

NORTH HERTFORDSHIRE LOCAL PLAN CONSULTATION

Stevenage Borough Council representations

December 2016

Summary

The North Hertfordshire Local Plan [NHLP] is the equivalent of the Stevenage Borough Local Plan [SBLP], providing the framework for controlling development in North Hertfordshire District through until 2031. It proposes major new housing development on the western, northern and north-eastern boundaries of Stevenage. This raises a number of issues, which the Borough Council has carefully considered.

Proposals

The North Herts Local Plan [NHLP] makes provision for 15,950 new homes 2011 – 2031, of which 14,000 are to meet North Herts' own needs and 1,950 to meet the unmet needs of Luton. The NHLP states that 4,340 homes have already been built; 4,860 are planned on 'local' allocations spread across the town and villages and 7,700¹ homes on six strategic housing sites.

Much of this land is proposed for removal from the Green Belt, with substantial compensatory new provision being made. Also, land west of the A1(M) at Stevenage is proposed for removal from the Green Belt as safeguarded land to provide up to 3,100 homes post-2026, subject to a further review of the local plan.

¹ The plan's maths appear to be wrong at this point

REPRESENTATION: WHOLE PLAN.

In response to the consultation, the Borough Council advises North Hertfordshire District Council that it generally welcomes the new NHLP and the spatial strategy set out within it, subject to the caveats raised in the objections that follow. SBC will be pleased to work with the District Council to address the objections it has made to the NHLP and it would hope to be able to advance such joint working to the point that agreed modifications can be put to the NHLP Inspector such that, subject to the adoption of those modifications, the objections can be withdrawn.

The NHLP scatters new housing development across the whole district, including six strategic housing sites of 600+ units adjacent to the main towns both within and bordering the District.

Land to the north of Stevenage is identified for 1,830 new homes spread across three sites in Graveley and Great Ashby parishes. This includes two strategic sites and one local site. Taken in combination, these represent the second largest amalgam of allocations in the District designed to meet NHDC's own housing needs. [We note that none of these sites is designed to meet the housing needs of Stevenage Borough].

These sites are intended to provide 13.2% of all of the housing proposed in the Stevenage HMA within the District. This represents an extra 24% [1,830] on top of all the housing allocations [7,600 homes] made in Stevenage Borough in the SBLP. The two figures combined represent an expansion of 9,430 new homes [or 472dpa] within, and on the edge of, urban Stevenage – an increase in the number of dwellings of approximately 25% over 2011 levels.

Given average house-building rates of 284dpa in the Borough over the twenty years to 2014, it is reasonable to question whether the Stevenage housing market can support this level of house-building.

It might reasonably be expected that there would be a scale of investigation and infrastructure provision commensurate with the scale of development being proposed in the NHLP. It is questionable whether that is the case.

However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education and retailing] which was not designed to accommodate development in North Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP3c/ii.

The Borough Council makes objection to the new employment site at Baldock, specifically to the lack of explicit employment provision to meet the unmet needs generated by Stevenage.

At an early stage in Duty to Co-operate discussions, the Borough Council identified to the District Council that it could not meet all of its housing and employment needs within the Borough boundary. Priority was given, in the SBLP, to meeting Stevenage's own share of the HMA housing requirement.

Whilst significant employment provision is made within the SBLP [some of which the District Council has raised formal objections against] there remains a short-fall of employment land against identified needs. Consequently, the Borough Council sought assistance, under the Duty to Co-operate, from the District Council [and others] in meeting its unmet employment requirements.

Paragraph 4.29 of the NHLP discusses this particular point. It states, inter alia, that:

"... The [employment] allocation at Baldock also takes account of long term needs which will arise within the wider FEMA. Stevenage, in particular, anticipates a shortfall of employment land against modelled requirements. These models assume continued commuting from North Hertfordshire to Stevenage, yet there is insufficient land in Stevenage to cater for the resultant growth."

However, this is where the discussion ends. The commitment previously made to explicitly provide employment land to meet the needs generated by Stevenage as a part of the Baldock allocation [policy SP3c/ii] has not been carried through to this iteration of the NHLP. The plan does not state that any provision will be made specifically for Stevenage. This commitment is set out only in a technical paper, which does not have the weight of the statutory local plan.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP5.

Whilst the Borough Council welcomes the creation of new, compensatory, Green Belt, it objects to the unduly large scale of it and the lack of justification for such a large designation.

Much of the land for new housing and employment development in the NHLP is proposed by way of Green Belt release. Also, land west of the A1(M) at Stevenage is proposed for removal from the Green Belt as safeguarded land.

As the SBLP has proposed the removal of land from the Green Belt in order to meet Stevenage's housing, retailing, G&T and employment needs, creating new, compensatory Green Belt is a move to be welcomed.

The NHLP intends to remove in the order of 1,000 hectares for development, in-setting and other designations. The SBLP is proposing the removal of, in the order of, 73 hectares for various developments.

NHDC are proposing an addition to the Green Belt in excess of 4,000 hectares. It is not clear whether such a large addition to the Green Belt can genuinely be held to be purely compensatory. It might be considered to be excessive.

As there is already a, sometimes substantial, collar of Green Belt around the western edges of Stevenage/ Hitchin and the eastern edge of Luton, it is not clear whether the land added to the Green Belt meets the five criteria to be designated as Green Belt. It could be argued that a smaller area of new Green Belt [that did not necessarily fill the entire gap between Whitwell and Great Offley] would equally well, or better, fit the criteria of restricting sprawl and preventing the merger of Stevenage/Hitchin and Luton.

The arguments offered in paragraph 4.55 are not compelling.

This representation refers to the issues of justification and effectiveness.

REPRESENTATION: POLICY SP8.

The Borough Council objects to the housing provision made as being inadequate to meet the overall OAN in the Stevenage HMA, given the scale of housing provision already made in the SBLP. The District Council should be aware that the Borough Council may need to ask for their assistance in meeting the OAN of Stevenage.

The overall housing provision across the Stevenage HMA, which includes the bulk of North Hertfordshire District as well as Stevenage Borough engages the Duty to Cooperate.

At the time of the preparation of the Stevenage Borough Local Plan [SBLP] the assessed overall objectively assessed housing need [OAN] across the HMA was being met in both plans combined. This remained the case at the time of the plan's submission for examination in July 2016.

However, subsequent to this, the Government has published the ONS 2014-based Sub-National Population Projections and the CLG 2014-based household projections.

Both NHDC and SBC jointly employed specialist consultants to interrogate the new data and to make recommendations. Their work showed that there was a small-scale [300 units] reduction in the OAN across the HMA but that this was not evenly distributed: a 600 dwellings fall in NHDC; was partially off-set by a 300 unit rise in Stevenage.

The consultants' recommendation in August 2016 was to leave the housing provision split as already planned in the submitted SBLP [7,300] and the emerging NHLP [14,400]. However, when the NHLP was published in October 2016, it proposed a housing target of only 13,800 homes [minus 600 on the previously planned number].

This leaves a short-fall of 300 homes across the HMA as a whole, specifically within Stevenage Borough. As the SBLP had already been submitted at this point, it has left the Borough Council in a difficult position.

SBC may need to ask NHDC to make additional housing provision in the NHLP to meet any unmet needs within the HMA and Stevenage Borough.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP8e(ii).

The Borough Council is concerned that the development proposed places an undue reliance on infrastructure provided within Stevenage Borough and advises the District Council that no provision was made for the infrastructure necessary to serve this development within the SBLP.

The NHLP scatters new housing development across the whole district, including six strategic housing sites of 600+ units adjacent to the main towns both within and bordering the District.

Land to the north of Stevenage is identified for 1,830 new homes spread across three sites in Graveley and Great Ashby parishes. This includes two strategic sites and one local site. Taken in combination, these represent the second largest amalgam of allocations in the

District designed to meet NHDC's own housing needs. [We note that none of these sites is designed to meet the housing needs of Stevenage Borough].

These sites are intended to provide 13.2% of all of the housing proposed in the Stevenage HMA within the District. This represents an extra 24% [1,830] on top of all the housing allocations [7,600 homes] made in Stevenage Borough in the SBLP. The two figures combined represent an expansion of 9,430 new homes [or 472dpa] within, and on the edge of, urban Stevenage – an increase in the number of dwellings of approximately 25% over 2011 levels.

Given average house-building rates of 284dpa in the Borough over the twenty years to 2014, it is reasonable to question whether the Stevenage housing market can support this level of house-building.

It might reasonably be expected that there would be a scale of investigation and infrastructure provision commensurate with the scale of development being proposed in the NHLP. It is questionable whether that is the case.

However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education and retailing] which was not designed to accommodate development in North Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP8e(ii).

The Borough Council welcomes, in principle, the decision to safeguard land 'west of the A1(M) at Stevenage' immediately to the west of the SBLP allocation at HO2.

REPRESENTATION: POLICY SP8e(ii).

The Borough Council objects to the lack of reference in the NHLP of the significant infrastructure obstacles that remain to be overcome before the North Hertfordshire part of the site can be developed. The District Council will need to undertake further work on these matters.

REPRESENTATION: POLICY SP8e(ii).

The Borough Council makes objection to the absence of the previous commitment to reserve the land to the West of the A1(M) at Stevenage to meet the longer-term housing needs of Stevenage.

After discussion about new settlement options for the longer term [paragraph 4.100 – 4.103], the NHLP states [paragraph 4.104] that:

"Land to the west of the A1(M) at Stevenage has long been identified as a sustainable location for a substantial urban extension to the town. Given the history of this site, it is considered there is sufficient justification to remove this site from the Green Belt now and safeguard it for future use. No development will be permitted until a plan review determines that the site is required to meet long-term needs and remains (part of) the most appropriate solution."

It is welcome that the District Council has recognised the value of this site. Policy SP8e(ii) states that the NHLP will seek to provide long-term certainty by:

“safeguarding land to the west of the A1(M) at Stevenage...for up to 3,100 dwellings in the period beyond 2026 subject to a future review of this plan.”

The figure of ‘up to 3,100 dwellings’ is noteworthy as both the Hertfordshire Structure Plan and the East of England Plan anticipated a development of 5,000 homes on a cross-boundary site. Close to this figure could, in theory, be delivered by the addition of this part of the site to the 1,350 homes proposed in policy HO2 of the SBLP, although there is mention neither of the Stevenage/SBLP allocation nor the full 4,450 homes figure in the NHLP. There is significant infrastructure that will need to be delivered before any volume of new

homes over and above the 1,350 in Stevenage Borough can be provided: again, the plan is silent on this point.

Of the most concern to Stevenage Borough is the absence of the commitment made in the 2014 iteration of the NHLP: namely, that the safeguarded land would be reserved in order to meet the longer-term housing needs of Stevenage. The change to this undertaking has not been discussed or agreed with the Borough Council.

Without this commitment, it is difficult to see the reasoned justification for removing land from the Green Belt on the edge of Stevenage in order to meet the future housing needs of North Hertfordshire, rather than in other locations elsewhere in North Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP16/NS1.

The Borough Council objects to the lack of references to Stevenage neighbourhood principles or Stevenage design principles being applied.

One of the requirements of the policy SP15/LG1 strategic housing allocation north of Letchworth is that the development should '*follow and implement Garden City principles*'.

Despite this, there is no equivalent commitment in either of the strategic housing allocations north of Stevenage [policy SP16/NS1 or SP18/GA2] to those developments adhering to either Stevenage neighbourhood principles or Stevenage design principles. Similar considerations apply to the local allocation GA1.

This omission is made despite the fact that the District Council has been made aware of the Borough Council's view that all urban extensions to Stevenage should be both sustainable and should be seen as new neighbourhoods following New Town principles established in 1947.

This representation refers to the issues of the Duty to Co-operate and effectiveness.

REPRESENTATION: POLICY SP16/NS1.

The Borough Council makes objection to the transport mitigation measures being proposed in relation to the housing developments north of Stevenage, on the basis that those measures may be inadequate.

One of the potentially biggest issues for the SBLP and for the housing allocations to the north of Stevenage in the NHLP is traffic and transport.

NHDC's July 2016 WHASH/Saturn transport modelling suggests that there will be adverse highways impacts across the Stevenage road network, much of it irrespective of the developments proposed in the NHLP. The principal problems are identified as:

- A1(M) junction 8 in the morning peak period
- A602/Monkswood Way in the evening peak period
- Six Hills Way/A602 in both the morning and evening peak periods

There have been no discussions between SBC and NHDC about these issues, nor has any mechanism been agreed for contributions for highways works [or any other mitigation/shared facilities].

HCC's own transport modelling [August 2016] shows significantly worse traffic conditions than those used by NHDC for their local plan. This is despite the fact that both of the models used are sanctioned by Herts CC and were constructed by, and are managed by, the same consultancy firm.

HCC's Paramics model identifies that in 2021 there are significant congestion issues at A1(M) junction 8, Hitchin Road and in the town centre in the evening peak. By 2031 the same model shows that in the evening peak A1(M) junction 8 is gridlocked in both the Do Minimum and Do Something scenarios, with the town centre congested in the Do Minimum scenario and gridlocked in the Do Something scenario.

The discrepancy between the two models, both promoted by HCC Highways, is still being explored by the Borough Council. Notwithstanding, it is important to bring these issues to the attention of NHDC. Tri-partite discussions with the County Council and the District Council may result in a mutually acceptable resolution to these apparently quite serious issues.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP16/NS1.

The Borough Council makes objection to the lack of retail provision commensurate to meet the needs generated by this development in North Hertfordshire District.

NHLP policy SP4 does not make explicit reference to provision being made for retail floorspace in the North Stevenage site (policy SP16/NS1). This is in contrast to the approach that the NHLP takes to the five other strategic housing allocations, where quite specific allocations are made.

On the North Stevenage site (aka Forster Country), policy SP16/NS1, whereas 900 homes are proposed, the requirement is for the *'integration with adjoining development in Stevenage Borough including site-wide solutions for access, education, retail and other necessary social infrastructure'*.

The SBLP policy HO3 [for the parallel site on the Stevenage side of the boundary] provides for local facilities, the scale of which have only been designed to serve the needs of the 800 homes proposed within the administrative area of Stevenage Borough. The scale of retail provision was not designed to serve the needs of the wider site i.e. NHDC's additional proposed 900 homes.

Indeed, at no time has NHDC indicated that it expected the Borough Council to make retail provision to meet North Hertfordshire's needs for the policy HO3 site.

The statement in 4.195, in combination with the lack of provision made in policy SP16/NS1, strongly infers that NHDC believe that the retail provision for their part of the site has already been, or should be, provided wholly within Stevenage Borough. This is not the case.

NHDC need to ensure that development in SP16/NS1 makes its own provision for retail or can be planned comprehensively to ensure appropriate retail provision, as well as any other *'necessary social infrastructure'*.

The NHLP approach raises further issues. The evidence base study 'North Hertfordshire Retail Study Update' (Nathaniel Lichfield & Partners, 2016), identifies a need, based on the proposed 900 homes in the policy, of a requirement for new retail floorspace of *'convenience goods of 300 sq.m net, comparison goods of 750 sq.m net and 300 sq.m of other Class A2 to A5 non-retail services'* to meet the needs generated by the SP16/NS1 site. No provision is being made to meet this on-site. Consequently, this need is not being met either on the HO3 or SP16/NS1 parts of the cross-boundary North Stevenage site.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP16/NS1.

The Borough Council is concerned that the development proposed places an undue reliance on infrastructure provided within Stevenage Borough and that none of this development was taken into account, or provision made for this development, within the SBLP.

The NHLP scatters new housing development across the whole district, including six strategic housing sites of 600+ units adjacent to the main towns both within and bordering the District.

Land to the north of Stevenage is identified for 1,830 new homes spread across three sites in Graveley and Great Ashby parishes. This includes two strategic sites and one local site. Taken in combination, these represent the second largest amalgam of allocations in the District designed to meet NHDC's own housing needs. [We note that none of these sites is designed to meet the housing needs of Stevenage Borough].

These sites are intended to provide 13.2% of all of the housing proposed in the Stevenage HMA within the District. This represents an extra 24% [1,830] on top of all the housing allocations [7,600 homes] made in Stevenage Borough in the SBLP. The two figures combined represent an expansion of 9,430 new homes [or 472dpa] within, and on the edge of, urban Stevenage – an increase in the number of dwellings of approximately 25% over 2011 levels.

Given average house-building rates of 284dpa in the Borough over the twenty years to 2014, it is reasonable to question whether the Stevenage housing market can support this level of house-building.

It might reasonably be expected that there would be a scale of investigation and infrastructure provision commensurate with the scale of development being proposed in the NHLP. It is questionable whether that is the case.

However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education and retailing] which was not designed to accommodate development in North Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP18/GA2.

The Borough Council is concerned that the development proposed places an undue reliance on infrastructure provided within Stevenage Borough and advises the District Council that none of this proposed development was taken into account, or provision made for this development, within the SBLP.

The NHLP scatters new housing development across the whole district, including six strategic housing sites of 600+ units adjacent to the main towns both within and bordering the District.

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However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education and retailing] which was not designed to accommodate development in North Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP18/GA2.

The Borough Council objects to the lack of sufficient secondary school provision that is capable of being demonstrably deliverable.

The County Council are known to be concerned about the nature of the educational provision being provided in the plan for the area in and around Stevenage, specifically to the north of the town.

At the time of the Building Schools for the Future programme [2005 – 2010], it was intended to relocate the Thomas Alleyne School from the High Street to a large Green Belt site in

North Hertfordshire District at Great Ashby. This proposal proceeded a long way towards delivery before being abandoned.

The NHLP now allocates the relocation site [together with adjacent land] for housing development as Policy SP18/GA2.

The NHLP says of the educational provision on this site:

“Great Ashby’s existing primary school is significantly oversubscribed...There is also no local secondary school...development of this site provides the opportunity to address these issues. 2FE of primary-age provision will exceed the requirements from the site....a modest level of provision, potentially in the form of an all-through school, could provide a local solution for Great Ashby and create a more sustainable residential neighbourhood”

However, Hertfordshire County Council [HCC] does not accept that an all-through school is a viable or deliverable option. If they are right, the short-fall of secondary school provision in Great Ashby will be exacerbated. Also, the NHLP proposals do not provide enough capacity to make good the identified deficit in secondary school provision in the North East Stevenage area more generally.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY SP18/GA2.

The Borough Council objects to the lack of references to Stevenage neighbourhood principles or Stevenage design principles being applied.

One of the requirements of the policy SP15/LG1 strategic housing allocation north of Letchworth is that the development should ‘*follow and implement Garden City principles*’.

Despite this, there is no equivalent commitment in either of the strategic housing allocations north of Stevenage [policy SP16/NS1 or SP18/GA2] to those developments adhering to either Stevenage neighbourhood principles or Stevenage design principles. Similar considerations apply to the local allocation GA1.

This omission is made despite the fact that the District Council has been made aware of the Borough Council's view that all urban extensions to Stevenage should be both sustainable and should be seen as new neighbourhoods following New Town principles established in 1947.

This representation refers to the issues of the Duty to Co-operate and effectiveness.

REPRESENTATION: POLICY SP18/GA2.

The Borough Council makes objection to the transport mitigation measures being proposed in relation to the housing developments north of Stevenage, on the basis that those measures may be inadequate.

One of the potentially biggest issues for the SBLP and for the housing allocations to the north of Stevenage in the NHLP is traffic and transport.

NHDC's July 2016 WHASH/Saturn transport modelling suggests that there will be adverse highways impacts across the Stevenage road network, much of it irrespective of the developments proposed in the NHLP. The principal problems are identified as:

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There have been no discussions between SBC and NHDC about these issues, nor has any mechanism been agreed for contributions for highways works [or any other mitigation/shared facilities].

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The discrepancy between the two models, both promoted by HCC Highways, is still being explored by the Borough Council. Notwithstanding, it is important to bring these issues to the attention of NHDC. Tri-partite discussions with the County Council and the District Council may result in a mutually acceptable resolution to these apparently quite serious issues.

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REPRESENTATION: POLICY GA1.

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REPRESENTATION: POLICY GA1.

The Borough Council objects to the lack of references to Stevenage neighbourhood principles or Stevenage design principles being applied.

One of the requirements of the policy SP15/LG1 strategic housing allocation north of Letchworth is that the development should '*follow and implement Garden City principles*'.

Despite this, there is no equivalent commitment in either of the strategic housing allocations north of Stevenage [policy SP16/NS1 or SP18/GA2] to those developments adhering to either Stevenage neighbourhood principles or Stevenage design principles. Similar considerations apply to the local allocation GA1.

This omission is made despite the fact that the District Council has been made aware of the Borough Council's view that all urban extensions to Stevenage should be both sustainable and should be seen as new neighbourhoods following New Town principles established in 1947.

This representation refers to the issues of the Duty to Co-operate and effectiveness.

REPRESENTATION: POLICY HS7.

The Borough Council objects to the lack of an explicit statement in policy, or its reasoned justification, that the provision made in the NHLP fully meets the G&T needs generated by North Hertfordshire during the lifetime of the plan and that, consequently, NHDC will not be seeking pitches outside the District to meet their identified G&T need.

The NHLP, policy HS7, states that Pulmore Water, Codicote is allocated to provide seven permanent Gypsy and Traveller [G&T] pitches to meet the District's needs up to 2031. Paragraph 8.44 refers to the evidence produced by ORS regarding the need for seven additional pitches. Pulmore Water currently has six temporary pitches which expire in 2017. It is understood these six pitches will seek a permanent planning permission and that the site will accommodate one additional pitch to meet the identified need.

However, the policy also includes criteria against which future G&T proposals can be assessed, suggesting that the District Council considers that possibly not all of its need is met by the allocation.

NHDC have made objections to the SBLP, including to the proposed new Gypsy and Traveller site at Graveley Road [policy HO12/1], whilst simultaneously requesting access to some of the pitches on this site to meet their needs.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATION: POLICY WY1.

The Borough Council objects to the allocation of this site without safe provision being made for access/egress to/from the site during the time of flood.

Whilst there are three sites immediately on the edge of the built-up area of Stevenage [albeit that only two of them are on the edge of Stevenage Borough], there are other sites nearby which might impact upon Stevenage. There are a number of detailed points about flood risk that should be mentioned to NHDC but which do not merit objections:

- Paragraph 11.68 should refer to the 'Rye Meads Water Cycle Study', rather than to the 'Stevenage Water Cycle Study'
- It is not clear whether the SFRA Update 2016 includes the climate change allowances, published by the Environment Agency in February 2016 and, if so, which Regions (Thames or Anglian) and which range (central, upper or higher)
- Sites GA1, GA2, NS1 and KB1 – KB4 potentially do not make adequate provision for SuDS or fluvial FZ envelopes or make adequate provision for the assessment of surface water run-off.

We would suggest further technical work on these issues.

There is a question mark about the deliverability of site WY1 for 300 homes in Wymondley. The 2016 SFRA Update shows that Stevenage Road, from which the sole access to the site is derived, lies within the Flood Zone envelopes for FZ2 and FZ3b of the Ash Brook. It is also a conduit for surface water run-off from the village itself and the surrounding fields. This would preclude safe access and egress to/from the site in the time of a flood, contrary to EA advice. Paragraph 13.358 acknowledges that Stevenage Road is a key flood route but offers no suggestion of how and when this should be addressed, or by whom.

This representation refers to the issues of positive preparation, justification and effectiveness.
