

## Stevenage Local Plan Objection to Matter 2

**I object to the Objectively Assessed Needs for Housing and Employment Land in the Stevenage Plan in that it makes inadequate allowance for the particular constraints that apply to Stevenage. The OAN should be reduced and the plans to build on Green Belt land North of Stevenage should be reduced.**

### 1) Stevenage Overview

Stevenage Borough options for new housing are particularly constrained by the following considerations:

- a) The Stevenage town has substantially been built up to the Borough boundary.
- b) Some residual green areas are designated as Green Belt and should be protected<sup>1</sup> from development.
- c) Most of the housing in the town has been built since the 1950s and as such is relatively modern and is not 'ripe for redevelopment'.

The above factors result in a serious shortage of sites to provide new housing with the possible exception of a number of 'brownfield' redundant commercial sites.

The town was set up as a new town to provide over-spill to house people moving out of London. The Borough boundary has enabled the Stevenage Development Corporation to provide the necessary space in the town of Stevenage. Over the last 60 years there has been a continuing build within the town until the town has virtually used up all available space. Over this period the town has had the following characteristics:

- House prices have generally been lower than the surrounding area where the established towns (e.g. Welwyn Garden City, St Albans, Hitchin, Letchworth, etc) have been considered more desirable and where new house building has been more constrained..
- The lower house prices in Stevenage are partially due to the significant building programme within the town and possibly (especially more recently) the run down town centre not being considered as desirable as the previously mentioned local towns.

Thus the supply-demand situation in Stevenage has resulted in lower house prices than surrounding towns. The lower house prices in Stevenage has resulted in considerable numbers of commuters to London and other employment areas living in Stevenage.

The Stevenage plan endeavours to satisfy the full projected requirement for housing without considering the constraint of limited available sites within the Borough boundary. It is clear that something has to give and the Stevenage Plan proposes to build on Green Belt land to solve the problem.

Another way of looking at it is to consider that Stevenage is in a transition to a time where it cannot continue to provide enough housing to satisfy commuters as well as the needs of the population and the employers of the town.

## 2) House Building Requirements

If we look at the way the housing requirements are projected<sup>2</sup> for the plan we find that inward migration is derived from two sources as follows:

1. The inward migration of the town is taken into account by projecting the historic census data forward. Principally the 10 year migration trend is used and projects that the population of Stevenage will be 95,241 in 2031 when combined with the natural change in population (births and deaths). Thus a 13% increase in population of Stevenage is projected in 20 years from the 2011 population of 84247. Using the Household Representative Rates (HRRs) this population translates, evidently, into a net increase of 6506 households and of 6634 dwellings over the 20 year period.
2. The Objectively Assessed Need (OAN) for housing considers further factors which affects dwelling requirement.
  - 2.1. **There is no requirement to uplift the population of Stevenage and North Herts due to employment trends as the population projection from 1 (above) provides more workers (10,000) than the projected increase in jobs currently projected (7300).** It is interesting to see that our region has 61.7% of the population that work locally and 38.3% who commute to jobs outside our region. Thus this implies that the percentage of commuters from our region is likely to increase (beyond 38.3% to 40.2%).
  - 2.2. The ORS<sup>2</sup> recommends an uplift of 10% of the dwelling requirement for market signals of which 1.6% is an allowance for concealed families and homeless households. It is stated that *“There is no definitive guidance on what level up uplift is appropriate”* on p51. The 10% uplift is based on a crude comparison with Southampton, Eastleigh and the New Forest region which the ORS sees as a suitable region for comparison with Stevenage and North Herts based on house prices, rents, affordability, overcrowding and rates of development. The inspector examining the Eastleigh Local Plan judged that a 10% uplift was reasonable. This is a supply –demand factor that is driven by house prices, availability, affordability, etc. **One major difference between , particularly, Stevenage and the Southampton/Eastleigh region is that Stevenage is constrained by the Borough Boundary and the Green Belt whereas there is virtually no Green Belt in Hampshire.** Never the less the ORS concludes that the OAN for dwellings in 2031 is 6634 uplifted by 10% or 7300. This implies that the population of Stevenage increases by approximately 1491 people at the 2032 projected average household size of 2.24. Thus the projected Stevenage population in 2031 would be 96732 and much of the incremental increase would be outward commuters driving the outward commuters from our region to 41.6% of workers if we assume Stevenage and N. Herts are uniformly affected.

**The Objectively Assessed Need section of the household projections is discretionary** and it<sup>2</sup> states on p9 *“It is important to recognise that the OAN does not take account of any possible constraints to future housing supply. Such factors should subsequently be considered by the local planning authorities as part of the plan-making process in order to establish the appropriate Housing Requirement and planned housing number.”*

It seems that not only do we have the considerable constraints of the Borough Council Boundary and the areas of Green Belt but the Stevenage Planning Authority has not

exercised its discretion to reduce the OAN part of the housing projection. No guidance is provided as to how to adjust the factor for these constraints but we know that Southampton & Eastleigh which has no Green Belt constraint used an uplift factor of 10%. I would postulate that given the constraints that Stevenage is under, an uplift factor in the range of 2% to 5% would be reasonable. Any number over 1.6% covers the provision for concealed families and homeless households.

3. The Stevenage Local Plan<sup>3</sup> proposes to set a target of 7600 new homes in the period (a further increase of 300 homes over the OAN<sup>#</sup>) to “help deliver affordable housing” and “to help put forward a positive message.” This is probably intended to be a contingency to ensure the OAN is achieved but it shows that the SBC is failing to appreciate the constraints that apply.

*# I notice that subsequent to the submission of the Stevenage Local Plan to the Inspector, the SBC has revised the plan to 7600 homes with no contingency (ref. ED112 Aug 2016). This is despite the projected overall OAN for Stevenage and North Hertfordshire dropping from 21685 to 21281 (i.e -404) homes in the latest ORS projections. The fact that the SBC effectively choose to increase the planned number of homes in Stevenage in these circumstances is further evidence that SBC fail to fully appreciate the constraints of the town.*

### 3) The Green Belt

The NPPF states:

*“79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*80. Green Belt serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

And further that

*“87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*

If we consider the area of Green Belt between North Stevenage and Graveley, the combined local plans of Stevenage and North Herts propose building 1800 houses between Stevenage and Graveley in the area that is currently Green Belt. **The net effect of this is to virtually eradicate the Green Belt between Stevenage and Graveley.** At the present time there is in excess of a half mile of green space between North Stevenage and Graveley but if the proposed house building is approved it reduces to just 200 yards. The traveller travelling North from Stevenage to Graveley along North Road and Graveley Road will hardly be aware of any green break between the houses. Thus it can be argued that these plans are counter to the first 2 purposes of Green Belts. i.e *to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another;* The other Green Belt region(s) within the Town boundary do not, on the face of it, have such a strong case for preservation.

The Stevenage plan<sup>4</sup> argues that it has demonstrated that exceptional circumstances exist but it is difficult to believe this when:

- a) The planning process allows for the OAN for market signals to be modified to allow for local constraints but no downward correction has been applied.
- b) An additional contingency of 300 dwellings has been added without strong justification.
- c) None of the incremental OAN housing is necessary for the employment in Stevenage or North Hertfordshire but instead serves as housing for workers who commute outside the Stevenage/North Herts Area.

#### **4) Summary**

In summary, Stevenage should be viewed as a town that is in transition from an overspill town which has capacity to provide housing for workers who travel to remote employment (outside the immediate area) to a town which is becoming full and should predominantly cater for the needs of the local people and local employment areas.

The constraints of a combination of the Borough Boundary, The Green Belt and a substantially modern housing stock which is not ripe for redevelopment should be used in the Local Plan to rationalise that a lower (than 10%) OAN uplift is appropriate. Something in the region of 2% to 5% would seem reasonable. This combined with a slightly lower contingency means a house building target of 7100 would be appropriate.

The Green Belt to the North of Stevenage should be preserved.

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<sup>1</sup> National Planning Policy Framework (NPPF) March 2012

<sup>2</sup> Stevenage & N Hertfordshire Strategic Housing Market Assessment Update 2015 by ORS June 2015

<sup>3</sup> Housing Technical Paper, Stevenage Borough Council December 2015

<sup>4</sup> Green Belt Technical Paper, Stevenage Borough Council December 2015