



FEBRUARY  
2017

# Stevenage Borough Local Plan Examination

## Hearing Statement – Matter 16 (Housing Site Allocations)

Iceni Projects Limited on behalf of  
Bragbury End Sports LLP

February 2017

ICENI PROJECTS LIMITED  
ON BEHALF OF BRAGBURY  
END SPORTS LLP

### **Iceni Projects**

London: Flitcroft House, 114-116 Charing Cross Road, London, WC2H 0JR  
Glasgow: Suite 2/1, The Mercantile Chambers, 53 Bothwell Street, Glasgow, G2 6TS  
Manchester: That Space, 31-33 Princess Street, Manchester, M2 4EW

t: 020 3640 8508 | w: [iceniprojects.com](http://iceniprojects.com) | e: [mail@iceniprojects.com](mailto:mail@iceniprojects.com)  
linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: @iceniprojects

**Stevenage Borough Local Plan  
Examination  
HEARING STATEMENT – MATTER 16 (HOUSING SITE  
ALLOCATIONS)**

---

---

# CONTENTS

<b>1.</b>	INTRODUCTION.....	1
<b>2.</b>	MATTER 16 – HOUSING SITE ALLOCATIONS .....	2

# 1. INTRODUCTION

- 1.1 This Statement has been prepared by Icen Projects Ltd on behalf of Bragbury End Sports LLP 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 and 3 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?*

- 1.2 The below comments build upon our previous representations on these issues with specific regard to the land owned by our client known as Bragbury End sports ground car park, and provide further explanation of how and why we consider Policy HO1 and its supporting text 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 ‘Bragbury End sports ground car park’, in our view the identification in Policy HO1/2 of an approximate capacity of 8 dwellings would appear to be broadly reasonable, having regard to the size and nature of the site.
- 2.2 However, as discussed in our previous representations, whilst Policy HO1 states that sites should be developed at an overall capacity which generally accords with the dwelling capacity given for that site, we consider that the policy should clarify that proposals for development in excess of these figures would be acceptable if the applicant demonstrates that a satisfactory layout could be achieved and that the proposals would be acceptable in all other respects. Clearly, the number of dwellings that could be delivered on a site will be dependent on a range of factors, such as the proposed dwelling mix, the layout of the site and the requirement to provide infrastructure or mitigate identified constraints. As such, there may be an opportunity to deliver an acceptable residential development on the sports ground car park site which would deliver more than 8 dwellings. This is recognised at paragraph 9.5 of the supporting text to the policy, which highlights that the housing numbers in Policy HO1 are indicative, and that schemes on these sites should aim to maximise development. Consequently imposing an absolute upper limit of 8 dwellings would be unjustified in advance of the preparation of a detailed development proposal which might reasonably accommodate a greater number of dwellings, and would thus be unsound having regard to paragraph 182 of the National Planning Policy Framework (NPPF).
- 2.3 We therefore consider that whilst the assumption regarding the potential capacity of the sports ground car park site would appear to be broadly reasonable, the wording of the policy should be amended to explicitly allow this illustrative capacity figure to be exceeded, having regard to the requirement set out at paragraph 9.5 of the supporting text to achieve the highest possible net density appropriate to the character of the area, passenger transport accessibility and other relevant plan policies. Whilst the indication within the policy text that schemes should be developed at an overall capacity which “generally accords” with the dwelling capacity would appear to allow some flexibility, we consider that this is not sufficiently explicit in stating that the quoted figures are not to be regarded as capacity limits for each site.

### Question 3

---

- 2.4 As noted within our previous representations and our response to the Call for Sites in April 2015, the site known as Bragbury End sports ground car park comprises an area of hardstanding formerly used as an overspill car park for Stevenage Football Club, with a brick wall separating the site from the

remainder of the car park area. Whilst the site identified in Policy HO1/2 has historically been used for car parking and the storage of maintenance and service equipment associated with the football club, it is no longer used for such purposes and performs no recreational or sporting function.

- 2.5 As such, we object to the reference within Table 3 of the supporting text to the proposed allocation resulting in a loss of sports facilities and the need to mitigate this loss. Clearly, there are no existing sports facilities within the site and thus there can be no justification for seeking mitigation for the supposed loss. We further note that the Council's Sports Facility Assessment and Strategy 2014-2031 (document reference CF1a) indicates that there is a sufficient supply of playing pitch space elsewhere in the Borough. Consequently we consider it to be entirely reasonable and consistent with paragraph 73 of the NPPF to allocate the former car park to make effective use of this currently vacant site and to assist in meeting the Borough's housing needs. Any developer contributions towards the improvement of existing sports facilities in the area will clearly need to be directly related to the development and justified in all other respects having regard to paragraph 204 of the NPPF.

### **Summary and Proposed Amendments**

---

- 2.6 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 HO1 and its supporting text:

- The lack of clarification within the policy text that the capacity figures identified for each proposed allocation are illustrative and that these may be exceeded provided that the applicant demonstrates that a satisfactory layout could be achieved and that the proposals would be acceptable in all other respects.
- The reference within Table 3 to the need for development proposals to mitigate the loss of existing sports facilities.

- 2.7 We regard these aspects as unsound, as it may be possible to design an acceptable development proposal for the Bragbury End sports ground car park site which exceeded the 8 dwelling capacity indicated within Policy HO1/2. In such circumstances, we are concerned that the current lack of explanation regarding the figures may result in a decision maker interpreting the 8 dwelling capacity as a limit which should not be exceeded, which would clearly not be justified, and would thus be unsound, having regard to the requirements of paragraph 182 of the NPPF. Meanwhile the reference to the need to mitigate the loss of existing sports facilities resulting from the redevelopment of the sports ground car park site is also unjustified, as it does not take account of the fact that the site has no sport or recreational use and thus its redevelopment would not result in any actual loss.

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

- (i) Amending the wording of Policy HO1 to clarify that the capacity figures identified for each site are illustrative.
- (ii) Removing reference within Table 3 to the need to mitigate the supposed loss of sports facilities resulting from the proposed redevelopment of Bragbury End sports ground car park.