

Matter 17 Appendix 2A:

Report By Bob McQuillan, MRTPI MRICS, RTPI Chartered Town Planner.

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10th February, 2017

The Parish Clerk,
1 Ponside Cottages,
Graveley,
Hertfordshire SG4 7LG

Dear Mr Rigg,

Policy HO12: Gypsy and traveller provision

You have asked me to comment on Policy HO12: Gypsy and traveller provision in the publication version of the Stevenage Local Plan which I understand is at Examination in Public stage at present.

The policy reads: The following site is allocated for permanent gypsy and traveller accommodation: HO12/1 land north of Graveley Road.

I have confirmed that I am happy to do so.

For the record, I have over 40 years experience in town planning.

I retired in 2012 as the Chief Planner of the London Borough of Bromley. I have worked as a planning consultant since.

I have considerable experience of gypsy and traveller matters, in terms of plan preparation, determining planning applications and taking enforcement action, in both local government and as a consultant.

Paragraph 9.90 of the Local Plan sets out how the policy was developed. Reference is made to the national guidance on Planning Policy for Traveller Sites. This requires an evidence base of need.

In the case of Stevenage this was the Gypsy and Traveller Accommodation Study prepared for the Council by DCA in 2013. This indicates a very modest need with no unauthorised sites and no applications for private sites in the pipeline. The level of need identified did not suggest a need to look at sites in the Green Belt.

The Council undertook a site search in 2014. This was published in December 2014. The site at Graveley Road proposed in Policy HO12 was not identified as a suitable site in the site search.

In policy terms, it was rated as difficult.

"This greenfield site is located within the Green Belt in an area that is judged to make a significant contribution to Green Belt purposes." (page 47)

Two other sites were positively recommended as gypsy and traveller sites.

Neither is in the Green Belt.

The Green Belt Technical paper published in December 2015 contradicts the conclusion of the site search paper without any explanation. The site judged to "make a significant contribution to Green Belt purposes" is now suggested as capable of being released. The release "would not cause undue damage to the strategic role of the Green Belt."

The site was also considered in the Housing Technical Paper published in December 2015. This endorsed the conclusion of the Green Belt Technical paper.

I have looked at the advice in the National Planning Policy Framework on how decisions to alter Green Belt boundaries should be taken.

Paragraph 79 reads; "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."

Paragraph 80 reads; "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."

Paragraph 83 reads; "once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan."

Have the Council in its policy and justification identified any exceptional circumstances?

The answer must be no. If "circumstances" have been identified they are certainly not exceptional.

There is no need for the site to be released.

Other sites have been identified and are as available and likely to come forward as Graveley Road.

Paragraph 85 requires that plans should "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

The new boundaries of the Green Belt once the Graveley Road site is excluded would not satisfy paragraph 85.

My conclusion concurs with the conclusion of the Council's site search paper.

There is no need to consider the Graveley Road site and no exceptional circumstances to justify releasing it from the Green Belt.

Expediency is not an exceptional circumstance.

If you have any queries, do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bob McQuillan', with a stylized flourish at the end.

Bob McQuillan