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Dear Sirs,

In response to the Stevenage Borough Council Local Plan currently out for consultation Graveley Parish Council have the following comments.

**Policy SP7: High Quality Homes, paragraph 9.1**

**Not Justified:** The 7,600 option preferred by SBC is based on ONS projections, as are supporting CLG Housing figures. These projections are dependent on their underlying assumptions and very small changes in the criteria used can have a dramatic effect on the final numbers produced. They therefore need to be used with caution.

We do not consider it to be appropriate to meet Stevenage's on-going housing needs and economic regeneration overtime from green belt land and consider a housing figure of 5,300 rather than 7,600 to be more appropriate.

Redevelopment of Stevenage Town Centre is long overdue and is to be welcomed as are proposals to include some 3,000 homes within the proposed development. Given the scale the development proposed we are however concerned that this has put upward pressure on the required level of housing needed to be built on green belt to help finance the cost involved.

Between now and 2031 there may be an increase in sites offered by developers going forward and a more efficient use of proposed sites which should permit development of sufficient homes without recourse to development on green belt land.

SBC's preferred housing target of 7,600 homes will require building on the green belt land within the Borough Boundary, and if built to the north of Stevenage will impact on the rural villages of Graveley and Weston. Development north of Stevenage as presently envisaged by Stevenage and NHDC will result in an extension of Stevenage's urbanization to within 400 metres of Graveley's village boundary and Graveley's effective coalescence with Stevenage.

**Policy SP10: Green Belt : paragraphs 5.123 & 5.124**

**Inconsistent with national policy:** Use of Green Belt land to meet housing targets is only permitted in exceptional circumstance, Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.

As part of this consultation SBC is seeking approval to consult with its neighbouring authorities (NHDC and East Herts) to undertake a review of the current green belt to amend its boundaries to address not only current development needs but also for the period post 2031. We are strongly opposed to this proposal. Land proposed for release north of Stevenage (N4) and north-east of

Stevenage (N9) will result in an excessive level of development, much of which will have limited interaction with Stevenage itself other than being categorised as being part of the Stevenage urbanisation. Development in N9 will be closer to Baldock than Stevenage.

We believe that the current green belt boundaries to the North of Stevenage should remain in place and that they fully meet the five stated qualifying purposes as laid down in NPPF. Development of the green belt will diminish access of North Stevenage and Great Ashby residents to the countryside, including the area known as Forster Country (proposals to retain an element of this area as parkland are wholly inadequate), destroy productive arable land and result in the effective absorption of Graveley into the Stevenage urbanisation.

**Not justified** : We question the independent nature of the Green Belt Review carried out by AMEC and its conclusions, which are highly favourable to Stevenage. The company was employed by Stevenage and its conclusions clearly favour its employer. In its publicity AMEC states that it prides itself on obtaining planning permission on large projects for its clients. AMEC's findings are clearly subjective in nature rather than objective and are designed to facilitate the expansion of Stevenage by creating space for future development.

We consider the assertion made in point 2 of the Executive Summary, Background and Purpose of this Report on page v of the review detailed below to be fundamentally flawed.

“In defining the second purpose of “preventing neighbouring towns from merging into one another”, the NPPF is clearly referring to towns and other urban areas, as opposed to settlements generally. Thus villages and hamlets, which are often” washed over” by Green Belt, do not fall within this definition.””

We would contend that the intended purpose of the Green Belt is to restricted unwarranted or excessive development and this is reflected in the five stated purposes laid down in NPPF:

To check the unrestricted sprawl of large built-up areas

To prevent neighbouring towns from merging into one another

To assist in safeguarding the countryside from encroachment

To preserve the setting and special character of historic towns

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Clearly the second criteria leads on from the first, that is, to prevent the unrestricted sprawl of large built-up areas such as Stevenage and is qualified by the third in seeking to safeguard the countryside from encroachment by urban areas. Great Ashby is a perfect example of urban sprawl and encroachment. A significant part of the Great Ashby development was undertaken by NHDC to support the housing requirements of Stevenage. The fifth stated purpose also reinforces the first by supporting urban regeneration and encouraging better land use within existing urban boundaries.

Two areas of green belt suggested for release , North of Stevenage (N4) and North-East of Stevenage (N9) have been described as “making a contribution to the green belt” but we believe this categorisation to be incorrect and the importance of its contribution minimised to facilitate the release of green belt land to accommodate the future expansion of the Stevenage urbanisation.

Contrary to the conclusions of the AMEC Green Belt report, the green belt land between North Stevenage and Graveley strongly fulfils the five NPPF tests, providing a clear boundary to the further expansion of Stevenage Urbanisation. Graveley Village itself has been in existence for a thousand years and is mentioned in the Domesday Book. It is unacceptable that by the combined actions of SBC and NHDC, Graveley should be subjected to effective coalescence with Stevenage. The whole area is rural in nature with arable fields, woods, small country lanes and hedgerows.

**Not Effective:** The Green Belt strategy proposed in the Local Plan will overtime result in excessive development / urban sprawl. The AMEC report proposes sites to be Safeguarded for future development for 10,175 homes of which 6,675 would be to the north east of Great Ashby on NHDC (3,780) and East Herts (2,895) land, with land Safeguarded for a further 1,400 houses towards Chesfield.

Development, particularly to the north-east (N9), will be well removed from the town centre and main employment areas and railway station. As much of the proposed housing is likely to be to support inward migration from London it is reasonable to expect a significant element of these new residents to travel into London, increasing car usage, pollution and traffic congestion. This development would actually be closer to Baldock than Stevenage town centre.

In light of the significant expansion of recent years already undertaken at Great Ashby, we consider retention of green belt land identified as N4 and N9 to be vital in preventing further urban sprawl and encroachment of the countryside in the current period and beyond.

**New Town Option:** Reference is made in the Local Plan and supporting documents as to the possibility of the creation of a New Town to address future development needs but that such a project will take years to come to fruition and as such is not a solution for the present plan. Planners in both SBC and NHDC have been strongly resistant to a New Town solution, preferring development around the periphery of existing settlements for reason of cost (cheaper land) and more efficient use of services and infrastructure. They have also argued that the time such an undertaking would take 10-15 years, coupled with the legal requirement for a rolling five year supply of land for development during the period of the plan renders the proposal unworkable. Were such a development to be a stated Central Government priority we believe ways and means would be found to achieve this object in a much shorter timeframe.

In the interim Stevenage planners have identified sufficient land to create/build 5,300 homes without recourse to green belt, equivalent to 14.5 years (required build rate of 365 homes per year. Opinion Research Services; Stevenage and North Hertfordshire SHMA Update June 2015 point 3.91) which could all but bridge the time needed to get approval for a New Town development. As part of any “Approved Local Plan” we believe SBC needs to provide a firm and strong commitment to the development of a New Town Scheme in conjunction with other interested Local Authorities to relieve pressure on North Herts green belt and road infrastructure. Similar development issues certainly exist for NHDC and possibly South Cambridgeshire despite the impending development of North Stowe.

### **Policy HO3: North of Stevenage, paragraph 9.22**

**Inconsistent with national policy:** Use of green belt land to meet housing targets is only permitted in exceptional circumstance, Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Under current proposals in the Local Plans of Stevenage and NHDC, the new 1,800 home development will come within 400 metres of the Graveley Village boundary. This will result in its effective coalescence with Stevenage.

### **HO12/1 Land north of Graveley Road**

#### **Policy SP7: High Quality Homes, paragraph 5.83**

We strongly object to the location of a Travellers site in close proximity to Graveley Village and believe it to be inappropriate for the following reasons.

**The site is not deliverable:** We believe the land owner of this site is opposed to it being used to accommodate a Travellers site.

**Inconsistent with national policy:** As green belt the proposed development is an inappropriate use of the site. Pursuant to the NPPF guidance notes Paragraph: 034 Reference ID: 3-034-20141006 “

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.”

**No adequate justification for the site:** As noted in 5.83 of the Local Plan document, “*There is some uncertainty around the precise level of future requirements because of the small size of the existing community*” and therefore it is by no means certain that a requirement for an 11-16 pitch site will ever exist in the future. If further pitches are required to support the travelling community then they should be focused at Dyes Lane where additional land is available to accommodate the creation of a second separate site, which could address police concerns over the well-publicised tensions within the current residents at Dyes Lane. This would also have the advantage of restricting management and policing to one Local Authority rather than spreading it over two jurisdictions.

**The site would have a significant impact on Graveley Village :** Under Policy HO13: Gypsy and traveller provision on unallocated sites, point c, planning permission for accommodation for Gypsies and Travellers will only be granted where the proposal “Provides, or is capable of providing, an appropriate buffer between any adjacent uses to safeguard the amenity of both residents and the and neighbours.” Given the Village’s close proximity to the proposed site, Graveley is just a short five minute walk via Ashwell Common footpath, this would seem to conflict with Policy HO13 (c). It will also be in close proximity to the new proposed housing developments (SBC + NHDC) and the proposed new supermarket.

A Travellers site of this size would also have a significant adverse impact on Graveley Village School, particularly if the occupants of the site were to evidence a similar age profile, once full, to that at Dyes Lane where 23 of the 50 occupants were aged 1 to 10 when the survey of Future Traveller Requirements was undertaken. (Stevenage Borough Council Gypsy and Traveller Accommodation Study Final Report 2013 page 20).

#### **Policy SP5: Infrastructure, paragraph 5.47**

**Not Effective:** Proposed SMART road improvements scheduled to come into effect by 2021 between junctions 6 and 8 of the A1 (M) may reduce current peak traffic congestion on the A1 (M) thereby reducing some of the pressure on the B197. However it is doubtful that the A1(M) despite the SMART related changes will be able to cope with the increased traffic volumes associated with the development (22,000 houses) proposed by SBC and NHDC.

Proposals to address the congestion issue on the A1(M) have revolved around cost and funding not the adequacy of the proposed solution. Utilising the hard shoulder may be expedient at peak times but creates serious safety issues for road users when the hard shoulder is being used as a third lane

**Impact of Development on North- Herts secondary road network.** Development proposed by SBC’s and NHDC Local Plans, coupled with the resulting increased usage of the Lister Hospital will result in a significant increase traffic volumes, air and noise pollution and driver frustration. The B197 is a single lane carriage way constrained by the Village of Graveley and cannot be widened to accommodate any future increase in traffic volumes. At present the B197 is subject to heavy traffic at peak times through Graveley with traffic queuing back to Jack’s Hill and beyond. This has resulted in an increase in pollution in the village (noise and fumes) and increased driver frustration and aggressive driving.

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

The road junction of North Road and Graveley Road is presently subject to regular and frequent, often serious accidents. Because of its high accident rate Herts Highways is currently reviewing the road layout to improve road safety.

Congestion at this junction will also increase as a result of the new industrial site EC1/4 planned on land next to the present rugby club. The traffic from this site which will inevitably involve large vans, will travel to /from A1 (M) junction 8 via the North Road / Graveley Road junction, rather than towards the Lister with its problems of hospital parking on the public highways restricting road width /access and queuing traffic towards the Old town. This will not only further increase traffic volumes at the junction, possibly delaying emergency vehicles but also block the visibility of other traffic using the junction from on-coming traffic. Road safety is already a serious issue at this junction. Improved road design at the junction to support all the development being proposed by Stevenage and NHDC cannot adequately address the increased traffic volumes that will result due to limitations placed on the road by existing housing along North Road towards Stevenage.

**Policy SP9: Healthy Communities, paragraph 5.108**

**Policy HC3: The Health Campus, paragraph 11.20.**

**Not Effective:** As proposed the Local Plan will limit the future expansion of Lister hospital.

**Solution:** Consideration should be given to setting aside the land pursuant to Policy HO/11 Land West of North Road (Rugby Club) to support further expansion of Lister Hospital rather than housing (HO1/11).

The Lister is now the main hospital for the Herts and South Beds area. If it is to maintain this role it will need the ability to expand as new treatments and procedures evolve, as well as to cater for an explosion in the local population due to the tens of thousands of new homes to be built in its catchment area pursuant to development plans currently being proposed by the various local authorities.

Already serious capacity issues are being experienced by the Lister, as reported recently in the local press (The Comet 28 January 2016) in respect of the A & E Department and it would be reasonable to expect these to grow not only for A&E but for other departments going forward to reflect increased demand associated with new development proposed within its catchment area and the ageing population.

SBC's proposals involve building right up to the hospital boundary. Land on which the Stevenage sports Club stands (HO1/11) and the adjacent field next to North Road (EC1/4) are ear-marked for housing and a light industrial area respectively. Land to the rear of Lister site is currently used for staff car parking, however to mitigate a serious shortage of parking spaces for staff (The Lister employs 2,700 staff), it is likely that a multi-story car park will be built to alleviate the significant parking problems in the surrounding residential area. The map accompanying the LP also includes a field to the rear of cygnet hospital as available for possible development, although there are issues relating to the sharply different land levels between the two sites and two sets of pylons running through the field.

Extra land availability was one of the reasons Lister won out over QE2 Welwyn. This would seem to be a serious flaw in SBC's proposal.

**Policy TC11: New Convenience Retail Provision, paragraph 7.71**

**Policy SP4: A Vital Town Centre, paragraph 5.37**

The proposed development is an **inappropriate use of Green Belt land and is inconsistent with national policy.**

**Not Effective:** Stevenage Garden Centre is the only garden centre for the town following the loss of Roger Harvey's garden centre to housing. As such residents wishing to go to a garden centre will need to travel out of area to do so with the associated increase in car travel and pollution. The garden centre also fulfils an important social/leisure role through its catering facilities as a meeting place for local residents or people attending Lister Hospital.

Locating a new supermarket store on this site to serve the new development North of Stevenage (potentially 1,800 houses) will significantly increase already heavy traffic congestion at the North Road/Graveley Road junction not only at peak travel times but also at other times further increasing the risk and frequency of more serious accidents. Given the easier road access compared to Sainsbury's at Corey's Mill the new store is likely to take business from the latter thereby further increasing traffic volumes. The ability to materially improve this junction is restricted by the physical constraints of the junction. Highways is currently reviewing its layout to improve it because of the number of accidents due to existing traffic flows.

### **No Impact Assessment of Development on Surrounding Communities**

It would appear that SBC have not carried out an impact assessment of how their development proposals will affect communities immediately outside the SBC boundary and on the non-A1 road network. Examples of this would include the impact of locating the proposed Travellers site at Graveley: the lack of consideration regarding the impact of increased traffic flows at the North Road / Graveley junction and on Graveley itself. Arguments that the road network is the responsibility of Herts Highways, does not adequately address SBC's disregard of the impact of the heavy development proposed and its effect on an already inadequate road network, improvements to which will be restricted / prevented by existing residential development and limited / non-existent funding.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Kemp". The signature is written in a cursive style with a large initial 'J' and 'K'.

Clerk to Graveley Parish Council.

