

Stevenage Borough Local Plan

Public Examination

Matter 10 Statement

January 2017

Stevenage Borough Local Plan 2011 – 2031 - Public Examination

Statement by Stevenage Borough Council (SBC)

Matter 10 – Employment

NB: SBC responses set out in blue font

1. Paragraph 2.55 of the Employment Technical Paper (CD TP1) says that at least one further iteration of the East of England Forecasting Modelling is anticipated prior to the Plan's examination. Has this been published and if so what were the key findings in relation to Stevenage and this Plan? Are there any serious implications for this Plan?

- 1.1. The most recent East of England Forecasting Model (EEFM) data was published in August 2016. In response to this, an update to the Employment Technical Paper has been produced to ensure our target is still appropriate (Employment Technical Paper: Update 2016 ([ED124](#))).
- 1.2. The Employment Technical Paper Update 2016 ([ED124](#), para's. 2.14 – 2.17) explains that although the most recent model run suggests a lower land requirement of 15ha, this must be treated with caution. As can be seen in Table 2.2 (p5), the model results vary significantly year on year and other runs of the model result in significantly higher land requirements.
- 1.3. Due to the acknowledged uncertainties associated with the data underpinning calculations of employment need, a balanced and pragmatic approach is required to determining employment land requirements for the SBLP. Other considerations also need to be taken into account, particularly the aspirations of the LEP for Stevenage to be a major growth area.
- 1.4. Taking into account a three year rolling average of 26ha and an overall average of all six years of EEFM estimates (32ha), the updated Employment Technical Paper concludes that providing at least 30ha new employment land, as provided for in the Plan, remains appropriate (para 2.18). The latest release of the EEFM is, therefore, not considered to present any serious implications for the Plan.

2. Would any employment land be lost to other uses as a result of any policies in the Plan? If so what is the justification for this?

- 2.1. The Local Plan seeks to protect all existing employment land. The Plan identifies that we have a shortfall in the amount of employment floorspace

we can provide within the Borough, against the identified need, thus every effort has been made to ensure that existing employment land is protected.

- 2.2. Gunnels Wood is the main employment area in Stevenage. Policies EC2 to EC4 allocate the whole of Gunnels Wood as an Employment Area and set out specific policies for parcels of land within this area. These policies state that development will be permitted where it is for employment use, or for ancillary uses. No alternative uses are permitted. The Council currently benefits from an exemption from office to residential permitted development rights on certain properties within the Gunnels Wood area. Due to the scarcity of employment land within the Borough, the Council has committed to implementing an Article 4 Direction, to come into effect when the exemption expires, to avoid any losses of valuable employment land.
- 2.3. Pin Green is the secondary employment area within the town. The allocated area of Pin Green (under Policy EC6) has been reduced from the area allocated within the current District Plan. However, this is solely to take into account sites which have already been converted to residential use under existing local or national planning policy. The Policy protects all employment uses that still exist within this area.
- 2.4. Policy EC7 also seeks to protect any other existing employment uses.
- 2.5. There are no policies within the plan that would result in the loss of employment land to other uses.

3. Are the proposed employment and mixed use site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

- 3.1. The SBLP takes into account a wide range of evidence studies when considering the sites to be allocated for development.
- 3.2. Our Sustainability Appraisal ([LP3](#)) has assessed the effects of options/policies within the SBLP throughout the plan-making process, including the specific employment and mixed use allocations, as well as the release of Green Belt required to accommodate some of these allocations. The SA concludes that the approach taken in the SBLP would provide significant positive economic and social impacts (p79) but recognises that potential for negative environmental impacts and that site specific implications need to be fully considered. Further evidence studies

have ensured the sites have been fully assessed and that the options identified are the most sustainable and appropriate.

- 3.3. The Strategic Land Availability Assessment (SLAA) ([ER3](#)) identifies a long list of potential development sites within the Borough and assesses whether these are suitable, available and achievable for development. However, this tests suitability in simplistic terms and on an independent basis. Further work has been carried out, in the form of the Employment Technical Paper ([TP1](#)), to consider these sites alongside each other and to reconcile any potential competing and conflicting objectives, ensuring the most appropriate overall balance is achieved.
- 3.4. Sites in the SLAA are categorised into four different land types; Previously developed land, Greenfield sites within the urban area, Greenfield sites outside of the urban area and Green Belt sites. This allows for a sequential approach to be taken when considering the results of the Assessment, with the use of Brownfield sites first (Employment SLAA, [ER3](#), para 6.5 – 6.9). The SBLP has exhausted all possible opportunities in terms of using previously developed and Greenfield sites (Employment Technical Paper ([TP1](#)), p3.9 – 3.17). All positively assessed sites from the SLAA have been brought forward for employment use, where possible, and only one has been excluded, where it was not clear that site specific constraints could be overcome. This includes the allocation of a Green Belt site, as justified by the Green Belt Technical Paper ([TP3](#)), which sets out the demonstration of exceptional circumstances.
- 3.5. The Infrastructure Delivery Plan (IDP) sets out the infrastructure likely to be required across the borough. This was produced in consultation with infrastructure providers, who were provided with the draft site allocations for assessment purposes. Strategic Policy SP5 and detailed infrastructure policies within the plan seek to ensure that any infrastructure required to support the proposals is provided. All of the allocated sites have been assessed within the transport modelling carried out to inform the Local Plan (ED126).
- 3.6. In terms of flood risk, the Level 1 SFRA ([E2a](#) and [E2b](#)) concludes that the majority of the development sites allocated in the SBLP are at low risk of flooding and that, with appropriate flood management and mitigation solutions, these sites would be acceptable for the development purposes for which they are allocated.
- 3.7. Two of the employment sites: Land West of North Road (EC1/4) and Land West of Junction 8 (EC1/7) were found to be at higher risk of flooding and were assessed as part of a Level 2 SFRA ([E3a](#) and [E3b](#)). This concluded

that the types of developments proposed in the SBLP (p50, Table 7-1) are compatible with the level of flood risk.

4. What are the implications of the identified employment land needs not being met within the Borough's boundaries?

- 4.1. The Council acknowledges it is unable to meet the full employment needs of the Borough. An update to the Employment Technical Paper ([ED124](#)) identifies that the shortfall in provision being made by the SBLP will be approximately 11.5ha.
- 4.2. This means that Stevenage will be reliant on its neighbours under the Duty to Co-operate.
- 4.3. The Functional Employment Market Area Study (FEMA) ([ER1](#)) identifies that Stevenage is located within a wider A1(M) corridor market area. It recognises that Stevenage is unlikely to be able to meet its needs, but that both North Hertfordshire (NHDC) and Central Bedfordshire (CBC) are likely to have a significant surplus of employment land to meet their own growth requirements over their respective plan periods (para 6.44).
- 4.4. The shortfall in provision has been discussed with authorities within the FEMA and, although further details will need to be clarified, both NHDC and CBC have agreed to make provision on behalf of Stevenage (MoU with NHDC, [ED130](#); MoU with CBC, [ED140](#)). Both have sites of over 20ha in size that have the potential to meet some, or all, of Stevenage's needs. As such, this provides the opportunity for the full employment land needs to be met within the FEMA.
- 4.5. As explained further in the SBC response to Matter 2 (question 7), the nature of the commuting flows between Stevenage, NHDC and CBC, mean that this would not have significant (if any) negative impact in terms of sustainable travel patterns, and may provide the opportunity to improve self-containment within NHDC and CBC.

5. What are the implications of Welwyn Garden City refusing to assist with providing employment land to meet some of the unmet demand from Stevenage Borough?

- 5.1. At the time the Local Plan was published for Publication consultation, Stevenage's shortfall in employment provision had been discussed in some detail with NHDC, CBC and Welwyn Hatfield (WHBC). All three authorities had identified a surplus of employment land within their

authorities, over and above what was likely to be required to meet their own needs.

- 5.2. We considered a commitment from all three authorities was beneficial in terms of allowing flexibility (as NHDC and WHBC were at an earlier stage in the plan-making process¹). However, in reality, this would have provided much more floorspace than the shortfall identified in Stevenage.
- 5.3. The FEMA study ([ER1, para 7.14](#)) identifies that whilst Stevenage has a significant shortage of employment space over the plan period, both NHDC and eastern CBC have a large surplus of supply to support their own growth requirements (equivalent of well over 11.5ha at the time of study preparation).
- 5.4. As such, the loss of commitment from WHBC should not impact upon the ability of Stevenage to meet its identified shortfall of provision in other local authority areas.

6. Does this have implications for Central Bedfordshire and North Hertfordshire who have agreed to assist in this regard?

7. Do they now need to contribute more than previously agreed and if so has this been discussed?

- 6.1. Prior to, and since, the publication of the SBLP, the Borough Council has been in discussions with both NHDC and CBC with regards to employment provision.
- 6.2. Both local authorities agreed to make employment provision to meet the needs of the Borough Council. An exact level of provision was never agreed. However, a shortfall of around 14 hectares (taken from the FEMA study, [ER1](#), para 5.52) was used as a starting point for discussions. This is higher than the shortfall identified in the updated Employment Technical Paper ([ED124](#)) of approximately 11.5ha, which takes into account updated employment supply/completions data and considers the impact of the new EEFM data released in August 2016.
- 6.3. Both NHDC and CBC have confirmed that they are still happy to contribute towards meeting Stevenage's needs (MoU with NHDC, [ED130](#); MoU with CBC, [ED140](#))². Their sites have the potential to provide in excess of the land that is actually required, either singularly or in combination. Both

¹ Prior to the withdrawal of the CBC Local Plan.

² These agreements were based around the 14ha shortfall, as previously discussed. The updated 11.5ha shortfall figure has now been shared with both NHDC and CBC and discussions will be ongoing, however, as it is a lower figure, it is not envisaged that this will cause any problems.

areas fall within the wider A1(M) corridor market area within which Stevenage operates from a FEMA perspective.

- 6.4. The employment site in Baldock has been allocated in the publication version of the NHDC Local Plan.
- 6.5. Central Bedfordshire Council are at an earlier stage in plan preparation, however, previous work on a withdrawn Local Plan demonstrated that their employment needs could be met within their area and their response to the SBLP consultation indicates that they have an adequate surplus of land to provide for Stevenage's needs.
- 6.6. Discussions will be ongoing with both authorities.

8. Does this need to be reflected in the Plan?

- 8.1. Policy SP3 of the Local Plan clearly sets out the Council's intention that additional employment land should be provided outside of the Borough, by local authorities within the FEMA, and that further work will be required in terms of liaising with these authorities. The Local Plan cannot include policies relating to areas outside the administrative area of Stevenage Borough. Thus it is considered that the approach taken goes as far as Stevenage Borough Council can go in terms of securing this provision.
- 8.2. In support the SBLP, MoU's have been signed with both NHDC ([ED130](#)) and CBC ([ED140](#)), to provide an additional level of certainty with regards to this matter.