



21 July 2017

Planning Policy
Stevenage Borough Council

By Email

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Dear Sir / Madam,

Stevenage Borough Local Plan: Proposed Main Modifications Consultation

Thank-you for consulting North Hertfordshire District Council on the Proposed Main Modifications to your local plan following the examination hearing sessions earlier this year.

Having reviewed the proposed changes, the District Council does not have comments to make on the significant majority of the proposed Modifications.

We note that, having conducted this part of the Examination, the appointed Inspector is not proposing substantive alterations in relation to many of the key principles of your Plan. A number of these rely on shared evidence or contain a common approach to that set out in our own recently submitted Plan. This includes, but is not necessarily limited to, a number of areas of broad support as set out in our response to the Proposed Submission consultation last year:

- 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 (SHMA) and the subsequently identified housing target in the plan;
- 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 demonstration of *exceptional circumstances* necessary to justify a 'roll back' of the inner Green Belt boundary in order to release land for development;
- 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.



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Notwithstanding this, we do have a small number of comments on the proposed changes. We do not consider these to be fundamental to the tests of soundness, but suggest that further clarity on these points would be helpful.

Housing Mix (MM11, MM12, MM66)

The above modifications would result in several references to smaller units and flats being omitted and references to larger homes introduced or emphasised. It is understood that these changes are influenced by the findings of Volume II of our joint SHMA (ED117), published after your plan was submitted. In interpreting these results we would highlight that:

When considering future need for different types of housing, the model assumes that the housing mix needed by households of each household type and age will reflect current patterns. For example, a growth in single person households aged 65-74 will lead to an increase in the need for the type of housing currently occupied by single person households of this age. On this basis, where such households continue to live in family housing despite no longer having a family living with them, this need for family housing will still be counted. (ED117, paragraph 3.17)

Our own further analysis showed that, in North Hertfordshire, a significant number of smaller households currently occupy larger homes. Boosting the supply of smaller units beyond that suggested by a straight reading of the evidence could provide greater choice, including the opportunity for some existing households the chance to downsize if they so wished thereby freeing up existing larger stock. A similar caveat or reference in the Stevenage plan would be welcomed to ensure a consistent approach.

Furthermore, we would expect the three proposed housing allocations on the edge of Stevenage in our own plan to display a bias towards the delivery of larger units due to their edge-of-town location.

The Borough Council should satisfy itself that the proposed changes will deliver an appropriate mix of new homes, housing choices and opportunities across both the Borough and the wider urban area.

Employment / capacity of GSK site (MM17)

The District Council welcomes MM4 which reflects the position in the Memorandum of Understanding recently agreed in relation to our own plan. However, MM17 now makes reference to the potential for significant additional capacity on the GlaxoSmithKline (GSK) site in Gunnels Wood over and above that identified in the plan.

The ongoing development of the GSK campus is seen as a specialist scheme of (inter)national importance. Your technical evidence suggests that this sits outside of the requirements generated by trend-based forecasts for which you have requested the assistance of North Hertfordshire.

The District Council supports the development of the GSK campus recognising the benefits it brings to the wider area in terms of employment opportunities and investment. However, we would welcome clarification of the position set out in MM17 against our recent agreement.



Transport issues and mobility (MM41, MM48, MM49, MM87)

As you will be aware, the District Council is broadly supportive of the mobility strategy being pursued in Stevenage and we are committed to further joint working to complete and realise our respective transport strategies. We recognise there is scope within the town to increase the proportion of shorter journeys undertaken by more sustainable modes thereby relieving potential future pressures on the highway network.

In that context, we welcome the direction of travel established by the above modifications. However we would like to make the following observations:

- Any transport strategies for the area need to be cognisant of, and realistic about, the complex patterns of movement between the towns and villages of northern Hertfordshire, the levels of provision for mobility that are and can be made and that sustainable solutions may not always be possible;
- MM87, in particular, makes reference to the improved connectivity of Stevenage with London that will arise from the Thameslink expansion and Crossrail driving a shift in travel onto rail. The Borough Council should reassure itself that such an approach will result in the plan continuing to meet identified local housing needs and not simply facilitating additional outward migration from London;
- The references promoting sustainable journeys to school are strongly supported. It will be essential to ensure that secondary schools, in particular, and the neighbourhoods they are to serve are or can be well connected to the cycle network to encourage independent journeys by these modes;
- The proposed car parking strategy appears to be directed primarily at commercial and workplace parking as opposed to residential parking. However, this distinction is not necessarily as clear as it might be. Our own experiences at Great Ashby demonstrate that reduced levels of residential parking provision (as were required by Government policies of the time) do not necessarily deter car ownership. The Main Modifications propose removing residential parking standards from the plan to be established through a Supplementary Planning Document. The District Council would wish to be consulted upon this document at the appropriate time given the interrelationship between our authorities in terms of existing and proposed development.

We trust these comments are of assistance as you finalise the new Local Plan for the Borough. If you would like to discuss any of these comments further, please contact the relevant officers using the details provided at the top of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Levett', with a long horizontal flourish extending to the right.

David Levett
Portfolio Holder for Planning and Enterprise