

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

## **Stage 1 hearing sessions**

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

#### **Matter 3 – Strategic Transport**

1. The detailed questions posed by the Inspector are noted. North Hertfordshire District Council (NHDC) consider that, in the first instance, these are for Stevenage Borough Council (SBC) to address in their statement and verbal evidence to the hearing sessions.
2. However, given the potential implications of any findings on this matter for the progression of NHDC's own plan, NHDC have requested to appear at this session. NHDC would also like to ensure that consideration is given to the wider context in which these issues have arisen.
3. The National Planning Policy Framework (NPPF) places emphasis on joint working with relevant bodies and 'front-loading'. This is reiterated in Planning Practice Guidance (PPG) which states that "...early discussion with infrastructure and service providers is particularly important..."<sup>1</sup>.
4. The Planning Inspectorate's procedural guidance (aka 'The Gold Book') suggests there should be 'no surprises' at examination stage: "...representors should ensure that all their evidence is provided with their original representation and should not expect an opportunity to submit further material during the examination"<sup>2</sup>.
5. In order to ensure that any local plan is supported by a robust evidence base, particularly in terms of infrastructure testing, it is necessary for local authorities to identify, with a relatively high degree of certainty, the proposed development strategy they will seek approval for some time in advance of formal publication of the plan at Regulation 19.
6. Against this backdrop, Hertfordshire County Council (HCC) have introduced substantive new evidence since the submission of the SBC plan in July 2016. Further information continuing to emerge and could not reasonably be taken account of. This also has implications for the preparation of NHDC's own plan.
7. Transport model coverage across Hertfordshire has historically been fragmented. Until very recently there has been no single model which covers the whole county. A series of transport models covering smaller areas have been constructed by HCC, in the first instance to support local urban transport plans but then 'rolled out' as a basis upon which to test the implications of proposed local plan growth.

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<sup>1</sup> Planning Practice Guidance, Preparing a Local Plan, Paragraph 018, Reference ID: 12-018-20140306

<sup>2</sup> Procedural Practice in the Examination of Local Plans (Planning Inspectorate, June 2016), Paragraph 3.15

8. Although these models focus on smaller geographic areas within the County they make assumptions about flows into and out of the modelled area to ensure wider traffic flows are appropriately taken into account. HCC accept that these models are an appropriate basis on which to test local plan proposals.
9. The Stevenage and Hitchin Urban Transport Model ('SHUM') is one such model. This model was used to consistently test the proposed submission SBC plan and 'preferred options' NHDC plan<sup>3</sup> in late 2014 / early 2015 through modelling work commissioned through HCC. The SBC version of this report is contained in Document TI5 with the modelling also referred to in NHDC's Matter 1 statement as evidence of joint work under the Duty to Co-operate.
10. TI5 remains the transport evidence which supported the Stevenage plan at the point of submission.
11. This identifies a range of mitigation measures required to support the (then) emerging SBC Plan and NHDC 'preferred options' plan (Document TI5, Table 5.1). SBC's Infrastructure Delivery Plan (Document TI1) sets these out along with a proposed apportionment of costs.
12. This model run includes allowances for proposed development in both SBC and NHDC based upon emerging proposed allocations at the time. It can now be seen that this model allows for a substantially higher level of development around Stevenage by 2031 than is now being planned by the two authorities. In particular, it includes the assumed traffic movements arising from the development of 3,100 homes to the west of Stevenage in NHDC (listed on p.27 of TI5).
13. NHDC's proposed submission plan now makes clear that this land is to be safeguarded with no development occurring prior to a future review of the plan and an expectation that no new homes will be built here prior to 2026 (Document ORD1, Policy SP8, pp47-51).
14. Since the completion of TI5, further work has been carried out to expand the 'SHUM' model to incorporate adjoining areas within Welwyn Hatfield's administrative area as well as the highway network in Letchworth Garden City and Baldock. This expanded model is referred to as WHaSH-BL.
15. NHDC commissioned a run of the WHaSH-BL model in May 2016 in consultation with HCC to support its own proposed submission local plan. Although, as evidence supporting NHDC's plan, it lies outwith the scope of this examination, it is simply noted for the purposes of this matter that many of the problem locations and mitigation measures arising from this run of the 'WHASH-BL' model by NHDC are broadly

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<sup>3</sup> NHDC consulted upon a 'preferred options' plan under Regulation 18 from December 2014 to February 2015.

consistent with those identified in TI5 and that, again, these have ended up being based upon slightly higher development assumptions than are actually expected<sup>4</sup>.

16. Following submission of the SBC plan, additional HCC-commissioned evidence has been added to the Examination Library and the County Council continue to carry out additional modelling work.
17. The PARAMICS model report (Document ED109) was initially a focussed model intended to explore detailed transport proposals in and around Stevenage town centre (c.f. paragraph 1.1.2 of that report). It was subsequently widened to explore a greater area (c.f. paragraph 1.1.3). Despite this, and the potential implications for our own plan, NHDC were not invited by HCC to be involved in the preparation of this work. NHDC understands that SBC were similarly not party to the preparation of ED109.
18. Section 3 of the report identifies the infrastructure assumptions made in the model runs. With particular regards to the Inspector's Question 3 for this matter, it is notable that these mitigations do not appear to include the substantial majority of the mitigation schemes identified in Documents TI5 or TI1. No further potential mitigations are identified or tested.
19. NHDC are committed to continued working with both SBC and HCC to ensure the highway impacts of both authorities' local plans are fully and consistently understood and provide an appropriate approach to mitigation.

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<sup>4</sup> The transport modelling work supporting NHDC's most recent plan consultation is publically available on the District Council's website, [www.north-herts.gov.uk/localplan](http://www.north-herts.gov.uk/localplan)