

## **Stevenage Local Plan Examination: Stage 1**

### **Statement from CPRE Hertfordshire**

#### **Matter 2 – Objectively Assessed Needs for Housing and Employment Land**

Statement by Stephen Baker, DMS, BSc, DipTP, MRTPI, representing CPRE Hertfordshire

This statement complements our original representations on the Local Plan, which are still relevant except where updated by this statement.

**Question 2: However, on the basis of the Plan as submitted, is it realistic that they (the proposed land allocations) would provide for:**

- (a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?**
- (b) A supply of specific, deliverable sites or broad locations for growth for years 6-10 from the point of adoption?**

1. CPRE Hertfordshire (CPRE) objected to the proposal in Policy SP7 to provide at least 7,600 new homes between 2011 and 2031 if this would require the removal of large areas of land from the Green Belt to the north and south east of the town (as proposed in the Plan), and to the identification of those two areas as broad locations for development in the Plan.
2. CPRE considers that these elements of the Policy and associated text in the Plan are unjustified, and contrary to national policy.
3. In particular we consider that the Plan fails to respect the specific requirement of paragraph 14 of the NPPF to seek to meet objectively assessed housing need ‘unless other policies indicate development should be restricted’. Despite noting this requirement in its background document on Housing numbers, neither the Plan in paragraph 5.67, nor any evidence document sets out a justified explanation of how the Council has met its obligation to balance Housing Need with Constraints as set out in the NPPF, stating only that it has set a Housing Target that meets those needs in full.
4. Hence in seeking to answer the Inspector’s question on whether the Plan would provide for sufficient sites to meet ‘the housing requirement’, the quantum of that requirement needs to be determined first.

5. CPRE contends that the figure of 7,600 dwellings should not be the housing requirement, which should be set at a lower level in the context of a re-assessment of the urban capacity of Stevenage for new housing, and in the context of a balancing process required by paragraph 14 and footnote 9 of the NPPF between meeting objectively assessed housing needs, and the constraints that apply to Stevenage, in particular the designation of nearly all the land around the existing built up area of the town as Green Belt. A lower Housing Target that avoids the need for removal of land from the Green Belt north and south east of the town, and an explanation of the balancing exercise that has led to the identification of a justified Housing Target should be set out in the Plan as a result.
6. CPRE considers that the failure to carry out such an exercise is a fundamental flaw in the Plan that renders it unsound as currently drafted.

**Question 6: If this (30ha of new employment land to meet locally derived needs over the Plan period) is to be achieved in neighbouring local authority areas are they agreeable to this and if so where is the evidence to support this? Are they able to provide for their own needs also? What stage are their local plans at?**

7. The principal potential locations outside the area of the Plan for accessible employment land that could realistically meet the needs of Stevenage, are likely to be within the A1 corridor in the adjacent North Hertfordshire District or nearby Welwyn Hatfield Borough.
8. Neither of these Council's have adopted plans that include provision for employment land solely to meet the needs of Stevenage. CPRE is not aware of any proposals in either of their latest draft Local Plans for provision solely to meet Stevenage's employment needs. Any such proposal would be likely to be highly controversial as any new site allocations would have to be in the Green Belt, and to be subject to the test of exceptional circumstances required by the NPPF. Both Local Plans are expected to be examined in 2017.
9. In the above circumstances no certainty of the delivery of employment allocations specifically to meet the needs of Stevenage outside Stevenage, can be assumed at present.