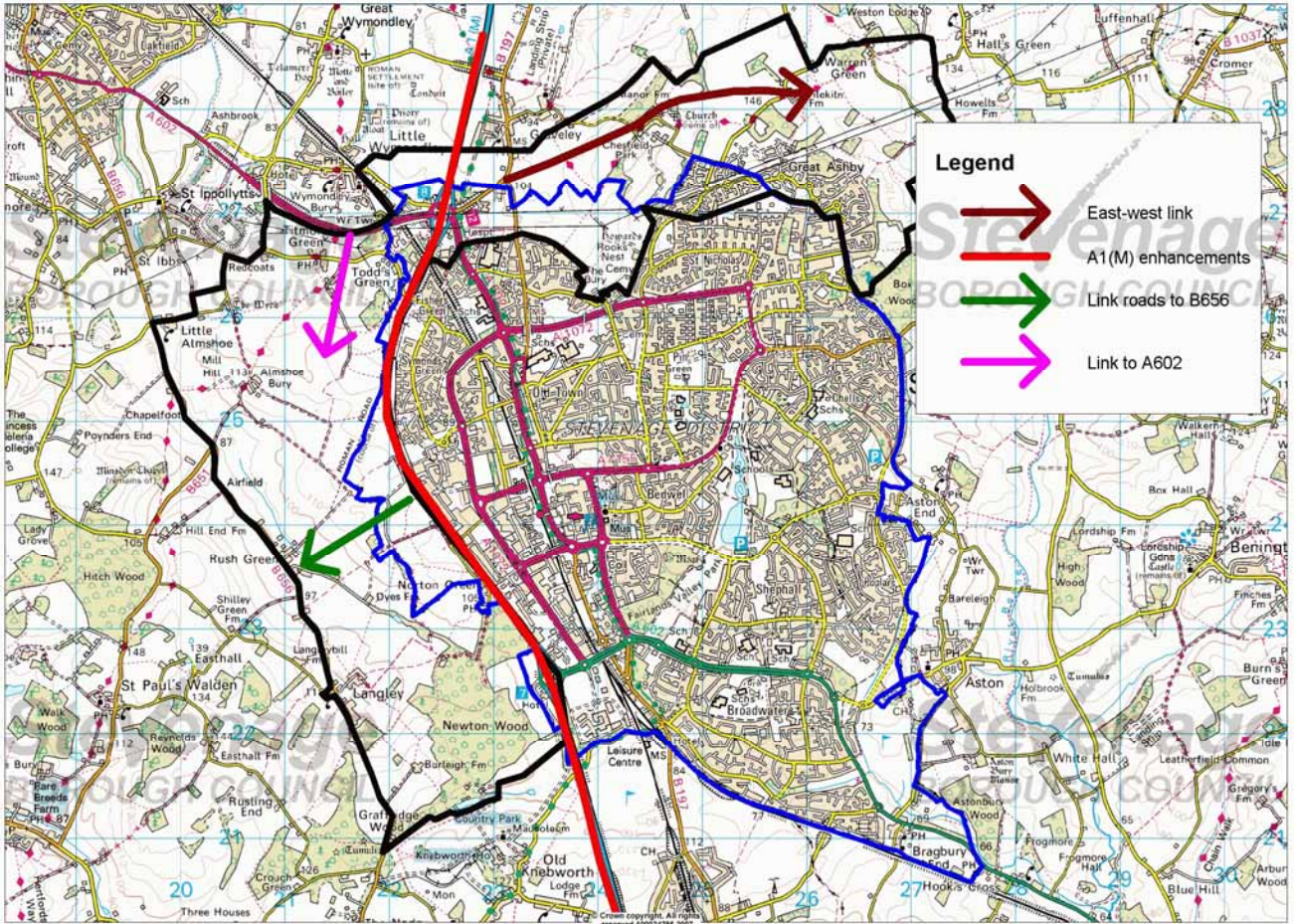
Question 9 – Do you support a road link between any new development to the west of Stevenage and the A602 Wymondley Bypass?

- a. **Yes, I support this road link.**
- b. **No, I do not wish to see this road link provided.**

56. Finally, up to now, both Stevenage and North Hertfordshire Councils have considered it to be unacceptable to create new road links between any new development west of the A1(M) and the B656 Hitchin to Codicote Road. Should this view continue to prevail?

Question 10 – Do you support new road links between any development to the west of Stevenage and the B656 Hitchin to Codicote road.

- a. Yes, I support such road links.
- b. No, I do not wish to see any new road links to the B656.



Map 4 Road Schemes

Forster Country

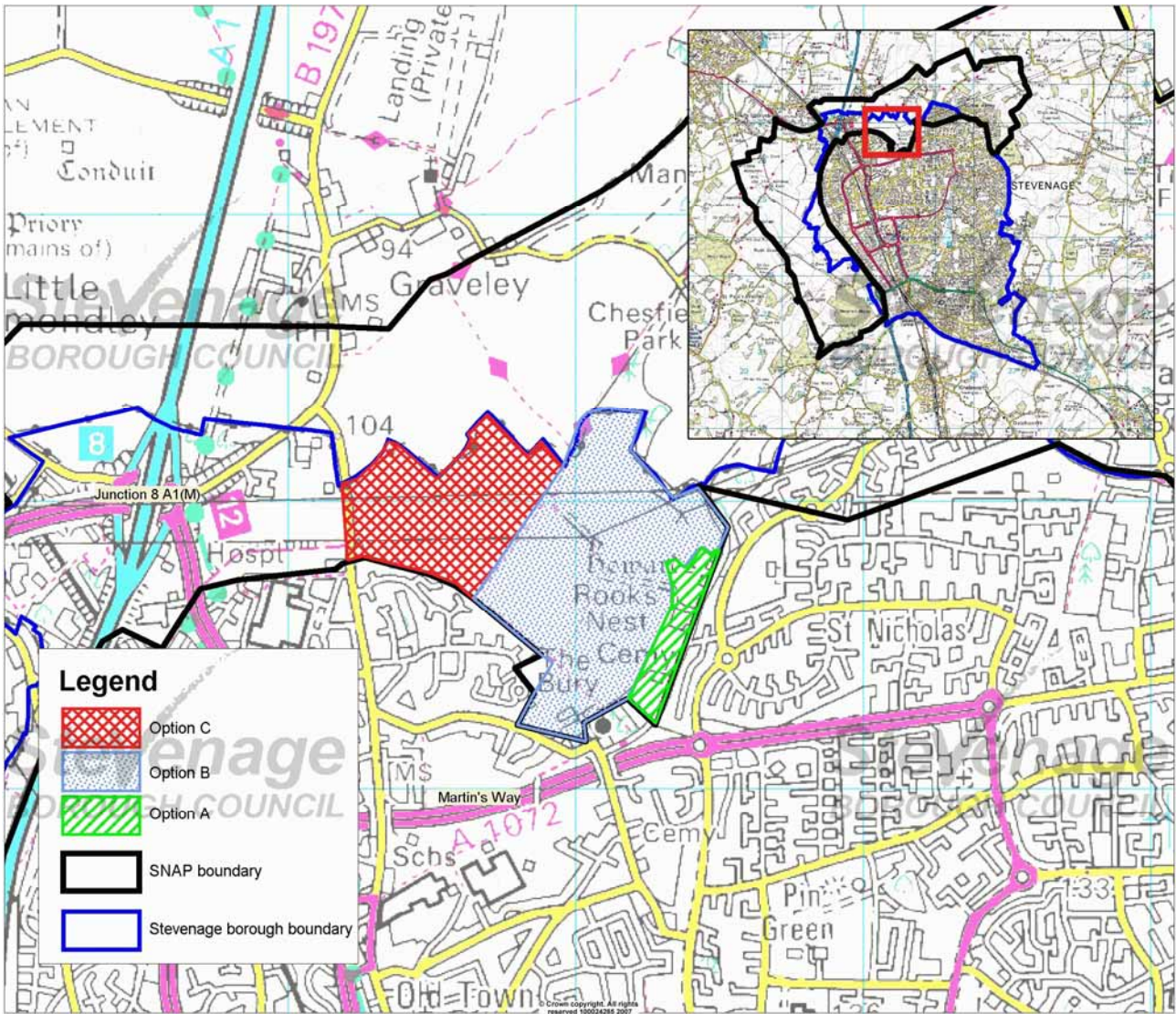
57. The area known by some as 'Forster Country' is located north of Stevenage and provides a setting to the historic Rooks Nest Farm. Rooks Nest Farm was once the family home of the writer E.M Forster. It was this house and the surrounding countryside that inspired his novel Howard's End. The designation of a country park here could ensure the conservation of 'Forster Country' for its contribution to the historic character and would also extend the existing network of open spaces through the new neighbourhoods to the countryside beyond. It would provide parkland for wildlife and residents of the town who are not particularly well served by Fairlands Valley Park to the south. It would become Stevenage's northern green 'lung'.
58. Stevenage Borough Council's Core Strategy promotes the creation of a new country park in 'Forster Country' generally to the north of St Nicholas Church and west of Rooks Nest Farm. What should the detailed boundaries of the country park be?



Views of Forster Country

Question 11 – What should be the detailed boundaries for a new Forster Country Park? Please select your preference, as shown on Map 5 or suggest your own boundary.

- a. Part of the existing St Nicholas Conservation Area, immediately surrounding Rooks Nest Farm;
- b. The proposed new St Nicholas Conservation Area boundary;
- c. From Rooks Nest Farm in the east through to the North Road (B197) to the west; or
- d. Other. Please suggest where they should be, preferably showing them on a map.



Map 5 Forster Country

Green Belt boundaries

59. The land within the SNAP area is largely designated as Green Belt. Clearly, in order to accommodate the new development required by the East of England Plan, the existing Green Belt boundaries must be changed or 'rolled back'. However, the new boundaries cannot simply follow the edges of the new development areas. There are two reasons for this.
- The East of England Plan requires a change of Green Belt boundaries to avoid the need for further review in meeting development needs to 2031.
 - Green Belt boundaries need to be established in relation to existing physical features, rather than the edges of new development.
60. The first of these requirements means that we must estimate the growth likely in the decade 2021 to 2031. The East of England Plan tells us how to do this. "It should be assumed that the rate of development at Stevenage will be the same from 2021 to 2031 as the average rate 2001 to 2021." Thus we must assume a further 8,000 new houses will be provided in and around Stevenage between 2021 and 2031. Some of these will be located within the existing built-up area and although we have not done any calculations yet, a very rough assumption is that 1,000 houses from the 8,000 will be located there over the 10 year period.
61. Thus, to accord with the East of England Plan's requirement, the existing Green Belt boundaries need to be "rolled back" from their present locations to allow for:
- Development to 2021 – some 10,300 new houses together with associated development and any possible new employment sites; and also
 - Development from 2021 to 2031 – a further 7,000 or so new houses, again with associated development.
62. In short, the total amount of land (2001 – 2031) to be removed from the Green Belt is between 3 and 4 times the size of the West of the A1(M) planning application site. (See paragraph 46 earlier)
63. We would like to know your views on revising the Green Belt boundaries. Where do you think future growth between 2021 and 2031 would best be located?

Question 12 – Where should new development be located during the decade 2021 – 2031? Please rank your preferences, with 1 being the most preferred. If possible it would be helpful to know your reasoning.

- a. Mostly to the north of Stevenage;
- b. Mostly to the west of Stevenage;
- c. Equally spread between the west and the north;
- d. Elsewhere, for example to the east and/or south of Stevenage.

The 4th option above would mean development being required outside the boundary of SNAP and would therefore need to be addressed in other policy documents.

If there are any areas where you would not want to see growth during this period please let us know.

Appearance and Quality

This chapter addresses themes relating to the appearance and quality of the new developments.

Density – How should the new urban extensions be planned to ensure the efficient use of land?

64. An important criterion in the overall appearance and character of a new neighbourhood is the density (or densities) at which it has been built.
65. Housing density is the number of homes within a given area. It is usually measured in terms of dwellings per hectare (dph). The Government advises us that in order that land is used efficiently, applications for new housing developments should normally only be approved if they achieve a density of at least 30dph. Most of the residential areas within Stevenage are built at around 25-30dph, although some medium and high density housing areas exist in some of the more recent developments. In North Hertfordshire as a whole, densities have increased from an average of 22dph in 2001-02 to 35dph in 2005 –06. In the towns, the difference is more marked with an increase from 32 to 57dph in the same time period. Such increases are a reflection of the application of government policy.
66. Housing density has implications for the extent of development in the countryside. A low density scheme will lead to a larger land take and the loss of more greenfield land, whilst a higher density scheme will take up less land. There is a risk that inappropriately high densities will result in townscape of a cramped and unattractive character. A suitable balance must be struck between land take and creating a pleasant environment.
67. There may be a case for a range of densities within the Plan area, such as higher densities in the neighbourhood centres and lower densities for the areas near the countryside.
68. SNAP will also need to achieve an appropriate mix of housing and this is discussed in more detail below. However, the mix will have implications for the density, and thus for the overall design and appearance of the development.
69. Question 14 and 15 both focus on density. In question 14, we seek your views on a possible policy in SNAP requiring an average minimum density to be achieved in all developments in the SNAP area.

Question 13 – If SNAP contains a policy regulating the density of development in new neighbourhoods, what should it be?

- a. Require all developments to comply with the government’s minimum density of 30dph?
- b. Promote a figure higher than 30dph? If you have a figure in mind, please suggest it.
- c. Do not specify an average minimum density in policy, leaving it to the development industry to build new housing at the density it decides?

70. A policy setting an average density across a development could result in either a range of densities - so that for example, some parts of a site may be at 20dph but others at 60dph - or no range of densities with all the housing being at 30dph. Both options would meet an average density requirement, but the latter could be seen to limit the amount of variety and character within the development. We would therefore like your views on whether we should address the issue of requiring a range of densities within new developments.

Question 14 – Would you support building at densities higher than 30dph in certain locations?

- a. Yes. If so, please specify which locations, for example higher densities only in neighbourhood centres.
- b. No.

71. Given that average densities within new developments appear generally to be rising, it would be helpful to get your thoughts on whether or not a maximum density should be set, and if so, what it should be.

Question 15 - Please suggest a maximum density that you consider appropriate for new developments. Or, if you consider that no maximum density should be set, please let us know.

Housing Mix

72. The Government tells us that in order to achieve balanced communities, all new developments should achieve a housing mix, both in terms of tenure (such as rented or owned) and house type (such as flats, bungalows, detached or terraced houses). The housing mix in new neighbourhoods should reflect the types of households requiring housing over the Plan period. Further work is being carried out on this aspect. The two councils have jointly employed a firm of consultants to undertake a Housing Market Assessment Study which will be completed in time to inform our Preferred Options document. The results will be helpful in determining how best to deal with this issue, but we would also like to know your views.

Question 16 - Which statement do you most agree with in relation to delivering a mix of housing?

- a. **The development industry should be allowed to determine the mix.**
- b. **The councils should set a policy which lists different house types and the proportions for each.**

73. The existing mix of house types in Stevenage also needs to be considered. Much of the original New Town comprised terraced housing and approximately 52% of the current housing stock is in the form of terraced homes. The predominance of terraces has endured despite the addition of recent suburban estates and flat developments. An issue therefore is whether the councils should try to secure a different mix of house types in new developments which would redress the existing housing imbalance. There is a shortage of 'aspirational homes,' which we define as large executive housing on large plots or executive apartments. More "aspirational homes" is seen by many Stevenage employers as important in more easily attracting employees to work in the town and live in the locality. There seems to be a specific problem in attracting people to fill positions of management in Stevenage. Do you think we should have a policy in SNAP which attempts to redress this imbalance?

Question 17 - Should SNAP include a policy to redress the existing imbalance of homes in Stevenage?

- a. No.
- b. Yes. If so which types of 'aspirational housing' would you like to see provided in the SNAP area?
 - 1. Large homes on substantial plots
 - 2. Executive apartments
 - 3. Other (Please specify)

Design/Urban Character

74. Good design is a key planning objective. In the built environment, good design means well designed buildings and attractive open space, each with a carefully thought out relationship with the other. In more detail, we need to look at the external appearance and character of buildings or groups of buildings, the use of materials, height, the layout of streets and green spaces, landscaping and street furniture amongst other aspects. This process is what can make a new development distinctive, pleasant and memorable.



Views to Graveley north of Stevenage

75. The importance of good design in achieving high quality development and creating sustainable communities is recognised by the Government. We are asked to develop a shared vision with our local communities of the types of residential environments we would like to see. A shared vision should be aimed at:

“Creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character, and

Promoting designs and layouts which make efficient and effective use of land, including encouraging innovative approaches to help deliver high quality outcomes”

76. We would therefore like to know your thoughts in relation to good design of developments within the new neighbourhoods.

Question 18 - What design features and characteristics would you like to see in the new neighbourhoods? Please list those you consider to be important.

Question 19 - Are there any features/characteristics that you would not like to see included in developments in the new neighbourhoods? Again please list them.

Treatment of the Urban Edge

77. How the edge of new development is treated will determine its appearance in views from open countryside. It could either present a hard urban edge (i.e. buildings) to provide a distinctive feature in the landscape or it could have planting to soften its impact. Planting could either completely screen the development or provide occasional glimpses of buildings. We would like to know your views on which approach you would prefer us to take.

Question 20 - How should the edges of new development adjoining open countryside be designed? Please select your preferred option.

- a. Planting with occasional glimpses of built development visible;
- b. Strong planting to completely screen the built development;
- c. Large areas of built development clearly visible;
- d. Other, please suggest.



View looking south towards the urban edge of Great Ashby

78. There are a number of settlements within SNAP, including Warren's Green, Todds Green, Titmore Green, Almshoe Bury, Norton Green and Langley. The next question asks you for your views on the relationship between new development and such settlements.
79. There are several options to consider. On the one hand, new development could be permitted right up to the edge of a settlement, effectively incorporating the settlement within the development area. On the other, a 'green buffer' or open space could be provided between the edge of the new development and the edge of the settlement. A further alternative would be to permit low density housing on landscaped plots next to the settlement, as a transition between old and new.

80. In asking you to consider this issue, we are not saying that new development will definitely surround or adjoin any particular settlement. However, given the scale of housing we have to plan for, it is a possibility. Hence, we are very interested in your views.

Question 21 –How should new development relate to existing settlements?

- a. Incorporate the existing settlement within the new development with no open space between old and new.
- b. Ensure that there is physical separation between existing settlements and new development. Please let us know how wide the separation should be.
- c. Allow well-landscaped low-density development up to the edges of the existing settlement as a transition between old and new.

You may feel that some settlements could be treated differently to others. If this is the case please specify which settlements and how they should be treated.

Facilities and Infrastructure

This chapter deals with other issues that are often referred to as 'associated development' to employment and housing. Facilities and infrastructure constitutes an important aspect of any new neighbourhood.

Affordable Housing

81. Both Councils are aiming to secure new housing to meet the needs of everyone in the community. This includes the provision of what is called **Affordable Housing** for those people unable to rent or buy housing available on the open market. The demand for housing in the area is growing due to the pleasant surroundings, the growing population and of course, the proximity to London. As a consequence, as house prices continue to rise faster than average wages and salaries, so housing becomes unaffordable for more and more people.
82. Affordable housing is defined as including both social rented housing and intermediate housing.
- **Social rented housing** is housing for rent, made available at less than market rents to those in need.
 - **Intermediate housing** includes shared equity schemes and housing specifically for key workers employed in the locality.
83. Affordable housing does not include low cost market housing.
84. To encourage the provision of appropriate levels of affordable housing, the Government requires councils to set targets. These must take into account existing and likely future demand.



An example of Affordable Housing

85. The two councils have jointly commissioned a study to determine the amount of affordable housing which could be provided without compromising development viability. The study concluded that a target of a minimum of 40% affordable housing on developments of 25 or more houses would still be economically viable, and this is now the standard set in the Preferred Options of both councils' Core Strategies. However, the study also indicated that a minimum of 50% affordable housing might be viable in large housing developments on currently agricultural land – such as are likely to be allocated in SNAP. We would like to know your views on having a different affordable housing target in SNAP then elsewhere in the two council areas.

Question 22 - What percentage of Affordable Housing should the new housing developments within SNAP be required to provide?

1. **A minimum of 40% affordable housing, as contained within the Core Strategies of both councils, or**
2. **Set a different affordable housing target in SNAP. If you choose this option, please indicate what you think the target should be and why.**

86. Once the overall scale of affordable housing has been decided, we then need to consider how best to accommodate it within the market housing. It could be grouped together or it could be mixed in with the market housing. We have identified 3 options below, on which we would like to know your views.

Question 23 - How would you prefer to see the affordable housing developed in the new neighbourhoods? Please rank the following options.

- a. **Put all the affordable housing within a new neighbourhood in a single location.**
- b. **Develop the affordable housing in small groups within the market housing. If this is your preference, please tell us what you consider the maximum number of affordable houses in any group should be.**
- c. **Mix affordable housing in with the market housing so that they are fully integrated and not visually distinguishable from each other (a process sometimes known as 'pepper-potting')**

Open Space

87. We need to ensure that when the new housing is provided, it contains sufficient open space of a high quality, properly related to the houses. We must also try to create a pattern of spaces, where each space is related to others. Clearly this makes an important contribution towards creating places where people want to live.
88. Open space standards are currently being developed by both councils in their respective Core Strategies.
89. Stevenage BC has already undertaken a review of its existing open space and identified a new set of local standards reflecting the current levels of open space in the town and its New Town heritage. North Hertfordshire DC is undertaking a similar review of open space within the district but has not yet determined new local standards.
90. As the two authority areas are very different in character, it is at least possible that the open space standards which emerge in the respective Core Strategies will be different. If we simply apply those standards, a neighbourhood within the SNAP area might end up with both of those standards being applied in different parts of it. Clearly this would be unacceptable. A consistent approach across SNAP is desirable and we would like your help in deciding appropriate open space standards for new development.
91. As the new housing will be in the form of extensions to Stevenage, we have framed our options in terms of whether or not we maintain the existing Stevenage character of open spaces in the new neighbourhoods.

Question 24 - What open space character should be required in the SNAP area? Indicate your preference for one of the two options below.

- a. **Maintain the open space character already established in Stevenage across the whole of the SNAP area.**
- b. **Establish a different open space character for SNAP. If this is your preference, please tell us how it should be different.**

Neighbourhood Centres

92. Neighbourhood Centres have traditionally provided the community with services that meet day-to-day shopping and other needs. Integral to the master planning of Stevenage was the development of neighbourhood centres, one for each of the original 6 neighbourhoods. Each was developed to provide its facilities, including shops, pubs, churches, clinics, workshops, garages and community facilities. This meant that the original residents of Stevenage did not have to go far to access the services they needed.



Examples of Neighbourhood Centres in Stevenage

93. Most of the Neighbourhood centres in Stevenage are small, made up of only 6-10 units, and whilst they have been important to Stevenage's past, their role has changed in recent times. With the frequent use of the car, people are no longer bound to their own neighbourhoods. Freedom of movement has meant that people can make use of the services in the town centre more easily. Indeed many prefer to do so. The town centre provides a wider variety of services, typically at a lower cost than in the traditional neighbourhood centres.

Question 25 - Given the change in their role, what facilities do you think are now needed in neighbourhood centres? Please select all those you think are appropriate?

1. Food supermarket
2. Other local shopping/service facilities
3. Medical facilities
4. Childcare
5. Public house
6. Take-aways
7. Places of worship
8. Community halls
9. Youth facilities
10. Sports facilities
11. Education facilities
12. Other, please suggest

Sustainability

“Sustainability” is an important theme throughout this document, but in this chapter we discuss issues that will contribute to the environmental performance of housing and associated development.

Renewable energy and energy efficiency to minimise climate change

94. The Government is committed to reducing greenhouse gas emissions and encouraging both energy efficiency and the use of energy from renewable sources. A target has been set that all new homes in the country should be “carbon neutral” by 2016. To attain this target, emissions of carbon dioxide (CO₂) must be reduced and methods of using energy efficiently and from renewable sources must be adopted.
95. The **Code for Sustainable Homes** was published by the Government in December 2006. It sets out new voluntary national standards based on a star rating system. The number of stars is calculated by measuring the environmental performance of a home against various categories, such as energy and water use, materials, waste, pollution and quality of life. One star represents a bare pass and a six-star rating is the maximum, representing a carbon neutral home.
96. Other methods have been developed for assessing the sustainability of non-residential buildings. For example, the Building Research Establishment Environmental Assessment Method - **BREEAM** - is based on good, very good and excellent ratings.
97. In the future, the Code for Sustainable Homes and BREEAM may be incorporated into the Building Regulations to become statutory requirements. However, in the absence of such statutory standards now, we would like your views on whether SNAP should introduce a policy requiring the attainment of standards. The East of England Plan indicates that growth area locations such as Stevenage have great potential for developing renewable energy technology and encouraging and securing the use of energy efficiency measures.

Question 26 - Should SNAP require the standards in the Code for Sustainable Homes or BREEAM to be met?

1. Yes. If yes, is there a year by which you think we should aim for Carbon neutral homes?
2. No, we will continue to rely on the standards set in Building Regulations.

98. The East of England Plan is likely to set a regional target of generating at least 10% of a development's predicted energy requirements from renewable sources by 2010 and 17% by 2020. It also encourages Councils to adopt more ambitious targets than these. Technology for providing energy from renewable sources includes solar panels, wind turbines, community heating systems and the transfer for heat from the ground to buildings. The major new developments within the SNAP may provide an opportunity to utilise the scale of development to achieve higher renewable energy targets.

Question 27 - Should the policies in SNAP aim to exceed the targets for use of renewable energy set out in the East of England Plan?

1. Yes. If so, what should the targets be?
2. No.

Encouraging environmentally friendly forms of Travel

99. There are various measures that can be used to discourage car use and encourage cycling, walking and the use of public transport. These would have a positive impact on minimising climate change. This question asks for your views on these measures.

Question 28 - Which of the following do you feel we should adopt to encourage people to use their cars less?

1. Extend and provide new attractive and safe footpaths, pedestrian and cycle networks
2. Give priority to pedestrians and cyclists over the car
3. Provide frequent, high quality, reliable and cost effective public transport
4. Provide real-time information at bus stops
5. Require Green Travel Plans for non-residential developments
6. Provide Bicycle stands
7. Provide a Park and Ride facility or facilities
8. Reduce car parking in residential developments
9. Reduce car parking in non-residential developments
10. Reduce car parking at schools
11. Provide dedicated bus-ways
12. Implement traffic calming measures
13. Other (Please specify)
14. None of these

If there are any of the above that you feel would not be suitable within the new neighbourhoods please specify and explain why.



Pedestrian priority zone



Stevenage train station and pedestrian links

Gypsy and Traveller Site Provision

The final issue on which we would like to know your views is whether SNAP should contain a proposal allocating a new site or sites for Gypsies and Travellers.

Gypsy and Travellers

100. When the East of England Plan is published early next year, it will **not** contain a policy on providing new sites and pitches for the Gypsy and Traveller communities. However, the Government requires regional planning bodies to assess Gypsy and Traveller needs across their regions and to identify the number of new pitches or sites required in each council area.
101. To remedy this deficiency, the East of England Regional Assembly (EERA) – the regional planning body for the East of England – is currently undertaking a review of the East of England Plan, focussing only on the single issue of Gypsy and Traveller site provision. It has concluded that there is a need for around 1,200 additional residential pitches across the region in the period 2006 to 2011, together with an additional number of transit pitches (official short stay sites).
102. To help EERA form a view on the distribution of these pitches, it consulted on two options, the first proposing 7 additional pitches for Stevenage and 3 for North Hertfordshire, and the second proposing 15 additional pitches for each council. No conclusions have yet been reached by EERA on an appropriate distribution.
103. Stevenage and North Hertfordshire have a duty to put the outcome of the EERA review, whatever it may be, into effect. This means that there is no option but to plan for the additional pitches set out for each council, either through the expansion of existing sites or by allocating land for a new site or sites.
104. In the meantime, 5 Hertfordshire councils – Stevenage, North Hertfordshire, Broxbourne, East Hertfordshire and Welwyn Hatfield, together with Hertfordshire County Council – have commissioned a firm of consultants to carry out a Gypsy and Traveller Accommodation Assessment. This study fulfils a government requirement and the final report has recently been published.
105. The consultants have identified a number of “areas of search” within which there may be potential for new Gypsy and Traveller sites. They have taken into account criteria such as the distance to services and environmental designations including whether or not the site lies within the Green Belt. Their assessment has identified a list of possible areas, including 9 in North Herts and 1 in Stevenage.

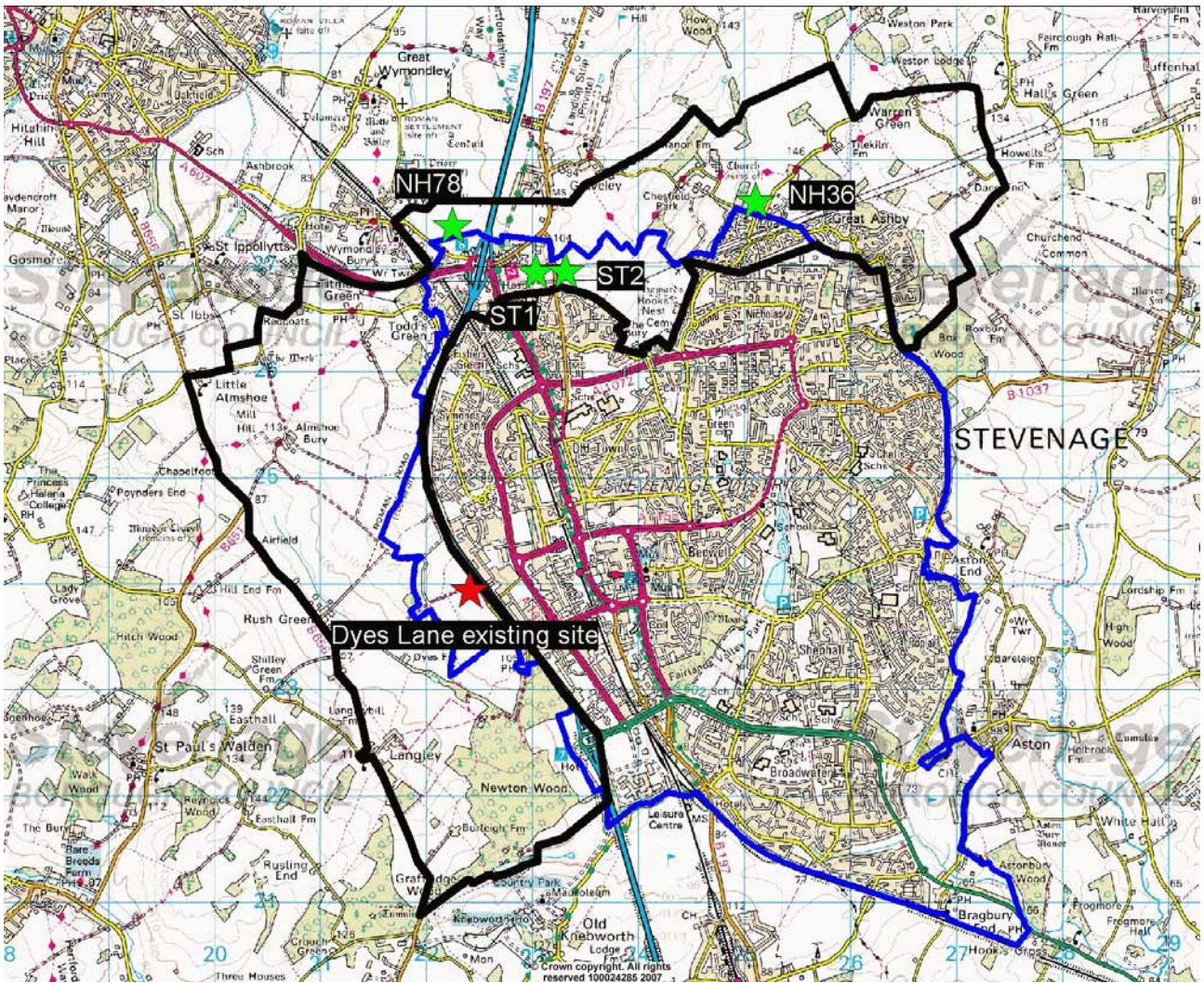
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106. They have also listed further areas in the appendix to the report which were acceptable in technical terms but were not identified due to being in the Green Belt. This list contains a further 16 areas in North Herts and 1 in Stevenage. The consultants state that the list in the appendix should only be considered if the non-Green Belt areas cannot be brought forward.
107. Of all the areas identified, only 4 are within the SNAP boundaries. Two are within Stevenage and the other two are in North Hertfordshire. One of the Stevenage sites lies outside Green Belt land and is therefore identified in the main part of the report. The other 3 sites are all in the Green Belt.
108. There is an existing Gypsy and Traveller site within Stevenage at Dyes Lane to the west of the A1(M). This site is inside the SNAP boundary and will continue to operate.
109. How does all this affect SNAP? We know that there will be a regional strategy on Gypsy and Traveller accommodation adopted sometime in 2009, which is likely to require the two councils to identify additional pitches within their respective areas. If more pitches but no new sites are required, it may be that these can be found by expanding existing sites, such as the Dyes Lane site. However, if the regional strategy determines that new sites are required, the two councils will have to identify and allocate suitable land. The recent study carried out by our consultants will be used in that process.
110. **Please note the following important points.**
- It is not certain that there will be a need for a new Gypsy and Traveller site or sites within the SNAP boundary.
 - Even if the regional strategy does require a site or sites within Stevenage and/or North Hertfordshire, it does not follow that a site or sites inside the SNAP boundary will be selected. There may be better sites elsewhere within the districts.
 - Please understand that the consultant's report sets out the conclusions of the consultants only. No view on these conclusions has yet been formed by either Stevenage BC or North Hertfordshire DC.
 - Elsewhere in this document there are alternative possible uses suggested for some or all of these 4 sites. Consequently, there is no certainty that they would be available for Gypsy and Traveller use, even if it was ultimately decided that they were the best sites for that purpose (i.e. other uses may still represent a better use even if the sites are the best for Gypsy and Traveller purposes).

111. In this context, we would like to know what you think of the options for Gypsy and Traveller sites identified in our consultants' report. Your views will help both councils to assess these conclusions and also help determine our response to the regional strategy in due course.
112. The 4 sites identified by the consultants are shown on Map 6 and described as:
- **Site ST1** - a non Green Belt site, described as agricultural with some pylons, residential dwellings and a nursery to the north, the Great North Road (B197) to the east, Corey's Mill sports ground to the south and new development and A1(M) Junction 8 to the west. It is graded "2" in the study, with "1" being the most preferable. A grade 1 site essentially means that it meets all the criteria set out in earlier in this section.
 - **Site ST2** - a Green Belt site, described as agricultural, with a bridleway to the north, footpath to the east, residential dwellings to the south and the B197 to the west. It is graded "Green Belt 2", with non-greenbelt sites and those with a higher grading being the most preferable.
 - **NH36** - a Green Belt site, described as pasture, with a footpath to the north with pasture beyond, residential dwellings to the east, and woodland to the west. It is graded "Green Belt 1."
 - **NH78** - a Green Belt site, described as agricultural, with Graveley Lane to the north, the A1(M) to the east and Stevenage Road to the south. It is graded "Green Belt 2."

Question 29 - If additional Gypsy and Traveller pitches or sites need to be accommodated within the SNAP boundary, please rank the following options.

1. **Site ST1**
2. **Site ST2**
3. **Site NH36**
4. **Site NH78**
5. **An extension to the existing gypsy/ traveller site at Dyes Lane**

Also, are there any other locations within SNAP that should be considered for Gypsy and Traveller pitches?



Map 6 Gypsy and Travellers

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And finally ...

Are there any other issues which you consider SNAP needs to address?

Question 30:

Please let us know if you think any important issues have not been included in this document, but should be, together with your reasoning.

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Appendix 1

Frequently Asked Questions

What is a Key Issues and Alternative Options consultation document?

1. An Issues and Options document is something that the two Councils are required to produce as part of the new planning system. It sets out in very broad terms what we believe are the key issues that will shape the long-term planning future of the new neighbourhoods around Stevenage and extending into NHDC. It also sets out alternative ways in which we might tackle these issues .
2. In identifying the key issues, it is assumed that:
 - All necessary infrastructure such as roads, water supply, drainage, electricity, gas, telecommunications, etc. will be delivered to support the scale of development set out in the East of England Plan;
 - All significant environmental assets in Stevenage and North Hertfordshire, such as sites of significant interest, wildlife sites, sites of historic importance, etc., will continue to be protected; and
 - All legislation and planning policies established by the European Union, the Government and the East of England Plan will be met.
3. The issues and Options consultation stage is the first in a series of more detailed consultations that we will carry out on each of our planning documents (in formal terms called Development Plan Documents or DPDs). At this stage in the process we are simply trying to identify what the broad scope of SNAP should be, so this document does not attempt to identify all of the issues or all of the possible options for tackling them.
4. We have relied upon the information from a number of evidence studies, some of which are mentioned within the document. A full version of each study undertaken by the Councils can be found at www.stevenage.gov.uk and www.north-herts.gov.uk. Please note that there are studies in this list that have been prepared by other organisations.

Haven't you already made your choices?

5. No. The Issues and Options document asks for your help in informing preparation of the next document at the preferred options stage (see below). At this stage, there is no commitment on our part to pursue any of the actions, options or sites proposed in this document. They are offered for comment and consideration without any preference being expressed. Once this consultation is completed, we will use its results – together with other material – to determine which of the options (if any) is the preferred way forward. We will then consult at a later date on our preferred options. There will be an

explanation why particular options have been chosen and why others have been rejected.

What role does both Councils Community Strategies Play?

6. The Community Strategies for each Council are the outcome of a comprehensive process to develop a vision for the future of Stevenage and North Hertfordshire respectively. They were written by the local strategic partnerships for each Council. These partnerships comprise numerous public sector agencies and voluntary and private sector partners. The actions within each community strategy broadly relate to ensuring economic prosperity, health and environmental protection and securing investment in the communities.
7. The Local Development Framework is the principal mechanism for delivering the spatial elements of the Community Strategies' objectives.

How does the new Planning System work?

8. In September 2004, the Government brought into force new legislation - the Planning and Compulsory Purchase Act - to simplify and speed up the production of planning documents and to ensure community involvement is at the heart of the planning system.

Core Strategy and Generic Development Control Policies	This document contains the vision and broad spatial strategy for the authority's area. Non-site specific policies against which planning applications are assessed are also included. All of the plans below must conform to the vision set out here.
Site Specific Policies	This document contains specific policy requirements for individual sites, and may include conservation and protection policies as well as policies for new development. It will not include policies for any area covered by an Area Action Plan.
Area Action Plans	These contain specific policies for the future use and development of particular areas. SNAP falls within this category.
Proposals Map	This identifies all site-specific policies contained in the plan on an Ordnance Survey base map of the area.

9. All local authorities must replace their local plans with Local Development Frameworks consisting of the above set of separate documents.
10. Both Stevenage and North Hertfordshire councils have prepared Local Development Schemes, which set out the documents making up the respective LDFs, together with a timescale for each document's preparation. The two LDSs can be viewed on the relevant authority's website – www.stevenage.gov.uk or www.north-herts.gov.uk.

How will you prepare the plans?

11. In preparing plans (or DPDs) we have to do the following work at the following stages:

Stage 1
Development of Evidence Base

This stage involves both authorities establishing an up-to-date information base on a range of social, economic and environmental matters.



CURRENT STAGE
Key Issues and Alternative
Options Consultation

The results of Stage 1 will be used to identify issues the plan needs to address and the options available to deal with each issue.

Stage 3
Preferred Options Consultation

Comments received during Stage 2 will be used to prepare a 'Preferred Options' version of the plan, setting out our preferred approach and providing a summary of the other options that were rejected. A 'Preferred Options' plan will be available for consultation for a minimum of 6 weeks. This will include an appraisal of the plan's social, economic and environmental implications.

Stage 4
Preparation of DPD

This stage involves us further developing and refining our preferred options and the precise drafting of policy wording for inclusion in the 'submission' plan.

Stage 5
Submission DPD Consultation

The plan is sent to Government in the final form that we prefer, at which point a further 6 week consultation period will start. There will be a second appraisal of the plan's social, economic and environmental implications.

Stage 6
Alternative Sites Consultation

This stage means that we have to consult on any 'alternative sites' put forward by other people in response to the Stage 5 consultation exercise.

Stage 7
Examination

An Inspector appointed by the Government will carry out an independent examination of the 'soundness' of the plan. This process allows those dissatisfied with the plan to make further written comments and, if they wish, to appear in front of the inspector in person.

Stage 8
Receipt of Inspector's Report
and Adoption

The inspector goes away and writes a summary report of the examination and decides what changes (if any) are necessary. Once we receive the inspector's report we have to publish it. Then we have to accept the amended plan with the inspector's changes and publish this final version of the plan.

How will you involve the community?

12. Both authorities have produced a Statement of Community Involvement (SCI) which provides further information on how we will involve the community in the preparation, alteration and review of local planning policies and planning applications. The Statements are available at www.stevenage.gov.uk and www.north-herts.gov.uk.

How have you decided which matters to consult upon?

13. As our Statements of Community Involvements make clear, we will only consult you on those matters that are genuinely open to debate and change. There is little more frustrating for our consultees than to find that their views have no influence because decisions have already been made. It is therefore a matter of principle that we should only consult you on those matters where no choice has yet been made (although that is not to say that we may have already expressed an opinion about some of these matters) and where we have the power to make the decision through preparing these plans.
14. Some topics are not open to public consultation at this stage for a variety of reasons. These matters fall broadly into two categories: those that are already settled and those to be determined in other plans at some point in the future.
15. Certain matters are already settled, for instance those in higher level planning strategies or documents such as the East of England Plan. These include such things such as the scale of housing to be built by 2021; the need for new neighbourhoods; the principal directions of growth of the town – all of which will be settled in the emerging East of England Plan and have already been open to public consultation and independent examination.

What do I need to comment upon?

16. At this early stage in the preparation of these plans, our ideas are not fully formed and therefore it is neither possible nor necessary to consult on every issue that may influence the shape of the final plan. There are at least two further stages of public consultation on SNAP and also a public examination in front of an independent inspector. What is important at this stage is to gauge reaction to possible issues for those elements of SNAP that are not yet settled.

Do I need to be a planning expert to respond?

17. No. Whilst town planning, like many professions, has its own technical terms and professional shorthand, both Councils support the use of plain English, especially in consultation documents that are designed to appeal to a wide audience, including non-planning people.
18. If you find any terms in this document that you are not familiar with, you may find them explained in the glossary in **Appendix 2**.
19. If you would like a fuller explanation of the issues and inter-relationships that lie behind the possible policy alternatives please do not hesitate to contact the SNAP Team and we will be happy to explain matters more fully to you.

What will you do with any written comments I send you?

20. All relevant written comments we receive by the end of the consultation period will be acknowledged in writing. We will not accept oral comments. At the end of the consultation period we will read and analyse all responses and prepare a summary report that will be available for people to view.

Appendix 2

Glossary

The following is a glossary of words used in the Stevenage and North Hertfordshire Action Plan. You may find these useful to help understand some of the terms and names used in this and other planning documents. The symbol ⓘ means that a definition is available in the glossary.

Affordable housing: This is housing provided to people whose needs are not met by the market. A precise definition is *“housing provided with subsidy for people who are unable to resolve their housing requirements in the local private sector housing market because of the relationship between housing costs and incomes.”*

Area Action Plan (AAP): These provide the planning framework for areas where significant change or conservation is needed or anticipated. These plans will have Ordnance Survey based maps which act as insets to the main proposals map. SNAP is an Area Action Plan.

Brownfield or Previously Developed land: Land previously developed for another purpose and occupied by a permanent structure and associated fixed surface infrastructure. The term is commonly used in connection with urban capacity studies ⓘ where the Government states that brownfield development shall take precedence over greenfield development ⓘ. A full definition of what constitutes brownfield land can be found in Annex C to PPG3.

Conformity: The Government requires that the Core Strategy ⓘ of each LDF ⓘ is in conformity with the RSS ⓘ and that every other DPD ⓘ in the LDF should be in conformity with the Core Strategy. In the case of the Core Strategy's conformity with the RSS, the test is of “general conformity” which tests whether an inconsistency or omission in the DPD would cause significant harm to the implementation of the RSS. The issue of conformity is tested at the submission stage ⓘ of the DPD.

Conservation Area: Any area that meets the standards for designation can be designated by a local authority as a Conservation Area. Conservation Areas are areas of special architectural or historical interest, the character of which it is desirable to preserve and enhance.

Core Strategy: The DPD ⓘ that sets out the key elements of the planning framework for the area of the Local Planning Authority ⓘ. It comprises a spatial ⓘ vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery. Once adopted all of the other DPDs must be in conformity ⓘ with it.

Development Plan Documents (DPD): These are the documents that must be taken into account in determining planning applications. Planning permission must be granted in accordance with these documents unless material considerations indicate otherwise. Development Plan Documents must be subjected to independent examination ⓘ before being adopted.

East of England Plan: See Regional Spatial Strategy.

East of England Regional Assembly (EERA): EERA is the Regional Planning Body responsible for producing the Regional Spatial Strategy (①). EERA comprises representatives of all 54 county, unitary and district/borough councils in the region (the counties of Hertfordshire, Bedfordshire, Cambridgeshire, Essex, Norfolk and Suffolk) together with a wide range of other public and private sector stakeholders. For further information about EERA's composition and constitution visit: www.eera.gov.uk.

Examination: All DPDs must be submitted to Government for independent examination, whether or not any representations are received, as the purpose of the examination is to consider whether a DPD is sound (①). An inspector will be appointed by the Government to conduct the examination. He/she will consider all of the written representations made, together with any supplementary oral evidence. The presumption will be that a DPD is sound unless it is shown to be otherwise as a result of evidence considered at the examination. Further information on examinations of DPDs can be found in Annex D of PPS12.

FAQs: Frequently Asked Questions i.e. the most useful information for readers.

Government (role of, in development plans): The role of the Government in local planning is to establish the national legislative and statutory framework within which Local Planning Authorities (cf) work, to set out national policy and guidance, to require local authorities to produce various documents (such as the LDS, DPDs, etc), to monitor performance against nationally-set targets (Best Value indicators), to provide guidance, comment and encouragement, to set the regional planning framework (through the RSS), to intervene (if necessary) and to stop plans that are unsatisfactory. Government is, arguably, the principal customer of the development planning system.

Green Belt: Although widely held by the press and public to be any open countryside area outside towns, Green Belts are – in fact – not widespread across the UK, although almost all major UK cities and conurbations now have Green Belts surrounding them. A Green Belt is a planning designation designed to prevent urban sprawl and coalescence between towns, cities and villages. The most important attribute of any Green Belt is its openness. There are five purposes set out by Government for designating Green Belts and, once designated, the land contained within them has a positive role to play in meeting six objectives. For more details on Green Belts see PPG2.

Greenfield development: Any development on a piece of land upon which there has not been any previous development (i.e. the opposite of brownfield land (①)).

Infrastructure: Infrastructure refers to all the items that support development such as roads, power lines, sewers, schools, health care centres, community buildings and many other things.

Key Issues stage of DPD: To inform the preferred options stage DPDs (①) authorities are required to consult with the community and stakeholders after, or whilst, they are creating their evidence base. At this early stage in the evolution of DPDs, ideas are not fully formed. Therefore it is neither possible nor

necessary to consult on every issue that may influence the shape of the final plans. It is important to concentrate on the broad principles that shape policy choices. It is the broad choices at this stage that will help to inform and shape the selection of the more detailed policies at later stages. The next stage in the evolution of a DPD is preferred options stage (①).

Local Development Documents (LDD): These documents can be Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), both of which are used to guide development and by the council in the determination of planning applications.

Local Development Framework (LDF): This statutory document comprises a number of different types of document, including the Local Development Scheme, Local Development Documents, Development Plan Documents and Supplementary Planning Documents.

Local Development Scheme (LDS): This document sets out which documents are part of the Local Development Framework and the timetable for their review and the preparation of new documents. It is essentially a programme management document. It is a statutory document, although not a Local Development Document (LDD).

Local Plan: A document produced under the old planning system that set out all the council's policies on the development and change of use of land and buildings. Existing local plans will be automatically 'saved' for three years from their adoption. This means that their policies and provisions continue to have statutory force during that three years period. If the council wishes to save its local plan policies beyond this period it must seek the permission of the Government.

Local Planning Authority (LPA): A local authority charged by central Government with the statutory duty to prepare development plan documents and undertake other duties under the Town and Country Planning Acts (and other, ancillary legislation). District Councils, sometimes styled as Borough Councils, have planning powers for all development in their administrative areas with the exceptions of minerals and waste. County Councils have planning powers for minerals and waste within their administrative areas. Unitary authorities (i.e. where there is no county council) have all the planning powers of both county and district councils within their own administrative areas. There are no unitary authorities in Hertfordshire.

Local Strategic Partnership (LSP): A local partnership of businesses, voluntary organisations, community groups and public organisations charged by central Government with the statutory duty to prepare a community strategy (①) for a particular locality.

Neighbourhood Centre: A neighbourhood centre is a collection of shops, often containing at least one supermarket or food store. It may also contain a range of non-retail services, such as banks or restaurants as well as local public facilities such as a library, surgery or community hall.

New neighbourhoods: A new neighbourhood is a sustainable option for providing additional housing after building on appropriate sites within urban areas. These neighbourhoods will be particularly appropriate where it is possible to utilise existing physical and social infrastructure and there is good access to public transport, jobs, schools, shopping and leisure facilities. Some planned new neighbourhoods can be so large that they make their own provision for the facilities listed above. Also known as **urban extensions**.

Planning Policy Guidance (PPGs): Old-style statements of Government planning policy and best practice produced prior to the 2004 Planning and Compulsory Purchase Act. PPGs are now being superseded by PPSs.

Planning Policy Statements (PPSs): Statements of Government planning policy produced since the 2004 Planning and Compulsory Purchase Act. PPSs are slowly superseding PPGs.

Preferred options plan: The preferred options stage is the third stage in the evolution of a DPD (following evidence gathering and key issues and alternative options consultation) and the second stage at which public consultation is statutorily carried out. Preferred options need to be presented clearly and in sufficient detail that meaningful consultation can be carried out. Detailed policy wording need not be defined at this stage. At this stage, sustainability appraisal (①) and Strategic Environmental Assessment (①) are carried out. The next stage in the evolution of a DPD is the preparation of the submission stage plan (①).

Previously developed land: See 'brownfield land'.

Regional Spatial Strategy (RSS): This is the successor to both the non-statutory Regional Planning Guidance and to the statutory Structure Plan (①). It will set the strategic context for development across the region, including setting the level of new housing to be accommodated. The RSS for the east of England region is the East of England Plan, which was prepared by the East of England Regional Assembly (①). The Plan went through examination (cf) during late 2005/early 2006.

Renewable energy: Is energy derived from natural resources such as the sun, the wind, the tide and geothermal heat. It is the opposite of energy derived from non renewable resources such as coal, oil and gas.

Site of Special Scientific Interest (SSSI): These are the country's very best wildlife and geological sites. Their purpose is to preserve natural heritage and important wildlife sites for future generations. They support plants and animals that often find it difficult to survive in the wider countryside.

Soundness (tests of): There are nine prescribed sets of soundness established by the Government which every DPD (①) must satisfy when it passes through examination (①). The nine tests of soundness fall into three categories – procedural, conformity and coherence/consistency/ effectiveness. The tests are set out in full in PPS12.

Spatial planning: The new remit for the town planning system since the 2004 Planning and Compulsory Purchase Act. Broader than land-use planning. LDFs should not just be concerned with the physical aspects of location and land use but also economic, social and environmental matters. The LDF (①) should include policies which can impact on land-use but which are not capable of being delivered solely or mainly through the grant of planning permission and which may, therefore, be implemented by other means.

Strategic Environmental Assessment (SEA): Required under the terms of the European directive 2001/42/EC for "environmental assessment of certain plans and programmes, including those in the field of planning and land use". Undertaken in conjunction with the Sustainability Appraisal (①).

Structure Plan: Document produced by Hertfordshire County Council under the old planning system (pre-2004) considering strategic issues. Now effectively superseded by Regional Spatial Strategy (①).

Submission plan: The version of a DPD (①) sent to the Government for independent examination in the final form that the preparing local authority prefers, with fully detailed policy wording and reasoned justification for those policies. There will be a second SEA and SA (①).

Sustainability Appraisal (SA): An assessment of the impact the proposals contained within a Local Development Document would have on the environment, economy and society. SA is an iterative process; it should be used to improve the sustainability of subsequent versions of the document. It is to be carried out in conjunction with the Strategic Environmental Assessment (①).

Sustainable Community Strategy: Sustainable Community Strategies are the products of Local Strategic Partnerships (①). They are documents produced by a variety of partners to set out a shared vision for a locality (commonly a county or a district), designed to advance the social, economic and environmental well-being of the community.

Sustainable development: An over-arching concept that encompasses any form of development that allows the best of today's environment to be retained for the use of the future population. Sustainable development can also mean fostering types, forms and patterns of development that allow the aims of the concept to be met. One of the Government's key aims for the town planning process is that it should encourage sustainable development.

Urban Capacity Study: A detailed search for brownfield land or buildings (①) that can act as a source of potential housing development that all Local Planning Authorities (①) are required by Government to undertake. A detailed methodology is set down as good practice by the Government.

Appendix 3

Sustainability Appraisal Summary

Summary of Sustainability appraisal

Sustainability appraisals are required for all documents that form part of each Councils Local Development Framework. In September 2007 a Sustainability Appraisal Scoping Report was prepared for SNAP. This document has reviewed all relevant plans and baseline information. It contains 23 sustainability objectives which sets out economic, environmental and social issues that will need to be addressed through future policies. These objectives are outlined below:

- Protect restore and enhance biodiversity, and a full range of characteristic habitats and species.
- Use natural resources efficiently, reuse and recycle where possible.
- Protect and enhance water quality and encourage water conservation.
- Reduce fluvial and surface water flood risk.
- Reduce contamination and safeguard soil quality and quantity.
- Minimise waste and increase landfill diversion.
- Reduce light and noise pollution.
- Limit air pollution to levels that do not damage natural systems to levels set out in National Air Quality Strategy.
- Reduce greenhouse gas emissions.
- Improve the district's ability to adopt to climate change.
- Reduce the need to travel by delivering more sustainable patterns of urban development that integrate with accessible and sustainable modes of transportation.
- Minimise unnecessary development of Greenfield land and protect and enhance significant landscapes.
- Promote sustainable urban living.
- Preserve and enhance areas and buildings designated for their historic and/or archaeological interest and protect their settings.
- Create places, spaces and buildings that are well designed, integrate with, and enhance the diversity and distinctiveness of the local character.
- Improve conditions and services that engender good health and reduce health inequalities.
- Reduce and prevent crime and the fear of crime.
- Ensure population growth maintains a balanced community.
- Increase participation and improve access to education, skills based training, knowledge and information, and life long learning.
- Provide equal access to all community services and facilities, taking into consideration inequalities within the community.
- Ensure all groups, have access to decent, appropriate and affordable housing.
- Ensure a mix of housing to support a diverse community.
- Achieve sustainable levels of prosperity and economic growth.

The following provides a summary of the assessment of all the key issues and options in the document against the 23 sustainability objectives above. Please note that the assessment of each option only identifies those impacts which are clear and which are not dependant on external factors that are unknown at this point in document production. It is stressed that this is an initial appraisal of the key issues and options as many details at this stage are not known. A further draft sustainability appraisal will be prepared at the preferred options stage.

Protection of the Natural Environment

It is the intention of SNAP to continue to protect areas that have significant environmental features, such as Wildlife Sites or SSI. However, the issue identified in the document also requests people to tell us what other features they wish to see protected. From a sustainability perspective providing the opportunity for greater protections of features of the natural environment, will have positive impacts on protecting and enhancing biodiversity, , encourage water conservation and will also provide benefit to protecting an areas existing setting. Not protecting the natural environment will increase the risk of negative impacts upon these elements. Dependant upon the areas protected or areas that maybe developed on, mitigation measures aimed at protecting or enhancing the environment will need to be implemented.

New housing locations

The provision of additional housing in Stevenage will provide the opportunity for the provision of greater housing choice, promote sustainable urban living, incorporate designing out crime principles, encourage population growth and provide high quality housing and affordable housing. However, any new development on such a large scale will inevitably have negative impacts in terms of loss of Greenfield and Green Belt land, the landscape and the environment. The extent to which will need to be looked at in more detail for each of the options during subsequent appraisals.

A majority of the areas will result in concerns relating to infrastructure and services. Upgrades to infrastructure and services will be required, and therefore in the initial stages of development access to high quality services may not be possible. There are also concerns relating to the impact new housing development will have on the infrastructure requirements of services such as the sewerage treatment works at Rye Meads. The impact of the development will be ascertained once the Rye Meads Water Cycle Study has been undertaken. This may pose a considerable sustainability risk to housing growth.

The north-eastern areas of search has a significant number of sites that have been identified as being important in terms of habitats and biodiversity. The southern portion of the north-eastern area also contains a wildlife area. Listed buildings also exist within the area of search and as such will need to be appropriately addressed within the development stages of any proposals.

The north western area of search, contains the settlements of Titmore Green and Todds Green. The impact on these settlements by the new development will need to be mitigated. Development to the west of Stevenage will need to take account of the environmental features such as the SSSI site in the southern

portion of area, and small villages such as Langley. All of these aspects will have to be carefully mitigated if these areas of development are chosen as being appropriate.

New employment sites

Generally the provision of new employment sites will have a positive impact on achieving prosperity and economic growth. New employment sites will create the opportunity for job provision for those people moving into the new neighbourhoods. Also the development of new employment areas in the vicinity of the new housing growth may reduce the need for many people to travel long distances to work and therefore may have a positive impact on reducing car use. Obviously Option A is unlikely to have these benefits on sustainability as job growth will not be provided in balance with housing growth.

The individual options identified may have different impacts on sustainability. Option B near Junction 8 of the A1(M) will provide good access. However, to the south west of Junction 8 lies a wildlife site, on which employment uses may have a negative impact; this may need to be mitigated with measures such as buffers or controls on less intensive employment uses. Also, passenger transport in this location is minimal and hence access by other means than the car is limited.

Option C near Junction 7 provides good access to the motorway and therefore has good access into the national transport network. However, passenger transport in this area is not good and hence it likely that most will access employment through the use of the car. In addition, the site is also near the SSSI site of Knebworth Woods. This will need to be carefully managed if this site is to be brought forward in the Preferred Options of SNAP. Management may include developing buffers and controlling the kind of employment that occurs.

Option D presently does not have good access from the strategic networks. It will also be limited in its size due to the west of the A1(M) application. It may not provide employment opportunities of a size that would be needed to provide a balance with housing growth.

Phasing of employment land

The phasing of employment land will have an impact on the prosperity and economic development associated with the new neighbourhoods. Each option has benefit to sustainability but may also have negative impacts. Phasing employment will assist in achieving efficient use of Greenfield land. This way only the amount of land that is needed to meet demand will be allocated. However, through phasing it may be difficult to anticipate when land will be needed, and hence there is a risk that prosperity and economic development may be restricted if not enough land is available at any one time.

Not phasing employment land raises risks for making the most efficient use of Greenfield land. Under this option, if employment development doesn't occur as it may be expected, then vast amounts of Greenfield land may sit vacant waiting for future employment uses. In this instance the land may be better used for housing development.

Road schemes

The development of new road schemes are likely to facilitate the movement by car through the development areas and therefore may have a negative impact on the objectives of achieving a reduction in car use. They are also likely to have environmental impacts such as changing the biodiversity and landscape character of the area. However, through not updating and developing new road schemes improving the conditions, health and services available to the community will be at risk.

Upgrading the A1(M) is likely to have widespread benefits to improving the services for the region. However, the upgrading of the A1(M) will need to be delivered along with measures designed to deliver sustainable modes of transport and hence attempt to reduce the need for people to travel by car.

A new northern distributor road will provide additional and safe access to development that occurs to the north of Stevenage. An important aspect to this option is that it will not only improve the services to the new residents in SNAP but also to those in surrounding areas.

The link road to the A602 will need to have regard to the two wildlife sites that are present to the west of Junction 8. The alignment of the link road will need to avoid these areas of importance. Mitigation measures to minimise the impacts are likely to be needed.

A road connecting with the B656 may be quite visible running down the Langley Valley and therefore may have an impact on the setting of the area. The SSSI site to the south west of the SNAP area will also need to be considered should a new road be delivered.

Forster Country

Foster Country provides a high quality landscape setting, associated with the writer EM Forster. Rooks Nest Farm has historic value and Forster Country contributes to its setting. The provision of Forster Country will have a positive impact on the provision of open space for the existing and future communities.

Option A only provides a very limited area to be protected as Forster Country. Whilst this will protect the immediate setting of the historic features, such as Rooks Nest, it will allow the opportunity for development to occur in the vicinity raising the risk of a negative impact on the setting. The provision of such a small area of open space is unlikely to provide sufficiently for the existing and future communities.

Option B will provide greater provision for a wider area of open space and more strongly protect the character and setting of Forster Country. Forster Country applying to this area of land will restrict homes developing down the ridge line and into the views from Rooks Nest and the surrounding areas.

Option C is a large area that will protect the wider setting and landscape of Forster Country. However, it is a considerable amount of land and restricting housing development in this area will only require a greater land take of Greenfield land elsewhere to deliver the housing growth.

Green Belt boundaries

At present it is difficult to determine the most sustainable option for the direction(s) of growth in the period 2021-2031. All growth that occurs in this period will need to utilise Greenfield land and it will be the detailed policies developed in the plan that will determine whether this occurs efficiently or not. Many impacts such as impact on soil quality, water conservation and flood risk are unknown at this point as definitive locations are not identified for additional study.

A Greenbelt review concentrated to the west and the north will assist in balancing the growth of the town. Currently the Town Centre doesn't sit in the middle of the town, as majority of the residential areas lie east of the town centre. This will mean that many of the services provided by the town, ie shopping, education etc, will be provided in accessible locations to development. For the same reasons future growth further east and south may not provide for sustainable locations of development.

Given that the exact location of the development is not known, it is difficult to know the impact in relation to a number of objectives. However, given the location of the SSSI site to the south-west of the town it is likely that further development to the west may have negative impacts.

Housing density

Our sustainability appraisal finds that applying a low minimum density of 30dph would comply with national guidance but is unlikely to make the best use of the Greenfield land. This is because more land take will be required to develop the number of homes. Low densities right across the new neighbourhoods may make it difficult to develop sustainable transport as typically it is more feasible to serve areas where a high population exists. Lower density however may better fit with development existing in the settlements. Applying a blanket approach of low density across the area may reduce the opportunity to provide housing mix.

Higher than 30dph may make services like passenger transport more viable. In addition this may also reduce the need for Greenfield land. Higher densities is also likely to provide for a greater range of housing type.

Leaving the development of densities to the developers to determine is difficult to appraise as it is not known what densities will occur. However, it does run the risk of development occurring at a density that is not desirable to deliver the kinds of homes which are needed.

With regard to developing higher densities for development in certain locations, this could link with the delivery of services such as passenger transport, shopping, entertainment, health care etc. If higher densities are grouped together then it will create a node for development which service provision can be allocated to. This will also provide the opportunity for housing mix to be developed.

Housing Mix

It is difficult to appraise the option of allowing the development industry to determine housing mix, as it is not known what might be proposed. For this reason there is a risk that a suitable housing mix will be provided

that meets the needs of the existing and future communities. It is also unknown what impact the delivery of houses will have on Greenfield land take. Allowing the Councils to set a policy for housing mix can directly relate to the needs that exist within the community.

The existing imbalance in housing types in Stevenage is a concern. Our sustainability appraisal finds that a policy to redress existing housing imbalances would create a more balanced community. It will also provide positive impacts to the economic development of the town, as it is known employers have difficulties in attracting staff to live in the town due to lack of choice.

Design and Urban Character

Cannot appraise as the community and stakeholders are asked as to what they think area appropriate forms for design.

Treatment of the urban edge

Our sustainability appraisal finds that strong planting would do most to protect and enhance landscapes and provide the most opportunities for biodiversity. Landscaping will also create the opportunity for water run off from the development to be addressed in a sustainable manner. It would also reduce light pollution from development. Occasional glimpses of development would create places that integrate with the local environment. This would provide obvious access between the development and surrounding countryside. Clearly visible areas of development could change the character of surrounding countryside and it is unlikely to improve biodiversity.

Our sustainability appraisal finds that incorporating new development with the existing settlements runs the risk of negative impacts upon protecting their character and setting. No space between existing and new settlements will also reduce the opportunity for biodiversity to be enhanced. New developments linking with existing settlements may also put pressure on the existing infrastructure, such as drainage.

Allowing low density development up to the edge of existing settlements may still create the risks similar to those above. However, they are likely to have minimal impact compared to development incorporating the existing settlements. The setting of the existing village could be preserved in this instance, and the impact on infrastructure will be less.

Physical separation would protect the setting of the existing settlement. However the separation distance may also create a harsh buffer between the two settlements. A buffer may create the opportunity for biodiversity to be enhanced or improved.

Affordable housing

Our sustainability appraisal finds that a target of 40% would help achieve the regional aspiration of 35% affordable housing and therefore provide appropriate levels of affordable housing to meet the need. Similarly a higher target set for SNAP would also achieve this. A lower target would likely create a higher affordable housing percentage on smaller proposals elsewhere in the two authorities to meet the needs of

the community. It is difficult to appraise setting a different affordable housing target for SNAP, as it is not known at the moment what that target would be.

Our sustainability appraisal finds that the provision of all affordable housing in a single area would not deliver a mix of housing to support a diverse community. It may also restrict the access of those living in affordable housing to services, dependant upon their location in the neighbourhoods. Such an option would segregate affordable and market homes and not create a balanced community. This option also goes against Government guidance to create mixed communities. Locating affordable housing in small groups may have similar affects, depending upon the size of the groupings. Although the impact on access to services and segregation, will be minimised through a number of small clusters. Pepper-potting affordable housing will enable market homes and affordable homes to be mixed completely, supporting a balanced community, providing equal access for all to services.

Open space

Open space would provide opportunities for biodiversity, provide recreation opportunities for residents and create a pleasant environment. A similar character to that which is established in the existing town would help new neighbourhoods feel part of Stevenage. It would also provide a relatively high level open space to support community development. However, it is important to note that a high level of open space will result in increase land take of Greenfield land to provide for all housing growth. A different character could reinforce distinctions between the existing town and new neighbourhoods and not result in a balanced community being created. There is also the risk that new standards wouldn't provide adequate open space levels to support health communities. Low open space standards would use less land and would protect more Greenfield than the alternative option.

Neighbourhood centres

Our sustainability appraisal concludes that all options have sustainability benefits. The provision of services in the immediate locality will assist in reducing the need to travel. Medical facilities, community centres and youth and sports facilities would provide services that encourage good health and wellbeing. Facilities such as youth services will also assist in providing services for a group that may be in the minority. Education facilities would improve access to education and can help in raising aspirations of the town. All new facilities are likely to increase employment opportunities within the area and support the growth of small businesses.

Renewable energy and energy efficiency

Our sustainability appraisal finds that efforts to achieve the Code for Sustainable Homes and BREEAM standards would reduce greenhouse gas emissions and help the districts adapt to climate change. However, following minimum standards will not result in the benefits as quickly as developing standards for SNAP which are higher. There is a risk however, of becoming too demanding on the development industry and developers choosing to go elsewhere where requirements are lower.

In addition to addressing climate change and greenhouse gas emissions, implementing such standards would also have an impact on improving water conservation, create places which are well designed and will reduce flood risk through the requirement of sustainable drainage system technologies to be put in place.

Renewable energy targets set out in the East of England Plan will encourage climate change to be addressed, along with a reduction in greenhouse gas emissions. Achieving these targets will also increase the use of natural resources and minimise waste. Obviously setting a higher target for development to achieve will result in these benefits being achieved sooner. However, as with the Code for Sustainable Homes and the BREEAM, the environmental benefits need to be carefully managed with the economic benefits of having developers choosing Stevenage to do business.

Sustainable transport

Our sustainability appraisal finds that all options would reduce the need to travel and greenhouse gas emissions. Many options have health benefits from increasing physical activity. Options like walking and cycling must consider safety and fear of crime issues. Some options will depend on influence peoples lifestyle choices, for example reducing residential car parking will only create congestion if people do not make a lifestyle choice to reduce the number of cars they own. There may also be economic impacts on reducing the level of parking in employment areas as this may deter businesses from locating the new neighbourhoods. In some respects options work together to reinforce a shift towards sustainable travel, for example implementing a reduction in employment car parking together with green travel plans to provide alternative means of travel.

Gypsy and Travellers

Our sustainability appraisal finds that all 4 “areas of search” meet certain sustainability criteria by being close to local services and transport routes and avoiding important environmental designations. This also means they are suitable for transit purposes. None directly affect any important habitats or wildlife sites. Sites ST1 and NH78 are over 500m from the nearest wildlife site. Sites ST2 is in the Green Belt and close to a landscape conservation area. Site NH36 is in the Green Belt and is also designated as a landscape conservation area. Site NH78 is in the Green Belt. All of these site are located on Greenfield land and therefore development as a gypsy site would mean further land would be needed for employment and housing development. Any new provision would help to ensure that Gypsies and Travellers have access to housing opportunities. It will ensure all communities have access to appropriate housing.

It is necessary to bear in mind that the presence of any of these sites may undermine the character of the local environment regardless of its designation and may prejudice other housing and/or employment options. It is also necessary to consider the proximity and relationship between a potential site and the settled community. An extension to Dyes Lane would achieve similar objectives to those above, however with the benefits of it already having access to existing services such as education and passenger transport. A new location elsewhere within SNAP may be appropriate. However, issues of landscape, access and relationships with the settled community can not be assessed at this moment without knowing its location.



Stevenage and North Herts Action Plan

Local Development Framework

Preferred Options June 2010

Stevenage
BOROUGH COUNCIL

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Introduction

Stevenage Borough Council and North Hertfordshire District Council would like your help.

We are preparing **The Stevenage and North Hertfordshire Action Plan - SNAP** for short. When finished, it will be the guiding document setting our plans for delivering significant new development to the north and west of Stevenage.

This introductory chapter sets out:

- What is SNAP?
- What have we done so far and what are we doing now?
- The East of England Plan and why we have to plan for growth around Stevenage
- Sustainability Appraisal/Strategic Environmental Assessment
- How do I respond?

If there are any terms used which you are unsure about or don't understand, please refer to the Glossary in Appendix 3 at the back of this document.

1.0 What is SNAP?

- 1.1 Stevenage Borough Council (SBC) and North Hertfordshire District Council (NHDC) are working together to prepare the Stevenage and North Hertfordshire Action Plan (SNAP). The main purpose of SNAP is to guide the development of major new neighbourhoods to the west and north of Stevenage on land which straddles both districts. SNAP will set out a vision, objectives, planning policies and proposals through to 2021 and beyond. The area covered by SNAP is shown at Appendix 1.
- 1.2 SNAP is part of each council's Local Development Framework (LDF) and follows the Core Strategies (the main document within each LDF) of both SBC and NHDC. Core Strategies have to determine the overall approach for their areas, including showing broadly how the housing requirements for the area over a fifteen year period will be met. For the SNAP area, housing targets are set by the East of England Plan which was published in May 2008. Both the emerging North Hertfordshire and Stevenage Core Strategies refer to significant new neighbourhoods to Stevenage to the north and west of the town.

1.3 What have we done so far and what are we doing now?

- 1.4 There are various stages we have to go through in preparing area action plans such as SNAP. We started with an initial public consultation in late 2007, where we identified the various issues SNAP needed to cover and set out various alternative options by which the issues could be resolved. We called that stage the SNAP Key Issues and Options Consultation.
- 1.5 We summarised all the responses we received in a document entitled the SNAP Key Issues & Options Consultation Summary Report. It is available for inspection on both Councils' websites. We would like to thank the many individuals and groups who responded at that time.
- 1.6 At the Key Issues and Options stage, neither Council expressed its view on how best to resolve the issues. We wanted to hear your views before doing that. However, it is now time for the Councils to set out their preferences – and we call them our Preferred Options. The SNAP Preferred Options Consultation

(this document) sets out our proposed vision for the area, key objectives to be met and various policies and proposals which we believe will give the most appropriate planning framework for delivering this development. We have drawn up our preferred options based on various pieces of technical evidence and in the light of the responses we received to the Key Issues & Options public consultation.

- 1.7 In some cases we have had to weigh up a range of conflicting views from the results of the public consultation and technical advice. As a result, there are some preferred options which unfortunately cannot satisfy everyone concerned.

1.8 The East of England Plan and why we have to plan for growth around Stevenage

- 1.9 The East of England Plan 2008 sets out the regional spatial strategy for the period 2001 to 2021 and beyond. An important policy in the East of England Plan, as far as SNAP is concerned, is Policy SV1: Stevenage Key Centre for Development Change. This refers to substantial growth in the form of new neighbourhoods to the west and north of Stevenage as outlined below:

Policy SV1 of the East of England Plan: Stevenage Key Centre for Development and Change

The strategy is to deliver a new vision for Stevenage as a regional employment and housing growth point twinned with transformational physical, social and economic regeneration of the original new town to create a self-contained, sustainable and balanced community.

The main elements of this strategy are:

- (1) Overall housing growth of 16,000 dwellings within and on the edge of the built-up area by 2021. Local Development Documents should maximise opportunities for brownfield redevelopment within the town but sustainable urban extensions will also be required to the west and north including at least 5,000 dwellings west of Stevenage. The green belt review should establish defensible long term boundaries which allow scope for continued growth of the Stevenage built up area until at least 2031;
- (2) Provision for strategic employment growth by improving the competitive position of Stevenage and capitalising on its position between London and

- Cambridge. Measures to achieve this will include retaining and developing existing advanced technology clusters, creating new high quality sites capable of attracting biotechnology and R&D activities, remodelling the town's more outworn employment areas to meet modern requirements, encouraging new enterprise and promoting a regenerated, expanded and more vital town centre;
- (3) Raised expectations and opportunities and better provision for local residents in terms of health, training and education, working aspirations and quality of life;
 - (4) Improved strategic transport infrastructure including creating the conditions for significant increase in public transport usage, walking and cycling within the town and improvements in capacity in key strategic corridors;
 - (5) Substantial improvement to the image and quality of the town's built fabric and public realm, including the provision of multi-functional green space as an integral part of urban extensions; and
 - (6) Additional waste water treatment capacity, planned and delivered with the water industry and its regulators.

The strategy for Stevenage should be delivered through a strong partnership approach, including the preparation of joint or co-ordinated development plan documents by Stevenage and North Hertfordshire District Councils to establish the planning framework for the green belt review and urban extensions. To facilitate a significant increase in housing delivery as soon as possible, development to the west and north should be brought forward together, rather than sequentially.

1.10 The two Councils responded differently when the East of England Plan was prepared by East of England Regional Assembly. SBC fully supported the concept of substantial growth in and around the town to 2021 and beyond, whereas NHDC objected strongly to it. The various arguments in favour and against the proposed scale of development were heard at a Public Examination (Public Inquiry) in 2005/06 and the government set out its conclusions in the final version of the East of England Plan adopted in 2008.

1.11 Whilst this policy covers the period 2001 to 2021, LDFs have to cover a 15-year period from when they are adopted – as 2021 is less than 15 years away, we therefore need to plan through SNAP for the period 2011-2026. Policy H1 of the East of England Plan includes assumptions on how many homes will be required in the period that is after 2021 but within the 15-year period that SNAP needs to cover.

1.12 Both SBC and NHDC now have a duty to prepare their respective LDFs which implement the policies of the East of England Plan, translating the broad policies of that plan into something workable that will deliver the required housing and associated infrastructure.

1.13 Sustainability Appraisal / Strategic Environmental Assessment

1.14 In producing SNAP, we are required to carry out two assessments of the impacts the plans will have: a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). These assessments are designed to ensure that the policies in SNAP are informed by proper assessment of the implications of development, with particular respect to implications on the environment, economy and society. Importantly, the protection and enhancement of the environment must be fully considered.

1.15 A scoping report on the SA and SEA for SNAP was published in September 2007 which identified the objectives to be used to carry out the sustainability appraisal and strategic environmental assessment. All our policies and proposals need to be assessed against these objectives. An SA and SEA report is produced at each stage of preparing SNAP.

1.16 How do I respond?

1.17 We want to hear your views on the proposals set out in SNAP. When responding we would like you to comment on whether you agree with our reasoning and whether you support our preferred option or support an alternative option we have rejected. The consultation period lasts for ** weeks beginning on the ****2010 and ending at **5pm, Friday ****2010**.

1.18 Although this document is prepared jointly by SBC and NHDC, for convenience SBC alone is hosting the relevant documents on its website and responses should be e-mailed or posted only to that council at the addresses given below. The analysis of the responses will be carried out jointly by both councils.

1.19 Comments can be:

- submitted on-line at: www.stevenage.gov.uk/SNAP
- emailed to planningpolicy@stevenage.gov.uk
- posted to the Planning Policy Team, Stevenage Borough Council, Daneshill House, Danstrete, Stevenage, SG1 1HN; or
- faxed to 01438 242922.

Any comments received will be made publicly available upon request.

1.20 If you have any queries and want to speak to any of the team members, please call us on:

- North Hertfordshire District Council: 01462 474000 Strategic Planning and Enterprise.
- Stevenage Borough Council: 01438 242161 Planning Policy Team.

2

Vision and Objectives

In preparing SNAP, the two councils have to be clear about what we are trying to achieve.

We have therefore drafted a vision setting out our view on how the SNAP area will look by 2026. This vision is supported by a series of objectives, which then form the basis for the remaining chapters of SNAP.

2.0 Vision

2.1 Having had regard to Policy SV1 from the East of England Plan, the Sustainable Communities Strategies and the responses to the consultation on the draft vision contained in the Key Issues & Options paper, we have agreed the following vision to be delivered through the SNAP document.

A vision for SNAP

Stevenage will grow substantially, with **new neighbourhoods created to the north and west** of the town. These neighbourhoods will be delivered in such a way as to **balance the social and economic needs for the development against the environmental impact** the development will have. The neighbourhoods will have **distinctive features** that will **lead the way** and draw on **best practice** in both **urban design** and tackling **climate change**.

The new development will **complement and support the regeneration** of the whole Stevenage urban area, and will **improve the range of housing stock** for the town's workforce.

Within the new neighbourhoods, a **strong sense of identity and community** will be **fostered at an early stage** through the provision of **community facilities**, the **distinctive quality of design** and the inclusion of **local employment opportunities** within each neighbourhood. Wider employment needs will be catered for with the inclusion of a **strategic employment site** near junction 7 of the A1(M). Land near to junction 8 of the A1(M) will be safeguarded for the future **expansion of Lister Hospital**.

Extensive **open spaces** and **semi-natural environments** will feature **throughout** and at the **heart** of the neighbourhoods forming an **integral** part of the urban fabric and community. A major new country park will be created **incorporating Forster Country and Chesfield Park**. There will be a **physical separation** between **surrounding villages** and the **edges of the neighbourhoods**, which will have **strong landscaping connections between the development** and the **countryside**.

2.2 Key Spatial Objectives

2.3 This document considers how this vision may be achieved. We have broken the document down into a number of chapters, each considering a separate topic. For each chapter, we set some key spatial objectives which identify the main issues raised by the East of England Plan and the SNAP vision above. These objectives are set out in the table below.

Chapter	Key Spatial Objectives
Location	<ul style="list-style-type: none"> • To define new green belt boundaries which prevent the town merging with nearby hamlets and villages, including Little Wymondley, Graveley and Weston. • Protect the most valued landscape. (Chapter 3)
Appearance and quality	<ul style="list-style-type: none"> • To ensure the new neighbourhoods are places which promote a healthy lifestyle in a safe environment. • To promote high quality design, which is functional, visually attractive, and develops character for the area. (Chapter 4)
Housing	<ul style="list-style-type: none"> • To meet the housing requirements set by the East of England Plan. • To provide for an appropriate level and type of affordable housing to meet identified need. • To encourage the development of aspirational housing in order to diversify the town's housing stock. • To encourage the efficient use of land. (Chapter 5)
Employment	<ul style="list-style-type: none"> • To help create prosperity in and around the town through the provision of sufficient and appropriately located land, buildings and infrastructure to support a substantially expanded, strong and competitive business community. • To provide a balance between job growth and housing growth to reduce the risk of Stevenage becoming a commuter town. • To help provide local employment opportunities to

Chapter	Key Spatial Objectives
	encourage people to both live and work more locally. (Chapter 6)
Green infrastructure	<ul style="list-style-type: none"> To create new green spaces and enhance existing green infrastructure linkages which together connect the town's open spaces and habitats with the surrounding countryside. (Chapter 7)
Environmental protection	<ul style="list-style-type: none"> To protect and enhance the best of the built and natural environment within the SNAP area. To ensure new buildings incorporate construction methods which make best use of resources and sustainable design. To capitalise on the opportunities created and push for carbon neutral development. (Chapter 8)
Access and transport	<ul style="list-style-type: none"> To secure reduced dependence on the motor car with new neighbourhoods designed to encourage walking, cycling and the use of public transport. To put in place the necessary public transport linkages at an early stage. To seek improvements to the A1(M) and local transport links. (Chapter 9)
Gypsy & Traveller accommodation	<ul style="list-style-type: none"> To provide for the accommodation needs of Gypsies and Travellers in the Stevenage and North Hertfordshire area. (Chapter 10)
Facilities, Infrastructure and Delivery	<ul style="list-style-type: none"> To ensure that facilities and infrastructure serve the residents of the new neighbourhoods and that existing communities do not suffer as a result of the growth; To ensure that facilities and infrastructure is delivered in a timely manner so that these are provided early on in the build programme. (Chapter 11)

2.4 Having defined these objectives to articulate the vision, you will find the relevant objectives reiterated and discussed at the start of each chapter.

3

Location

Objective of this chapter:

Objective 3a: To define new green belt boundaries which prevent the town merging with nearby hamlets and villages, including Little Wymondley, Graveley and Weston.

Objective 3b: Protect the most valued landscape.

3.0 Site and setting

- 3.1 The area of land to the west and north of Stevenage contains countryside of differing characteristics and includes several farms and hamlets such as Norton Green, Chesfield, Tilekiln Farm, Almshoebury and Dane End. Whilst much of the land is arable farmland, it also contains some significant areas of woodland.
- 3.2 To the west of the town there is a high plateau area – this is the watershed between the River Thames drainage basin to the south and the Great Ouse drainage basin to the north. West of the plateau, the land drops away to the Langle Valley, along the bottom of which the B656 road between Hitchin and Codicote runs.
- 3.3 To the north of Stevenage the land is more undulating, with several minor valleys and slopes. There are some prominent views through the gaps between houses in the vicinity of Rooks Nest farm on Weston Road. At Chesfield there is a substantial area of parkland associated with the old manor house. This parkland links into Forster Country, which lies to the south of Chesfield. The ruined church of St Etheldreda at Chesfield and the surrounding hamlet are both visually and historically significant.
- 3.4 To the north-east of Stevenage lies the recently developed estate of Great Ashby. Around the periphery of Great Ashby are substantial areas of woodland, notably Brooches Wood. To the north-east of Great Ashby beyond these woods is an undulating plateau of isolated farms including Dane End and Tilekiln Farm. This plateau drops to the south east into the Beane valley near Walkern. There are some prominent views looking south-east into the Beane valley – notably from the Great Ashby district park.
- 3.5 We need to take all these characteristics into account as we decide what areas of land should be included within SNAP. We need to define two separate boundaries. The first should be the policy area covered by SNAP, which will include areas suitable for development and areas to be left largely as countryside, but with strong links into the new development. Secondly, we need to define a new green belt boundary, showing which areas within SNAP should be developed and which should not. This will ensure enough land is made available to deliver the required amount of development in SNAP.

3.6 The SNAP boundary

3.7 The East of England Plan is clear that the new neighbourhoods of Stevenage must be located to the north and west of the town. It also gives guidance on the amount of houses which must be accommodated.

3.8 The SNAP area boundary has been refined following previous consultation which took place as part of the Key Issues and Options consultation in November 2007. The SNAP area broadly covers land both to the north and to the west of the town of Stevenage. The proposed boundary has been decided upon jointly by Stevenage and North Hertfordshire Councils following a review of the consultation responses to the Key Issues and Options.

3.9 Following this consultation, the comments made regarding the SNAP boundary are summarised as:

- The SNAP boundary should not come too close to, or enter Weston village and / or Weston parish to the north of Stevenage;
- The SNAP boundary should not encroach into the Langley Valley to the west of Stevenage;
- 'Urban Sprawl' should not be permitted;
- Development should be accompanied by sufficient supporting infrastructure;
- Forster Country should not be included within the SNAP boundary;
- Development should be more evenly spread across the Stevenage Borough;
- The A1(M) should form the western boundary of SNAP; and
- SNAP should follow the existing Stevenage Borough boundary in the north.

3.10 In refining the SNAP boundary, we have tried to satisfy the growth requirements of the East of England Plan whilst considering comments to our consultation. Clearly, it is not possible to satisfy both, and compromises have to be made. For instance, if we did not include any land in Weston parish, the development would be pushed further to the north of the town towards Graveley village. Our preferred option is to use some land from Weston parish,

but to ensure that there is clear separation between the SNAP boundary and the villages of Weston and Graveley. Similarly, excluding land west of the A1(M) or land outside Stevenage Borough to the north of the town would make it impossible to meet the East of England Plan's targets. Therefore, as set out by the East of England Plan, we believe it is necessary to include land both west and north of the town.

3.11 The SNAP area shown at Appendix 1 is a policy boundary and not a development boundary. This means that we are not suggesting all land within SNAP should be developed; indeed some will be identified as unsuitable for development and safeguarded as open space land of high environmental quality. Forster Country is, and will continue to be, an important environmental asset for Stevenage residents. This area of countryside will be retained for public use as an important 'green lung' linking the Old Town to the countryside beyond.

3.12 Other supporting land uses have also been considered in determining the amount of land needed. As well as housing, SNAP will include areas for employment, new schools, neighbourhood centres and other green spaces for play areas and open space. There are some areas of existing housing within SNAP, at Great Ashby and also some hamlets and isolated dwellings which need to be taken into account.

3.13 Green belt

3.14 Under the East of England Plan, we are required to define a green belt boundary which will enable the town to grow until at least 2031. A general principle of green belts is their permanence, and therefore the boundary needs to be carefully planned and be capable of delivering the proposed housing growth and supporting land uses.

3.15 In defining the green belt boundary, we have considered the developable land to the north and west of the town. We need to ensure that enough land is available for development to meet the East of England Plan targets whilst ensuring that land not required for development is safeguarded under green belt policy.

- 3.16 In particular, we will ensure that the hamlet of Norton Green, to the south west of Stevenage and to the south of the Stevenage West development site, is put back into the green belt (this is an area of approximately 3.9 ha). Nearby Knebworth Woods are also important to safeguard within the green belt, both as a site of special scientific interest (SSSI) and for forming a strong buffer to the new urban edge, protecting the area not only from development, but also from light pollution and noise.
- 3.17 To the north of Stevenage, we have left Chesfield and Forster Country within the green belt as an area which is worthy of protection in its own right. This area also provides valuable open space and links to open countryside for residents of both the existing town and the new development. The open space will provide separation between the different areas of new housing, which will help them develop their own character and identity.
- 3.18 The green belt boundary will ensure that the villages of Graveley, Weston and Little Wymondley remain separate from Stevenage, in order to maintain their identity. It will also give a degree of separation to the larger hamlets of Chesfield, Almshoebury and Norton Green.
- 3.19 The SNAP and green belt boundaries are shown on the plan at Appendix 2. Please note, this map does not indicate the possible village boundaries being considered for Graveley, Little Wymondley and Weston as part of the North Hertfordshire Land Allocations process. However, it does indicate the broad areas beyond the SNAP area which North Hertfordshire intends to add to the green belt via the Land Allocations process, both in the Langley to Offley area and to the north-east of SNAP around Halls Green and Luffenhall. The precise boundaries of these areas to be added to the green belt will be determined through North Hertfordshire's Land Allocations process, as they fall outside the area covered by SNAP.
- 3.20 The area of land to be removed from the green belt equates to 511.7 ha in North Hertfordshire and 44.5 ha in Stevenage Borough, making a total of 556.2 ha.

4

Appearance and quality

Objectives of this chapter:

Objective 4a: To ensure the new neighbourhoods are places which promote a healthy lifestyle in a safe environment.

Objective 4b: To promote high quality design, which is functional, visually attractive, and develops character for the area.

4.0 Design and masterplanning

- 4.1 High quality design is fundamental to the success of the new neighbourhoods so that the areas are highly regarded, locally distinct and provide a strong sense of place for both residents and visitors. Several responses to the Issues and Key Options Consultation recognised that high quality design and layout within the SNAP area are important issues.
- 4.2 The design process for SNAP can be seen as having two distinct phases. First is the masterplanning stage, setting the broad layout of development across the area and the relationship between the different land uses. Second is the more detailed question of urban design – how the buildings, public spaces and other elements will be built and how they will look.
- 4.3 The draft policy on design and masterplanning below ensures that effective design delivery measures are in place to support the SNAP vision and objectives. It also reflects and expands upon both councils' emerging policies on design and their design guidance documents.
- 4.4 Applicants will need to take into account best practice in urban design to satisfy the requirements of this policy. Whilst this document is itself a form of masterplan, more detailed masterplans will need to be prepared by applicants in support of outline planning applications in order to create a framework within which a high quality development can be achieved.
- 4.5 For more detailed urban design, we will require design codes which will ensure that development follows a set of principles that delivers the overall vision and masterplan for SNAP. They will provide a set of instructions to guide development and provide some degree of certainty for each phase of development. They will be required for the residential neighbourhoods, neighbourhood centres, employment areas and strategic areas of open space.
- 4.6 The new neighbourhoods will take some years to complete. Therefore, a review mechanism has been included in the policy to ensure flexibility. Further guidance on design codes is outlined in Design Coding in Practice, an

Evaluation, DCLG, June 2006 and The Future for Design Codes, ODPM, December 2005.

- 4.7 The list in point 1 of the policy reflects a number of advisory guides published by the Commission for Architecture and the Built Environment (CABE). It is not exhaustive, but is a minimum set of specifications that must be considered. In particular, sites should be considered on an individual basis in relation to issues such as topography, landscaping, biodiversity, historic context and so on. In addition, emerging and built schemes will be assessed under the Building for Life criteria as part of both councils' Annual Monitoring Reports.

Draft Policy 01: Design Process and Masterplans

The new neighbourhoods will be of the highest quality design. Our preferred option is to require applications for planning permission to:

- (1) Demonstrate that, as a minimum, the following key design principles for making successful places have been taken into account:
 - Character and local distinctiveness;
 - Continuity and enclosure;
 - Quality of the public realm;
 - Ease of movement;
 - Legibility;
 - Adaptability;
 - Diversity; and
 - Safety and crime prevention.
- (2) Prepare masterplans for the new neighbourhoods to the west, north and north east of Stevenage. These will demonstrate how they have been prepared in consultation with the local community, and how the key development principles and policies set out in SNAP will be achieved;
- (3) Prepare design codes in conjunction with, and subsequently approved by, the local planning authorities in advance of any "reserved matters" planning applications, to support the delivery of agreed phases of development. These will be monitored and reviewed jointly by the developer, the councils, and other

stakeholders at appropriate times to reflect performance, changing circumstances and lessons learned through the progression of development;

- (4) Take into account the Design Guide of Stevenage Borough Council.

4.8 Names for the neighbourhoods

4.9 SNAP will establish the development of six new neighbourhoods and it is inevitable that these will need to be named to help with identification and navigation. Local people should be given the opportunity to influence what will be an important part of each new neighbourhoods identity, rather than leaving this for developers to determine.

4.10 Further, identifying names at this early stage will ensure that the names are attached to the neighbourhoods from the start. The use of names can help foster community spirit and cohesion. We also want to ensure that the names reflect a deeper understanding of the local area and its historic features and place-names, rather than being chosen by developers.

4.11 We have therefore drawn up a series of possible names for the six new neighbourhoods and the business park at junction 7 of the A1(M). These are drawn from the names of existing woods, farms, roads, features named on historic maps and other names we thought had genuine connection to the areas. The neighbourhoods are shown indicatively as circles on the plan below, with the preferred names for each (as well as some alternatives) in the table below.

Area	Preferred name	Alternatives
A	Norton Woods	Simms Wood / Kitching Woods
B	Chadwell	Broomin / Highfield
C	Almshoe Green	Lucas Wood
D	Lower Chesfield	Chesfield Park / Forster Park
E	Tilekiln Green	Parsons Green / Roundwood
F	Little Ashby	Newberry Grove / Danesgrove
G	Lytton Park	Cobbold Park / Bulwer Park



Stevenage and North Hertfordshire Action Plan

Possible names for neighbourhoods



Scale: 1:50000
Date: 4 Mar 2010

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5 Housing

Objectives of this chapter:

Objective 5a: To meet the housing requirements set by the East of England Plan

Objective 5b: To provide for an appropriate level and type of affordable housing to meet identified need.

Objective 5c: To encourage the development of aspirational housing in order to diversify the town's housing stock.

Objective 5d: To encourage the efficient use of land.

5.0 Housing supply

- 5.1 One of the main roles for SNAP is provide for the growth of Stevenage, which will support the long term sustainability and economic prosperity of the town. SNAP will define the locations where housing will be allocated and we have stated our preferred options for the location of housing in the paragraphs below. Our areas of search are shown on the Proposals Map which indicates various land sectors to the north and west of Stevenage. These are based on the Key Issues and Options Consultation of November 2007, along with extensive further work undertaken between Stevenage Borough Council and North Hertfordshire District Council, including consulting with developers and land owners and undertaking further research, on land availability, landscape implications, requirements for open space and green infrastructure and ecological, conservation and archaeological considerations, amongst others.
- 5.2 One of the most important issues to be addressed in SNAP is where to locate the new housing. The East of England Plan designates Stevenage as a 'Key Centre for Development and Change' and proposes significant growth and regeneration of the town. It sets out the following:
- A minimum of 22,200 new homes must be provided within Stevenage and North Hertfordshire between 2001-2021;
 - Overall housing growth to Stevenage of 16,000 dwellings within and on the edge of the built-up area by 2021;
 - At least 6,400 of these new dwellings are to be provided within the Stevenage administrative area, with at least a further 9,600 to be provided as new neighbourhoods around Stevenage, in North Hertfordshire;
 - New neighbourhoods will be required to the west and north, including at least 5,000 dwellings west of Stevenage;
 - The Green Belt review should establish defensible long term boundaries which allow scope for continued growth of the Stevenage built up area until at least 2031;
 - An improved strategic transport infrastructure; and
 - New waste water facilities to serve new development.

- 5.3 The two councils must allocate enough land for at least 16,000 new houses to be built between 2001 and 2021. Some of these have already been built and others will be accommodated in the built-up area of Stevenage between now and 2021. The overall housing target for the whole of Stevenage Borough is already part-way to being achieved. In total, during the period 2001-2009 1,732 dwellings (net) have been completed, were outstanding on sites under construction, or had been granted planning permission by the partner authorities at 31st March 2009¹.
- 5.4 We estimate that a further 3,510 additional dwellings will be built within Stevenage's existing built up area by 2021. This leaves around 10,300 new dwellings to be located within the SNAP boundary.
- 5.5 However, we must also consider development beyond 2021, in the 10 years to 2031. The East of England Plan asks us to review and roll back existing green belt boundaries, not only to accommodate the new development to 2021 but also to "avoid the need for any further review prior to 2031". A formula within the East of England Plan tells us that we should be planning for an extra 9,600 additional houses between 2021 and 2031.
- 5.6 There is also a requirement for Councils preparing new plans such as SNAP to show they have a 15 year supply of identified housing land. Assuming SNAP is adopted in 2011, this means we need to allocate land covering anticipated housing needs to 2026. Thus we split the decade 2021-2031 into two parts, 2021 to 2026 and 2026 to 2031. For each of these 5 year periods, some new housing will be located within the existing built-up area of Stevenage. We estimate that 1,600 new dwellings will be built within Stevenage between 2021 and 2026 and 1,900 between 2026 and 2031. The remainder must be planned for in SNAP. Thus, for the 5 year period between 2021 and 2026, we must plan for an additional 3,200 new houses, and for the 5 year period between 2026 and 2031, we are looking for 2,900 more.

¹ North Hertfordshire and Stevenage Strategic Housing Land Availability Assessment – 2008/09 Update, September 2009

- 5.7 To summarise, SNAP must plan for 10,300 new dwellings between 2009 and 2021, a further 3,200 between 2021 and 2026, and a further 2,900 between 2026 and 2031. This gives us a total of 16,400 additional dwellings.
- 5.8 It is the role of SNAP to determine how much land will be required to achieve the East of England Plan targets. The amount of land we need to allocate to achieve the figures above depends on several factors.
- 5.9 The urban area of Stevenage is already bigger than the area covered by the Borough boundary. A large part of Great Ashby is within North Hertfordshire. Similarly, large amounts of the planned growth within SNAP will take place on land within North Hertfordshire.
- 5.10 In reality, it is difficult to consider housing targets for development in SNAP without referring to land within both North Hertfordshire and Stevenage. In some areas there are no obvious features that distinguish the two authorities from one another on the ground. Consequently, some potential development sites within SNAP straddle the authority boundaries, lying partly in North Hertfordshire and partly in Stevenage.
- 5.11 Our strategy identifies three new neighbourhoods to be provided on greenfield sites. Neighbourhoods to the west and north will use land in both authorities to provide 7,500 new homes. A new neighbourhood to the north-east will deliver 5,000 further homes on land wholly in North Hertfordshire. Smaller scale greenfield developments will take place in suburban and edge of town locations within Stevenage Borough.
- 5.12 The table below shows the expected amount of housing which can be accommodated in the SNAP area. This excludes areas of open space such as Forster Country. It therefore may differ from the figures contained within our SHLAA, which does not take into consideration areas of safeguarded open space, for example.

SNAP allocations

2001-2026	SBC	NHDC	SNAP total
Built	227	1,559	1,786
Permission	7	75	82
Identified sites	2,460	10,445	12,905
<i>North Stevenage</i>	445	1,500	1,955
<i>North East Stevenage</i>	0	4,255	4,255
<i>North East Stevenage (reserve areas)</i>	0	1,488	1,488
<i>Chesfield Park / fringing Forster Country</i>	115	102	217
<i>Stevenage West</i>	1,900	3,100	5,000
Total	2,694	12,079	14,773

5.13 The detail of how these estimates have been derived and the allowances made for open space and community facilities can be found in the SNAP Background Paper: Housing Capacity Estimates.

Draft policy 02: Location of Housing

Our preferred option is to identify and allocate enough land to provide new housing, associated infrastructure and services by 2026, which are deliverable and / or developable at (but not limited to) the following locations:

- 5,000 homes to the West of Stevenage
- 2,000 homes to the North of Stevenage
- 5,500 homes to the North East of Stevenage

5.14 The identification of the sites above will require us to redefine a new green belt boundary around Stevenage which currently closely follows the urban administrative boundary of the Borough. Without a review of the green belt, development of land within SNAP will not be permissible. The East of England Plan suggests that when we do this, we should make sure that we will not have to review the green belt boundary again until at least 2031.

5.15 In particular, both Stevenage Borough Council and North Hertfordshire District Council are in the process of undertaking discussions with the North Stevenage Consortium and the West Stevenage Consortium. The consortia are made up of various land owners and developers which have an interest in areas of land to the north and west of Stevenage. These areas are discussed in further detail in the sections below.

5.16 What development options have we considered?

5.17 We have looked at the land to the west and north of Stevenage in terms of their landforms and landscape quality. In response to Question 12 of the Key Issues and Alternative Options document, “Where should new development be located during the decade 2021 – 2031?” the majority of respondents (38%) preferred development to be focussed to the west of Stevenage at the existing application site. Following development to the west, the next preferred options were to the south west and further to the west (scoring equally), followed by directing development mainly to the north. We will now examine each in turn:

5.18 West of Stevenage

5.19 Of all the areas considered for development within SNAP, Stevenage West is located closest to the existing town centre of Stevenage. This area is identified for development through regional planning guidance, and has been granted planning permission for 3,600 dwellings, through identical planning applications to Stevenage Borough Council and North Herts District Council. The proposed gateway to Stevenage West at Bessemer Drive is within 1km of the town centre and will also provide access to employment opportunities at Gunnels Wood, the town’s main employment area. Therefore, this location is deemed to be highly sustainable and future residents of the new neighbourhoods would enjoy excellent linkages with the town.

5.20 Landscape Assessment work² found that West Stevenage was the most suitable and sustainable location for the highest amount of development, at 152 hectares. The study concluded that development outside those areas identified would have unacceptable landscape and visual impacts. This includes development further to the west, north and east beyond those areas identified.

5.21 The key landform to the west of Stevenage is the Langley Valley, running approximately north / south, with the B656 Hitchin to Codicote Road running along the valley bottom. We have strongly concluded that there should be no significant encroachment of development into the Langley Valley. It is an extensive part of attractive countryside with a good quality rural character which would be lost if development here were to be allowed.

² Stevenage Landscape Sensitivity and Capacity Study, Halcrow Group Ltd, January 2006

- 5.22 However, the East of England Plan requires us to locate “at least 5,000 dwellings” to the west of Stevenage. The only option is on the land between the Langley Valley and the A1(M). This land forms the Stevenage West site for 3,600 dwellings and associated development. We refer to this as the “plateau area” and define it with the boundary of the planning applications.
- 5.23 We consider that the plateau area can accommodate at least 5,000 new houses, within the application site. We have also considered whether additional development could be located south or north of this site. However, these are less favourable options. To the south, development would have an adverse impact on the nearby Knebworth Woods, which is a Site of Special Scientific Interest (SSSI) and would result in Norton Green being surrounded by new development. To the north, the settlements of Todd’s Green and Titmore Green would lose their individual identities.
- 5.24 It is possible that the application site could accommodate substantially more than 5,000 new dwellings. However, we believe that any significant increase over and above 5,000 new houses is likely to impinge on the Langley Valley, adversely affecting its rural character.
- 5.25 Thus, to the west of Stevenage, we propose to plan only for 5,000 dwellings located on the plateau area between to A1(M) and the Langley Valley. The remaining housing will be located on land within SNAP to the north of Stevenage.
- 5.26 From our consultation on the Key Issues and Options for SNAP 2007, the majority of respondents preferred housing to be located to the west of Stevenage, at the existing application site. This was followed by the North East sector of Stevenage as a preferred location. Among the representations, the most common argument was that housing should not take place to the north or north east of the town. Overall, 13% of representations objected to the general principle of expansion while 12% suggested that housing growth should be directed to the west of Stevenage. In general, the responses were as expected when considering directions of growth to the town, whereby those living to the north of Stevenage at Graveley, for example, encouraged development to be directed towards the west, and those living towards the west at Wymondley and

Todds Green, for example, encouraged development to be directed to the north and north east of Stevenage.

Draft policy 03: Stevenage West

Our Preferred Option is to provide approximately 5,000 new homes at Stevenage West by 2021. The requirements of Stevenage West in terms of housing and associated infrastructure will be shown within the Stevenage West Masterplan boundary, as submitted with the planning application.

5.27 North of Stevenage

5.28 There is a very attractive green lung running northwards from St Nicholas Church in Stevenage, across both “Forster Country”, a designated Conservation Area, and Chesfield Park to the north of it. We consider that this land should not be developed but instead retained as agricultural (pasture) use. It would be of significant ecological value as a wildlife corridor.

5.29 The fringes of this area would be entirely appropriate for aspirational housing, with well-landscaped plots providing a transition between the rural green lung and the more densely developed new neighbourhoods on either side. The SNAP Proposals Map at Appendix 1 shows the proposed locations of the aspirational housing (shown in light yellow). We estimate that about 200 aspirational homes could be built here.

5.30 To the west of the green lung is our second proposed area of housing growth, which we refer to as North Stevenage. We have deliberately maintained a gap between the allocation and the village of Graveley. A new northern distributor road is required to serve the housing north of Stevenage and we envisage that it will begin at the junction of Old North Road, Stevenage, with the B197 and swing north-eastwards to form the edge of the Stevenage north development area. The capacity of Stevenage north is estimated to be approximately 2,000 dwellings.

5.31 Our third area proposed for residential development is located to the east of the green lung at North Stevenage, and extends around Great Ashby and Burleigh Park. Its northern boundary is the boundary for the SNAP area proposed in the

Key Issues and Options public consultation document 2007. We believe this forms a transition between relatively enclosed landscape to the south (the proposed new neighbourhood) and more open landscape to the north which should remain undeveloped. The capacity of this area is approximately 4,250 dwellings.

- 5.32 Beyond this area, there are also two further parcels of land which could be considered. The first lies north of the original SNAP boundary to the west of Weston Lane in the vicinity of Friends Green Farm. This area has been estimated to have a potential capacity of just over 1,100 dwellings. It was identified as part of landscape evidence prepared by Land Use Consultants as an area which could accommodate growth without causing significant harm to the landscape.
- 5.33 The second area lies at the north-eastern tip of the SNAP area, north of the footpath known as Halls Green Lane. This area has been estimated to have a potential capacity of about 350 dwellings. It has been drawn to our attention during the preparation of SNAP that this area lies within a mediaeval deer park, albeit it has been ordinary farmland since the mid-16th century.
- 5.34 These two reserve areas are those which North Hertfordshire District Council would most like to exclude from the development area, but recognises that the housing numbers may require us to develop them. We will be carefully considering the capacity of SNAP in the period between the publication of this preferred options document and the submission document to see if there is a way of excluding those sites – and if possible avoiding development east of Dane End Lane completely.
- 5.35 This new neighbourhood to the north-east of Stevenage ties in well with Hertfordshire County Council's current proposal for a new secondary school adjacent to Great Ashby. Whilst the assessment of SNAP allocations was carried out in the knowledge of the County Council's education proposals, this has not affected the final conclusion.

5.36 How do our preferred options match the housing targets?

5.37 Having carried out a detailed analysis of the land requirements needed to meet the development needs to 2021, 2026 and 2031; we conclude that sufficient land can be allocated to meet the 2021 and 2026 targets. We have not allocated sufficient land to meet the needs to 2031. When looking at the growth opportunities for Stevenage as a whole, there are future possibilities other than to the north and the west. In particular, there are sites to the east of Stevenage, within East Hertfordshire District Council, which appear to be more sustainable and less environmentally damaging than further development to the north and west.

5.38 Density

5.39 The overall density of housing development within SNAP is crucial. Housing density is a measure of how many homes are provided on a given area of land. The higher the density, the less the land take, and vice versa. Density therefore determines how much housing will be delivered on a specific site.

5.40 In accordance with Government planning guidance, land should be built on efficiently. This should be supported through SNAP especially when one of our key aims is to reduce the amount of greenfield land that we need to develop to meet our housing targets.

5.41 Our Key Issues and Options consultation in 2007 asked for your views on housing density. The majority of representations said we should require all developments to comply with the Government's figure of 30dph. When asked if support was given to build at densities higher than 30dph, the most common response was that higher densities should only be allowed near to local facilities or public transport.

5.42 Along with your responses to our previous consultation, we have also considered densities achieved on recent examples in the vicinity, the development at Great Ashby, and the planning application for land West of Stevenage. This will help us achieve a level of consistency and calculate a reasonable and realistic density standard. Our preferred option is 38 dwellings per hectare (dph) as a realistic standard based on our research. This will

achieve an appropriate balance between making the best use of greenfield land and creating attractive residential environments.

5.43 38dph will also enable appropriate car parking to be provided for the future residents. Standards applied on some recent developments are too low and have created difficulties in terms of parking on pavements and narrowing roads for refuse and emergency service access. We will therefore apply higher standards for the new neighbourhoods of SNAP.

5.44 Housing mix

5.45 Due to the levels of affordable and aspirational housing to be developed within the SNAP area, we anticipate that 50% of housing on new developments should be market housing. Our evidence³ suggests that we should aim to provide the following overall mix of market homes within the SNAP area:

- 60% 1 bed or 2 bed properties;
- 20% 3 bed properties; and
- 20% 4 bed properties.

5.46 With the exception of our proposed requirement for 10% of homes to be provided for 'aspirational' housing, we do not propose to set prescriptive policy targets regarding the type and size of market housing within SNAP (remembering that affordable housing is not classed as market housing). It should be acknowledged that more central and accessible locations, which are perhaps closer to Stevenage town centre, for example, the town centre will make a significant contribution to the provision of smaller units over the period to 2021. It is therefore proposed that the larger sites within SNAP will have a greater emphasis on medium sized family housing, such as 3 or 4 bedroom homes.

5.47 Developers will be required to demonstrate that they have taken the findings of the Housing Market Assessment, along with projections of existing and anticipated housing supply for both Stevenage and North Hertfordshire, into account when formulating development proposals. This should ensure the delivery of an appropriate mix of housing size.

³ Stevenage Strategic Housing Market Assessment, Final Report August 2008, DCA UK

5.48 Affordable housing

5.49 Stevenage and North Hertfordshire experience significant levels of housing need. This term refers to people who require a home of their own but cannot afford to buy or rent on the open market without assistance. The level of need can be linked to a number of factors. These include high house prices, low levels of earnings and areas of deprivation.

5.50 The provision of affordable housing within SNAP is crucial in establishing an appropriate mix of housing. Giving priority to the provision of affordable housing is one of the key objectives of the East of England Plan in order to address housing shortages in the region. Affordable housing includes both social rented housing and intermediate housing:

- Social rented housing is housing for rent, available at less than market rents to those in need; and
- Intermediate housing includes shared equity schemes (where part of the property is purchased with rent paid on the balance) and housing specifically for key workers (such as nurses or police officers) employed in the locality.

5.51 In 2008, Stevenage and North Hertfordshire commissioned a Housing Market Assessment⁴ which concluded that almost half of working households in Stevenage and North Hertfordshire cannot afford to purchase a property in the area.

5.52 Stevenage's Affordable Housing Strategy requires 80% of new affordable housing to be rented with the balance to be intermediate provision. For this reason our preferred option is to require 65% of affordable housing to be social rented, with 35% intermediate provision. Our evidence shows that this split can be implemented without affecting economic viability, provided it is flexible. It is recognised that sites should be assessed on their individual merits and that there can be specific conditions and constraints which may determine which types and sizes of units may be suitable in a specific location. Therefore our policy on affordable housing is intended to act as a starting point for negotiation

⁴ Stevenage Strategic Housing Market Assessment, Final Report August 2008, DCA UK

on each scheme, based on its merits. Developers will need to demonstrate that they have taken into account the provision of mixed housing when putting forward a scheme.

5.53 The East of England Plan sets a target whereby 35% of all newly developed housing should be affordable. However a viability study⁵ commissioned by both councils concluded that on sites of 25 or more units, a minimum of 40% affordable housing could be provided without affecting the economic viability of a scheme. This is agreed in both Stevenage and North Hertfordshire's emerging Core Strategies.

5.54 In accordance with Stevenage's Core Strategy, developers proposing new housing within SNAP should provide at least the following proportion of affordable homes:

- 40% for sites of 25 or more homes
- 35% for sites of 15-24 homes
- 30% for sites of 10-14 homes
- 20% for sites of 5-9 homes
- 10% for sites of 1-4 homes (to be secured as a financial contribution).

5.55 Our Key Issues and Options 2007 Consultation responded to this with the majority of consultees agreeing that at least 40% of new housing within SNAP should be affordable. Indeed, a higher target of 40% would help to achieve the regional aspiration of 35% affordable housing. By applying this policy, we would hope to deliver almost 4,000 affordable homes within the SNAP area by 2021, which is equivalent to 300 units per year.

5.56 Our consultation also asked how affordable housing should be developed in the new neighbourhoods. From this, the majority of representations felt that it was important for affordable housing to be mixed with market housing, also referred to as 'pepper-potting'. We have prepared our preferred option based on the results of public consultation and evidential research.

⁵ Affordable Housing Development Economics Study, NHDC & SBC, September 2007, Adams Integra

Draft policy 04: Affordable Housing

Our preferred option is to ensure that 40% of all new housing development built within the new neighbourhoods of SNAP is genuinely affordable to meet with housing need. 65% of which should be social rented, with 35% consisting of other affordable tenures, to be provided on site.

The mix, size, type and tenure of affordable homes should take into account the housing needs of the Borough, as identified through the Stevenage Borough Council Strategic Housing Market Assessment.

Affordable housing should be physically indistinguishable from other types of homes and should be distributed across the site to avoid over concentration in one area.

5.57 Aspirational housing

5.58 Density and land take within SNAP depends heavily on the mix of housing to be provided. Stevenage Borough Council has identified a need for what is termed 'Aspirational Housing' within SNAP, the principle of which is supported by North Hertfordshire District Council. Areas for aspirational housing are shown on the SNAP Proposals Map.

5.59 Housing growth planned for Stevenage within the SNAP boundary to the west, north and north east of the town will provide an important and much needed opportunity to address the imbalance in the housing stock, as identified in the Aspirational Homes Survey⁶. It has been established through various studies⁷ that Stevenage's housing stock is limited to 3 bedroom, terraced housing, with very few larger, more executive type dwellings.

5.60 SNAP will look to change this situation through the new neighbourhoods to Stevenage. It aims to deliver 'Aspirational Housing' defined as:

⁶ Stevenage Borough Aspirational Homes Survey – 2007, DCA UK

⁷ Stevenage Borough Aspirational Homes Survey – 2007, DCA UK, Stevenage Borough Housing Needs Survey, DCA Ltd, 2003, North Hertfordshire and Stevenage Strategic Housing Market Assessment, Final Report August 2008, DCA UK

- Housing which is built in small groups in suitable suburban and edge-of-town locations;
- Low density, typically between 8 and 15 dwellings per hectare;
- Detached, with at least four bedrooms and two bathrooms;
- Sited on large plots with rear gardens of at least 150m²; and
- Provided with at least two off-street parking places

5.61 These are generally considered as the required minimum criteria to achieve a level of aspirational housing. It may be appropriate to provide aspirational houses that exceed these guidelines, assessed on a site-by-site basis within SNAP.

5.62 Stevenage's Core Strategy⁸ establishes that aspirational housing will be identified within SNAP where it would complement the area or act as a useful diversification to the existing dwelling stock. It is now the role of SNAP to require the construction of aspirational housing at appropriate locations within new housing development areas.

5.63 Our Key Issues and Options Consultation in 2007 asked whether SNAP should include a policy to redress the existing imbalance of homes in Stevenage. The majority of representations (66%) agreed that SNAP should contain a policy on this matter, with the majority agreeing we should provide larger homes on substantial plots. Suggestions also included the provision of detached and semi-detached family housing with good sized gardens, housing of a similar style to that provided at Great Ashby, along with plots for 'self-build' projects and/or eco homes.

5.64 In response to our Key Issues and Options Consultation, our preferred option is set out below.

Draft policy 05: Aspirational Housing

Our preferred option is to encourage the development of aspirational housing to the north and west of Stevenage to ensure that the town can offer a good mix of housing to attract prosperity.

⁸ Stevenage Borough Council Core Strategy Submission Document, 2010

Within SNAP, developers will be required to provide 3% of aspirational housing within the new neighbourhood areas.

Aspirational housing will typically be defined as:

- detached houses of four or more bedrooms;
- houses with appropriately sized private gardens; and
- houses with off-road parking for at least 2 vehicles.

6

Employment

Objectives of this chapter:

Objective 6a: To help create prosperity in and around the town through the provision of sufficient and appropriately located land, buildings and infrastructure to support a substantially expanded, strong and competitive business community.

Objective 6b: To provide a balance between job growth and housing growth to reduce the risk of Stevenage becoming a commuter town.

Objective 6c: To help provide local employment opportunities to encourage people to both live and work more locally.

6.0 Employment sites

- 6.1 An identified target of 68,000 new jobs has been set out in the East of England Plan to be provided for the whole of Hertfordshire over the period 2001 to 2021, with 20,000 new jobs at Stevenage⁹. SNAP is required to provide new employment sites to ensure an appropriate and balanced mix of homes and jobs is met, with the aim of reducing out-commuting to other neighbouring centres.
- 6.2 The East of England Plan identifies Stevenage as a 'Key Centre for Development and Change', whereby the strategy is to deliver a new vision for Stevenage as a regional employment and growth point. One of the main elements of this strategy is the provision for employment growth by improving the competitive position of Stevenage and capitalising on its position between London and Cambridge. Suitable employment sites should be identified at Stevenage, which are of the quality and quantity required to meet the needs of businesses identified through the employment land review. The identification of such sites should ensure that the employment demands of existing and new residents are met.
- 6.3 A number of studies have been undertaken to inform our approach to employment land. Stevenage's Employment Capacity Study¹⁰ showed that existing sites in the urban area of Stevenage could only contribute a maximum of 5,000 new jobs in B-class uses (such as offices, factories and research and development). It was considered that this figure was too low to support enough growth, in light of the advice in the East of England Plan. Stevenage currently only has a limited supply of land that could be developed for employment use compared to potential competitors, such as Hatfield. Further research has therefore been undertaken to identify new areas of suitable land for employment development within SNAP.

6.4 Where should the new employment go?

- 6.5 Most existing employment opportunities within Stevenage Borough are provided in the two main employment areas at Gunnels Wood and Pin Green.

⁹ Skills and Employment Study 2005, Employment Capacity Study 2006, Employment Capacity Update 2010, East of England Plan policies E1 and H1

¹⁰ Employment Capacity Study, DTZ Consulting and Research 2006

Gunnels Wood is the largest employment area in Hertfordshire and is therefore of regional significance. The Gunnels Wood Area Action Plan will plan for the remodelling of this area to make it a destination fit for modern business. This area is not geographically included within the SNAP boundary and therefore will be dealt with in a separate Area Action Plan DPD. Alongside employment at Gunnels Wood and Pin Green, areas within SNAP are required to provide significant employment opportunities, namely new employment allocations identified close to Junction 7 of the A1(M).

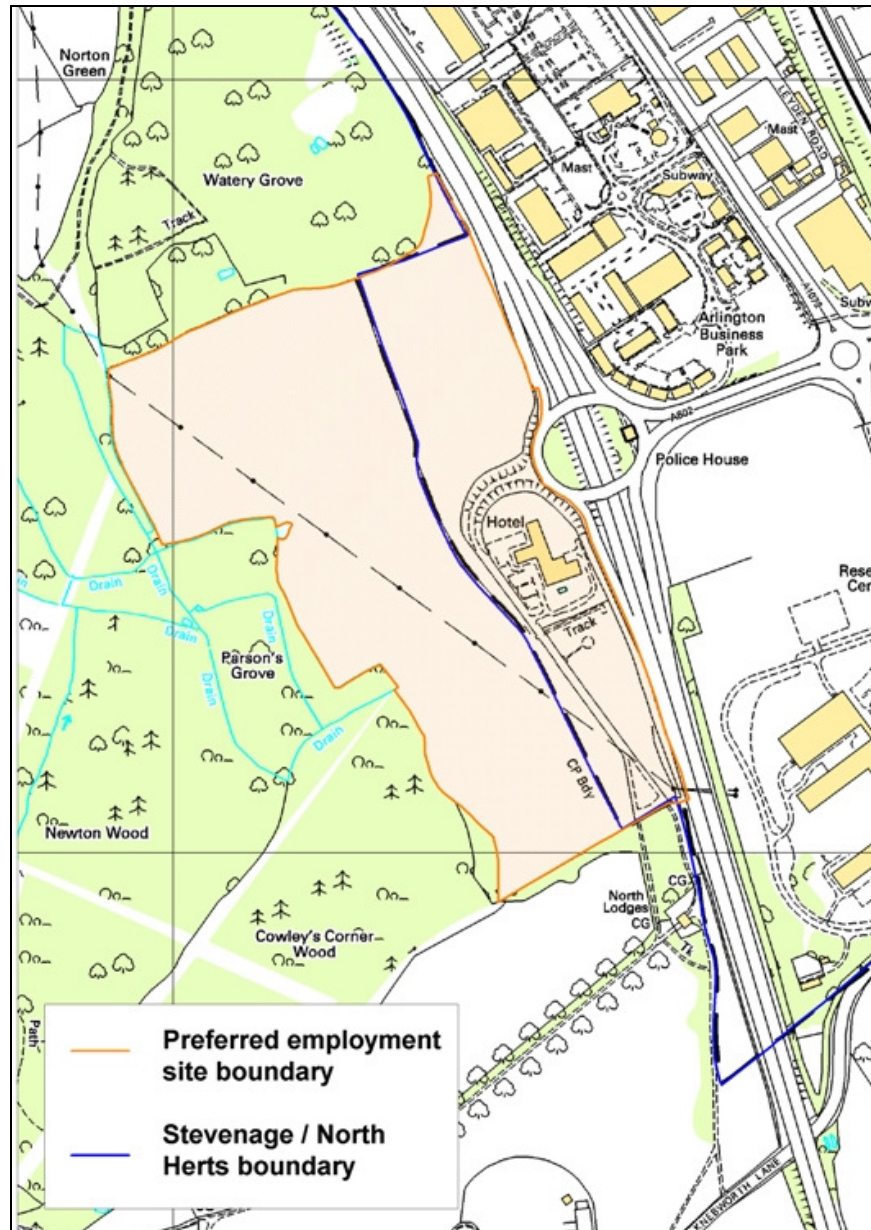
- 6.6 The Key Issues and Options Consultation in November 2007 proposed three broad locations for additional employment land which included land at:
- The proposed Stevenage West planning application site;
 - Junction 7 of the A1(M); and
 - Junction 8 of the A1(M).
- 6.7 From consultation representations, the most frequently stated point was that new employment sites should be directed to brownfield land within Stevenage. However, there is a distinct lack of available brownfield land suitable to accommodate the required amount of employment within the Stevenage Borough boundary. From the business community's response to our consultation, almost half were in favour of employment locations at the A1(M) junctions due to accessibility for both staff and clients.
- 6.8 From our 2007 consultation, the most popular response was not to provide any land for employment within SNAP. This is not an option we are able to undertake, due to guidance set out in the East of England Plan, and due to the amount of residential growth planned; along with the aspirations we have for the town of Stevenage to be prosperous and innovative. Given the amount of new homes to be provided, it is important that new jobs are also created to maintain a good balance between the numbers of people employed and those living in the town.
- 6.9 If we were to build the housing required by the East of England Plan without also delivering new employment opportunities, we would dramatically increase the rate of commuting, almost all of which would be out-commuting, putting considerable strain on the transport networks. We recognise that we cannot

force residents to work in Stevenage, nor will all people who work in Stevenage want to live in the town, but we can try and ensure that people who want to work in their home town have a reasonable chance of finding a job, and likewise that people who work in the town have a reasonable chance of finding a home that meets their needs.

- 6.10 For the purpose of this document, we have determined that our preferred location for focussing employment development is land at Junction 7 of the A1(M). Land at Junction 8 will be allocated through SNAP primarily as land safeguarded for the expansion of the Lister Hospital.
- 6.11 The Masterplan for Stevenage West identifies employment land at three locations adjacent to the A1(M). These lie close to Bessemer Drive, Meadway and then further towards the north of the Stevenage West site.
- 6.12 In planning for land to the north and north-east of the town, we have allowed for 3 hectares of dedicated employment land, in addition to the employment that would be generated by the community facilities (such as local shops, pubs, takeaways, etc) themselves.

6.13 Junction 7

- 6.14 From our Key Issues and Options consultation in 2007, other than not providing any employment land at all within SNAP, the next most popular response was to provide employment land at Junction 7 of the A1(M). This location has therefore developed as our preferred option for locating employment land within SNAP. Junction 7 has previously been promoted by the Knebworth House Education and Preservation Trust and Terrace Hill Developments Ltd, who supported the idea of a new, high technology employment area on the land to the west of Junction 7, as shown on the Map below:



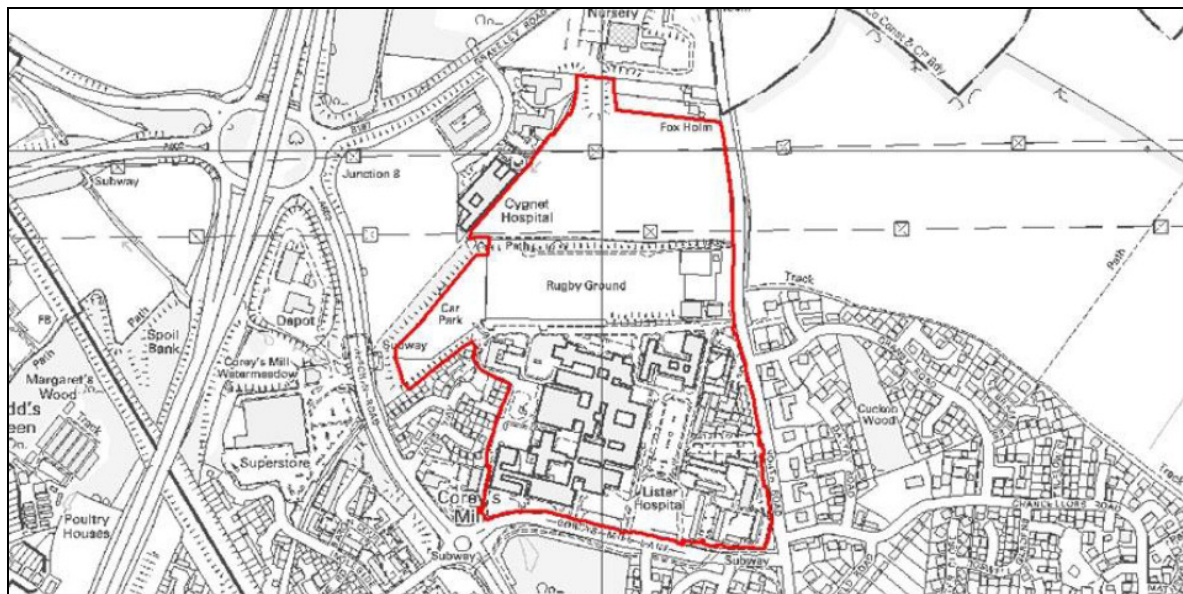
6.15 As our preferred option, the strategic employment site will be allocated at Junction 7 of the A1(M) to provide 65,000m² of new employment floorspace and 3,000 jobs¹¹. The site is presently semi-rural and located in an attractive environment and is therefore suitable as an innovation park considering the strong base already established in the area by companies such as GlaxoSmithKline, at Gunnels Wood on the opposite side of Junction 7. It will benefit from excellent transport linkages linking the site to the local, regional and national road network, along with connections to Gunnels Wood and the town centre. GlaxoSmithKline's research centre is situated to the east and is

¹¹ Stevenage Borough Council Core Strategy Submission Document , 2010

included within Stevenage's Gunnels Wood Area Action Plan boundary. Within the Employment Capacity Study, it is envisaged that the site may have the potential to deliver additional employment floorspace for B1 offices and research and development, which would compliment neighbouring uses.

6.16 To the south of land at Junction 7 lies the Grade II Historic Park & Garden at Knebworth. This area is legally protected under the Ancient Monuments and Archaeological Areas Act 1979. Thus, development at Junction 7 will need to take full account of the setting of this site, including views both to and from the park. Only the minimum amount of lighting needed for operational requirements will be used. The orientation and scale of lighting at this area will need to be sensitively positioned so as not to disturb neighbouring land of environmental quality and the countryside beyond.

6.17 Lister Hospital expansion



6.18 Land close to Junction 8 of the A1(M) will be safeguarded to allow for the future expansion of the Lister Hospital. Land at this location is semi-rural, and is located within the SNAP boundary as an allocation for future development. The land is located to the north of the existing Lister Hospital site and to the south of the B197 Graveley Road, close to the mental health facility.

- 6.19 The Lister Hospital is the largest employer in the town providing 2,700 jobs, and is set to expand further to accommodate the emergency services for East and North Hertfordshire, along with a linked programme to provide new and upgraded maternity facilities at the hospital. Planning permission has been granted for expansion and refurbishment of the existing site which is set to provide an additional 1,075 jobs. The East and North Herts NHS Trust have expressed an interest in safeguarding land for the future expansion of the hospital site. Emerging proposals suggest that a future allocation could enlarge the overall site by around 30%, which would in turn provide for an additional 1,000 jobs.
- 6.20 In calculating how much employment land is required in SNAP to provide enough jobs at Stevenage, land to the north of Lister Hospital has been omitted to help determine whether the jobs target could still be met without relying on this land for general employment use. Through the update of employment forecasts and capacity estimates¹² a figure of 3,470 net jobs has been identified to be provided through SNAP (along with 8,725 new jobs identified within the existing urban area, and 9,825 new jobs provided from identified non-B class sectors such as health and retail). This figure does not include land at Junction 8 due to its allocation for the Lister Hospital expansion, although it does include an approximate 3 hectare new employment allocation within the new neighbourhood to the north east of Stevenage.
- 6.21 The provision of new employment sites would create jobs for those people moving into the area and also for those in the surrounding area. This would score highly in terms of economic sustainability and would also discourage out-commuting from the area. The development of new employment land may reduce the need to travel long distances to work and assist in maintaining a balance between housing and jobs growth. Conversely, failure to provide additional employment sites would be unlikely to deliver these benefits.

¹² Updating Employment Forecasts and Capacity Estimates for Stevenage, Stevenage Borough Council, September 2009

Draft policy 06: Employment Sites

Our preferred option is to designate the following areas as employment sites:

- Approximately 65,000m² of employment floorspace and approximately 3,000 new jobs at Junction 7 of the A1(M) to provide linkages with the regionally important Gunnels Wood employment area;
- A small scale allocation to be located within the new neighbourhoods at north east Stevenage; and
- The provision of approximately 13 hectares of land for employment use within the new neighbourhood at West Stevenage.

We will also allocate and safeguard land to the north of the Lister Hospital for future expansion purposes specifically in relation with the Hospital.

7

Green Infrastructure

Objective of this chapter:

7a: To create new green spaces and enhance existing green infrastructure linkages which together connect the town's open spaces and habitats with the surrounding countryside.

7.0 Green infrastructure

- 7.1 This chapter considers the closely related subjects of open space, recreation and strategic landscaping, as well as the treatment of the area known as Forster Country. All of these elements are incorporated into a term known as 'green infrastructure'. This can be defined as all land that is not built on within the SNAP.
- 7.2 Green infrastructure is the network of open spaces, natural and semi-natural environments and how they are linked to each other. The East of England Plan (policy ENV1) requires consideration of green infrastructure in preparing plans, in particular requiring "the retention of substantial connected networks of green space in urban, urban fringe and adjacent countryside areas to serve the growing communities in key centres for development and change".
- 7.3 A Green Infrastructure Plan was prepared for North Hertfordshire District Council by Land Use Consultants in 2009 (Stevenage is also currently preparing a Green Space Strategy). This identified a number of features of the landscape which function as green infrastructure in the SNAP area. We do not discuss all the Green Infrastructure Plan's recommendations here, but highlight some of the principal recommendations which affect the main development areas within SNAP.
- 7.4 To the west of Stevenage, it identifies (amongst other projects):
- a green buffer to separate the West of Stevenage development from Knebworth Woods and Knebworth Park to the south;
 - landscape buffers between residential development and the A1(M); and
 - a cycle route linking Stevenage and Hitchin via Norton Green, Rush Green and the Langley Valley.
- 7.5 To the north and north-east of Stevenage, it identifies (amongst others):
- a strategic area of open space in the Forster Country / Chesfield area;
 - potential for connections with the Stevenage Outer Orbital Path (STOOP) through the area;
 - a significant network of public rights of way, especially to the north-east of Great Ashby; and

- the need for landscaping both within and around any new development.

7.6 In the Key Issues and Options Consultation we asked what design features and characteristics people would most like to see in the new neighbourhoods. By far the most popular, with 54% of the responses received, was the need for good landscaping, green spaces and areas for wildlife. Therefore, we consider green infrastructure as a major factor in creating attractive, healthy and locally distinctive places where people want to live.

7.7 In view of the importance given to green infrastructure by the public, we asked Land Use Consultants (LUC) to prepare more detailed work for SNAP¹³ drawing on the North Herts Green Infrastructure Strategy and the Landscape Sensitivity Study. Plans taken from the LUC work [Insert Plans] set out key messages in relation to the new north and north eastern neighbourhoods within SNAP. They have informed the proposals maps and should inform any future masterplans for the SNAP area. We expect landowners and developers to demonstrate how they have incorporated green infrastructure into their designs drawing on the work that has already been undertaken to inform SNAP.

7.8 Open spaces, recreation and Forster Country

7.9 The areas of North Herts District and Stevenage Borough are different in both landscape and built character, and as a result have different standards for open space. Given that the development within SNAP will be new neighbourhoods to the town of Stevenage, we consider it more appropriate to apply the open space standards of Stevenage Borough Council to the new neighbourhoods. In response to the Key Issues and Options consultation 73% of people responded in relation to this issue and agreed with this approach.

7.10 The open space standards are outlined in Stevenage Borough Council's emerging Green Space Strategy¹⁴, which are as follows:

¹³ SNAP North: Landscape Opportunity Mapping, April 2010.

¹⁴ The emerging Green Space Strategy will be largely based on the standards of Open Space, Recreation and Sport Study, 2006.

Stevenage Borough Council open space standards

Open space type	Target (hectares per 1000 people)	Walking distance in metres
Parks and gardens	0.73	800m
Natural and semi-natural open space	1.78	400m
Amenity greenspace	1.1	400m
Children and young people	0.8	400m
Outdoor sports facilities	2.2	10min drive for bowling, cricket, football, hockey & rugby. 10min walk for MUGA & tennis
Allotments and community gardens	0.13	1,200m
Cemeteries and churchyards	No local standard set	As required
Green corridors	No local standard set	As required

7.11 An alternative option would be to establish a different open space character for SNAP. One option raised through consultation exercises at the Parish Council Workshop¹⁵ suggested limiting the amount of open space within the SNAP area so that the amount of land needed for development in the countryside would be less. However, this option has been discounted on the basis of the importance attached to green infrastructure for new communities, as outlined above, as well as habitat protection and creation.

7.12 To the west of Stevenage the main areas of open space have been identified in the submitted masterplan which forms the basis of the approved scheme for 3,600 dwellings, including a linear park along the south-western edge of the development in the vicinity of Upper Kitching Spring and High Broomin Wood, along with other smaller areas of open space throughout the development.

7.13 To the north of Stevenage, applying Stevenage Borough's open space standards would require an open space provision of 90ha. This would form some but not all of the green infrastructure requirements as outlined in the paragraphs above.

7.14 The proposed green lung at Forster Country and Chesfield is approximately 58ha. This would provide a significant proportion of the natural / semi-natural

¹⁵ Notes of the Parish Council Conference May 2010

open space requirement for the new neighbourhoods to the north and north-east of Stevenage. Making the entire green lung at Forster Country and Chesfield formal public open space would mean a very large area to manage, beyond what could be justified by the needs of local residents. Moreover, part of the area's existing quality and character lies in the informal nature of its management and the gradual change from paddocks and parkland through to farmland and open countryside.

7.15 Therefore, our preferred option is to ensure the southern 40 ha (approximately) of the green lung is managed open space, in the form of Forster Country Park. The area further north around Chesfield Park and the hamlet of Chesfield will remain as they are, in private ownership, although we will work with landowners to improve public rights of way in this area. Our preferred option is to ensure that there are good quality routes for pedestrians, cyclists and horse-riders to travel the length of the green lung from the Old Town High Street to Rectory Lane, through Forster Country, past or through Chesfield Park and out into the open countryside north of Chesfield hamlet.

7.16 It is intended that Forster Country Park would represent all of the natural and semi-natural open space for land at northern Stevenage. Additionally, it would accommodate required standards for parks and gardens. Therefore, additional natural and semi-natural open space would not be required within the remainder of the north and north eastern neighbourhoods, although some may be provided whereby areas of woodland, for example, should be protected from development. However, the preferred approach of green infrastructure throughout the heart of the new neighbourhoods as outlined in the paragraphs above will ensure that all parts will incorporate green elements. This is reflected on the proposals map¹⁶.

7.17 Land Use Consultants¹⁷ suggest that the green lung at Forster Country/Chesfield Park is worthy of protection due to the particular landscape sensitivity of this part of the SNAP area, as identified in the Landscape Sensitivity Analysis.

¹⁶ This approach needs further discussion.

¹⁷ Land north of Stevenage: Landscape Sensitivity Study, LUC 2010.

7.18 Treatment of urban edge & strategic landscaping

7.19 At the edges of the newly developed urban neighbourhoods, our preferred option is to see a reduction in the density of housing and other development with a substantial landscape buffer to enable a degree of screening. Recent developments at Burleigh Park close to the Weston Road, for example, have an awkward urban / rural relationship, with bulky dwellings very close to a rural country lane, screened by a thin hedgerow which was formerly a field boundary.

7.20 Other parts of Great Ashby have been more successfully screened from the rural area beyond, making good use of established woodlands, reinforced with additional planting.

7.21 Our preferred option is to try and reduce the visual impact of development on these rural areas around Stevenage's northern and western fringes. Skilful design, incorporating the topography, existing and additional areas of planting, and appropriate layouts for the new neighbourhoods should ensure that the new residential areas are barely noticeable from the surrounding rural area.

Draft policy 07: Green infrastructure, open space and landscaping

Our preferred option is for the designation of new strategic open space requirements to be in accordance with Stevenage Borough Council's Open Space Standards.

The SNAP area will make provision for:

- a. A Country Park of approximately 40 ha in the southern area of Forster Country. This will preserve the setting of Rooks Nest House along with historic connections.
 - b. The improvement of public rights of way linkages through Chesfield Park and the farmland beyond, ensuring that a publicly accessible green link is secured from Rectory Lane and St Nicholas Church through to the open countryside north of SNAP around Graveley.
 - c. Green infrastructure. Development proposals for SNAP will need to demonstrate that the findings of the Green Infrastructure Plan and the Landscape Opportunity Mapping have been taken into account. Where appropriate, connections should be made to the proposed Green Way, the horse and pony route, and the Stevenage Outer Orbital Path (STOOP).
3. Density of development. Residential areas will be tapered towards rural and semi-rural edges, with existing and new woodland belts forming most of the external boundaries. Where new woodlands are planted to form a buffer to development, a width of at least 20m will be required.

8

Environmental Protection

Explanatory note:

This chapter is yet to be completed and therefore cannot be displayed in this draft.

For further detailed information, please refer to the schedule of outstanding work, which accompanies this draft document.

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9

Access and transport

Objectives of this chapter:

9a: To secure reduced dependence on the motor car with new neighbourhoods designed to encourage walking, cycling and the use of public transport.

9b: To put in place the necessary public transport linkages at an early stage.

9c: To seek improvements to the A1(M) and local transport links.

9.0 Sustainable travel

- 9.1 Policy SV1 from the East of England Plan requires the growth of Stevenage to create “the conditions for significant increase in public transport usage, walking and cycling...” The amount of land required for SNAP requires the development of land which lies a significant distance from the town centre, notably to the north-east of the town, where some areas are approximately three miles from the town centre. Therefore, whilst the layout and design of the development can be used to make the new neighbourhoods pedestrian and cycle friendly for local trips within the neighbourhoods, new residents are less likely to walk to the town centre.
- 9.2 To make walking within the new neighbourhoods an attractive option for pedestrians, they need to include pedestrian-friendly routes. We expect the neighbourhood centres to contribute to this by having facilities arranged in a layout closer to a traditional street or market place rather than (as at Great Ashby) facing a car park and facing away from the main through route.
- 9.3 Cycling has the potential to be a significant mode of transport linking the new neighbourhoods to the rest of the town. Whilst Stevenage’s topography is undulating, the hills are not so steep as to deter cycling. The town centre and surrounding areas benefit from segregated routes for cyclists and pedestrians away from vehicular traffic, although signage on these routes could be improved for both cyclists and pedestrians.
- 9.4 The main deterrent to cycling is often the busier roads where cyclists have to compete with motor vehicles. Within the new neighbourhoods, appropriate design of streets should encourage cycling – trying to avoid on-street car parking whilst ensuring that the design of the road discourages high speeds from motor vehicles, for instance. For the more major routes, there will need to be a degree of segregation between cyclists and motor vehicles to encourage cycling. Some improvements will be outside the new neighbourhoods, on roads which already exist. For instance, the Stevenage Urban Transport Plan¹⁸ identifies a potential scheme to provide cycle lanes along Gresley Way, linked to the existing cycle lanes along Martins Way.

¹⁸ Draft final report, September 2009 (AECOM for Hertfordshire County Council)

- 9.5 In terms of public transport, the bus network will need to be extended to accommodate the new neighbourhoods of SNAP. However, given the distance into the town centre, it will not be sufficient to rely on just extending existing services – the journey times into the main destinations of the town centre and railway station would be too great. There needs to be dedicated services to serve the new neighbourhoods, routed so as to provide a relatively fast and reliable service into the town centre, as well as extensions to existing services to provide better linkages to other parts of the town.
- 9.6 Services need to be introduced early in the development process, so that new residents have the option of using a fast bus from early in the life of the new neighbourhoods. Whilst this may mean running near-empty buses at first, it means that other alternatives are offered to limit the use of cars.
- 9.7 The Stevenage Urban Transport Plan identifies the potential for a relocated bus station in the centre of Stevenage to Lytton Way which will be opposite the railway station. It also suggests providing real-time information around the network – so that it is possible to know at each bus stop when the next bus is expected and where it's going. Clearly, such measures would assist in making bus usage in the town more attractive and is something that we believe it is appropriate for developers to contribute towards.

Draft Policy 08: Sustainable transport

We will support the provision of sustainable transport schemes within SNAP at an early stage in the development. This will link with existing development at and around Stevenage, and will link with new development at the town centre, along with employment areas.

Applicants will be required to ensure the new neighbourhoods are pedestrian and cycle friendly. Proposals should include pedestrian and cycle linkages not only within the new development, but also to existing neighbourhoods, the rest of the town and surrounding areas.

Where appropriate, we will require Transport Assessments and Travel Plans to demonstrate that the proposed new neighbourhoods will not have an unacceptable impact.

9.8 Vehicular access

9.9 The Stevenage Urban Transport Plan (insert reference) identifies a number of areas where the new development is likely to lead to congestion on existing roads. To the west of Stevenage, the approved scheme has access via Meadway and Bessemer Drive, with a bus-only access from Todds Green. The network in this area appears to be able to cope with the forecast amount of traffic. To the north of the town, North Road provides suitable access points for the development area west of Forster Country and Chesfield. However, access to the north-east of the town is more problematic.

9.10 There are very few points where appropriate vehicular access can be gained around the Great Ashby and Burleigh Park area. Church Lane from Graveley to Chesfield and Warrens Green Lane are both too narrow to provide main access routes and to do so would radically change their rural character.

9.11 We have identified three possible access points within Great Ashby / Burleigh Park where a road of adequate width could be provided to give access to the development area to the north. These are shown at Appendix 1 in red, and are:

- Haybluff Drive (a relatively new road within the Burleigh Park development);
- Utilising the new access road to the proposed relocation site of Thomas Alleyne School off Mendip Way parallel to Cromdale Walk (beneath the pylons); and
- From the Martins Way / Gresley Way roundabout, skirting the southern edge of the Great Ashby District Park (a very small part of this route may actually need to be on land in Walkern parish in East Hertfordshire, which would necessitate the agreement of East Hertfordshire District Council).

- 9.12 Modelling work carried out for the Stevenage Urban Transport Plan showed that using accesses such as these would lead to congestion problems on several existing roads, notably Canterbury Way and Martins Way.
- 9.13 To combat this, the Urban Transport Plan requires the inclusion of a major northern relief road, running from a new roundabout at the existing North Road / Graveley Road / High Street Graveley junction, running north of Chesfield to provide access into the north-eastern development area. It also suggests continuing this road through the development and out to the south around the edge of Box Wood to link with the Fairlands Way / Gresley Way roundabout, which would have the advantage of providing a more direct route into the town centre, but would use significant areas of land in East Hertfordshire, which this document does not have the authority to allocate.
- 9.14 Without the provision of such a link road (at least the stretch from North Road to the development area), it is unlikely that development could proceed without existing roads within both Great Ashby / Burleigh Park and within the wider town reaching capacity. However, the provision of such a road raises landscaping and environmental issues.
- 9.15 In particular, the concept of providing a green wedge northwards from Forster Country and Chesfield to the open countryside beyond is undermined if there is a major road to cross before reaching the open countryside. Also, there are several areas of established woodland, notably to the north of Chesfield.
- 9.16 The topography in this area may enable the road to be screened at the critical point where it crosses the green wedge north of Chesfield and Forster Country. Chesfield hamlet is already screened to the north by the woods of Ledge Side Plantation. To the north of the woods, there is a significant drop in the land, which is particularly noticeable on the road from Chesfield to Graveley (Church Lane).
- 9.17 Building a road along the lower ground here, with a good wooded landscape buffer to the north of the road would provide appropriate screening to Graveley, Chesfield and the new development. Further, Church Lane could be closed to vehicular traffic between Chesfield and the cottages at Crow End in Graveley,

becoming a footpath and bridleway instead, with a bridge over the new road. This bridge's location will give views north-westwards across fields towards Graveley, which will increase the attractiveness of the route to longer-distance walkers, riders and cyclists and reinforce usage of Forster Country and Chesfield.

- 9.18 To the north-east of Chesfield there is also a point between Stonesley Wood and Harbourclose Wood where the woodland narrows to a band just 20m wide, shown at Appendix 1. Whilst the loss of any woodland is regrettable, this pinch-point allows us to provide the road in such a way as to minimise the loss of more established woodland. Part of the landscaping for the new road will require significant new woodland planting, notably along the northern edges of the road.

Draft policy 09: Vehicular access

Our preferred vehicular access to the new neighbourhoods from the existing road network will be as follows:

West Stevenage:

- Meadway
- Bessemer Drive
- Todds Green (bus and cycle access only)

North of Stevenage:

- North Road

North east of Stevenage:

- Main access via a new road from the junction of North Road / Graveley Road / Graveley High Street, along the northern edge of Ledge Side Plantation and between Stonesley and Harbourclose Woods
- Secondary accesses from Haybluff Drive and Mendip Way at Great Ashby (via the route of the pylons).

We will also investigate the possibility for access to the north-eastern area from Gresley Way in the vicinity of Box Wood and the Great Ashby District Park, both of which would require the use of land in East Hertfordshire District.

9.19 Parking

9.20 Parking is an issue which has serious implications for the design, usage and land-take of the development. Feedback about the recently developed parts of Great Ashby and Burleigh Park suggests that the parking provision is poorly designed into the scheme, with little space for visitor car parking causing high amounts of on-street parking.

9.21 We have already committed to ensuring that the aspirational houses within the SNAP area have at least two off-street parking spaces. For the remainder of SNAP, we aim to provide an average of two spaces per house, excluding garages. At least one of these spaces should generally be provided on plot, and applicants should show how on-street visitor parking can be accommodated. Separate pooled parking or garage courts should be avoided.

10

Gypsy & Traveller accommodation

Objective of this chapter:

10a: To provide for the accommodation needs of Gypsies and Travellers in the Stevenage and North Hertfordshire area.

- 10.0 Local Authorities have a legal duty to consider the housing requirements of Gypsies and Travellers and we should plan for their accommodation in the same way that we plan for other forms of housing. Government guidance¹⁹ in relation to Gypsy and Travellers sets out the importance for us to allocate sufficient sites in suitable locations to meet with the needs of Gypsy and Travellers.
- 10.1 Aside from this statutory duty, there are practical reasons for making provision for the Gypsy and Traveller community. 1 in 4 Gypsies and Travellers are technically homeless, having no legal place to live and often find themselves in a cycle of enforced nomadism, being continually moved on by authorities because of the shortage of sites. The cost associated with unauthorised sites, such as enforcement action, can greatly be reduced through the creation of new or expanded sites.
- 10.2 Government guidance aims to promote good community relations at the local level in order to avoid unauthorised developments and encampments. There is a need to provide Gypsy and Traveller sites at locations which meet the lifestyle requirements of the community. In terms of sustainability consideration of access to health services, shops and education facilities is important, as is a site which reduces the need for long-distance travelling and which is not located in areas at high risk of flooding. Sites on the outskirts of built-up areas may be appropriate. Sites may also be found in rural or semi-rural settings, and should be available, or likely to be available, and should consider alternatives to the car in accessing local services.
- 10.3 The East of England Plan was revised through a Single Issue Review in July 2009 to include policies on the provision of accommodation for Gypsies and Travellers and Travelling Showpeople. The new policies within the Plan require local authorities to make provision for additional residential and transit pitches, and plots. This provides the regional framework which SNAP must conform with.

¹⁹ Circular 01/2006 – Planning for Gypsy and Traveller Caravan Sites, ODPM, February 2006

- 10.4 Stevenage's site assessment identified a list of potential sites within the Borough. These were not confined to the SNAP area, although sites in the north west of the Borough were preferred locations²⁰, especially as the town is under-bounded and there is a lack of available and suitable land elsewhere in the Borough. Government guidance says that "many Gypsies and Travellers express a preference for a rural location which is on the edge of / or closely located to a large town or city consistent with traditional lifestyles and means of employment"²¹.
- 10.5 Our Core Strategies require an appropriate level of provision that meets the identified needs of the travelling community. Stevenage's Core Strategy sets out that Stevenage will work with North Hertfordshire to identify a site for at least 10 additional Gypsy and Traveller pitches through SNAP by 2011. A Gypsy and Traveller site already exists at Dyes Lane, to the west of Stevenage. This originally provided 14 pitches, with the development of a further 3 pitches recently completed. However, there is still the requirement for Stevenage to provide a further 15 permanent pitches by 2021, which should be allocated through SNAP, 7 of which are to be provided before 2011, with a total of 20 to be provided by 2026. By 2011, it is envisaged that Stevenage Borough should have a minimum of 24 pitches (with 14 authorised pitches already existing as at 2006). Our evidence shows that the best opportunities for Gypsy and Traveller provision lie in the north-west of the Borough²².
- 10.6 North Hertfordshire District Council is required to provide a minimum additional 5 pitches by 2011 and 13 pitches between 2011-2021.
- 10.7 In North Hertfordshire there is an existing authorised site in the district, where the possibility of extension is currently being investigated. Any additional pitches provided here will mean a reduction in the amount required in SNAP. Nevertheless, for management purposes, good practice guidance (insert reference) suggests that the number of pitches that would be required cannot be provided on one single site; therefore two sites will be required in North Hertfordshire in the SNAP area.

²⁰ One of the main intentions of Circular 01/2006 is that the site selection process should help to deliver sustainable, respectful and inclusive communities.

²¹ Designing Gypsy and Traveller Sites – A Good Practice Guide

²² Northern and Eastern Herts Gypsy and Traveller Site Identification Study, Scott Wilson (2007)

Gypsy and Traveller Pitch Requirements as required in the East of England Plan

Minimum Requirement	East of England	Stevenage	North Hertfordshire
Existing pitches at 2006	1,782	14	6
Additional pitches to 2011	1,237	10	15
Total pitches at 2011	3,019	24	21
Additional pitches 2011 to 2021		8	13
Additional pitches 2021 to 2026		5	TBC
Total to 2026		37	TBC

10.8 Our Key Issues and Options Consultation in 2007 asked for responses on locations that could be used to help meet the East of England Plan requirements set out in the table above. Of the proposed locations, extending the existing site at Dyes Lane was considered to be the most preferable. Indeed, this has already been implemented with an additional 3 pitches now operational.

10.9 Sites either side of the B197 Great North Road were favourable options, identified within our Key Issues and Options document as ST1 and ST2. However, based on further work undertaken by Stevenage Borough Council²³ both these sites have since been discounted. Sites ST1 and ST2 both have pylon lines running across them which are a significant constraint. We have since identified ST1 as being more suitable for the expansion of Lister Hospital. Through our research, ST2 has since been identified as being more suitable for residential use.

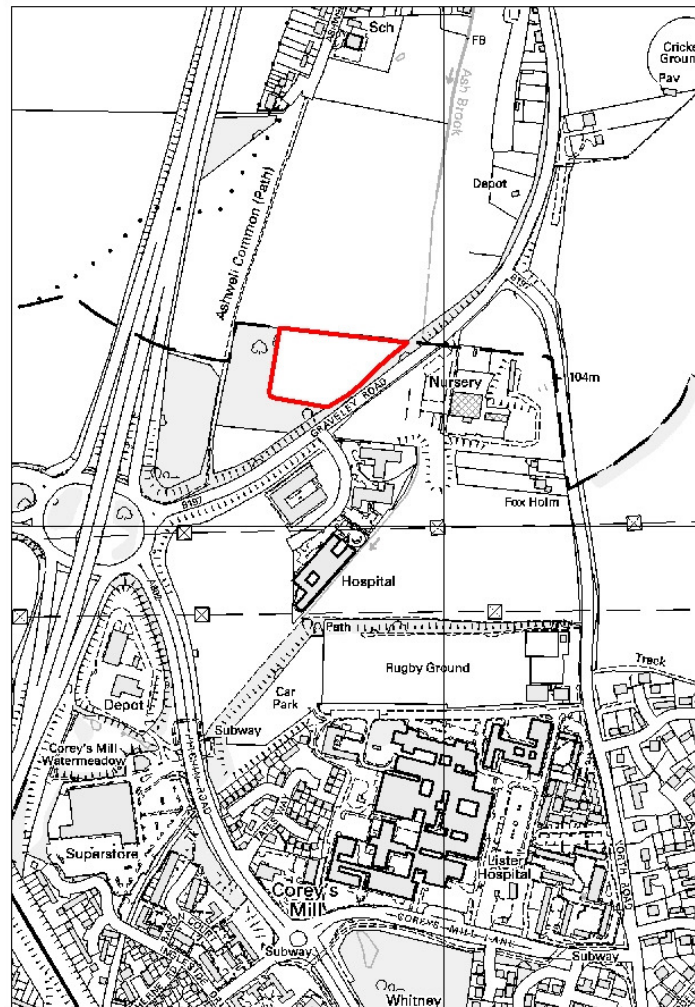
10.10 Although the pylons remain a significant constraint to housing of any sort, site ST2 is dependent on the overall package of land uses that is chosen and/or whether it is possible to successfully include a Gypsy and Traveller site in any larger scale scheme for this site. Land at ST2 has been identified as a potential residential site. The East of England Plan is clear that we should build a new neighbourhood to the north of Stevenage, and as such, this parcel of land is required to meet with these requirements. Any Gypsy and Traveller site would need to be included as part of this larger development; however this

²³ Gypsy and Traveller site search, Stevenage Borough Council.

would be contrary to government guidance which specifies sites should be in a rural location. It is therefore uncertain whether this sort of environment could be provided at site ST2.

10.11 It is therefore our preferred option to propose an appropriate Gypsy and Traveller site to the north of the B197 Graveley Road, close to J8 of the A1(M) shown on the map below. A site in this location would help to deliver the best overall package of land uses in the northern area of Stevenage, with the site located on the edge of the urban area. The site is currently within the green belt; however it is considered that exceptional circumstances exist to justify its allocation. This location is also supported by the Gypsy and Traveller community who have said that a location to the north of Stevenage with good access to the A1(M) would be their preferred approach.

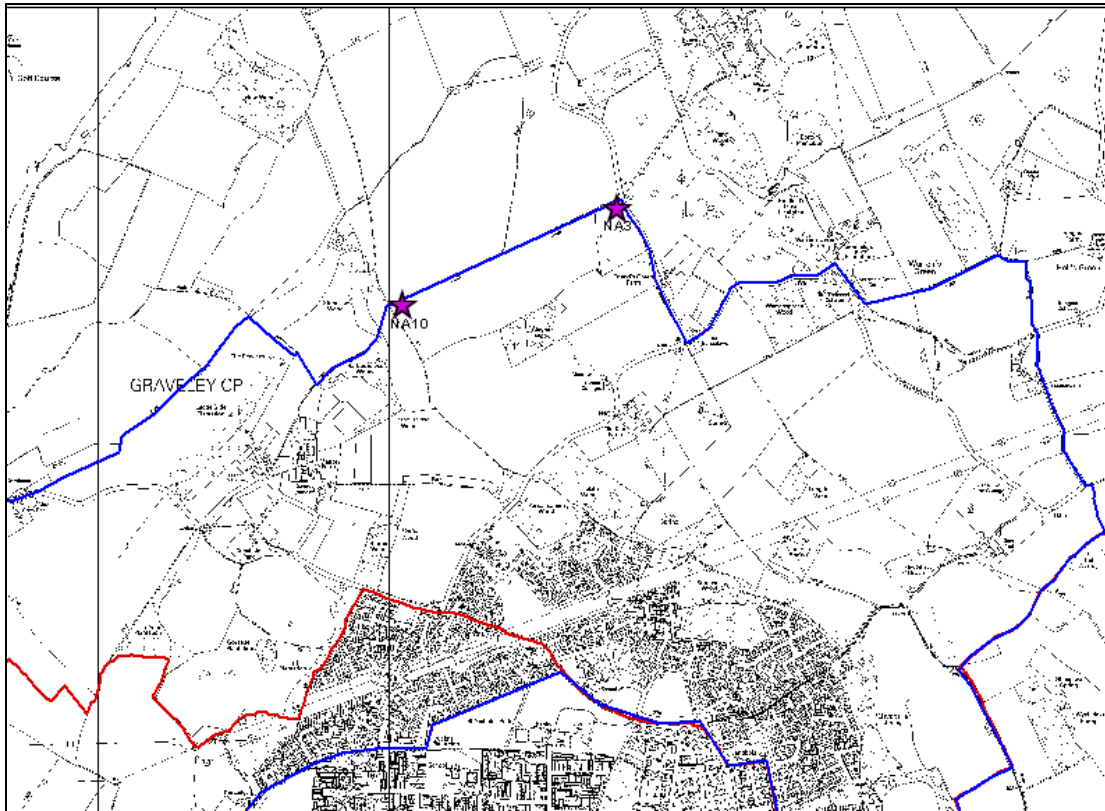
10.12 The site identified is 1.38ha, and is therefore large enough to meet all outstanding Gypsy and Traveller demand for Stevenage Borough to 2021 and beyond. We have estimated the number of pitches that could be provided on a site by looking at the current site at Dyes Lane. This provides 17 pitches on a site of 1ha. Therefore, at least 10 pitches can be accommodated on this site, which is also large enough to accommodate the 20 pitches that must be provided over the period to 2026.



10.13 Sites consulted on in the Key Issues and Options Consultation in 2007 did not specifically take account of the future development of the SNAP area. Therefore, in terms of deliverability these sites were never assessed as if they were part of the wider development. Through this document we are seeking to integrate Gypsy and Traveller accommodation within the wider development, and ensure that sites would be in sustainable locations.

10.14 Through consideration of the wider developable area, two locations in North Hertfordshire have been identified as potential Gypsy and Traveller sites. Consultation with the Gypsy and Traveller Liaison Unit at Hertfordshire County Council has suggested that development could take place at “NA3” in advance of other SNAP related development. However, appropriate infrastructure should be in place before the site at NA10 is developed. Currently both these sites are within the greenbelt; however, through a greenbelt review of the SNAP area,

land will be released from the greenbelt, making it appropriate for development. The sites are identified below.



Draft policy 10: Gypsy and Traveller Site Provision

Within SNAP, our preferred option is to ensure land is made available for permanent Gypsy and Traveller sites.

Within the Stevenage area of SNAP, there will be 15 new permanent Gypsy and Traveller pitches by 2021. 7 will be provided by 2011 and 8 will be provided by 2021. These will be located at:

- 1) Land close to Junction 8 of the A1(M).

Within the North Herts boundary, there will be 23 new permanent Gypsy and Traveller pitches in SNAP by 2021. These will be located in the following areas:

- 1) 10 Pitches at site NA3 in the short term, which will expand to a maximum of 15 pitches by 2021.
- 2) 8 pitches will be provided at site NA10 in the long term.

11

Facilities, infrastructure & delivery

Objectives of this chapter:

11a: To ensure that facilities and infrastructure serve the residents of the new neighbourhoods and that existing communities do not suffer as a result of the growth;

11b: To ensure that facilities and infrastructure is delivered in a timely manner so that these are provided early on in the build programme.

11.0 Facilities and Infrastructure

11.1 Not only will SNAP identify land required for housing, but it will also need to allocate enough land for supporting infrastructure. This will include land within the new neighbourhoods to be used for local employment uses, local shops, medical services, open space, and education. Without such facilities delivered at an early stage in the development the community could become isolated and unsustainable with problems accessing overstretched services and facilities.

11.2 The range of facilities and infrastructure required has been investigated in consultation with a wide range of service providers such as the Environment Agency, the County Council, the Primary Care Trust and the police. There will be continued dialogue between us, the developers and other agencies throughout the SNAP process and during delivery.

11.3 Neighbourhood centres & retail

11.4 The concept of community neighbourhoods is central to the original masterplanning of Stevenage New Town. The original masterplan showed essential facilities such as shops, churches, pubs and community centres provided within half a mile of all homes. This is reflected in the network of large and small centres that are found across the town. These centres are a key feature of Stevenage's built heritage and an important part of the town's character²⁴. We will therefore require the provision of neighbourhood centres to continue within SNAP.

11.5 The neighbourhood centre at Whitehorse Lane was developed to serve the Great Ashby development. This is a relatively successful, well established and thriving example of a facility serving around 3,000 dwellings. It comprises a community centre, private nursery, a local food store, two hair salons, vets, an estate agent, a takeaway, a chemist and a florist. There are flats located on the upper floors above. The Round Diamond Primary School is located on adjacent land and a children's centre has recently been established at the school.

²⁴ Plan showing 'Proximity to neighbourhood centres within Stevenage', NHDC, January 2010.

- 11.6 In order to ensure an appropriate level of facilities and services which will meet the needs of the community, the preferred option is to establish a number of neighbourhood centres within each of the new neighbourhoods. This would enable residents to be within walking distance of local facilities. The neighbourhood centres will need to be provided at an early stage of each phase of the development to ensure that the new community has the opportunity to use local services rather than needing to travel outside the area.
- 11.7 Different options were considered in relation to the number of neighbourhood centres to be provided. As a starting point the layout of existing neighbourhood centres within Stevenage was plotted to gain an understanding of the current layout of services provided for existing residents. This indicated that an 800 metre walking distance from facilities would be an appropriate and reasonable standard, as it would be consistent with the rest of Stevenage. On the basis of this option, there would need to be a neighbourhood centre to the north and in the north eastern part of SNAP there would need to be two.
- 11.8 A 400 metre distance was discounted as this would be in excess of the coverage already identified within the town. A 1200 metre distance was also discounted as it would again not be in accordance with the character of Stevenage and was considered to be a distance that people would be more likely to use their car instead of more sustainable forms of transport²⁵.
- 11.9 In the Key Issues and Options consultation we asked what facilities should be provided in neighbourhood centres. In excess of 500 responses were received in relation to this issue. The table below lists what facilities people would like to see, expressed as a percentage from the number of people who responded:

²⁵ Places Streets and Movement: A Companion Guide to Design Bulletin 32 – Residential Roads and Footpaths, 2006.

Facility	%
Medical facilities	84.5%
Youth facilities	71.6%
Education facilities	70.5%
Community halls	69.1%
Sports facilities	65.9%
Local shopping / service facilities	65.4%
Food supermarket	57.3%
Childcare	57.0%
Public house	45.8%
Places of worship	41.6%
Take-away	33.9%

11.10 The neighbourhood centres will be of a scale and nature so that they meet the day-to-day shopping and community needs of the new residents. Primary schools will be developed as an integral part of the neighbourhood centres as their catchments will be at the heart of the communities. Grouping facilities together in this way will be more sustainable, enabling residents to carry out a number of functions in one journey, which will reduce the number of trips generated. Opportunities for the co-location of facilities will also need to be explored by service providers.

11.11 The design of the neighbourhood centres

11.12 Whilst the Great Ashby neighbourhood centre has been relatively successful in terms of it being well used, we would expect to see a far greater quality in terms of design for the new neighbourhood centres of SNAP. The new neighbourhood centres will need to be a focal point for high quality design and will influence the design of dwellings around them.

11.13 Retail Mix

11.14 The mix of retail facilities will be ultimately be governed by market conditions. However, we will need to allow space for these facilities within the neighbourhood centres. In planning, retail land uses are defined by legislation as 'A-class', which are the most appropriate uses to be accommodated at the new neighbourhoods, and include:

- A1 – shops;

- A2 – financial and professional services (such as banks and estate agents);
- A3 – restaurants and cafes;
- A4 – drinking establishments (such as pubs and bars); and
- A5 – hot food takeaway²⁶.

11.15 The retail provided within SNAP will not detract from the main town centre shopping area of Stevenage nor the existing neighbourhood centres. Shops provided within SNAP should aim to be of such a scale so as to support and promote the town centre, as a sub-regional facility.

11.16 In order to assess the required amount of retail floorspace at SNAP, Stevenage Borough Council instructed King Sturge to undertake a Retail Capacity Assessment²⁷. It has been determined that about 10,500m² of additional gross convenience retail floorspace will be required to meet the needs of the growing town to 2026.

11.17 In assessing options to accommodate further retail floorspace, SBC has decided that Stevenage town centre is already well provided for in terms of food shopping. Therefore the majority of the extra food shopping will be met through the provision of new stores elsewhere in the town. The study recommends that new stores are located in new local centres to serve the new neighbourhoods to the north and west of Stevenage.

Draft policy 11: Neighbourhood Centres

- 1. The development will make provision for six neighbourhood centres at an early stage of each phase. They will be located in the following areas:**
 - a. Three in the neighbourhoods to the west of the A1(M);**
 - b. One in the northern neighbourhood; and**
 - c. Two in the north eastern neighbourhood.**

²⁶ Use Classes Order (2005)

²⁷ Stevenage Borough Retail Capacity Assessment, King Sturge, 2009

- 2. They will be located to ensure that the majority of local residents are within an 800m distance of facilities;**
- 3. They will need to be of a sufficient scale to meet the daily needs of local residents for convenience shopping and service provision. Each neighbourhood centre will incorporate the following elements:**
 - a. Retail floorspace (A1 to A5) – 3,000m² at Stevenage West;
- 3,000m² at North East Stevenage;
- 1,500m² at North Stevenage;**
 - b. A primary school and children’s centre;**
 - c. A community centre incorporating youth provision;**
 - d. A site for a dedicated place of worship (one to the north and one to the west);**
 - e. A private nursery (one to the north and one to the west);**
 - f. A police station;**
 - g. A neighbourhood recycling point (hardstanding and containers);**
 - h. Higher density residential units;**
 - J. Space for a mobile library, and or any other library facility that may be required;**
- 5. The neighbourhood centres will be of a high quality design, with landmark buildings and distinctive features to create a strong sense of identity. They will also include an element of public art, street furniture and landscaping;**
- 6. A health centre in the form of a polyclinic to be provided in the central neighbourhood West of the A1(M).**

11.18 Health

11.19 A significant proportion of respondents to the Key Issues and Options consultation wanted to see medical facilities located within the neighbourhood centres. This was the top rated feature required as outlined above. The Primary Care Trust (PCT) have carried out an analysis of the existing capacity

within Stevenage²⁸ and have concluded that two new polyclinics are required to serve the growing population to the north and west of the town. The requirement for the west is outlined in the policy above. In relation to the north, the PCT are planning to build a new polyclinic on the old Dixon's site at Cartwright Road. This is not within the SNAP area but would be within walking distance of many new residents within SNAP. This will serve the expanding population of this area.

11.20 Police

11.21 Hertfordshire Constabulary has indicated that anything in excess of 2,000 new dwellings would require a police station and that one would be required to the west and one to the north. However, given the potential layout between the north and north eastern areas a further facility may be required and discussions with the police authority will take place to determine this. Police stations can take the form of a neighbourhood station co-located with other facilities and would be of a small scale (approximately 150sq metres) or an intervention base (approximately 0.4ha of land required). The police authority has indicated that the latter is the preferred option for SNAP.

11.22 Fire and rescue

11.23 The extent of provision for a new fire station will need to be explored with the fire and rescue service when a more detailed layout of the proposed development is known. Fire and rescue stations should be located within a 10 minute call out attendance time as standard, therefore this should be fully considered when locating a new station. The planning permission for land west of Stevenage includes provision for a new fire station. However, provision should be considered in a holistic manner, which assesses the need both within the existing Stevenage urban area and the proposed new neighbourhoods and surrounding area.

11.24 Schools

11.25 There is no intention for the areas of new development to use existing village schools. Through SNAP, enough school places will be provided to serve the new neighbourhoods. Early indications by Hertfordshire County Council

²⁸ Planning for Growth, April 2009, Guildhouse UK Limited

suggest that the primary schools in the locality are at capacity and cannot accommodate any more children from the new development. In addition to the suggested that another one to two form entry (FE) primary school will be required to meet the needs of existing residents in the north east of Stevenage. Local schools at Great Ashby are already at capacity. Martins Wood School in Pin Green is also due to be expanded by a further FE. The County Council are currently carrying out a feasibility study of existing primary schools capacity adjacent to the SNAP area of Stevenage. The results of this will inform future versions of SNAP and whether or not we need to identify more land within SNAP to accommodate this additional capacity.

11.26 The sites for the new schools will need to be large enough to accommodate associated children's centres, nursery provision and out-of-school care. Each school site would need to be at least 2.5 hectares to be of a sufficient size to accommodate the facilities required by the County Council. In some instances there may be scope for these additional facilities to be incorporated into other community buildings, such as the community centre. In addition, the schools should be capable of providing community facilities within them, such as sports halls etc. This is known as dual use. However, this approach would need careful planning from the outset.

11.27 The positioning of the secondary school site West of the A1(M), which has been granted planning permission by the Secretary of State, may have to be reconsidered in the future. It is shown to be in a prominent position at the top of the Almshoe Plateau and would represent a significant visual feature in the landscape from the western side of the Langley Valley. The topography of the sloping site is also limited in terms of its design. Therefore, in the event that a further outline planning application is submitted, relocation to the core of the site would be more acceptable.

Draft policy 12: Schools

- 1. The development will make provision for seven primary schools. These will be located in the neighbourhood centres with the exception of one school in the north east to be located next to the secondary school. The development should provide up to:**

- a. **Two 2FE and one 3FE to the west of the A1(M); and**
 - b. **Three 3FE and one 2FE to the north and north east.**
2. **The primary schools will include provision for children’s centres, nursery care, early years day care (pre-school), and out-of-hours care. Alternatively, there may be scope for some of these facilities to be located within other buildings, subject to agreement with the two Councils;**
3. **The development will make provision for two secondary schools. The development should provide up to:**
 - a. **One 6FE to the west of the A1(M); and**
 - b. **One 8FE to the north east.**
3. **The secondary school west of the A1(M) will be re-located in the centre of the development in the event that a new outline planning application is submitted.**
4. **The schools will have additional community facilities within them (dual use) if required by service providers.**

11.28 Built Sports Facilities

11.29 North Herts District Council and Stevenage Borough Council are currently undertaking sports facilities strategies. This will inform us whether sports facilities are required within the north and north eastern part of the SNAP area. A study was already undertaken for the West of the A1(M) and it was agreed that a sports hall would be required. There will be a sports hall facility in association with the new secondary school within the north eastern part of SNAP; this will be available to members of the public at certain times.

Draft policy 13: Built Sports Facilities

- 1. A sports hall will be provided West of the A1(M). Elsewhere in SNAP, provision will be made.**

Future Provision and Flexibility

11.30 Reserve Sites and Strategic Reserve Fund

11.31 It is difficult to predict all future eventualities, particularly for large scale communities that will be developing over a number of years. Due to many changing variables, there may be examples of insufficient land available to deal with changes in circumstances. Therefore, the preferred option is to have an element of flexibility within the neighbourhood centres to deal with any unforeseen circumstances in the future. Without this preferred policy there could be new neighbourhoods built without the ability to adapt to future needs. An infrastructure fund will be established with funds sought from developers, which will contribute towards the costs of any additional infrastructure that may be required. This will allow for the build programme to adapt to local needs which may change in the future.

11.32 It is difficult to be exact with the calculations for the infrastructure fund, due to the uncertainties of what infrastructure may be required and when, over and above, those already outlined in this chapter. However, it is only reasonable that any unforeseen needs created by the development should not be a complete burden on tax payers, service providers and the public sector. Therefore, the development industry should help contribute towards this. The figures in the preferred policy have been kept low to acknowledge that likely costs cannot be predicted and that other funding sources would need to be explored.

Draft policy 14: Reserve Sites and a Strategic Reserve Fund

1. The development will be required to make provision for three reserved sites, each being 1 hectare, one to the west, north and north east. These are to be left undeveloped as managed open spaces until required;
2. A sum will be required from applicants in the form of planning obligations towards unforeseen infrastructure needs as outlined below:
 - a. 1 bed dwelling = £50
 - b. 2 bed dwelling = £75
 - c. 3 bed dwelling = £100
 - d. 4 + bed dwelling = £150

11.33 Specifications

11.34 Should developers be required to build community facilities such as schools and community centres, a specification will need to be agreed to ensure that they are built to an appropriate standard which meets the needs of the community. Without such a mechanism the buildings may not be fit for purpose.

Draft policy 15: Specifications and start-up costs for community buildings

1. In the event that a community building is required to be built by a developer, specifications including design and access will need to be agreed between the developer, local authorities and relevant service providers;
2. The developers to provide capital start-up costs for the provision of new facilities in the event that they are passed onto the local authority or other body to maintain.

11.35 Community Development

11.36 Pro-active community development will be a key element in ensuring the success of the new neighbourhoods, so that they are places in which people will want to live. The local authorities will seek to ensure that this happens from the outset, including pursuing all sources of funding for this. Community development may involve workers with skills to support residents in identifying and meeting their needs, welcoming material and information and support for community events and initiatives.

Draft policy 16: Community Development

- 1. Outline applications will need to be supported a programme for community development and how this will be achieved.**

11.37 Water Supply & Waste Water Drainage

11.38 The SNAP area lies within the operational boundaries of three water companies. Three Valleys Water is responsible for the supply of water to the whole area, whilst Anglian Water and Thames Water are responsible for drainage and sewerage. The operational boundary between Anglian Water and Thames Water runs through the SNAP area.

11.39 A Water Cycle Study was carried out for northern and eastern Hertfordshire with the involvement of the three water companies and the Environment Agency. The study showed that there are no issues regarding the supply of water to the additional dwellings proposed at SNAP and that engineering solutions to drain the waste water to treatment plants either in the Anglian or the Thames regions are not cost prohibitive.

11.40 All three companies are obliged under the Water Industry Act to carry out their relative functions and it is under this Act that they will also require financial contributions from developers towards the cost of any new or upgraded infrastructure that is needed.

11.41 Implementation/ Delivery

11.42 There is a requirement for SNAP to demonstrate that it is 'effective'. This means that the proposals must be deliverable, flexible and are able to be monitored. The development programmes (trajectories) below demonstrate the delivery/implementation sequence for the various elements of SNAP so that the targets of the East of England Plan are met.

11.43 The development programmes above are based on a number of assumptions in terms of the target dates already set at regional level and the resulting ambitious growth rates, together with assumptions of development within each Councils boundary. However, there needs to be an element of flexibility in the approach to delivery. Market conditions will play a strong part in delivery. Masterplans and phasing programmes will be required to be submitted with outline planning applications for each new neighbourhood, in order to determine a realistic delivery programme for the development. This will also ensure the appropriate timing for infrastructure is agreed with both the developers and service providers. Further detailed phasing plans will also be required with each phase of development to ensure flexibility.

Draft policy 17: Phasing

In accordance with Stevenage's Core Strategy Policy CS05, and North Herts emerging Core Strategy, we will ensure that infrastructure is phased appropriately to support development at SNAP. We will work with service providers to ensure that appropriate capacity is available to serve SNAP.

Our preferred option is to require applicants to:

- 1. Submit a phasing plan with each outline planning application:**
- 2. Submit a more detailed phasing plan alongside detailed masterplans.**

11.44 Planning permission for the west of the A1(M) included a general phasing plan. A condition is also attached requiring more detailed masterplans and phasing plans to be submitted for parcels of up to 500 dwellings, together with the

neighbourhood centres. The preferred option is to continue with this comprehensive approach to planning the new communities. An alternative option would be reliant on phasing within SNAP only. However, this would not maintain an element of flexibility and deal with any issues that may arise at a later date. The new communities may also become disjointed without appropriate phasing.

11.45 The delivery of facilities and infrastructure in SNAP is dependent on the order and timing of the various development parcels. Development of infrastructure will need to commence at an early stage to serve the residents of the new neighbourhoods and not harm existing facilities. This will need to be balanced against the viability of the infrastructure to be provided. The Infrastructure Delivery Schedule below sets out the required infrastructure to provide sustainable communities. More precise timing of delivery will be negotiated through trigger points in the planning obligations.

11.46 Infrastructure Delivery Schedule

11.47 This list is not exhaustive or definitive as there may be some unforeseen projects not identified in the table. These will be pursued if necessary. There may also be opportunities for the co-location of facilities where appropriate. In addition, whilst the principle for particular infrastructure has been established in this table, it is not possible to be absolutely certain on the detail of some projects, as they are reliant on the layout, phasing and detail of development. This may alter some of the requirements. The Councils will put in place formal arrangements for ensuring key infrastructure is delivered by the relevant bodies which will take into account more details when they are known. All potential funding mechanisms will be explored in addition to developer funding through planning obligations.

Description	Project	How will it be delivered?	Main Delivery Body	Timing
SCHOOLS				
	New secondary school to the west of Stevenage	To be secured through Section 106 agreement with developers.	Developers / HCC	Related to the build out period of the housing to the west of Stevenage.
	Relocation of Thomas Alleyne School to the north-east of Stevenage	BSF funding or planning obligations. Relocation of Thomas Alleyne School. Planning permission 09/01349/1CC.	HCC	2012/13 to 2015
	Three new primary schools to the west and four to the north/north east, incorporating children's centres	To be secured through Section 106 agreement with developers.	Developers / HCC	Related to the build out period of the housing in the new neighbourhoods.
HEALTH				
	Two new polyclinics, one	To be secured through Section	East and North Herts	Related to the build

SNAP

Preferred Options Document

Description	Project	How will it be delivered?	Main Delivery Body	Timing
	already secured within the administrative boundary of Stevenage at Martins Way in the north east. Another is required to the west of the A1(M)	106 agreement with developers. The health facility already secured at Martins Way will be funded by the PCT and negotiations are ongoing.	Primary Care Trust / LIFT / HCC / Private operator	out period of the housing.
TRANSPORT				
	Access to Stevenage West including new and improved vehicular and pedestrian accesses across the A1(M) at Meadway and Bessemer Drive	To be secured through Section 106 agreement with developers	Developers, HCC, Highways Agency.	Related to the build out period of the housing. This will be early on in the build programme.
	New and improved public transport services to and within SNAP	Initial funding to establish services to be secured by planning obligations	HCC, Highways Agency & public transport operators	Related to the build out period of the housing.
	Northern relief road to serve the north and north eastern neighbourhoods.	To be secured through Section 106 agreement with developers. Stevenage Urban Transport Plan	Developers, HCC	Related to the build out period of the housing in this area.
GREEN INFRASTRUCTURE				
	Forster/Chesfield Country Park Strategic Open Space	To be secured through planning applications and legal agreement. Green Infrastructure Strategy. Management arrangements must be established to sustain this facility.	SBC/NHDC Herts and Middlesex Wildlife Trust	Related to the build out period of the housing in this area.
	Cemetery extension in northern Stevenage to address existing demand and future demand of SNAP, and a new cemetery	To be secured through planning applications/obligations.	SBC	Extension provision is already underway. Further extensions and

Description	Project	How will it be delivered?	Main Delivery Body	Timing
	west of the A1(M)			capacity provision will relate to the build out period of the housing within SNAP.
	Green infrastructure (including, but not limited to outdoor play, sports pitches, allotments, structural planting, greenways, public rights of way and environmental mitigation)	To be secured through planning applications and obligations.	Developer/NHDC/SBC/HCC	Related to the build out period of the housing.
DRAINAGE & WASTE WATER TREATMENT				
	Wastewater treatment	The Rye Meads Water Cycle Study has shown that it is technically possible to treat the waste water arising from the development up to 2021. Thames Water and Anglian Water are discussing precise solutions to be adopted with the Environment Agency. Some funding will be from developer contributions.	Thames Water & Anglian Water and the Environment Agency	Related to the build out period of the housing.
	Sustainable Urban Drainage Systems (SUDS) to control and contain surface water run-off	To be secured through planning application/obligations	Developer in consultation with the Environment Agency	Related to the build out period of the housing.

SNAP

Preferred Options Document

Description	Project	How will it be delivered?	Main Delivery Body	Timing
ELECTRICITY/GAS & ENERGY				
	A maximum of 2 primary electricity substations and reinforcements.	Part funded by the developer and part funded by EDF energy. Current reinforcements to provide additional capacity at Wymondley Grid funded by EDF energy.	EDF Energy	Related to the build out period of the housing.
	Connection to a medium pressure gas pipeline at Corey's Mill Lane and/or relaying of an existing pipeline to the West of the A1(M)	Programme in relation to the planning application/developer contributions	British Gas Transco	Related to the build out period of the housing.
	A combined heat and power (CHP) plant in the north.	Planning Obligations.	CHP company	Related to the build out period of the housing.
RECYCLING				
	Household waste and recycling facilities	To be secured through planning application/ obligations.	NHDC/SBC	Related to the build out period of the housing.
	Green Waste Composting site West of the A1(M).	To be secured through planning application/obligation	Developer &/or private operator/HCC	Related to the build out period of the housing.
COMMUNITY FACILITIES				
	Community centres within each neighbourhood	To be secured through planning application/planning obligations. Community Halls Strategy which is currently being undertaken.	Developers/NHDC/SBC	Related to the build out period of the housing.
	Library facilities (mobile library	To be secured through planning	Developers/SBC/HCC	Related to the build

SNAP

Preferred Options Document

Description	Project	How will it be delivered?	Main Delivery Body	Timing
	facilities and/or possible expansion or provision of new library in Stevenage or provision of onsite facilities).	application/obligations, Libraries Implementation Plan		out period of the housing.
	Sports hall(s) and pavilions	To be secured through planning application/obligations	Developers &/or HCC/NHDC/SBC	Related to the build out period of the housing.
	Adult care/special needs	To be secured through planning application/obligations	Developer & or HCC	Related to the build out period of the housing.
	Private day nurseries. One to the west and one to the north/north east	To be secured through planning application/obligations	Private operator	Related to the build out period of the housing.
	Indoor youth facilities	To be secured through planning application/obligations	Developers &/or HCC	Related to the build out period of the housing.
	Ambulance facilities	To be secured through planning application/obligations	Developers & Ambulance authority	Related to the build out period of the housing.
	Places of worship. One to west and one to north/north east	To be secured through planning application/obligation	Developers &/or private operator	Related to the build out period of the housing.
	Neighbourhood centres - convenience and service facilities	To be secured through planning application/ obligation	Developers &/or private operator	Related to the build out period of the housing.
	Main food retail store(s)	To be secured through planning application/obligation	Developer &/or private operator	Related to the build out period of the housing.
	Built police facility. One to the west and one to the north/north east.	To be secured through planning application/obligation	Herts Constabulary	Related to the build out period of the housing.

SNAP

Preferred Options Document

Description	Project	How will it be delivered?	Main Delivery Body	Timing
	Fire and Rescue. The extent of which to be confirmed with the Fire and Rescue Service.	To be secured through planning application/obligation	HCC	Related to the build out period of the housing.
	Social infrastructure (Start up capital costs and temporary costs for the provision of infrastructure and services)	To be secured through planning obligations and explore other means of funding by the Council's.	Developers/HCC/NHDC/SB C	Related to the build out period of the housing.

11.48 Delivery Mechanisms

11.49 SNAP has been prepared in consultation with a variety of service providers and stakeholders. It is a joint plan between Stevenage Borough Council and North Herts District Council. This joint working will continue to follow through with the delivery and implementation of the development and infrastructure. We commissioned consultants to advise on options for future delivery arrangements to ensure that SNAP is implemented effectively. We will consider this advice and develop a robust mechanism that will ensure a holistic and focused approach to the delivery of development in the SNAP area.

11.50 Risk and Contingency

11.51 The paragraphs above seek to ensure that mechanisms are in place to allow for flexibility in delivery. However, there is a risk that development proposals may fall behind, due to reasons beyond the control of the local authorities. For example, the fragility of the housing and employment market is likely to result in possible housing and employment target shortfalls. This will require an element of high level contingency planning and an action programme developed by the partnership arrangements/delivery mechanism put in place as outlined above. This may involve developing initiatives with other organisations and promoting activity from affordable housing providers.

11.52 In addition, the Councils will need to promote infrastructure funding from a variety of sources such as developer contributions and public and private sector initiatives; and ensure planning procedures are dealt with in an efficient and timely manner. Both of the Councils Core Strategies have a Planning Obligations / Developer Requirements policy that the development would need to accord with. These are not intended to be repeated within SNAP.

11.53 The Strategic Housing Land Availability Assessment (SHLAA) has shown that there are some areas of land within the North Eastern part of the SNAP which may not be immediately deliverable due to land ownership issues. Alternative locations were considered, but not found to be acceptable for planning and sustainability reasons. Further discussions will take place with the landowners. However, because this land lies within North Herts boundary, North Herts

District Council may need to use its powers to compulsorily purchase the land to ensure SNAP will be delivered.

11.54 Monitoring

11.55 Planning authorities are required to produce an Annual Monitoring Report (AMR) every year. This will be the main mechanism for assessing the performance and effectiveness of SNAP. It will track progress on the extent to which the vision, objectives and policies within this development plan document are being successfully implemented.

11.56 Should the AMR reveal any significant failures in meeting targets, action to rectify these will be taken. This will include reviewing some of the policies within SNAP or if necessary the whole action plan.

Appendices

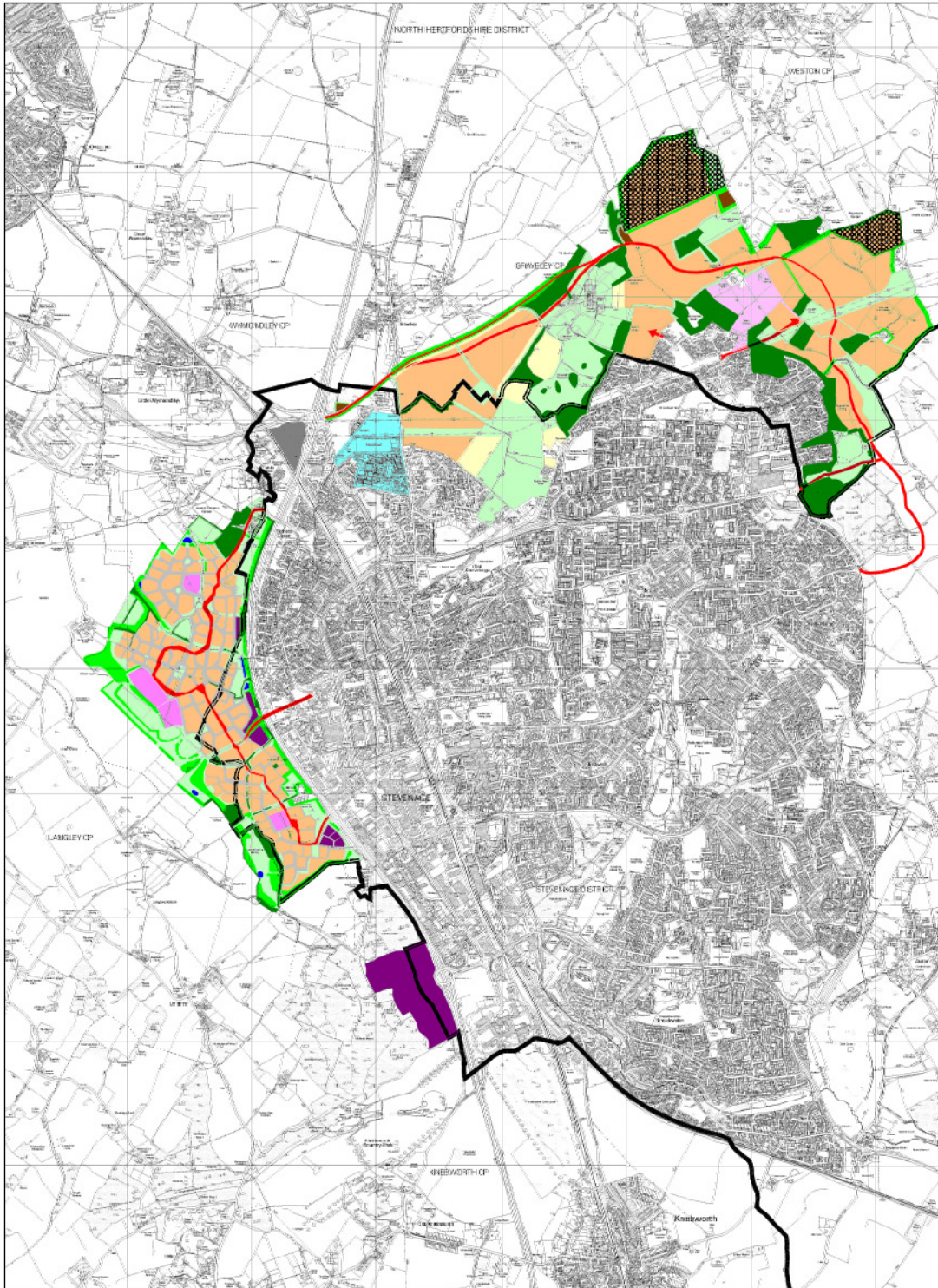
Appendix 1

Emerging masterplans

Stevenage and North Hertfordshire Action Plan

- Employment
- Housing
- Open space
- Road
- Road (minor)
- School
- Water
- Woods (existing)
- Woods (proposed)

⊞ Reserve area



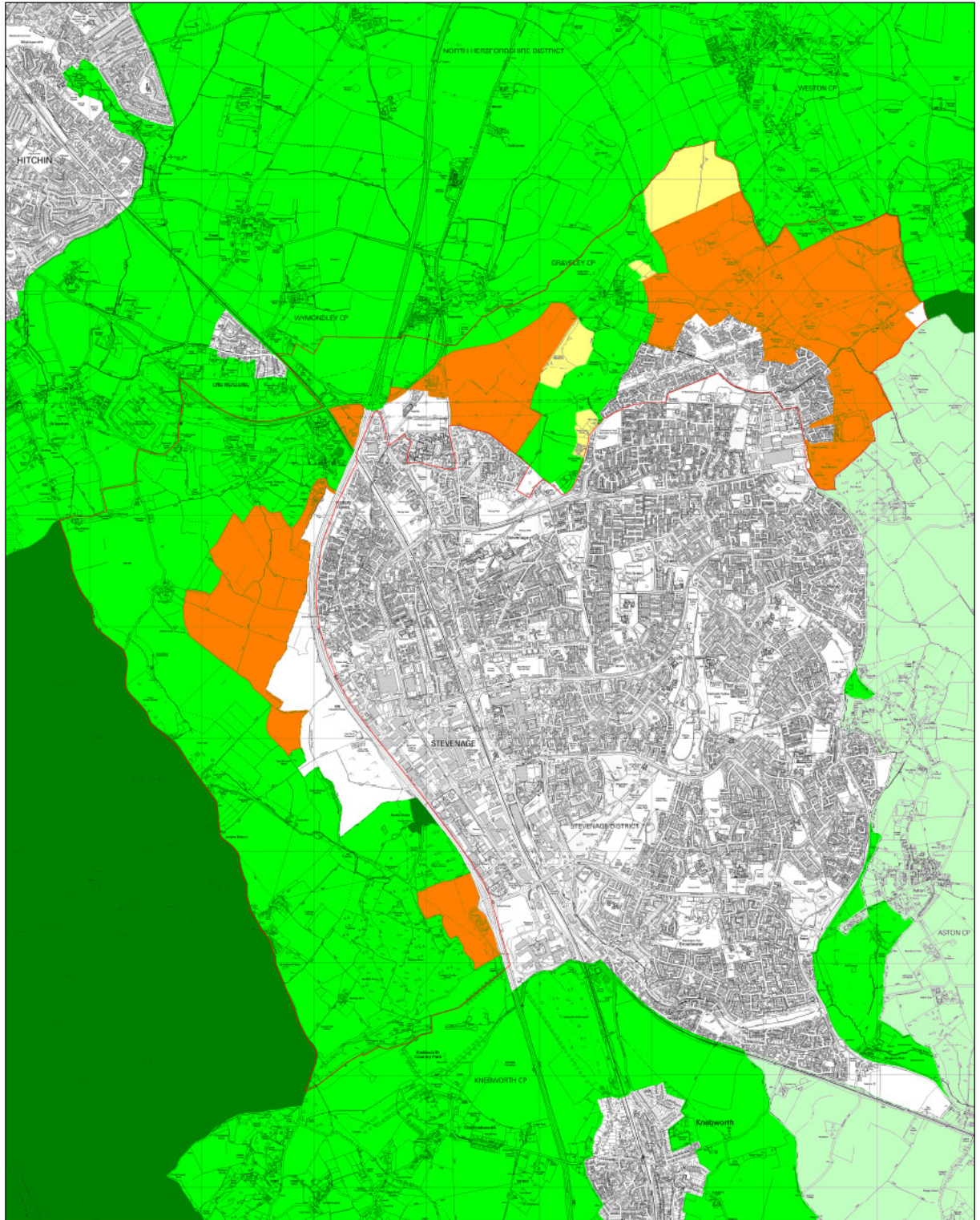
Scale: 1:10,000
Date: 18 May 2010

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Appendix 2

Stevenage and North Hertfordshire Action Plan
Green Belt Review

- Add to green belt
- Adjoining districts
- Existing green belt (i.e. no change)
- Remove from green belt
- Debatable



Scale: 1:30000
Date: 3 Mar 2010

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Appendix 3

Glossary

The following is a glossary of words used in the Stevenage and North Hertfordshire Action Plan. You may find these useful to help understand some of the terms and names used in this and other planning documents. The symbol ⓘ means that a definition is available in the glossary.

Acronym: An acronym is a shortened form of a longer word or title. For example East of England Regional Assembly becomes EERA and Local Development Framework becomes LDF.

Affordable housing: This is housing provided to people whose needs are not met by the market. The council's precise definition is "*housing provided with subsidy, both for rent and low cost market housing, for people who are unable to resolve their housing requirements in the local private sector housing market because of the relationship between housing costs and incomes.*"

Annual Monitoring Report (AMR): This measures how the council is progressing with the timetable set out in its LDS. It also assesses the effectiveness of the various policies contained in the other Local Development Documents and monitors key indicators, such as house building, employment land take-up, etc. This is a statutory document.

Area Action Plan (AAP): These provide the planning framework for areas where significant change or conservation is needed or anticipated. These plans will have Ordnance Survey based maps, which will act as insets to the main proposals map. These are voluntary Development Plan Documents that, if written, are statutory documents. The Stevenage and North Hertfordshire Action Plan is an Area Action Plan.

Biodiversity: The variety of life in all its forms.

Brownfield (previously developed) land: Land previously developed for another purpose and occupied by a permanent structure and associated fixed surface infrastructure. Term is commonly used in connection with urban capacity studies (ⓘ) where Government states that brownfield development shall take precedence over

greenfield development (①). A full definition of what constitutes brownfield land can be found in Annex C to PPG3.

Communities England: The future name for the Government's national regeneration agency which is currently called English Partnerships (①).

Conformity: Government requires that the Core Strategy (①) of each LDF (①) be in conformity with the RSS and that every other DPD (①) in the LDF should be in conformity with the Core Strategy. In the case of the Core Strategy's conformity with the RSS, the test is of "general conformity" which means where an inconsistency or omission from the DPD would cause significant harm to the implementation of the RSS. The issue of conformity is tested at the submission stage (①) of the DPD.

Conservation Area: Any area that meets the standards for designation can be designated by a local authority as a Conservation Area. Conservation Areas are areas of special architectural or historical interest, the character of which it is desirable to preserve and enhance.

Core Strategy: The DPD (①) that sets out the key elements of the planning framework for the area of the Local Planning Authority (①). It comprises a spatial (①) vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery. Once adopted all of the other DPDs must be in conformity (①) with it.

Development Plan Documents (DPD): These are the documents that must be taken into account in determining planning applications. Planning permission must be granted in accordance with these documents unless material considerations indicate otherwise. Development Plan Documents must be subjected to independent examination (①) before being adopted.

District Plan (SDP2R): See 'Local Plan'.

East of England Development Agency (EEDA): EEDA is the Government sponsored regional economic development agency for the East of England region. Charged with the responsibility of ensuring economic prosperity across the region, its wide-ranging remit includes economic development and social & physical

regeneration, business support, investment and competitiveness, skills and employment, sustainable development and high-quality environment and creating a public profile for the region. EEDA promotes the benefits of investing in the East of England and acts as a powerful lobbying and influencing voice. It also brings together the work of partners and businesses at a regional level, enabling the spread of best practice.

East of England Plan (EoEP): See Regional Spatial Strategy.

East of England Regional Assembly (EERA): EERA is the Government sponsored voluntary regional chamber charged as the Regional Planning Body responsible for producing the Regional Spatial Strategy (①). EERA comprises representatives of all 54 county, unitary and district/borough councils in the region (the counties of Hertfordshire, Bedfordshire, Cambridgeshire, Essex, Norfolk and Suffolk) together with a wide range of other public and private sector stakeholders. For further information about EERA's composition and constitution visit: www.eera.gov.uk.

English Partnerships (EP): The Government's national regeneration agency. Responsible for securing major regeneration schemes across England, either on their own or in public and/or private sector partnerships. Stevenage West features among the agency's top national priorities.

Examination: All DPDs (and the SCI) must be submitted to Government for independent examination, whether or not any representations are received, as the purpose of the examination is to consider whether a DPD is sound (①). An inspector will be appointed by Government to conduct the examination, who will consider all of the written representations made (which may be supplemented through oral evidence presented to the inspector). The presumption will be that a DPD is sound unless it is shown to be otherwise as a result of evidence considered at the examination. Further information on examinations of DPDs can be found in Annex D of PPS12.

FAQs: Frequently Asked Questions i.e. the most useful information for readers.

Government (role of, in development plans): The role of the Government in local planning is to establish the national legislative and statutory framework within which Local Planning Authorities (cf) work, to set out national policy and guidance, to

require local authorities to produce various documents (such as the LDS, DPDs, the AMR, etc), to monitor performance against nationally-set targets (Best Value indicators), to provide guidance, comment and encouragement, to set the regional planning framework (through the RSS), to intervene (if necessary) and to stop plans that are unsatisfactory. Government is, arguably, the principal customer of the development planning system.

Green Belt: Although widely held by the press and public to be any open countryside area outside towns, Green Belts are – in fact – not widespread across the UK, although almost all major UK cities and conurbations now have Green Belts surrounding them. A Green Belt is a planning designation designed to prevent urban sprawl and coalescence between towns, cities and villages. The most important attribute of any Green Belt is its openness. There are five purposes set out by Government for designating Green Belts and, once designated, the land contained within them has a positive role to play in meeting six objectives. For more details on Green Belts see PPG2.

Green field development: Any development on a piece of land upon which there has not been any previous development (i.e. the opposite of brownfield land (①)). In contexts where the countryside (which is inherently greenfield) is also designated as Green Belt, the two terms can become effectively the same thing.

Highways Authority: The county council are the Highway Authority for Hertfordshire. They are charged with the statutory responsibility of adopting, maintaining, designing, making safe and constructing all roads, footways and public rights of way other than trunk roads and motorways (which are looked after by the Government's Highways Agency).

Infrastructure: Infrastructure refers to all the items that support development such as roads, power lines, sewers, schools, health care centres, community buildings and many other things.

Key Issues stage of DPD: To inform the preferred options stage DPDs (cf) Authorities are required to consult with the community and stakeholders after, or whilst, they are creating their evidence base. At this early stage in the evolution of DPDs, ideas are not fully formed. Therefore, it is neither possible nor necessary to

consult on every issue that may influence the shape of the final plans. It is important to concentrate on the broad principles that shape policy choices. It is the broad choices at this stage that will help to inform and shape the selection of the more detailed policies at later stages. The next stage in the evolution of a DPD is preferred options stage (①).

Local Development Documents (LDD): These documents can be Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), both of which are used to guide development and by the council in the determination of planning applications. The Statement of Community Involvement (SCI) is also an LDD.

Local Development Framework (LDF): This statutory document, prepared by LPAs (①), comprises a number of different types of document - Local Development Scheme, Annual Monitoring Report, Statement of Community Involvement, Local Development Documents, Development Plan Documents and Supplementary Planning Documents.

Local Development Scheme (LDS): This document sets out which documents are part of the Local Development Framework and the timetable for their review and the preparation of new documents. It is essentially a programme management document (cf). This is a statutory document, although not a Local Development Document (LDD).

Local Plan: A document produced under the old planning system that set out all the council's policies on the development and change of use of land and buildings. Existing local plan will be automatically 'saved' for three years from their adoption. This means that its policies and provisions continue to have statutory force during that three years period. If the council wishes to save its local plan policies beyond this period it must seek the permission of the Government.

Local Planning Authority (LPA): A local authority charged by central Government with the statutory duty to prepare development plan documents and undertake other duties under the Town and Country Planning Acts (and other, ancillary legislation). District Councils, sometimes styled as Borough Councils, have planning powers for all development in their administrative areas with the exceptions of minerals and

waste. County Councils have planning powers for minerals and waste within their administrative areas. Unitary authorities (i.e. where there is no county council) have all the planning powers of both county and district councils within their own administrative areas. There are no unitary authorities in Hertfordshire.

Local Strategic Partnership (LSP): A local partnership of businesses, voluntary organisations, community groups and public organisations charged by central Government with the statutory duty to prepare a community strategy (①) for a particular locality.

National Land Use Database (NLUD): A statutory register compiled by Government, with the assistance of local authorities, of all derelict, vacant and underused (brownfield) land and buildings over 1 hectare in size.

Neighbourhood Centre: A neighbourhood centre is a collection of shops, often containing at least one supermarket or food store. It may also contain a range of non-retail services, such as banks or restaurants as well as local public facilities such as a library, surgery or community hall.

New neighbourhoods: A new neighbourhood is a sustainable option for providing additional housing after building on appropriate sites within urban areas. These neighbourhoods will be particularly appropriate where it is possible to utilise existing physical and social infrastructure and there is good access to public transport, jobs, schools, shopping and leisure facilities. Some planned new neighbourhoods can be so large that they make their own provision for the facilities listed above. Also known as urban extensions.

Planning Policy Guidance (PPGs): Old-style statements of Government planning policy and best practice produced prior to the 2004 Planning and Compulsory Purchase Act. PPGs are now being superseded by PPSs.

Planning Policy Statements (PPSs): Statements of Government planning policy produced since the 2004 Planning and Compulsory Purchase Act. PPSs are slowly superseding PPGs.

Preferred options plan: The preferred options stage is the third stage in the evolution of a DPD (following evidence gathering and key issues and alternative options stage consultation) and the second stage at which public consultation is statutorily carried out. Preferred options need to be presented clearly and in sufficient detail that meaningful consultation can be carried out. Detailed policy wording need not be defined at this stage. At this stage, for the first time, sustainability appraisal (①) and Strategic Environmental Assessment (①) are carried out. The next stage in the evolution of a DPD is the preparation of the submission stage plan (①).

Previously developed land: See 'brownfield land'.

Project/programme management: Project management is the discipline of defining and achieving targets while optimising the use of resources (time, money, people, materials, energy, space, etc...) over the course of a project. In contrast to on-going (or process-orientated) work, a project is a 'temporary endeavour undertaken to create a unique product or service'. The duration of the project – the time taken from its start to its completion – can take days, weeks, months or – in the case of each of the DPDs – years. Programme management provides a layer above project management. It is the process of managing a portfolio of multiple on-going inter-dependent projects. Programme management also reflects the emphasis on co-ordinating and prioritising resources across individual projects, departments and Authorities to ensure that competition for scarce and valuable resources is managed from an over-arching focus. The LDS (①) is a programme management tool.

Regional Spatial Strategy (RSS): This is the successor to both the non-statutory Regional Planning Guidance and to the statutory Structure Plan (①). It will set the strategic context for development across the region, including setting the level of new housing to be accommodated. The RSS for the east of England region is the East of England Plan, which was prepared by the East of England Regional Assembly (①). The Plan went through examination (cf) during late 2005/early 2006.

Renewable energy: Is energy derived from natural resources such as the sun, the wind, the tide and geothermal heat. It is the opposite of energy derived from non renewable resources such as coal, oil and gas.

Site of Special Scientific Interest (SSSI): Are the country's very best wildlife and geological sites. Their purpose is to preserve natural heritage and important wildlife sites for future generations. They support plants and animals that often find it difficult to survive in the wider countryside.

Soundness (tests of): There are nine prescribed sets of soundness established by Government which every DPD (①) must satisfy when it passes through examination (①). The nine tests of soundness fall into three categories – procedural, conformity and coherence/consistency/ effectiveness. The tests are set out in full in PPS12.

Spatial planning: The new remit for the town planning system since the 2004 Planning and Compulsory Purchase Act. Broader than land-use planning. LDFs should not just be concerned with the physical aspects of location and land use but also economic, social and environmental matters. The LDF (①) should include policies which can impact on land-use but which are not capable of being delivered solely or mainly through the grant of planning permission and which may, therefore, be implemented by other means.

Statement of Community Involvement (SCI): This sets out the Council's policy on involving the community in policy-making and major planning applications. It is a Local Development Document (①).

Strategic Environmental Assessment (SEA): Required under the terms of the European directive 2001/42/EC for "environmental assessment of certain plans and programmes, including those in the field of planning and land use". Undertaken in conjunction with the Sustainability Appraisal (cf).

Structure Plan: Document produced by Hertfordshire County Council under the old planning system (pre-2004) considering strategic issues. Now effectively superseded by Regional Spatial Strategy (①).

Submission plan: The version of a DPD (①) sent to the Government for independent examination in the final form that the preparing local authority prefers, with fully detailed policy wording and reasoned justification for those policies. There will be a second SEA and SA (①).

Supplementary Planning Documents (SPD): There is no legal requirement to take these documents into account in determining planning applications, so their nature is to provide guidance to applicants wishing to develop land. The community will be involved in their preparation, but there is no independent examination of the document.

Supplementary Planning Guidance (SPG): Same as SPD (①), but as produced under the old planning system, with fewer regulations governing their preparation.

Sustainability Appraisal (SA): An assessment of the impact the proposals contained within a Local Development Document would have on the environment, economy and society. SA is an iterative process; it should be used to improve the sustainability of subsequent versions of the document. It is to be carried out in conjunction with the Strategic Environmental Assessment (①).

Sustainable Community Strategy: Sustainable Community Strategies are the products of Local Strategic Partnerships (①). They are documents produced by a variety of partners to set out a shared vision for a locality (commonly a county or a district), designed to advance the social, economic and environmental well-being of the community.

Sustainable development: An over-arching concept that encompasses any form of development that allows the best of today's environment to be retained for the use of the future population. Sustainable development can also mean fostering types, forms and patterns of development that allow the aims of the concept to be met. One of the Government's key aims for the town planning process is that it should encourage sustainable development.

Typologies (open space): Typologies are sub-categories. Open spaces studies use a number of grouping or typologies of open space types to assist in both analysis and policy formulation.

Urban Capacity Study: A detailed search for brownfield land or buildings (①) that can act as a source of potential housing development that all Local Planning Authorities (①) are required by Government to undertake. A detailed methodology is set down as good practice by the Government.

Urban Characterisation study: An appraisal of an urban area designed to provide a framework for the conservation of the historic environment. Essentially a mapping study, an urban area is divided into zones exhibiting a distinct range of generic development character types.

Use Classes Order: A national planning tool that groups certain types of development together into similar classes of development. Changes of use within use classes (and sometimes between classes) do not require planning permission. There are currently 5 categories of A use classes (retail and similar uses); three categories of B type uses (associated with industry and offices); three categories of C type uses (residential type uses); and two types of D uses (non-residential institutions). Further details of the Use Classes Order are available on the CLG website.

Appendix 2:
Stevenage Borough Council: Local Plan policy extract



Stevenage Borough Local Plan 2011-2031

Publication draft - January 2016

9.15 Two access points already exist to serve the site, allowing movement under the A1(M) at Meadway and Bessemer Drive. The entrance to the site at Meadway will require enhancements to provide satisfactory vehicular access, but no additional access points will be required at this stage. The developer will need to work with the Highways Authority to ensure any improvements required to the road network are provided. A major new access point will be required to serve the wider, cross-boundary scheme. Land to facilitate this is safeguarded by Policy IT2.

9.16 The NPPF is clear that significant development should be focused in locations which are or can be made sustainable⁽⁸⁰⁾. Part of this means ensuring that the residents of new developments have access to appropriate local facilities. The location of the site, to the west of the A1(M), means that new facilities will be required to ensure that residents can meet their day-to-day needs. This will also ensure that these significant developments broadly reflect the ethos and planning principles that underpin the existing neighbourhoods of the town. Facilities will include a primary school (exact requirements to be confirmed by Hertfordshire County Council), a doctors surgery and local convenience retail provision.

9.17 New facilities which meet the general parameters for local or neighbourhood centres will be treated as such. New facilities which do not will be treated as local shops. Any applications for subsequent development or changes of use will be considered against the criteria of the relevant policy.

9.18 Sports facilities will also be required, in line with policy HC8. Our evidence identifies a need for an additional cricket pitch to be provided within the town towards the end of the plan period. It recommends Stevenage West as the preferred location for this provision to be made. A skate park / alternative youth facilities will also be required.

9.19 The site also encompasses an Area of Archaeological Significance. A full assessment will be required, and advice should be sought from Hertfordshire County Council.

9.20 Our SHMA identifies the need for more larger homes to balance out our housing mix. Due to its location on the edge of town, and adjacent to surrounding Green Belt / Greenfield land, our evidence⁽⁸¹⁾ identifies this site as being suitable for providing much-needed aspirational homes within the Borough. The study recommends around 5% aspirational homes are provided on our urban extension sites. This will ensure an appropriate level of provision, without flooding the market.

9.21 A small proportion of plots will be required to be made available for sale to people who want to build their own homes. This can be combined with the aspirational homes requirement, by reserving larger plots that meet both criteria.

Policy HO3: North of Stevenage

Land to the North of Stevenage, as defined by the proposals map, is allocated for the development of approximately 800 dwellings.

80 As set out in Paragraph 17 'Core Planning Principles'.

81 Aspirational Housing Research (SBC, 2010)

A Masterplan for the whole site will need to be submitted as part of an outline planning application. The Masterplan must be approved prior to the submission of detailed development proposals for the site.

Development proposals will be permitted where the following criteria are met:

- a. The applicant can demonstrate that development can be expanded beyond the Borough boundary, and fully integrated with a wider, cross-boundary scheme;
- b. Satisfactory vehicular access is provided. At least two access points to and from the site will be required, which link effectively into the existing road, cycleway and pedestrian networks;
- c. The scheme is designed to encourage the use of sustainable modes of transport;
- d. At least 5% aspirational homes are provided in line with Policy HO9;
- e. Plots to accommodate at least 1% new homes are made available for self-build purposes;
- f. At least 30% affordable housing is provided in line with policy HO7;
- g. Provision for supported or sheltered housing is made in line with Policy HO10;
- h. Local facilities to serve the community are incorporated, including a GP surgery;
- i. A primary school is provided in line with the most up-to-date evidence of need;
- j. A skate park or MUGA for children is provided on-site;
- k. A full archaeological assessment is undertaken;
- l. A full flood risk assessment is undertaken;
- m. The proposal seeks to preserve or enhance the conservation area, including the setting of adjacent listed buildings. The following mitigation measures should be incorporated;
 - i. As much of the requirement for aspirational homes (criteria d) as possible should be met on the part of the site that lies within the conservation area. Development within this area should also be heavily landscaped to reduce the visual impact of development;
 - ii. Existing hedgerows should be maintained and additional screening implemented to reduce the visual impact of the development;
 - iii. Tall buildings will not be permitted. Building heights will be a maximum of two storeys within the eastern part of the site;
 - iv. No vehicular access to the site will be permitted from the east of the site, across the open fields;
 - v. Existing Public Rights of Way are retained and designed into the development, where possible; and
 - vi. Building styles and layout to the east of the site should reflect the key features of the conservation area.
- n. The scheme incorporates a network of green infrastructure, with an emphasis on high quality landscaping within and around the development to reduce the impact of the development on the surrounding greenfield / Green Belt land; and
- o. An appropriate buffer around existing power lines is incorporated;

As part of any development proposal, we will the open space to the east of the boundary to be retained as such, either via a Legal Agreement or through the transfer of land to the Borough Council.

9.22 Land to the north of Stevenage, east of the B197 North Road, has been removed from the Green Belt to enable the development of around 800 new homes. The large, relatively unconstrained site offers the opportunity to create an urban extension north of the existing urban area.

9.23 This site forms part of a wider potential development opportunity which stretches beyond the Borough boundary. North Hertfordshire have consulted on delivering a further 1,000 homes to the north of Stevenage. Any prospective developer should liaise with North Hertfordshire and adjacent landowners / developers to ensure that proposals on this site can be fully integrated with a wider scheme in the future. The approval of a Masterplan will be required prior to the submission of detailed development proposals for the site.

9.24 There is currently no vehicular access to the site. The primary access route can be taken from North Road. An additional access point is likely to be required. The developer will need to work with the Highways Authority to ensure any required improvements to the road network are undertaken.

9.25 As with Stevenage West, the location of the site, on the edge of the town, means that new facilities will be required to ensure that residents can meet their day-to-day needs. This will also ensure that these significant developments broadly reflect the ethos and planning principles that underpin the existing neighbourhoods of the town. Facilities will include a primary school (exact requirement to be confirmed by Hertfordshire County Council), a doctors surgery and local convenience retail provision.

9.26 New facilities which meet the general parameters for local or neighbourhood centres will be treated as such. New facilities which do not will be treated as local shops. Any applications for subsequent development or changes of use will be considered against the criteria of the relevant policy.

9.27 Sports facilities will also be required, in line with policy HC8. Our evidence identifies a need for a skate park / alternative youth facilities to be provided on site.

9.28 Our evidence⁽⁸²⁾ identifies the need for more larger homes to balance out our housing mix. Due to its edge of town location, and its proximity to surrounding Green Belt / Greenfield land, our evidence⁽⁸³⁾ identifies this site as being suitable for providing much-needed aspirational homes within the Borough. The study recommends around 5% aspirational homes are provided on our urban extension sites. This will ensure an appropriate level of provision, without flooding the market.

9.29 A small proportion of plots will be required to be made available for sale to people who want to build their own homes. This can be combined with the aspirational homes requirement, by reserving larger plots that meet both criteria.

82 Strategic Housing Market Assessment (SBC, 2015)

83 Aspirational Housing Research (SBC, 2010)

9.30 The site lies partly within the St. Nicholas and Rectory Lane Conservation Area. Our evidence⁽⁸⁴⁾ shows that the development of this area will have some degree of impact on the character and appearance of the conservation. However, this will not be significant, and will be outweighed by the social and economic benefits that would be provided by the development of the land for residential use. A number of mitigation measures are identified that should help to minimise any negative aspects of development.

9.31 In particular, it recommends that larger, aspirational homes are provided within the part of the site that lies within the Conservation Area, and that these are heavily landscaped to enable more effective transition from the new housing to the adjacent open spaces. Existing screening is currently provided by the hedgerow, but this could be increased to make it more effective. This has worked successfully for the adjacent development of Chancellors Road, which also directly adjoins the conservation area. Building styles, massing and layout will require careful consideration.

9.32 The site is also adjacent to an Area of Archaeological Significance. A full archeological assessment will be required and guidance should be sought from Hertfordshire County Council.

9.33 In accordance with our Open Space Strategy, and the findings of the Heritage Assessment, we will seek to protect the openness of the countryside closest to St. Nicholas Church and within Rectory Lane Conservation Area, known locally as Forster Country. The protection will recognise the literary connection of the land to E.M. Forster and Rooks Nest House⁽⁸⁵⁾. As part of any development proposal, we will require the remaining open space to be retained as such, either via a Legal Agreement or through the transfer of land to the Borough Council. This will be as part of / in lieu of on-site open space provision. Policy NH8 supports proposals which aim to enhance this site and to create a country park.

9.34 Pylons and overhead power cables run east/west through the centre of the site. Development will need to be carefully planned to ensure that a suitable buffer is provided. National guidance will be used to assess the minimum width requirements.

Policy HO4: South East of Stevenage

Land to the South East of Stevenage, as defined by the proposals map, is allocated for the development of approximately 550 dwellings. The site will be developed as two separate parcels:

- North of the A602 (150 dwellings)
- South of the A602 (400 dwellings)

Development proposals will be permitted where the following criteria are met:

- a. Satisfactory vehicular access to both sites is provided from a single point of access off the A602, in line with Highways Authority requirements;
- b. The schemes are designed to encourage the use of sustainable modes of transport;

84 Heritage Impact Assessment - North Stevenage (SBC, 2015)

85 Open Space Strategy (SBC, 2015)



Stevenage Borough Local Plan Proposed Main Modifications

Mod Ref	Page	Policy / Paragraph no.	Main Modification
MM57	108/111	Policy HO3	<p>.....</p> <p>f. <u>At least 30% affordable housing is provided in line with policy HO7;</u></p> <p>.....</p> <p>h. Local facilities to serve the community are incorporated, including a GP surgery, <u>subject to demand;</u></p> <p>.....</p> <p>v. Existing Public Rights of Way are retained and designed into the development, where possible, <u>and diverted where necessary;</u> and</p> <p>vi. Building styles and layout <u>within the conservation area to the east of the site should reflect the key features of the conservation area.</u></p> <p>.....</p> <p>p. <u>Electric car charging points are provided at an easily accessible location within the site.</u>.....</p>

Table MM57

Mod Ref	Page	Policy / Paragraph no.	Main Modification
MM58	111	9.24	<p>There is currently no vehicular access to the site. The primary access route can be taken from North Road. An additional access point is likely to be required <u>for phases of development beyond 300 units (or equivalent traffic generating uses).</u> The developer will need to work with the Highways Authority to ensure any required improvements to the road network are undertaken.</p>

Table MM58

Mod Ref	Page	Policy / Paragraph no.	Main Modification
MM59	111	9.29	<p><u>Add to end of para 9.29</u>.....</p>

			<u>If self-build plots are not taken up by the public after being marketed for at least two years, we will allow these to revert to conventional build plots.</u>
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Table MM59

Mod Ref	Page	Policy / Paragraph no.	Main Modification
MM60	112-113	Policy HO4	<p>.....</p> <p>e. At least 30% affordable housing is provided in line with policy HO7;</p> <p>.....</p> <p>g. <u>The loss of sports facilities to the north of the A602 will need to be mitigated against;</u></p> <p>h. <u>Local facilities to serve the community are incorporated, including a GP surgery;</u></p> <p><u>Update all subsequent criteria numbering following the deletions above.</u></p> <p><u>Add the following text to the end of the Policy:</u></p> <p>n. <u>Electric car charging points are provided at an easily accessible location within the site.</u></p> <p><u>The following will also be required to be provided within the parcel south of A602, unless demonstrated that these facilities are more satisfactorily accommodated on the northern part of the site:</u></p> <p>i. <u>Local facilities to serve the community, including a GP surgery, subject to demand; and</u></p> <p>ii. <u>On-site sports facilities in line with Policy HC8, including, but not limited to, the provision of a MUGA or Skate Park for children.</u></p>

Table MM60

Mod Ref	Page	Policy / Paragraph no.	Main Modification
MM61	113	9.36 / 9.37	<p><u>Add new para after 9.36.....</u></p> <p><u>Applicants for planning permission will need to address the requirements of the Development Plan as a whole. In this instance, this will include the Herfordshire Minerals Plan which contains these sites within the Sand and Gravel Belt. Further advice can be obtained from either the Borough or County Councils on the practical implications of this designation</u></p>

Appendix 3:
Court of Appeal judgment: C1/2014/1517 & C1/2014/1530
[2015] EWCA Civ 10



Neutral Citation Number: [2015] EWCA Civ 10

Case No: C1/2014/1517 & C1/2014/1530

IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
ADMINISTRATIVE COURT

Mr Justice Green

[2014] EWHC 654 (Admin)

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 22/01/2015

Before :

LORD JUSTICE RICHARDS
LORD JUSTICE TOMLINSON

and

MR JUSTICE MITTING

Between :

The Queen on the application of
(1) Mrs Jean Timmins
(2) AW Lymn The Family Funeral Service Limited

Claimants/
Respondents

- and -

Gedling Borough Council

Defendant/
Appellant

- and -

Westerleigh Group Limited

Interested
Party/
Appellant

Richard Kimblin (instructed by **the Solicitor to Gedling Borough Council**) for **Gedling Borough Council**
Stephen Sauvain QC and John Hunter (instructed by **Hill Dickinson LLP**) for **Westerleigh Group Ltd**
Paul Brown QC (instructed by **Taylor & Emmett LLP** and **Clyde & Co LLP**) for the **Respondents**

Hearing date : 3 December 2014

Approved Judgment

Lord Justice Richards :

1. The main issue in this appeal is whether the creation of a cemetery is “inappropriate development” in the Green Belt, within the meaning of section 9 of the *National Planning Policy Framework* (“the NPPF”), with the consequence that planning permission should not be granted for it except in very special circumstances.
2. The issue arises in the following way. The second appellant, Westerleigh Group Limited (“Westerleigh”), made an application to the first appellant, Gedling Borough Council (“the Council”), for planning permission for the development of a crematorium and cemetery in an area of Green Belt known as the Lambley Dumbles, Nottinghamshire. The second respondent, AW Lymn The Family Funeral Service Limited (“Lymn”), made a competing application for the development of a crematorium, without an additional cemetery, in the same area. The first respondent, Mrs Jean Timmins, was an objector to both applications. The Council, acting through its Planning Committee, granted Westerleigh’s application and refused Lymn’s application. Mrs Timmins and Lymn brought judicial review proceedings to challenge the decision.
3. During the decision-making process and in the early stages of the judicial review proceedings, all concerned proceeded on the basis that the cemetery element of Westerleigh’s scheme was not inappropriate development in the Green Belt. In September 2013, however, in the light of the judgment of the Administrative Court in *Fordent Holdings Limited v Secretary of State for Communities and Local Government* [2013] EWHC 2844, to which I will return, the grounds of claim were amended to include a ground that the Council erred in treating the application for the cemetery element as not inappropriate development in the Green Belt.
4. The judicial review claims were heard by Green J who, in a judgment handed down on 11 March 2014, allowed the claims on the inappropriate development ground and quashed the decision: see [2014] EWHC 654 (Admin). He granted permission to appeal on the basis that the issue is one of real importance.
5. The Council and Westerleigh have both pursued appeals. Their various grounds of appeal raise the following broad issues: (1) is the creation of a cemetery inappropriate development? (2) if so, was there a material error in the Council’s treatment of the cemetery in Westerleigh’s application, such as to justify quashing the decision?

The meaning of “development”

6. When considering the policies on inappropriate development in the Green Belt, it is helpful to keep in mind that “development” has the same meaning in this context as in the Town and Country Planning Act 1990 (“the 1990 Act”). Section 55 of that Act provides in material part:

“55(1) Subject to the following provisions of this section, in this Act, except where the context otherwise requires, ‘development’ means the carrying out of building, engineering, mining or other operations in, over or under land, or the making of any material change in the use of any buildings or other land.”

In so far as Westerleigh's application related to a cemetery, the development for which permission was sought consisted in a *material change of use* of land, as distinct from the carrying out of building or other operations on land.

7. It should also be noted that "building" is defined by section 336 of the 1990 Act as including any structure or erection and any part of a building as so defined.

The present policy: the NPPF

8. Section 9 of the NPPF is headed "Protecting Green Belt land". It starts with some broad principles, in paragraphs 79-81:

"79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

9. After paragraphs relating to the establishment of new Green Belts and the defining of Green Belt boundaries in local plans, one gets to the key provisions relating to inappropriate development, at paragraphs 87-90:

"87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of

inappropriateness, and any other harm, is clearly outweighed by other considerations.

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction; and
- development brought forward under a Community Right to Build Order.”

The previous policy: PPG2

10. Section 9 of the NPPF replaced previous Government policy on the Green Belt, as set out in *Planning Policy Guidance 2: Green belts* (“PPG2”). A comparison between the two documents features large in the rival submissions in the present case.
11. PPG2 contained, in paragraphs 1.4-1.5, provisions broadly corresponding to those of paragraphs 79-80 of the NPPF concerning the fundamental aim of the Green Belt and the purposes it serves. Paragraphs 1.6-1.7 of PPG2 were similar to paragraph 81 of the NPPF, in that they referred to the positive role that Green Belts have to play in pursuing various objectives, including the provision of opportunities for outdoor sport and outdoor recreation near urban areas.
12. Paragraphs 3.1-3.2 of PPG2 contained the presumption against inappropriate development which is reflected in paragraphs 87-88 of the NPPF:

“3.1 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved, except in very special circumstances. See paragraphs 3.4, 3.8, 3.11 and 3.12 below as to development which is inappropriate.

3.2 Inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should not be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”

13. The last sentence of paragraph 3.1 cross-referred to paragraphs 3.4, 3.8, 3.11 and 3.12 for inappropriate development. There were some differences in the structure and detailed content of those provisions as compared with paragraphs 89-90 of the NPPF:

“New buildings

3.4 The construction of new buildings inside a Green Belt is inappropriate unless it is for the following purposes:

- agriculture and forestry ...
- essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it (see paragraph 3.5 below);
- limited extension, alteration or replacement of existing dwellings ...;

- limited infilling in existing villages ... and limited affordable housing for local community needs under development plan policies according with PPG3 ...;
- limited infilling or redevelopment of major existing developed sites identified in adopted local plans

3.5 Essential facilities (see second indent of paragraph 3.4) should be genuinely required for uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it. Possible examples of such facilities include small changing rooms or unobtrusive spectator accommodation for outdoor sport, or small stables for outdoor sport and outdoor recreation.

...

Re-use of buildings

...

3.8 The re-use of buildings inside a Green Belt is not inappropriate development providing:

- (a) it does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;
- (b) strict control is exercised over the extension of re-used buildings, and over any associated uses of land surrounding the building which might conflict with the openness of the Green Belt and the purposes of including land in it ...;
- (c) the buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction; and
- (d) the form, bulk and general design of the buildings are in keeping with their surroundings

...

Mining operations, and other development

3.11 Minerals can be worked only where they are found. Their extraction is a temporary activity. Mineral extraction need not be inappropriate development: it need not conflict with the purposes of including land in Green Belts

3.12 The statutory definition of development includes engineering and other operations, and the making of any material change in the use of land. The carrying out of such

operations and the making of any material changes in the use of land are inappropriate development unless they maintain openness and do not conflict with the purposes of including land in the Green Belt. (Advice on material changes in the use of buildings is given in paragraph 3.8 above).”

The basis of the Council’s decision to grant planning permission

14. The Council’s decisions on the competing planning applications were based on lengthy officers’ reports, comprising an introductory report and separate reports on the Lymn application and the Westerleigh application respectively. It is sufficient for present purposes to quote two passages.

15. The introductory report said this, under the heading “Very special circumstances and other legal issues”:

“Both applications are for inappropriate development in the Green Belt. It should be noted that even if an application contains elements that on their own would be appropriate development (such as a cemetery), the Courts have held that the whole of the development is still to be regarded as inappropriate [footnote reference to *Kemnal Manor Memorial Gardens Ltd v First Secretary of State* [2005] EWCA Civ 835].

Therefore in order to be granted planning permission, very special circumstances (VSC) have to be demonstrated which outweigh the general harm

The very special circumstances referred to by Westerleigh in its planning statement ... are, in summary:-

- The defined and over-riding need for a new crematorium to serve this part of Nottinghamshire including the benefits of reduction in travel.
- The provision of a further 3 acres of burial land which will relieve pressure on cemetery facilities throughout the District”

16. The report on the Westerleigh application included the following, under the heading “Green Belt considerations”:

“Development within the Green Belt is inappropriate, unless it is for one of the purposes identified in paragraph 89 of the NPPF or Policy ENV26 of the Replacement Local Plan (RLP).

Policy ENV26 of the RLP states that within the Green Belt planning permission will be granted for appropriate development including, amongst other things, cemeteries

This is reflected in paragraph 89 of the NPPF

...

As stated in the NPPF, where development is deemed inappropriate, the application will need to demonstrate that very special circumstances exist which outweigh the harm to the Green Belt and any other harm caused. Crematoria are inappropriate development and ‘very special circumstances’ need to be demonstrated

...

As such, it is considered that, given the very special circumstances that apply in this case, the proposed development would not unduly harm the openness of the Green Belt and consider that the proposal complies with Policy ENV26 of RLP and paragraphs 80, 87, 88 and 89 of the NPPF.

With regard to the proposed cemetery, the list of appropriate Green Belt uses within paragraph 89 of the NPPF and Policy ENV26 of the RLP includes cemeteries and, as such, this element of the proposal is acceptable in policy terms, if it were proposed on its own.

In my opinion, therefore, the proposed cemetery constitutes an appropriate form of development within the Green Belt and that, given the nature of the proposed use, its extent and the fact that it would be screened by existing and proposed hedgerows, it would preserve the openness of the Green Belt in this location and would not conflict with any of the purposes of including land within the Green Belt, in accordance with Policy ENV26 of the RLP and paragraphs 89 of the NPPF.”

The judgment of Green J

17. Green J held that the Council erred in interpreting paragraph 89 of the NPPF as treating cemeteries as appropriate development (provided they met the limited test contained in the paragraph). He said that paragraph 89 is concerned with the construction of new buildings and might, for example, address toilet facilities or a cafeteria or a car park which serves a cemetery but is not concerned with the cemetery itself, so that “the Defendant erred in treating the exception as applying to the cemetery as opposed to a new building which provided facilities to serve the cemetery” (paragraph 23 of his judgment).
18. He went on to say that that conclusion would not matter if upon a true construction of section 9 of the NPPF as a whole (as opposed to paragraph 89 specifically) cemeteries are not treated as exerting any adverse effect upon the Green Belt. For reasons given at paragraphs 25-32 of his judgment, he held that section 9 means that *any* development in the Green Belt is treated as *prima facie* inappropriate and can only be justified by reference to very special circumstances, save in the defined circumstances set out in paragraphs 89 and 90; and that the creation of a cemetery does not fall within one of the exceptions in paragraphs 89 and 90.

19. An important part of that reasoning, at paragraph 31 of the judgment, was that the proposed development constituted a material change of use from agricultural land to a cemetery. Had paragraph 3.12 of PPG2 applied, the development would have been considered appropriate in so far as it maintained openness and did not conflict with the purpose of including land in the Green Belt:

“However that paragraph has not been replicated in the NPPF. This, in my view, was intentional and reflects a deliberate shift in policy towards a tightening of the circumstances in which development could occur within the Green Belt.”

20. At paragraphs 33-40 the judge went on to consider the existing case-law, especially *Fordent* (see paragraph 3 above). That case concerned a proposed material change of use from agricultural use to use as a caravan and camping site (found to be a use for outdoor sport and recreation), together with the construction of a shop and other buildings. An inspector appointed by the Secretary of State found that this would be inappropriate development within the meaning of the NPPF, in particular that a material change of use did not fall within paragraph 89, which related only to the construction of buildings, and that the effect of paragraph 90 was that all material changes of use were by definition inappropriate development. His Honour Judge Pelling QC dismissed an application under section 288 of the Town and Country Planning Act 1990 to quash the inspector’s decision. He did not go as far as the inspector in relation to paragraph 90, holding that a change of use falling within one of the categories identified in that paragraph was in principle capable of being not inappropriate, though none of those categories applied to the proposal in question. But he agreed with the inspector that paragraph 89 related to the construction of buildings, not to material changes of use, and that development in the Green Belt was inappropriate unless it fell within one of the exceptions identified in paragraphs 89 and 90. Green J said that the conclusions he had arrived at in the present case were the same as those of Judge Pelling in *Fordent*. He also observed in passing that the submissions accepted in *Fordent* emanated from the Secretary of State for Communities and Local Government, whose policy document is of course in issue.
21. One other matter relating to case-law which Green J addressed, at paragraphs 41-45 of his judgment, arose out of the statement in the planning officers’ introductory report that both planning applications were for inappropriate development and that “even if an application contains elements that on their own would be appropriate development (such as a cemetery), the Courts have held that the whole of the development is still to be regarded as inappropriate”, with a footnote reference to the *Kemnal Manor* case (see paragraph 15 above). It was submitted to the judge that the direction given to the Planning Committee by the planning officer was that they were still required to consider the entirety of the development (crematorium and cemetery) as inappropriate and therefore apply the very special circumstances test. The judge rejected that submission for three reasons. First, it was inconsistent with the facts: there was no evidence that the very special circumstances test was applied to the cemetery part of the proposal; on the contrary, the documents showed clearly that the test was applied exclusively to the crematorium part. The second and third reasons run together: the point in the *Kemnal Manor* case, in particular per Keene LJ at paragraph 34, was that a development should not be regarded as appropriate development merely because part of it is appropriate; and the relevant paragraph of the officers’ report should be

read accordingly, as no more than an instruction to the Planning Committee that the inclusion of a cemetery (wrongly thought to be appropriate development) did not mean that the crematorium component of the proposal should likewise be treated as appropriate.

22. This led to the judge's conclusion, at paragraph 46, that the Planning Committee erred in acting on the officers' advice that a cemetery was appropriate use. In the following paragraph he noted that the first witness statement of the Principal Planning Officer stated, with commendable frankness, that if the judgment in *Fordent* had been available at the time of the report they would have gone on to consider whether very special circumstances justified the approval of the cemetery as inappropriate development.
23. At paragraphs 48-53 the judge found that the Council's error in treating the cemetery element of Westerleigh's application as appropriate development was a material error. The officers' report had identified the cemetery as one of the advantages of the Westerleigh application; the decision between the competing applications was extremely finely balanced, at least in relation to need; and the addition of a cemetery could have been the tipping point between them. To seek to overcome this problem, Westerleigh had entered into a section 106 obligation committing it not to take forward the cemetery element of the development for which permission had been granted. The judge held that this came far too late to affect the decision-making of the Planning Committee and could not therefore have any effect on the materiality of the Council's error, which had to be measured as at the date of the decision.

The first issue: whether the cemetery was inappropriate development on the proper interpretation of the NPPF

24. There is no dispute as to the correct general approach towards the interpretation of the NPPF. Policy statements of this kind should be interpreted objectively in accordance with the language used, read as always in its proper context, which is not to say that such statements should be construed as if they were statutory or contractual provisions (see per Lord Reed JSC in *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13, [2012] PTSR 83, at paragraphs 18-19). The NPPF is on the face of it a stand-alone document which should be interpreted within its own terms and is in certain respects more than a simple carry-across of the language in the guidance it replaced (see *Europa Oil and Gas Limited v Secretary of State for Communities and Local Government and Others* [2014] EWCA Civ 825, [2014] JPL 1259, in particular at paragraphs 15 and 32). But the previous guidance, in this case the guidance on Green Belt policy in PPG2, remains relevant. In *Secretary of State for Communities and Local Government and Others v Redhill Aerodrome Limited* [2014] EWCA Civ 1386 the Court of Appeal rejected a submission that "any other harm" in paragraph 88 of the NPPF had a narrower meaning than in paragraph 3.2 of PPG2, which would have made it less difficult than under PPG2 to establish the existence of very special circumstances justifying a development. In so doing, the court said this (per Sullivan LJ at paragraphs 16-17):

"16. If it had been the Government's intention to make such a significant change to Green Belt policy in the Framework one would have expected that there would have been a clear statement to that effect. Mr Katkowski accepts that there is no

such statement. In my judgment, all of the indications are to the contrary:

(i) While there have been some detailed changes to Green Belt policy in the Framework, protecting the Green Belt remains one of the Core planning principles, the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land open, the essential characteristics of Green Belts, and the five purposes that they serve, all remain unchanged. By contrast with paragraph 86 of the Framework, which does change the policy approach to the inclusion of villages within the Green Belt, paragraph 87 emphasises the continuation of previous Green Belt policy (in PPG2) in respect of inappropriate development: ‘As with previous Green Belt policy’.

(ii) The Impact Assessment in respect of the Framework published by the Department for Communities and Local Government in July 2012 said that ‘The government strongly supports the Green Belt and does not intend to change the central policy that inappropriate development in the Green Belt should not be allowed’. Under the sub-heading ‘Policy Changes’ the Impact Assessment said that ‘Core Green Belt protection will remain in place’. It then identified four proposed ‘minor changes to the detail of current policy’ which would resolve technical issues, but not harm the key purpose of the Green Belt, ‘as in all cases the test to preserve the openness and purposes of including land in the Green Belt will be maintained’. On the face of it, paragraphs 87 and 88 would appear to constitute ‘central policy’ which the Government did not intend to change.

(iii) That there was no intention to change this aspect of Green Belt policy is confirmed by the Inspector’s statement in paragraph 19 of her decision: that the *River Club* approach to ‘any other harm’ in the balancing exercise [i.e. the approach under PPG2] is reflected in decisions by the Secretary of State since the publication of the Framework. We were not referred to any decision in which a different approach has been taken to ‘any other harm’ since the publication of the Framework.

17. I readily accept that these indications are not conclusive. The Framework means what it says, and not what the Secretary of State would like it to mean However, if the Framework has effected this change in Green Belt policy it is clear that it has done so unintentionally. Mr Katkowski did not submit that there was any material difference between paragraphs 3.1 and 3.2 of PPG2 and paragraphs 87 and 88 of the Framework. He was right not to do so. The text of the policy has been reorganised ... but all of its essential characteristics ... remain the same”

25. Against that background, Mr Kimblin, on behalf of the Council, advances two alternative bases on which a material change of use of land to use as a cemetery is submitted to be not inappropriate development, within the meaning of section 9 of the NPPF, provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. The first basis is that the second bullet point of paragraph 89 (“provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries”) should be given a flexible interpretation and be read as covering not only the built structures but also the use that goes with them. The second is that paragraphs 89 and 90 are not to be read as closed lists, dealing respectively with new buildings and with other forms of development and treating all development in the Green Belt as inappropriate unless it falls within one of the exceptions in those paragraphs: other forms of development, including the long established category of use as a cemetery, may be appropriate provided that they preserve openness and do not conflict with Green Belt purposes. It is submitted that the policy of the former PPG2 with regard to inappropriate development has been carried over into the NPPF: there has been a process of condensation but the policy is unchanged (cf. the opening words of paragraph 87, “As with previous Green Belt policy ...”) and the provisions of the NPPF should be read accordingly. The published Impact Assessment, referred to in the passage quoted above from the *Redhill Aerodrome* case, does not identify any relevant change of policy. Further, Green J’s interpretation leads to absurdity. For example, on that interpretation a change of use of agricultural land in the Green Belt to use as a cricket pitch would be inappropriate development and would require very special circumstances to be shown, despite the fact that paragraph 81 obliges local planning authorities to provide opportunities for outdoor sport and recreation; yet the construction of a cricket pavilion for an existing cricket pitch would in principle be appropriate development and would not require very special circumstances to be shown.
26. Mr Sauvain QC, for Westerleigh, focuses in effect on the second of the bases advanced by Mr Kimblin, whilst adopting the first basis as an alternative. On his primary position, it was by reason of paragraph 3.12 of PPG2 (“... the making of any material changes in the use of land ...”) that a change of use of land to use for outdoor sport or recreation or to use as a cemetery was not inappropriate development; but this reflected a recognition that such uses are appropriate provided they preserve openness and do not conflict with Green Belt purposes, and this has carried through into the NPPF even though the NPPF contains no express equivalent of the relevant part of paragraph 3.12 of PPG2. On a fair reading of the NPPF, it does not contain an exhaustive list of appropriate and inappropriate development. Paragraphs 89 and 90 contain a series of exceptions based on various policy considerations but there is no express statement as to the limit of what is appropriate or what is inappropriate. No significance should be attached to the fact that the draftsman, in condensing what was formerly in PPG2, has omitted the part of former paragraph 3.12 that related to material changes of use as a general category. The Impact Assessment shows that no change to the former policy was intended in this respect; and if a change had been intended, one would have expected some mention of it in the opening words of paragraph 87 of the NPPF. There is no reason why development that does not impact on openness or on Green Belt purposes should be inappropriate. It accords with common sense that if a development meets all the requirements of Green Belt policy it should be regarded as “appropriate” in the ordinary sense of that word. In addition to those points, Mr Sauvain makes a number of detailed criticisms of the judge’s

reasoning, in particular at paragraphs 25-30 of his judgment, and submits that the judge was misled by his initial assumption at paragraph 25 that under the NPPF “any development in the Green Belt is treated as *prima facie* inappropriate”.

27. Mr Brown, appearing for both respondents (he acted for Mrs Timmins alone before the judge below), submits that the judgments of Green J in the present case and Judge Pelling in *Fordent* were correct. Paragraph 89 of the NPPF is concerned only with the construction of new buildings, which is to be regarded as inappropriate development unless one of the listed exceptions applies. It is plainly not intended to cover material changes of use and it is plainly a closed list. Paragraph 90 deals essentially with other forms of development, though they may also involve the construction of buildings and to that extent there is an overlap with paragraph 89. It covers some specific changes of use (notably in the fourth bullet point, “the re-use of buildings ...”) but does not include material changes of use as a general category. Again, it is plainly a closed list. The policy defines protection for the Green Belt by reference to the closed lists in paragraphs 89 and 90: if development is not within those lists, it is necessarily inappropriate. If it had been intended to lay down a general test that development is not inappropriate provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it, the policy would have said so. The open-ended interpretation advocated by the appellants would not give the Green Belt the protection that the policy intends. If a development falls within the scope of paragraph 81, relating to enhancement of the beneficial use of the Green Belt by means such as the provision of opportunities for outdoor sport and recreation, that will be highly relevant to the question of very special circumstances but does not mean that the development is to be regarded as appropriate.
28. Mr Brown submits that consideration of PPG2 supports, rather than undermines, the judge’s interpretation of the NPPF. The various matters covered in paragraphs 3.4 to 3.12 of PPG2 have been transposed in one way or another into paragraphs 89 and 90 of the NPPF, with the notable exception of the general provision in paragraph 3.12 concerning “any material changes in the use of land”. Whatever the reason may have been, that provision has been omitted. If the omission is due to an oversight, it is open to the Secretary of State to correct it. The decision in *Europa Oil* (paragraph 24 above) shows that it is possible for the NPPF to have made changes to previous policy that have not been heralded in the Impact Assessment. The situation is very different from that in *Redhill Aerodrome*, where the suggested change was to a core aspect of Green Belt policy and one would have expected a clear statement if such a change had been intended. In so far as it is relevant to consider the way the policy has been applied by the Secretary of State, as mentioned in the quoted passage from *Redhill Aerodrome*, Mr Brown makes the point that the conclusion reached by Green J in this case is the same as that reached by Judge Pelling in *Fordent*, upholding a decision of one of the Secretary of State’s inspectors which was successfully defended by the Secretary of State in the face of arguments that it would lead to absurd results. As to the absurdity arguments in the present case, Mr Brown submits that the occasional quirk may arise but that none of the examples given produces an absurd result or provides a good reason for giving the relevant paragraphs of the NPPF a meaning they cannot properly have. The fact that, given what is already on the ground, a particular form of development is treated as not inappropriate (for example, facilities for an existing use of land for outdoor sport or recreation, or the extension of an existing building), conveys no judgment as to the appropriateness or otherwise of what is

already on the ground; and it cannot be said, for example, that because facilities for an existing use are not inappropriate, a new use of the same description is not inappropriate.

29. I am satisfied that Mr Brown's submissions are correct and that Green J's conclusion on this issue should be upheld.
30. Mr Kimblin's first way of putting the case is plainly unsustainable. The second bullet point of paragraph 89 of the NPPF cannot be read as covering a material change of use of land to use as a cemetery. Paragraph 89, as its opening sentence makes clear, lays down a general rule that the construction of *new buildings* in the Green Belt is inappropriate development: "building" for this purpose has the wide meaning given by section 336 of the Town and Country Planning Act 1990 (see paragraph 7 above). The various bullet points are exceptions to that general rule and are therefore likewise concerned only with the construction of new buildings. Thus the second bullet point covers the construction of a building (for example, a café) as an appropriate facility for an existing cemetery, but it does not cover a material change in the use of land so as to create a new cemetery. To the extent that it is relevant to look back at the position under PPG2, there is no reason to believe that the equivalent provision (the second bullet point of paragraph 3.4) was to be read in any different way: any general understanding that a new cemetery fell to be treated under PPG2 as appropriate development was attributable to the "material change of use" provision in paragraph 3.12, not to the terms of paragraph 3.4.
31. I would also reject Mr Kimblin's alternative way of putting the case, and the primary basis on which the case is advanced by Mr Sauvain. The drafting of the NPPF could have been clearer but it seems to me that paragraphs 89 and 90 are properly to be read as closed lists. Paragraph 89 states the general rule that the construction of new buildings is inappropriate development and sets out the only exceptions to that general rule. Paragraph 90 sets out other forms of development (mineral extraction, engineering operations, etc) that are appropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. It is not stated expressly but is implicit that other forms of development apart from those listed in paragraph 90 are inappropriate. I do not think that the NPPF gives any scope to local planning authorities to treat development as appropriate if it does not fall within paragraph 89 or paragraph 90. In particular, there is no general test that development is appropriate provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt. Had such a general test been intended, in my view it would have been spelled out in express terms and would also have affected the way in which the specific exceptions were expressed.
32. I acknowledge that paragraph 81 of the NPPF, which places an obligation on local planning authorities to plan positively to enhance the beneficial use of the Green Belt by means such as the provision of opportunities for outdoor sport and recreation, gives a degree of support for a wider interpretation. It might be said, for example, to support the view that development in the form of a material change of use of land to use for outdoor sport or recreation is appropriate development, on the basis that it cannot have been intended to categorise as inappropriate a form of development that local planning authorities are required to promote. For my part, however, I consider that such an approach places too much weight on paragraph 81. The fact that a

development represents a use of land that local planning authorities are required to promote may help to establish the existence of very special circumstances justifying the development, but when considered in conjunction with paragraphs 89 and 90 it does not warrant treating the development as appropriate rather than inappropriate; it does not provide a satisfactory basis for reading paragraphs 89 and 90 otherwise than as closed lists of appropriate development. In any event paragraph 81 could not assist the appellants in the present case since the obligation it places on local planning authorities does not extend to the provision of cemeteries.

33. I do not accept that reference to PPG2 justifies a different interpretation. It is striking that paragraph 3.12 of PPG2 contained a general provision concerning material changes of use which is not to be found in the NPPF. It is impossible to say, however, whether the omission of such a provision from the NPPF was deliberate or unintentional (the absence of reference to it in the Impact Assessment is not conclusive); and even if it was unintentional, there is no proper basis for reading the provision into the NPPF. If there is a material omission, the right course is for the Secretary of State to amend the policy, not for the court to adopt a strained interpretation of the policy.
34. Nor do I accept that this interpretation of the NPPF leads to absurdity or to such anomalous consequences as to compel a different interpretation. Even if my preferred interpretation produces some odd results, that is not a sufficient reason for reading into the NPPF a general provision which is conspicuously absent from it, to the effect that any material change of use (or, on a more limited basis, any material change of use to use for sport or recreation, or to use as a cemetery) is appropriate development provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt.
35. Accordingly, I would reject the case advanced by each of the appellants in relation to the first main issue.

The second main issue: the materiality of the Council's erroneous interpretation of the NPPF

36. I have grouped under this heading the appellants' arguments relating to the materiality of the Council's erroneous view that a cemetery, of itself, is appropriate development.
37. First, it is submitted that the error in classifying the cemetery itself as appropriate development was rendered immaterial by the officers' direction, in accordance with which the Council acted, that the application as a whole was for inappropriate development and that very special circumstances therefore had to be demonstrated. This is the *Kemnal Manor* point. I have set out relevant passages from the officers' reports at paragraphs 14-16 above and have explained at paragraph 21 above the reasons given by the judge for rejecting it. In my view the judge was right to reject the point. The first of his reasons is sufficient to dispose of it: there is no evidence that the very special circumstances test was applied to the cemetery part of the proposal; on the contrary, the documents show that the test was applied exclusively to the crematorium part (a view which is further supported by the witness statement of the planning officer to which the judge refers: see paragraph 22 above). I do not think that one can discount the possibility, in relation to such a finely balanced

decision, that the application of the very special circumstances test to the cemetery element of the proposal might have made a difference to the decision.

38. I also agree more generally with the judge's reasons for concluding that the Council's error in treating the cemetery element of the application as appropriate development was material. The appellants have both sought to rely on the fact that Westerleigh subsequently entered into a section 106 agreement by which it undertook not to proceed with the cemetery element of the development. It is said that this rendered the point academic and/or provided a remedy, so that the judge ought to have declined to grant relief in the form of an order quashing the decision. In my view, however, the judge was plainly correct to hold that the section 106 agreement did not affect the materiality of the Council's error. Since it is possible that the error affected the decision to grant Westerleigh's application and to refuse Lymn's application, it was not remedied by Westerleigh undertaking to proceed with the crematorium element of its proposal alone. In any event, I am not persuaded that any proper basis has been established for interfering with the judge's exercise of discretion with regard to relief.

Conclusion

39. For the reasons I have given, I would dismiss both appeals.

Lord Justice Tomlinson :

40. I have read in draft the judgments prepared by Richards LJ and Mitting J. I agree with them that the appeals should be dismissed for the reasons upon which they agree. The only point of disagreement between them is on the question whether paragraph 90 of the NPPF should be regarded as a closed list. It is unnecessary to decide this point, as both are agreed that since the obligation cast upon local authorities by paragraph 81 of the NPPF does not extend to the provision of cemeteries, reliance upon that paragraph does not assist the appellants in their argument as to the proper construction of paragraph 90. Since in other circumstances the proper construction of paragraph 90 of the NPPF may be important or even potentially decisive, and since our own view expressed on this appeal will in any event not be a binding part of the ratio, I would prefer to reserve my view on the point until such time as it is necessary to decide it.

Mr Justice Mitting :

41. I gratefully adopt and agree with the summary of the background, statutory and policy material, and of facts and the parties' submissions set out in paragraphs 1–28 inclusive of Richards LJ's judgment. I also agree that this appeal should be dismissed for the reasons which he gives in paragraph 30, the last sentence in paragraph 32, paragraph 33 and paragraphs 36–38 of his judgment. I agree with him that because cemeteries are not included in paragraph 81 of the National Planning Policy Framework, it does not assist the appellants in construing paragraph 90. For that reason, even if my interpretation of paragraphs 81 and 90 read together were to be preferred to that of Richards LJ, it could not affect the outcome of this appeal. Nevertheless, because I take a different view from him on that issue of interpretation which may have an impact on other cases, I thought it right to set out my conclusion on it.

42. Even in a central government document giving planning guidance to local planning authorities it would be surprising to find two flatly opposed policies on the same topic set out within three pages of each other. Paragraph 81 imposes a positive obligation on local planning authorities to plan to enhance the beneficial use of the green belt in four ways:
- i) to look for opportunities to provide access;
 - ii) to provide opportunities for outdoor sport and recreation;
 - iii) to retain and enhance landscapes, visual amenity and biodiversity; and
 - iv) to improve damaged and derelict land. (My emphasis).

Fulfilment of these obligations will normally involve a change of use amounting to development for which planning consent is required. Commonplace examples will include putting land formerly in agricultural use to recreational use; the incorporation of damaged or derelict or agricultural land into a public or private park; and the conversion of a derelict quarry into a fishing or boating lake. It would be a misuse of language to describe such changes of use as amounting to, or occurring only in, “very special circumstances”. If, therefore, paragraph 90, like paragraph 89, contains a closed list of changes of use which are “not inappropriate” the only means by which local planning authorities can fulfil the obligations imposed upon them by paragraph 81 is to water down the stringent test set out in paragraph 88.

43. I do not think that, as a matter of language, paragraph 90 compels that conclusion. There is a significant difference in wording between the opening words of paragraphs 89 and 90. Paragraph 89 says in terms that a local planning authority “should regard the construction of new buildings as inappropriate in Green Belt”. It is obvious that the exceptions to that general proposition set out in the bullet points define – exclusively – what the exceptions are. By contrast, paragraph 90 does not begin with a general statement that local planning authority “should regard other forms of development as inappropriate in green belt”. If the draftsman had intended to create a closed list in paragraph 90, I can see no reason why he should not have adopted the same drafting technique as he did in paragraph 89. What he did was to choose a clumsy double negative to identify “other forms of development” – plainly including changes of use – which might be deemed appropriate. There is, in my view, no difference between the statement made by the double negative “certain other forms of development are also not inappropriate in Green Belt” and the same statement expressed positively, “certain other forms of development may be appropriate in Green Belt”. Given that the meaning of the statement is the same, whether it is expressed positively or by a double negative, I can see no reason for interpreting a policy expressed by a double negative more strictly than one expressed positively.
44. Thus interpreted, paragraphs 81 and 90 sit comfortably together; and the absurdity of a policy which would deem inappropriate the laying out of a cricket ground and the playing of cricket regularly on agricultural or derelict land but deems appropriate the construction of a cricket pavilion on the same land would be avoided. On a true construction of paragraphs 81 and 90, paragraph 90 must not be read so as to inhibit or discourage the fulfilment of the local planning authority’s positive obligations under paragraph 81.

Appendix 4:
Concept Masterplan



KEY

- Site Boundary
- Green Belt
- Secondary School Site - Phase 1
- Secondary School Site - Phase 2
- Care/Assisted Living & Aspirational Homes To be Removed from Green Belt
- Proposed Allocations

North Herts
Proposed
Allocation Site
(GA1)

Care/Assisted Living
& Aspirational Homes
Area (15.3 Ha)

Stevenage Proposed
Allocation Site
(NS1)

Secondary
School Site
Phase 2
4.40 Ha

Secondary School Site
Phase 1
12.44 Ha

Stevenage Proposed
Allocation Site
(HO3)

Proposed North
Stevenage
Country Park
(NH8)



North Stevenage
Land off Back Lane,
Stevenage

Concept Plan

Dwg. No. XX09/007