

# NORTH HERTFORDSHIRE DISTRICT COUNCIL

*Correspondence address:*

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16 February 2016

Planning Policy  
Stevenage Borough Council  
Daneshill House, Danestrete  
Stevenage  
SG1 1HN

Our Ref:  
Your Ref:

Contact Officer: Nigel Smith  
Direct Line: (01462) 474847  
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Dear Sir / Madam,

## **North Hertfordshire District Council Response to Pre-submission Stevenage Local Plan (2011-2031)**

Thank-you for consulting North Hertfordshire District Council on the draft Local Plan for Stevenage. We welcome the publication of your draft plan as a clear expression of the Borough Council's ambitions and priorities. The aim to adopt a new local plan in advance of the Government's early 2017 deadline is supported.

I appreciate that significant efforts have been expended in bringing the plan to this stage of preparedness. Joint working between our authorities and others under the Duty to Co-operate (the Duty) has progressed our collective understanding in a number of areas.

Our authorities have jointly considered a range of issues including housing, employment and infrastructure, resulting in a number of shared or co-ordinated pieces of evidence. Your draft plan therefore follows or complements a number of the principles and proposals underpinning our own emerging plan.

Officers from our two authorities are working together on an on-going basis to produce a Memorandum of Understanding (or equivalent) to demonstrate compliance with the Duty. It remains our intention to reach an agreement with Stevenage Borough Council prior to submission of your plan. This will set out to a Planning Inspector and other interested parties those areas where our authorities have worked together and are in agreement.

For simplicity's sake, and to avoid overlap with any future Memorandum (or equivalent), we have not responded in detail on those issues or principles that we anticipate will be included in any agreement. However, I can confirm that North Hertfordshire District Council broadly supports Stevenage Borough Council's draft plan insofar as it relates to a range of issues and principles including, but not necessarily limited to:

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- The identification of the key challenges to be addressed through the evidence base and environmental assessments;
- The geographic definition of functional housing and economic market areas through studies jointly commissioned with North Hertfordshire District Council and others;
- The calculation of Stevenage's objectively assessed needs through a jointly conducted Strategic Housing Market Assessment;
- The accommodation of all of Stevenage's own objectively assessed housing needs within the Borough boundary with no reliance placed upon other authorities within the Housing Market Area;
- The identification of affordable housing targets based upon up-to-date evidence of viability;
- The proposed regeneration of Stevenage town centre, including the provision of a substantial number of residential units on previously developed land, new offices and remodelled and improved public transport provision;
- The retention of the town's two main employment areas and the identification of new sites within these for development;
- The identification of residential-led new neighbourhoods to the north and west of the existing urban area potentially allowing for complementary development to occur within North Hertfordshire;
- The need to properly masterplan these developments to ensure any additional development beyond the administrative boundary can be properly integrated;
- The associated identification of safeguarded corridors to provide access to land within North Hertfordshire if required;
- The role of the Lister Hospital as a facility of (sub-)regional importance, serving many people from outside of the Borough;
- The principles underpinning the demonstration of *exceptional circumstances* necessary to justify a 'roll back' of the inner Green Belt boundary in order to release land for development;
- The need to ensure appropriate infrastructure provision including support for increased capacity on the A1(M) and requirements for additional education and community facilities;
- The broad approach to Green Infrastructure including the recognition of the potential ability for open spaces within the Borough to contribute towards requirements arising from any future development beyond the boundary in North Hertfordshire; and
- Providing support for relevant schemes beyond the Borough's administrative boundary whilst recognising that other authorities, including North Hertfordshire, will determine the most appropriate outcomes in these locations

Beyond these, we do have a small number of non-strategic concerns with your draft plan. I have instructed officers to prepare detailed individual representations for these using the pro-forma provided and which address the key tests of legal compliance and soundness that the Planning Inspectorate will examine. These are appended to this letter for completeness.

The detailed representations predominantly relate to the introduction of new, proposed allocations at the north-west of the Borough close to Junction 8 of the A1(M). We are, in the main, supportive of these proposed designations in principle.

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However, we consider some additional work is required to ensure these can be accommodated without prejudicing either the well-being of existing North Hertfordshire residents or the realisation of sites and schemes we may wish to bring forward through our own plan.

In submitting these representations, I should be clear that North Hertfordshire District Council fully supports Stevenage Borough Council's ambition to achieve a 'sound' and legally compliant plan. The success of our plans is interrelated and failure to achieve a satisfactory set of outcomes for Stevenage would seriously prejudice our ability to deliver a new local plan for North Hertfordshire (and vice versa).

I consider that all of the attached objections can be resolved prior to, or at, examination through the completion of additional technical work or proposed modifications to the plan.

I would further encourage Stevenage Borough Council to satisfy itself that it has complied with all the relevant legal and soundness tests before submitting its draft plan for Examination to reduce the risk to the emerging plans of both our authorities.

The 'preferred options' version of North Hertfordshire's own local plan included allowances for development within this District around the edge of Stevenage and these are referenced appropriately within your draft plan. At this point, my officers remain minded to continue recommending this broad strategy. Such a decision is plainly subject to its own processes and approvals and I cannot predetermine the outcome of future deliberations. However, based upon our present timetable, I remain confident that we will be able to provide the necessary level of clarity and certainty by the time your plan reaches Examination.

If you would like to discuss these comments in more detail, or arrange further meetings to resolve the issues raised, please contact the Strategic Planning & Enterprise team at North Hertfordshire District Council using the details provided at the top of this letter.

Yours faithfully

Cllr David Levett  
Portfolio Holder for Planning and Enterprise

Local Plan Representation Form  
January 2016

*Submissions of North Hertfordshire District Council*

**1. To which part of the Local Plan does this representation relate?**

*Policy EC1 (site EC1/7)*

*Consequential implications for Policies SP3(a)& GB1, paragraphs 5.129 & 6.7 and Proposals Map*

**2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)**

Yes

**3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)**

Yes

**4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)**

Yes

**5. Do you consider this element of the Local Plan is sound? (please select one answer)**

No

**6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)**

Not Justified  
Not effective

**7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.**

North Hertfordshire District Council objects to the proposed allocation of Site EC1/7 – land west of Junction 8.

The Borough Council's approach to employment is clearly set out in the plan and evidence base. It is accepted that, based on current information, Stevenage is likely to have a shortfall of available employment land that can reasonably be said to address the requirements arising from the East of England Forecasting Model. The aspiration to maximise employment provision within the Borough on reasonable sites is supported.

However, North Hertfordshire District Council does not consider this site to be an appropriate location for employment development.

Although it is located within the Borough's administrative boundary, it is physically separated from both the existing and proposed urban area of Stevenage by Junction 8 of the A1(M) and poorly related to the existing town.

The Council's 'Part I' Green Belt Review identifies this area as making a significant contribution to Green Belt purposes. The District Council has previously supported waste uses on this land. However, this was based upon the specific circumstances relating to that proposed use rather than 'in principle' support for the more general release of this land for development.

On current evidence, it is considered that the A1(M) from the Fishers Green Road / Stevenage Road overbridge to Junction 8 presently provides a more appropriate and defensible, long-term Green Belt boundary in this part of the Borough.

The impacts of this proposed allocation have not been considered in either the joint traffic modelling commissioned by our two authorities or in the flood assessment work which underpins the draft plan. No specific mitigation measures are identified for the proposed allocation.

The increase in traffic movements arising from this site (either in isolation or cumulatively having regard to other new proposals in this area) could, without appropriate mitigation, have an adverse impact on the local highway network thereby prejudicing the realisation of sites which North Hertfordshire District Council is considering for inclusion in its own local plan.

We are additionally unconvinced that the existing underbridge beneath the A602 Wymondley Bypass onto Chantry Lane / Stevenage Road provides an appropriate means of access. Any improvements are likely to represent a significant cost to development.

Environment Agency mapping details an area of river flood risk in the north-west of the Borough in an approximate 'u' shape entering the Borough from Graveley and exiting towards Little Wymondley. This is not reflected in the General Flood Risk Assessment Maps which form part of the evidence base and neither existing nor future flood risk in this area appear to have been subject to modelling and / or assessment.

Without proper assessment and / or mitigation, development proposals in this area of the Borough could exacerbate flood risk within North Hertfordshire's administrative area, particularly at Little Wymondley.

The Employment Technical Paper acknowledges that there will be a shortfall in employment provision regardless of whether this site is included or not. The plan also notes that the site is only suitable for low-intensity uses: it will make a relatively small contribution to overall employment requirements.

North Hertfordshire District Council does not consider that this proposed allocation has been adequately justified, nor that *exceptional circumstances* justifying the release of this land from the Green Belt have been adequately demonstrated. Given the range of constraints, it is questionable whether this site is deliverable.

**8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal**

requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete site EC1/7 plus consequential amendments to the plan and proposals map.

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)

*Yes, I wish to participate at the oral examination*

Local Plan Representation Form  
January 2016

*Submissions of North Hertfordshire District Council*

1. To which part of the Local Plan does this representation relate?

*Paragraph 6.14*

2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

Yes

3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)

Yes

4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)

Yes

5. Do you consider this element of the Local Plan is sound? (please select one answer)

No

6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)

Not positively prepared  
Not Justified

7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

North Hertfordshire District Council objects to paragraph 6.14 which appears to encourage non-employment uses in the most accessible part of Stevenage's main employment area.

The Borough Council's approach to employment is clearly set out in the plan and evidence base. It is accepted that, based on current information, Stevenage is likely to have a shortfall of available employment land that can reasonably be said to address the requirements arising from the East of England Forecasting Model.

North Hertfordshire District Council's Preferred Options Local Plan identified a 'safeguarded' employment site at Baldock to take account of the long-term needs which may arise within the functional economic market area (FEMA) which our Councils, together with Central

Bedfordshire Council, have collectively identified. Stevenage Borough Council's representations to this iteration of our plan requested release of the whole site in the current plan period.

Given the constrained nature of employment land within Stevenage, the wilful release (or apparent encouragement thereof) of existing employment land by the Borough Council does not represent a positive strategy to meet future employment needs. It may additionally prejudice North Hertfordshire's ability to demonstrate the necessary *exceptional circumstances* in order to release land from the Green Belt to address any future shortfall arising from within the Borough.

We hold similar concerns with the current application to convert the former John Lewis warehouses on Gunnels Wood Road from employment use.

- 8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete paragraph 6.14.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

***Yes, I wish to participate at the oral examination***



## Local Plan Representation Form January 2016

### *Submissions of North Hertfordshire District Council*

1. To which part of the Local Plan does this representation relate?

*Policy TC11*

*Proposals Map TC10 [incorrect notation]*

*Consequential implications for Policy SP4(d)(v) and paragraphs 5.37 & 7.71*

2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

Yes

3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)

Yes

4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)

Yes

5. Do you consider this element of the Local Plan is sound? (please select one answer)

No

6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)

Not Justified

Not effective

7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

North Hertfordshire District Council does not object, in principle, to the provision of a new convenience retail store on this site subject to appropriate justification and mitigation.

However, the impacts of this proposed store have not been considered in either the joint traffic modelling commissioned by our two authorities or in the flood assessment work which underpins the draft plan. No specific mitigation measures are identified for the proposed allocation.

The increase in traffic movements arising from this site (either in isolation or cumulatively having regard to other new proposals in this area) could, without appropriate mitigation, have an adverse impact on the local highway network thereby prejudicing the realisation of sites which North Hertfordshire District Council is considering for inclusion in its own local plan.

Environment Agency mapping details an area of river flood risk in the north-west of the Borough in an approximate 'u' shape entering the Borough from Graveley and exiting towards Little Wymondley. This is not reflected in the General Flood Risk Assessment Maps which form part of the evidence base and neither existing nor future flood risk in this area appear to have been subject to modelling and / or assessment.

Without proper assessment and / or mitigation, development proposals in this area of the Borough could exacerbate flood risk within North Hertfordshire's administrative area, particularly at Little Wymondley.

Notwithstanding these points, should additional justification and / or mitigation be identified, North Hertfordshire District Council would be interested in exploring any extent to which this site might help address convenience retail needs arising from within our own authority area.

- 8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

North Hertfordshire District Council consider that this objection may be capable of being resolved / withdrawn prior to Examination through completion of further technical work demonstrating that this proposed allocation can be accommodated without an adverse impact on flood risk or the highway network.

This may necessitate minor changes to the plan and supporting text. For example, in the event that additional mitigation measures are identified as necessary. These could be progressed as suggested modifications to the plan at the Examination stage.

The Proposals Map should be amended to show the correct policy notation.

In the event that these objections cannot be overcome, the proposed retail allocation should be removed from the plan.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

***Yes, I wish to participate at the oral examination***

## Local Plan Representation Form January 2016

### *Submissions of North Hertfordshire District Council*

1. To which part of the Local Plan does this representation relate?

*Policy HO12*

*Consequential implications for Policy SP7(b)(v) and paragraphs 5.83 & 9.91-9.94*

2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

Yes

3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)

Yes

4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)

Yes

5. Do you consider this element of the Local Plan is sound? (please select one answer)

No

6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)

Not Justified

Not effective

7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

North Hertfordshire District Council does not object, in principle, to the provision of a new Gypsy and Traveller site at Graveley Road subject to appropriate justification and mitigation.

However, the impacts of this proposed allocation have not been considered in the joint traffic modelling commissioned by our two authorities. No transport mitigation measures are identified for the proposed allocation. Further mitigation measures may be required to ensure the amenity of (existing and future) nearby residents.

The increase in traffic movements arising from this site (either in isolation or cumulatively having regard to other new proposals in this area) could, without appropriate mitigation, have an adverse impact on the local highway network thereby prejudicing the realisation of sites which North Hertfordshire District Council is considering for inclusion in its own local plan.

We would strongly encourage further dialogue between the Borough Council, North Hertfordshire District Council, Graveley Parish Council and other interested parties to ensure the potential impacts of this site have been fully understood and mitigated against.

North Hertfordshire District Council would be interested in exploring any extent to which this site might potentially help address Gypsy and Traveller needs arising from within our own authority area.

- 8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

North Hertfordshire District Council consider that this objection may be capable of being resolved / withdrawn prior to Examination through completion of further technical work demonstrating that this proposed allocation can be accommodated without an adverse impact on the highway network.

This may necessitate minor changes to the plan and supporting text. For example, in the event that additional mitigation measures are identified as necessary. These could be progressed as suggested modifications to the plan at the Examination stage.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

***Yes, I wish to participate at the oral examination***

## Local Plan Representation Form January 2016

### *Submissions of North Hertfordshire District Council*

1. To which part of the Local Plan does this representation relate?

*Policy HC3*

*Consequential implications for paragraph 11.22 and Proposals Map*

2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

Yes

3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)

Yes

4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)

Yes

5. Do you consider this element of the Local Plan is sound? (please select one answer)

No

6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)

Not Justified

Not effective

7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

North Hertfordshire District Council fully supports the role of the Lister Hospital as the provider of strategic emergency health services for north and east Hertfordshire. It is a vital facility for many of North Hertfordshire's residents.

North Hertfordshire District Council does not object, in principle, to the provision of new health facilities within this proposed allocation subject to appropriate justification and mitigation.

However, the impacts of any additional floorspace have not been considered in either the joint traffic modelling commissioned by our two authorities or in the flood assessment work which underpins the draft plan. No specific mitigation measures are identified for the proposed allocation.

The increase in traffic movements arising from this site (either in isolation or cumulatively having regard to other new proposals in this area) could, without appropriate mitigation, have an adverse impact on the local highway network thereby prejudicing the realisation of sites which North Hertfordshire District Council is considering for inclusion in its own local plan.

Environment Agency mapping details an area of river flood risk in the north-west of the Borough in an approximate 'u' shape entering the Borough from Graveley and exiting towards Little Wymondley. This is not reflected in the General Flood Risk Assessment Maps which form part of the evidence base and neither existing nor future flood risk in this area appear to have been subject to modelling and / or assessment.

Without proper assessment and / or mitigation, development proposals in this area of the Borough could exacerbate flood risk within North Hertfordshire's administrative area, particularly at Little Wymondley.

- 8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

North Hertfordshire District Council consider that this objection may be capable of being resolved / withdrawn prior to Examination through completion of further technical work demonstrating that this proposed allocation can be accommodated without an adverse impact on flood risk or the highway network.

This may necessitate minor changes to the plan and supporting text. For example, in the event that additional mitigation measures are identified as necessary. These could be progressed as suggested modifications to the plan at the Examination stage.

In the event that these objections cannot be overcome, the proposed health campus allocation should be redrawn to cover the existing facilities only.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

***Yes, I wish to participate at the oral examination***

## Local Plan Representation Form January 2016

### *Submissions of North Hertfordshire District Council*

1. To which part of the Local Plan does this representation relate?

*Policy GB2*

2. Do you consider this element of the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

Yes

3. Do you consider this element of the Local Plan has met the legal requirements? (please select one answer)

Yes

4. Do you consider this element of the Local Plan has met the procedural requirements? (please select one answer)

Yes

5. Do you consider this element of the Local Plan is sound? (please select one answer)

*n/a – comment only*

6. If no, do you consider this element of the Local Plan is unsound because it is: (please select all that apply)

*n/a – comment only*

7. Please give details of why you consider this element of the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

Todd's Green straddles the administrative boundary between Stevenage and North Hertfordshire. Policy GB2 of the draft plan allows for small-scale infilling in those parts of Todd's Green within Stevenage Borough.

North Hertfordshire District Council's Preferred Options Plan does not identify Todd's Green within the settlement hierarchy. A policy of Green Belt restraint is therefore proposed for that part of Todd's Green within this District.

This could lead to differential policies being applied to land or properties within Todd's Green.

We do not wish to lodge a formal objection to this policy at this point. We do not consider this to be a strategic issue that falls within the remit of the Duty to Co-operate.

However, we would encourage the Borough Council to (re-)consider the most appropriate policy approach for Todd's Green having regard to:

- i. This specific hamlet when viewed as a whole;
  - ii. The proposed policy approaches of North Hertfordshire and any other relevant local planning authority surrounding / near Stevenage for hamlets of this size and nature in general; and
  - iii. Proposed changes to the NPPF, especially with regard to previously developed land in the Green Belt. These may provide adequate guidance within national policy for the types of site and development which draft Policy GB2 may have in mind.
- 8. Please set out what change(s) you consider necessary to make this element of the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Upon reflection, the Borough Council may be minded to amend its approach. Any such changes could be progressed as suggested modifications to the plan at the Examination stage.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

***We would like to reserve our position pending submission of your local plan***