

NORTH HERTFORDSHIRE DISTRICT COUNCIL

Correspondence address:

PO Box 480, SALE, M33 0DE

Telephone: (01462) 474000

Text Phone: (01462) 474800



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Planning Policy
Stevenage Borough Council
Daneshill House
Danestrete
SG1 1HN

Our Ref: PL10/LA

Contact Officer: Laura Allen
Direct Line: (01462) 474826
E-mail: laura.allen@north-herts.gov.uk

Dear Planning Policy Team

North Hertfordshire District Council response to the Stevenage Borough Council Community Infrastructure Levy Preliminary Draft Charging Schedule consultation

Thank you for providing North Hertfordshire District Council the opportunity to comment on the Stevenage Borough Council Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule, which sets out proposed CIL charging rates.

As you are aware, North Hertfordshire is currently at an advanced stage of Local Plan preparation and is currently awaiting a schedule of proposed modifications from the Inspector appointed to conduct the Examination.

North Hertfordshire District Council is yet to take a decision on whether to pursue CIL. We would therefore welcome the opportunity to continue to work with Stevenage Borough Council in ensuring that the infrastructure required to support the delivery of our Local Plans can be delivered in a timely and effective way.

Cross-boundary infrastructure requirements

Our authorities have previously worked together during the preparation of our Local Plans, including on-going engagement regarding housing allocations along our shared administrative boundary, namely NS1 North of Stevenage, GA1 Land at Roundwood, GA2 Land off Mendip Way, Great Ashby (all within the North Hertfordshire District Council boundary), as well as HO3 North of Stevenage (within the Stevenage Borough Council boundary). The allocations collectively set out plans for 2,630 dwellings.

We are particularly concerned to ensure that adequate funding for infrastructure is achieved to ensure the timely delivery of these development sites. This is also vital in the context of the Stevenage Local Plan with ambitions to bring forward growth and regeneration over the town as a whole.



We are keen to work with you proactively to ensure that progress on your CIL is undertaken in a clear and robust way, addressing the cross-boundary impacts on infrastructure, services, transport networks and the environment.

Evidence base

It is noted in the CIL Viability Update that the residual valuation for the Northern Extension is identified as viable, with potential for CIL (p.50). As shown in the Stevenage Borough Council CIL Viability Update, house prices have risen by circa 20% in the period 2015-2017 (Table 4.2, p.16). This indicates a rapidly changing housing market, which will require monitoring once CIL is adopted to ensure that rates continue to be set at an appropriate level to maximise receipts given the identified funding gap.

Infrastructure delivery

Given that the NS1 North of Stevenage allocation is directly linked to the HO3 North of Stevenage allocation, it is imperative that delivery mechanisms for any cross-border, common or shared infrastructure are discussed not only between our Councils, but also in conjunction with the relevant landowners, developers and infrastructure providers. This will ensure that there is a coherent and integrated approach to infrastructure delivery.

We would welcome clarification as to whether site-specific requirements will continue to be secured through S106 agreements, with CIL in addition to this.

Further to this, future secondary school provision required to support growth in Stevenage is likely to be provided within the North Hertfordshire administrative boundary. This may arise from the direct demand for school places, from displaced demand or due to the residents of schemes taking priority over existing and future North Hertfordshire residents.¹ For this reason, the Council is keen to ensure that there is ongoing engagement between our authorities in relation to governance arrangements.

Transitional arrangements and the phasing of development

Given that an outline permission granted prior to the introduction of CIL, followed by reserved matters after the introduction of CIL does not incur a liability, the timing of the introduction of the Stevenage CIL in relation to site delivery will be an important consideration. This is particularly relevant for your North of Stevenage site where an outline application is presently awaiting determination,

¹ Hertfordshire County Council have requested the provision of eight forms of entry (8FE) of secondary education provision to serve the Stevenage area in our own emerging plan. Based upon the ratios used by the County Council to plan for new schools, new development in this part of North Hertfordshire will generate approximately 5FE of additional demand.



Infrastructure providers and funding mechanisms

In terms of infrastructure delivery, we would urge you to consider the roles of Stevenage Borough Council and Hertfordshire County Council once CIL is adopted. Section 106 allows for the provision of infrastructure by the developer, whereas the responsibility and risk of delivering projects funded by CIL would be passed to the Council and County Council.

Further to this, as outlined in the Whole Plan Viability Study (paragraphs 13.23 and 13.24, pages 138 and 139), Stevenage Borough Council will need to consider the mechanisms for the delivery of infrastructure under a CIL regime, including borrowing. We note that the issue of forward funding is addressed in the Infrastructure Funding Strategy (para. 5.2.1, p.26) to take into account the expected lag between the preparation and adoption of CIL and the time at which CIL receipts are collected.

We consider these considerations of paramount importance to ensure that the necessary infrastructure can be secured, and to prevent unnecessary delays to development.

Governance arrangements

We would urge you to provide greater clarity on the proposed governance arrangements in relation to the delivery of infrastructure.

We request that we are involved in forthcoming discussions regarding the Stevenage Regulation 123 list and proposed governance arrangements, once further details are known. This will ensure that cross-boundary infrastructure impacts are considered from the outset. Concurrently, there may be a need for our authorities to work collaboratively on securing other sources of funding.

Next steps

Whilst North Hertfordshire is yet to take a decision on whether to pursue CIL, we are firmly committed to meaningful collaborative working between our authorities to ensure that our respective planned housing growth can be brought forward in a coordinated and positive manner. We look forward to ongoing engagement and the opportunity to comment once again during your forthcoming consultation on the Stevenage Borough Council CIL Draft Charging Schedule.

Yours sincerely,

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

Cllr David Levett

Executive Member for Planning, Enterprise and Transport