

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

Stage 1 hearing sessions

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

Matter 2 – Objectively Assessed Needs for Housing and Employment Land

Question 1. Is the identified objectively assessed need (OAN) for housing of 7,600 new dwellings, as set out in Policy SP7, soundly based and supported by robust and credible evidence?

1. North Hertfordshire District Council (NHDC) is satisfied that this element of the plan is soundly based and supported by robust and credible evidence.
2. As set out in our statement to Matter 1, NHDC and Stevenage Borough Council (SBC) worked together to produce a joint Strategic Housing Market Assessment (SHMA) (Document HP2). This informed the preparation of both authorities' plans and identified an OAN for SBC of 7,300 homes and for NHDC of 14,400 homes.
3. The methodology and reasoning underpinning this conclusion is clearly set out throughout HP2. This methodology is consistent with SHMAs prepared for other nearby authorities including Central Bedfordshire, Luton and East Hertfordshire meaning that emerging plans across a wide area have been prepared on a consistent basis.
4. Following the release of the 2014-based subnational population and household projections earlier in 2016, the two authorities worked together to provide an updated expression of overall housing need (Document ED112).
5. This identifies a small change in the OAN for both authorities. As set out in paragraph 17 of that document, SBC's OAN has increased to 7,600 homes. This brings it in line with the target set in Policy SP7. NHDC's own OAN decreased slightly to 13,800 homes.

Questions 2, 3, and 5.

6. NHDC has no specific comments to make against these questions.

Question 4. The soundness of individual employment sites set out in policy EC1 will be considered at Stage 3 of the Examination. However, on the basis of the Plan as submitted, is policy SP3's aim of providing at least 140,000 m² of new B-class employment floorspace over the Plan period from allocated sites for employment development soundly based and supported by robust and credible evidence?

7. NHDC is satisfied that the evidence of employment need underpinning the SBC plan in the evidence base as submitted (Documents TP1, ER1 and ER8) is robust and credible.

Question 6. On the basis of The East of England Forecasting Model the Council accepts in the Plan that it would be prudent to plan for at least 30ha of new employment land to meet locally derived needs over the Plan period. It is clear that this is not being met by the submitted Plan. If this 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?

8. NHDC's emerging plan (Document ORD1) includes a proposed allocation of almost 20ha of new employment land at Baldock. This is intended, in part, to make good the anticipated shortfall of employment land at Stevenage.
9. The previous 'Preferred Options' iteration of NHDC's plan proposed a smaller allocation in this area with the remaining land safeguarded for longer term use. However, following representations from SBC and ongoing discussions under the Duty to Co-operate, it is now proposed to allocate the whole site at this time to address this specific issue. In particular, NHDC's emerging plan recognises that:

"Economic activity is not contained by the District boundary and North Hertfordshire needs to be viewed within its wider Functional Economic Market Area (FEMA). Joint work has identified a FEMA along the A1(M) corridor. This area broadly covers North Hertfordshire, Stevenage and the eastern part of Central Bedfordshire. The proposed allocation at Baldock also takes account of the long term needs which will arise within the wider FEMA. Stevenage, in particular, anticipates a shortfall of employment land against modelled requirements. These models assume continued commuting from North Hertfordshire to Stevenage, yet there is insufficient land in Stevenage to cater for the resultant growth"

(ORD1, paragraph 4.29)

10. Both the SBC plan as submitted and the Proposed Submission version of NHDC's own plan (and associated evidence bases) were prepared having regard to the 2014 East of England Forecasting Model (EEFM) results. This was the most recent release at the time of writing. Based on these results, it is considered that NHDC's emerging plan would provide sufficient employment land to meet the district's own needs in their

entirety and also be able to contribute approximately 14 hectares of land towards Stevenage's unmet requirements.

11. NHDC's plan has recently completed its proposed submission ('Regulation 19') consultation. The Council's current Local Development Scheme anticipates submission of the plan for examination in March 2017.
12. Since submission of the SBC plan, a further round of EEFM results have been released. These show a rise in projected job numbers for North Hertfordshire and a fall in projected numbers for Stevenage. NHDC understand that SBC have commissioned additional work to understand the implications of this for their own plan. NHDC will investigate any implications for its own plan prior to submission.

Question 7. Has regard been had to the impact of the likely shortfall in jobs on unsustainable travel patterns?

13. Employment forecasts are workplace based (rather than resident based): trends in people employed in a given area determine future jobs requirements, rather than the number of people living there.
14. The joint FEMA study (Document ER1, paragraphs 4.13 – 4.16) identifies that North Hertfordshire has a large outflow of commuters in both gross and net terms. Almost one in five out-commuters from NHDC travel to Stevenage for work.
15. These commuters help to drive SBC's future employment requirements up and NHDC's future requirements down. This issue is explicitly identified in NHDC's emerging local plan (as quoted in answer to Question 6 above).
16. By making employment provision at above modelled levels, NHDC considered greater opportunities would be provided for people to both live and work in the district and help reduce the proportion of NHDC residents commuting to Stevenage. This would potentially have a beneficial impact upon travel patterns within the FEMA.