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Stevenage Borough Local Plan Examination

Hearing Statement – Matter 16 (Housing Site Allocations)

Iceni Projects Limited on behalf of
RPF Developments

February 2017

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ON BEHALF OF RPF
DEVELOPMENTS

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Stevenage Borough Local Plan
Examination
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1. INTRODUCTION

- 1.1 This Statement has been prepared by Iceni Projects Ltd on behalf of RPF Developments in response to Matter 16 of the Inspector's Matters, Issues & Questions (Stage 3) for the Stevenage Local Plan Examination. In particular, this Hearing Statement provides our client's response to Questions 2, 3 and 4 of Matter 16, which state:

2. Are the assumptions regarding the capacity of the sites justified, what is this based on?

3. What is the basis for proposing housing on areas of public open space and sites currently in recreational use? What is the situation regarding the adequacy of open space/recreational facilities in the areas concerned? How would the proposed housing sites affect this? Is the approach justified and is it consistent with the NPPF?

4. Are the detailed requirements for each of the allocations clear and justified? Have the site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?

- 1.2 The below comments build upon our previous representations on these issues with specific regard to the land owned by our client to the north of the A602 and provide further explanation of how and why we consider Policy HO4 will need to be amended to make it sound in this regard.

2. MATTER 16 – HOUSING SITE ALLOCATIONS

Question 2

- 2.1 With specific regard to the proposed allocation identified in the draft Local Plan (document reference LP1) as 'South East of Stevenage', in our view the identification in Policy HO4 of an approximate capacity of 550 dwellings would appear to be broadly reasonable, having regard to the nature of the site and the requirements for the provision of land for associated infrastructure including highways, open space and drainage/ flood risk mitigation.
- 2.2 We note that the approximate capacity of 550 dwellings for the overall allocation (comprising 150 dwellings from North of the A602 and 400 dwellings from South of the A602) appears to derive from the illustrative capacity figures for these two land parcels identified in the Council's June 2015 Strategic Land Availability Assessment (document reference HP3). Section 5 of this document indicates that the stated housing potential for each site was based on information provided by the landowner, unless the Council considered that providing housing at the density proposed would be unsuitable for the site.
- 2.3 As discussed in our previous representations, based on initial masterplanning work undertaken to date (included at Appendix 1), which has been informed by initial technical work relating to matters including flood risk and highways, we consider that up to approximately 200 dwellings could be acceptably accommodated on the land to the north of the A602. This was highlighted within our response to the Call for Sites in July 2013 and thus we contend that the illustrative capacity of the land to the north of the A602 should be stated as being up to approximately 200 dwellings, rather than 150 dwellings as currently presented. We are concerned that the current wording of Policy HO4 may be interpreted as identifying a definitive capacity of 150 dwellings for the land to the north of the A602, which in our view would be unsound, as the appropriate capacity can only be properly determined by undertaking a detailed masterplanning exercise in support of a planning application. In advance of such an exercise, we consider that it would be appropriate to use the 200 dwelling figure as an approximate maximum capacity for this parcel of land based on the initial illustrative masterplanning work undertaken on behalf of our client, thereby providing sufficient flexibility to ensure future development is not artificially constrained by the policy. Any such artificial constraint on the quantum of future development at this stage would lack an evidential basis and would be premature to detailed technical assessment and masterplanning of the site, and would therefore be unsound as it would not be justified.
- 2.4 Meanwhile the incorporation of and apportionment of elements of the allocation such as community facilities, open space, affordable housing, self-build and aspirational homes across the two land parcels comprising the overall allocation will inevitably influence the overall residential capacity of

each site, and thus a degree of flexibility in the policy is required to ensure the effective delivery of future development proposals are not prejudiced.

- 2.5 Having regard to the above, we therefore consider that Policy HO4 as currently worded is unsound as the 150 and 400 dwelling figures referenced could be interpreted as imposing absolute limits on the capacity of each part of the allocation prior to the preparation of a specific development proposal, and in the case of the 150 dwelling figure for the land to the north of the A602, this would not be justified having regard to the initial masterplanning work undertaken to date. Consequently we consider that in order to make the policy sound the 150 dwelling figure should be amended to 200 dwellings, and it should be clarified within the policy text that these are illustrative maximum capacity figures, with the precise capacity that would be appropriate for each site to be determined through the preparation of specific development proposals.

Question 3

- 2.6 With specific regard to the land north of the A602 allocated for residential development by Policy HO4, we note that paragraph 9.37 of the draft Local Plan (document reference LP1) makes reference to the site's former use as playing fields. However it goes on to explain that these facilities no longer have any community use and have been redundant for a number of years, repeating the findings of the Council's Sports Facility Assessment and Strategy 2014-2031 (document reference CF1a). Paragraph 9.37 further highlights the over-supply of playing fields across the town and importantly notes that sufficient space will remain even with the growth planned for the plan period, and Figure 116 of the Sports Facility Assessment thus concludes that the site is "not required for sport".
- 2.7 Having regard to the above, the land north of the A602, which comprises part of the 'South East of Stevenage' allocation, is not in sport or recreational use and has been disused for a number of years, and this has been discussed with the Council and Sport England as detailed in our previous representations. On this basis, and in light of the stated over-supply of playing fields across the town, we consider it to be entirely reasonable for this land to be allocated for residential purposes in order to assist in meeting the Borough's very significant housing needs. Given the lack of existing recreational use and the existing provision within the area, the former sports facilities are clearly surplus to requirements and thus we consider that the allocation of this land for residential development is compliant with paragraphs 73 and 74 of the National Planning Policy Framework (NPPF).
- 2.8 As stated within our previous representations, we consider that it would be reasonable for developer contributions to be required to improve nearby existing facilities in order to mitigate any increase in demand from new residents where this would be directly related to the development and justified in all other respects having regard to paragraph 204 of the NPPF. However, we object to part 'g' of Policy 4 as presented within the Publication Draft of the Local Plan (document reference LP1), as

the current wording refers to a “loss of sports facilities” and a need to mitigate this loss. Clearly, this is contrary to the Council’s own evidence base and the explanation in paragraph 9.37 that the land preforms no sports or recreational function, and consequently it would not be logical to consider the development of this site for residential purposes to result in a ‘loss’ of sports facilities. We note that the Council has proposed to modify the wording of part ‘g’ (Proposed Modification HOC7, Document ED113) to clarify that the sports facilities are “now redundant”. However, the policy as amended would still require this ‘loss’ to be mitigated, despite the fact that the Council has acknowledged the redundant nature of the site, and by logical implication, the fact that residential development would not result in loss of a sports facility. We therefore encourage the Council to remove the reference at part ‘g’ of Policy HO4 to mitigating the loss of sports facilities, as set out within our previous representations, in order to ensure that the policy is sound.

Question 4

- 2.9 We are broadly supportive of the majority of the criteria set out at parts ‘a’ to ‘o’ of Policy HO4, which would appear to be reasonable, based on the nature of the site and its constraints, and the need to deliver a sustainable form of development. As detailed within our previous representations however, we do object to the wording of certain aspects of the policy. Whilst the Council would appear to have now provided justification for the 1% self-build requirement set out at part ‘d’ of the policy (evidence for which is provided in the Council’s Housing Technical Paper: 2016 Update – Document ED118), for the reasons set out previously we consider it necessary for the policy to clarify that the 30% affordable housing requirement will be subject to viability considerations, in addition to our previous comments regarding part ‘g’ above.
- 2.10 Furthermore, with regard to the detailed requirements of the allocation, as highlighted within our previous representations, we consider that in order to make the policy sound the Council should clarify that the requirements set out in sections ‘c’ to ‘h’ in particular apply to the allocation as a whole, rather than requiring individual development proposals to deliver an equal proportion of self-build, aspirational or sheltered housing for example. Clearly, provided the allocation as a whole complies with the relevant requirements it would be illogical and unjustifiable to require individual applications for each development parcel to deliver an equal mix of housing. Given the larger size of the land to the south of the A602 it may be more appropriate to locate a greater proportion of social and community infrastructure such as a GP surgery at this location, and to deliver a higher number of smaller, higher density dwellings than on the land to the north of the A602, which may be more appropriate for larger, aspirational homes.
- 2.11 In this regard, the respective landowners (RPF Developments and Stevenage Borough Council) have engaged in productive discussions (as noted within the Statement of Common Ground between the parties – Document ED131) with the intention of ensuring that the allocation is developed in a coherent and efficient manner, and to consider the potential distribution of infrastructure across the two sites, potentially coordinated by a joint illustrative masterplan for the entire allocation.

- 2.12 It is therefore important that the policy wording includes appropriate flexibility to ensure that the landowners can work together to achieve appropriate provision and apportionment of these detailed requirements across the two parts of the allocation, rather than requiring uniform provision of each item on each land parcel. As such, we consider that the policy should state that the detailed requirements apply to the allocation as a whole rather than individual parts of the allocation.

Summary and Proposed Amendments

- 2.13 Having regard to the above, we consider that the following parts of the Local Plan are currently unsound, based on the latest wording of Policy HO4 and its supporting text as modified by Proposed Modification HOC7:

- The reference to a potential capacity of 150 dwellings for the land to the north of the A602.
- The reference to the need for development proposals to mitigate the loss of existing sports facilities.
- The current wording of part 'e', which does not explicitly state that any such affordable housing requirement will be subject to viability considerations.
- The lack of clarification that the detailed requirements set out within the policy relate to the allocation as a whole rather than individual applications for specific parts of the wider site.

- 2.14 We regard these aspects as unsound, as an artificial cap of 150 dwellings for the land to the north of the A602 would not be justified having regard to the technical work undertaken to date, whilst the reference to mitigating the loss of sports facilities would also be unjustified given the lack of existing sports use and the Council's own evidence base regarding supply across the town. Meanwhile we also consider that a potential requirement for each part of the allocation to deliver an identical mix of housing to meet the policy criteria would not be justified having regard to the requirements of paragraph 182 of the NPPF, given the intention for the landowners to explore the potential to work together to deliver this site in the most efficient and effective manner. Furthermore, as discussed in our previous representations, the lack of reference to affordable housing requirements being subject to viability considerations would clearly be contrary to national planning policy including paragraph 173 of the NPPF.

- 2.15 We consider that the Local Plan can be made sound by:

- (i) Amending the wording of Policy HO4 to identify an approximate capacity of 200 dwellings for the land to the north of the A602, and clarifying that these figures are illustrative, subject to further detailed masterplanning and technical work.

- (ii) Removing the reference at part 'g' of Policy HO4 to the need to mitigate the loss of existing sports facilities.
- (iii) Clarifying that the affordable housing provision required by part 'e' of Policy HO4 is subject to such provision being viable.
- (iv) Adding reference within the text of Policy HO4 to clarify that the requirements set out within the various criteria are applicable to the allocation as a whole rather than individual development proposals on each of the two parcels of land which comprise the wider site, and that infrastructure (including social infrastructure) may be delivered in differing proportions across the wider site provided the minimum requirements are met for the allocation as a whole.

A1. CONCEPTUAL MASTERPLAN



- Key
- 1 Tree planting and open space
 - 2 Primary vehicle access
 - 3 Secondary vehicle access
 - 4 Residential housing clusters
 - 5 Pedestrian routes
 - 6 Stevenage Football Club and area for further enhancements to sports facilities

Land owned by Stevenage Borough Council: —
Land owned by RPF Developments: —

Land at Bragbury End Stevenage
Conceptual Masterplan

Raw Architecture July 2013 1:2000 at A3