

# Examination of the Stevenage Borough Local Plan (2011-2031)

## Stage 3 hearing sessions

### Statement of North Hertfordshire District Council (representor ref: 405069)

**Note:** *This statement is written on the presumption that, if this session proceeds, the Inspector is minded to find the plan sound and legally compliant on the matters discussed at Stages 1 and 2 of the examination.*

*A number of the questions posed for this session overlap with or repeat questions and issues from these earlier Stages. The Council reserves its right to appear at the Stage 3 hearings to address these points contingent on the extent to which they are addressed at the Stage 2 hearings.*

#### **Matter 18 – Employment**

*1. Are the proposed employment and mixed use site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?*

##### *EC1/7 – Land west of Junction 8*

- 1. Do exceptional circumstances exist to justify the removal of the site from the Green Belt?*
- 2. Would the proposal result in highway safety issues that could not be mitigated?*
- 3. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?*
- 4. Is the proposal likely to affect any protected species?*

1. Question 1 replicates Question 3 of the Stage 2 / Matter 10 session. NHDC's position in relation to that question was set out in our Statement to the Stage 2 hearings. The relevant paragraphs from that statement – which also address the additional questions now identified in relation to site EC1/7 – are replicated below.
2. NHDC's objections relate to the suitability of site EC1/7, as identified in Policy EC1 of the submitted plan (LP1).
3. Following completion of additional flood risk analysis, NHDC has confirmed (ED133) that it does not wish to pursue this element of its objection in relation to its site. However, NHDC retains its objections on other grounds, notably Green Belt and transport.
4. NHDC fully supports the Stevenage Borough Council's (SBC) aspirations to maximise employment provision within the Borough on reasonable sites. However, in light of the Plan's acknowledgement that this site is only suitable for lower-intensity uses, the benefits to be derived from this site do not outweigh the harms. It will deliver only a

limited quantum of additional development. It will do little to obviate the need for SBC to seek assistance from other authorities to meet its employment needs.

5. NHDC consider the A1(M) from the Fishers Green Road / Stevenage Road overbridge to Junction 8 to be a more appropriate and defensible long-term Green Belt boundary for this part of the Borough.
6. Site EC1/7 lies within the relatively narrow gap between Stevenage and Little Wymondley and close to the settlement of Todds Green. Encroachment beyond the A1(M) for employment uses could introduce development of an inappropriate scale and intensity into this area.
7. In transport terms, development of this site would potentially load further demand through what is currently one of the minor arms of A1(M) junction 8 (Stevenage Road). This would potentially conflict with more strategic movements between the A602 and A1(M), particularly from the A602 eastbound to A1(M) northbound.
8. If it is to serve requirements arising from within SBC, this site will draw additional traffic movements across Junction 8, potentially exacerbating issues identified in relation to the Stage 1 hearings. In the alternate it may encourage additional 'rat running' through Todds Green and Chantry Lane to avoid the junction.
9. Notwithstanding the evidence presented at the Stage 1 hearings in relation to the transport strategy and modal shift, routes across Junction 8 for pedestrians and cyclists can best be described as sub-optimal. It is considered unlikely that any significant proportion of journeys from within Stevenage will be by these modes.
10. NHDC remains unconvinced that the existing access beneath the A602 is adequate or that it can be improved without a prohibitive cost to any future development.

#### *Questions 2 and 3*

11. North Hertfordshire District Council (NHDC) has no specific comments against these questions.

*4. What are the implications of the identified employment land needs not being met within the Borough's boundaries?*

*5. What are the implications of Welwyn Garden City refusing to assist with providing employment land to meet some of the unmet demand from Stevenage Borough?*

*6. Does this have implications for Central Bedfordshire and North Hertfordshire who have agreed to assist in this regard? Do they now need to contribute more than previously agreed and if so has this been discussed? How will this be secured and when?*

*7. Does this need to be reflected in the Plan?*

12. These questions replicate those posed in Questions 4 to 8 of the Stage 2 / Matter 10 session. NHDC's position in relation to those questions was set out in our Statement to the Stage 2 hearings. The relevant paragraphs from that statement are replicated below.
13. NHDC consider there is merit in considering these questions holistically.
14. The issues were largely addressed through the Stage 1 hearings. In particular, NHDC's Matter 2 statement set out the proposed approach in our own emerging plan (ORD1) to help address the shortfall arising from Stevenage. This was reiterated in verbal evidence to the hearings.
15. It has been confirmed that SBC have not placed any particular reliance on a positive contribution from WHBC in coming to a view on how much employment land Central Bedfordshire and North Hertfordshire may be asked to provide to address unmet employment needs.
16. As per paragraph 10 of our Matter 2 statement, NHDC consider that having regard to the 2014 EEFM the proposals in ORD1 would have broadly balanced the unmet needs identified in SBC's Employment Technical Paper at the point of submission (TP1).
17. ED124 reflects the latest EEFM results and identifies a reduction in the perceived shortfall arising from SBC to approximately 11.5 hectares.
18. As per paragraph 10 of our Matter 2 statement, NHDC have identified that the equivalent results for our own district show an increase in job numbers. NHDC are currently in the process of commissioning additional work to understand the implications of this and expect this to be available in March 2017.
19. An increase in NHDC's job numbers may be read as suggesting that our ability to contribute to the shortfall of employment land from Stevenage may be reduced. It will not be possible to confirm or deny this until the analysis above has been completed.
20. Although this may lead to a degree of uncertainty, Central Bedfordshire have agreed in principle to also contribute to any unmet needs from Stevenage<sup>1</sup>. This should provide flexibility should NHDC's ability to assist change and / or if NHDC's objections in relation to site EC1/7 are upheld.

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<sup>1</sup> Matter 2 Statement of Stevenage Borough Council, paragraph 6.3, ED140