

North Herts District Council Local Plan EIP Statement

Matter 11 Graveley (including North of Stevenage)

Statement by Graveley Parish Council

***11.21 Are all of the proposed housing allocations deliverable? In particular, are they:
c) deliverable, having regard to the provision of the necessary infrastructure and services,
and any environmental or other constraints?***

No in respect of the following issues.

1. North Road/Graveley Road Junction Improvements.

1.1. Improvements to address road safety concerns are to be welcomed.

1.2. ED14, 7.10 notes junction capacity improvements in the form of a roundabout “may not be appropriate, as they could attract more traffic”. It is now proposed to signalise the junction, which will increase congestion back through the village.

1.3. Junction upgrades to improve traffic management not scheduled before 2027, whereas NS1 development could begin as soon as 2021. Increasing traffic volumes (background growth and proposed development (Appendix 1, Baseline Traffic Flows (first 4 lines of data)), and construction site traffic throughout the plan period renders such a delay unsound on safety grounds.

The junction is classified as a hazardous junction by HH with frequent accidents often requiring the attendance of the emergency services.

2. GP Surgery provision should be required, not dependent on demand, there is currently a shortage of GP Services within the town. If all proposed development takes place it will result in an additional of 1,849 houses in the immediate vicinity, with additional developments scheduled at Wymondley (350 homes), GA1 (360 homes) and GA2 (600 homes). The new surgery would also permit some relief of pressure on existing surgeries.

3. Education: NHDC and Stevenage are seeking primary school provision on their respective sites of 1.5FE, not the 2FE required by HCC. This is unsound. Projecting future pupil numbers is not an exact science and for that reason provision should err on the side of caution and provide more rather than less places.

HO3 Education Supporting Document, 2.4 (Appendix 4) proposes rather than providing for all children of primary school age, which typically will tend to be higher in the early years of the development, proposes a levelling out of places required over time, implying a shortfall of places in the early years.

Developers have proposed if required additional land can be provided to HCC to bring the school up to 2FE at “open market residential value” but may prove prohibitive on cost.

HCC as responsible Authority is best placed to assess/determine appropriate provision of places required.

4. Air / Noise / Vibration Pollution associated with increased traffic volumes and increased commercial vehicle content, factors required to be taken into consideration specifically for new developments but apparently not for existing residents in the locality who are classified as Off-site and therefore not considered.

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

No.

1. Background Traffic Congestion (Please read in conjunction with our representations made in Matters 6 and 16.)

1.1. Fragile local road network. Improvements to the A1(M) may facilitate traffic flows travelling to destinations north and south of Stevenage but for vehicles accessing Stevenage the adequacy of the local road network remains critical (see Matter 16).

1.2. Inadequacy of Stevenage's local road network was confirmed by the Stevenage's Inspector (ED16, para 108, page 20 "new mobility strategy was necessary to support planned development"). The new Mobility Strategy does not seek to address current, growing congestion in Stevenage or the surrounding districts.

1.3 Stevenage Mobility Strategy traffic models differ from those used by Herts Highways and understates the impact of development (Appendix 2: 7.3.1: "The development's highway impacts have been assessed using the WHaSH and Paramics models. As noted previously, these are based on background growth factors significantly in excess of those which form the basis of SBC's Mobility Strategy for the Local Plan.")

1.4 Subsequent to the AECOM Report (see Matter 16), Vectros was commissioned to produce a new Traffic Forecast, which resulted in a sharp drop in background traffic in the AM and PM peak travel times to 7% and 13% from 26% and 38% respectively. To achieve this Vectros proposed an allowance of 15% mode shift away from use of the private car to non-car modes of travel, together with a lower trip rate and some spreading of peak travel in the model.

1.5. TI1 (Infrastructure Delivery Plan) 5.104 & 5.105 (page 47) identifies 20 key junctions requiring mitigation within North Herts, many triggered by background growth in traffic levels. (See also TI4 Table 4.3 (p16) and ED14, Appendix2 – Highway impacts & Potential Mitigations.) 10 fall within the Stevenage urbanisation, which following adoption of its new Mobility Strategy, have been put on hold, pending assessment if highway capacity improvements are still required (TI4, 6.17 page 94). Of the 10 junctions, 3 are critical to traffic flows seeking to access Stevenage from the north, HM2 A1M J8/A602, HM18 A602/Corey's Mill and HM20 B197 Graveley Road/North Road.

1.6. TI4, 4.3 p59 notes under the Stevenage strategy some highway capacity would need to be reallocated for use by pedestrians, cyclists and bus users, thereby potentially further restricting the highway capacity/ increasing road congestion.

1.7. HCC is in the process of developing a Growth and Transport Plan (GTP) for consultation in mid-2018 (ED14, 5.79) for North Hertfordshire. Until completed the evidence is not available to demonstrate that proposed mitigation measures are sufficient to enable proposed development to go forward or if sufficient funding has been set aside.

2) Traffic Impact for Graveley:

2.1. Concentration of most development north of Stevenage has accentuated the negative effect of development proposed under NHDC's plan, particularly in respect of traffic movements /congestion.

B197, single lane road constrained by the Village, cannot be widened to accommodate future increases in traffic volume. Heavy traffic flows at AM and PM peak times resulting in slow moving/ stationary traffic and increased pollution in the village (fumes, noise and vibration).

2.2. Traffic travelling north/south to/from Baldock/Letchworth /Hitchin / Royston to/from Stevenage utilise the B197 to avoid A1 (M) junction 8 congestion.

Going forward traffic volumes are likely to rise significantly from the 31,490 southbound and 30,744 northbound weekly volume measured by Police Traffic Management through Graveley for the week commencing 21/07/16.

2.3. ED38, PTB Traffic Impact Assessment, point 1.8.6 (page 11) notes "in the absence of appropriate mitigation, the cumulative impact of development of proposed sites would be 'severe' and thus the local plan proposals would fail the test in paragraph 32 of the NPPF".

2.4. Proposed mitigations in HO3 Transport Assessment (Appendix 2, 7.3.10) are considered to be inadequate, particularly given the comment in 7.3.12

7.3.12 No other highways improvements are proposed to mitigate the development's impacts, as it is considered that such improvements would encourage increasing use of the car. This is contrary to SBC's Mobility Strategy.

2.5. HCC's Matters 6 submission, (page 5: Villages), raises concerns that modelling is underplaying the impact on the highway network of proposed Local Plan growth on North Hertfordshire villages.

2.6. Graveley traffic congestion is likely to be further exacerbated by

a) Use of traffic lights to control access/egress from NS1/HO3 and the new employment area EC1/4.

b) Relocation of the Stevenage Rugby Club (SBC LP HO1/11) to north of Stevenage in North Herts green belt,

c) Pidgeon development proposals at Chesfield, including a large senior school.

3). Church Lane

3.1. Proposed GA1 road layout changes, improving access to Church Lane/Back Lane for Great Ashby residents will result in significant increases in traffic volumes as residents seek to avoid heavy congestion in travelling towards Stevenage Town Centre (see PTB Report, Appendix 3, page 1, "the impact of the GA1 development from highways / transport perspective, pursuant to NPPF 32, is likely to be severe".)

3.2. Church Lane is a single lane "narrow, winding and difficult", with a number of blind bends, not suitable for large volumes of traffic or inappropriate speeds. It is subject to regular flooding, has no footpath and is popular with horse riders, cyclists and walkers using the Hertfordshire Way.

4. Flooding

4.1. Site 353 is subject to heavy surface water flooding with pooling of water during periods of heavy rainfall in the fields next to the B197. Steep contouring in the North Western corner of site 353 / NS1 (Appendix 6) creates pooling of water in times of prolonged rain fall (Appendices 8 rainfall for the two weeks ending 4th

4.2. Church Lane Graveley is subject to regular flooding by runoff from the surrounding hills and results in properties being flooded. St Mary's Church in 1967 was subject to flooding to a depth of 1 meter. Development of this site and GA1/GA2 will only increase the risk and frequency of flooding. Flooding is also experienced at Chesfield.

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

No. Please refer to our comments on West of Stevenage (Submission Consultation, Policy SP8 (e) (ii) and paragraph 4.104 and 4.105: Housing, page 9).

11.24 Sites NS1 and GR1 both 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?

No, for the following reasons.

- i) No exceptional circumstances to warrant removal from green belt (NPPF 83) (see Submission Consultation, Policy SP5 a: Countryside and Green Belt, first 3 paragraphs, page 5).
- ii) NPPF 14 footnote 9 policy exceptions including green belt (Submission Consultation response SP8 & 4.85 to 4.93, page 8).

iii) Insufficient prioritisation of brownfield land. One of the criteria for inclusion on NHDC's brownfield register is that sites accord with policies in NHDC's Development Plan. This restricts the area of search, rather than identifying sites across all of North Herts.

iv) NS1 currently meets all 5 purposes and conversely its development would be contrary to all 5 purposes of the GB. Removal of the site would contribute towards the sprawl of Stevenage, coalescence of Graveley with Stevenage; encroachment into open countryside and harm the historic setting of Graveley; development of a green field site contrary to national policy on use of previously developed land and contribute nothing towards regeneration.

v) Approval of NS1 will help planners justify the release of GB North and North-East of Stevenage for a further 7,235 houses / 335 Hectares identified in *Stevenage's 2015 Green Belt review* (Stevenage EiP Library Doc GB2, page 51/52, copy attached Appendix 5) recommended for Safeguarding for development post 2031 to facilitate a further increase in Stevenage sprawl.

Contrary to NPPF 85, SP5, 4.57 seeks to justify not disclosing this significant proposed area of safeguarded land.

Given strong objections by residents and District Councillors to the current plan, had the above been included it is considered highly likely that the plan would not have been approved and would certainly attracted a much greater level of resident opposition. In view of the above the plan must be considered as **Not Positively Prepared**

vi) Green Belt review not based on a robust assessment methodology (see our Matter 7 submission, 7.2 point 1.1, and Submission Consultation response, page 11," Coalescence with Stevenage is contrary to National Policy (NPPF)").

vii) Inappropriate assessment criteria employed in the analysis of

a) Potential development sites (CG1 Section 5), (see our Matter 7 submission, 7.2 para 1.2,) and

b) The contribution of villages in the green belt to the green belt detailed in CG1 Sections 4.3 and 4.4 are incorrect (see our Matter 7 submission, 7.2, point 3.)

viii) No Duty to Co-operate with Stevenage.

a) As noted in paragraph 2.39 of NHDC's Local Plan, Stevenage can now fully meet its OAN, therefore development of NS1 no longer required.

b) NS1 is only being developed for the benefit of Stevenage expansion and as such will be included within the Stevenage urbanisation (LP SP16, 4.195). This is in contrast to LP SP8, 4.92 which states development of NS1 will be wholly to meet the housing needs of North Hertfordshire.

ix) No Contribution of NS1 to the required 5 year land bank until 2024 due to infrastructure constraints restricting commencement of development.

NB recently signed ED 32 (SOCG) states development “may be brought forward to 2021 following a timely grant of planning permission”, **not will be**, and as such is not a firm undertaking.

It is also concerning that should development commence in 2021, completion of the site would remain 2031.

iv) Allocation of NS1 is contrary to The Graveley Village Plan 2010. (Submission consultation, Policy SP16, and paragraphs 4.195 to 4.201: Site NS1 North of Stevenage, para (x), page 12)

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

NS1 Is Contrary to Land Study Recommendations. (Submission consultation p12)

i) The *2011 Land Study Report* describes developments of greater than 5 hectares as not appropriate for the site. References to the 2011 Land Study may be found in OLP7-SA-SEA 2014 PO *Appendix 6 Report, page 33, section 3(b) Protect and enhance landscapes.*

NS1 also contrary to HDS4: Density (development to respect any established character of the area.)

ii) Landscape functions. “The primary landscape function is in forming the setting to the historic settlement of Graveley. The rural landscape around Graveley also plays an important role in relation to maintaining a sense of separation between the village and Stevenage, to the south.” (CG9, Landscape Study Part 2, p 46, para 4.25).

The Study determines large urban extensions/ new settlements would not be appropriate in this landscape due to its rural and undeveloped nature. The scale would not be in keeping and it would have a significant visual impact. Smaller urban extensions would also not be appropriate. The Study identifies that visual impacts could be high due to the panoramic views/undeveloped skyline. Recommendations for the landscape strategy include retaining the rural, open character and long distance views of the area and avoiding new development in visually exposed areas.

iii) Coalescence of Graveley with Stevenage is Contrary to National Policy (NPPF 80) and ministerial statements. (Submission Consultation page 11, point (iv)).

iv) Coalescence with Stevenage.

Would urbanize rural setting of buildings and village, destroying its historic character and distinctiveness as a settlement to the detriment of the setting of listed buildings and an Ancient Monument, contrary to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

NHE7 (Section 3.2, page 11, last sentence, first paragraph, to end of section) cites the small distance between NS1 and the conservation area and negative effects of noise, light and activity impact upon the special interest of the listed building/conservation area.

Size and close proximity of NS1 to the rural village of Graveley is contrary to NHDC's policies Spatial Vision 3.6, third point: SP9, 4.115 : ENV2 and Policy D1. (Submission consultation Development of NS1 is contrary to policies contained within NHDC's Local Plan point (v) p11).

NHE7 also comments "development of the south and west part of the strategic site will not impact upon the significance of heritage assets". It is considered highly doubtful that the impact of such a large joint development can be adequately mitigated given its close proximity. Graveley would be dominated and subsumed by the new development.

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?

The proposed 250m of GB between the NS1 and the proposed Graveley Settlement Boundary, encompasses 2 residential properties and a small field in which the village cricket club is located. It would be insufficient to prevent the urbanization of the rural setting of the buildings/ village, destroying Graveley's historic character and distinctiveness.

Please see 11.24 (b) (iv) above.

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?

No, contrary to NPPF 85, Site NS1 is comprised of two sites, NS and 353, (see CG1, page 129).

Initially included as part of NS1, following strong objections by residents site 353 was excluded from NS1, moving the development boundary back 400 metres to the southern border of site 353. Under the Submission Consultation the boundary reverted to the edge of the village. Speaking to David Hill Senior Planner we were advised that the developer had requested its inclusion within NS1.

CGB1, 5.3, p109, seeks to justify inclusion of 353 as part of "the boundary will be along hedgerows and therefore more defensible than the previous proposed boundary, although parts are still across fields".

In fact the majority of the GB Boundary remains across green field with no discernible features to identify the boundary, with the hedgerow full of gaps (Appendix 8) and dead wood rendering it uncertain as to its permanence. Contrary to NPPF 85. In contrast the southern boundary of NS1 is bounded by a double row of mature trees.

11.25 Is the proposed settlement boundary:

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

We could not identify any methodology as to how the settlement boundary was determined.

b) appropriate and justified?

No, (Submission Consultation response, p16, 13 Communities Graveley and North of Stevenage.)

Attachments

- Appendix 1, HO3 Land North of Stevenage, Environmental Statement, Appendix 5.1: Baseline Traffic Flows.
- Appendix 2, Extract of Page 25/27 of Outline Planning Permission Application, HO3, Land North of Stevenage Transport Assessment.
- Appendix 3 PTB Letter to Mr S Ellis re- Planning Application for Land at Roundwood, Back Lane, Graveley.
- Appendix 4 HO3 Education Supporting Document for Outline Planning Application.
- Appendix 5 Review of the Green Belt around Stevenage Part 2, pages 51/52 (Stevenage EiP Library Doc GB2)
- Appendix 6 HO3 Outline Planning Application: Extract from Land North of Stevenage, Environmental Statement, Appendix 8.7 – Flood Risk Assessment Site Contour Map.
- Appendix 7 Photos of Surface Water Flooding NS1.
- Appendix 8 Photos of NS1 proposed Northern Hedgerow Boundary.