

Stevenage Borough Local Plan

# Public Examination

Matter 16 Statement

February 2017



## Stevenage Borough Local Plan 2011 – 2031 - Public Examination

### Statement by Stevenage Borough Council (SBC)

#### Matter 16 – Housing site allocations

##### NB: SBC responses set out in blue font

#### **1. Are the proposed housing site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**

- 1.1 The SBLP takes into account a wide range of evidence studies when considering the sites to be allocated for development.
- 1.2 Our Sustainability Appraisal ([LP3](#)) has assessed the effects of options/policies within the SBLP throughout the plan-making process, including the specific housing 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 but recognises the potential for negative environmental impacts and that site specific implications need to be fully considered (p78, p80-81). Further evidence studies have ensured the sites have been fully assessed and that the options identified are the most sustainable and appropriate.
- 1.3 The Strategic Land Availability Assessment (SLAA) ([HP3](#)) 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 Housing Technical Paper ([ED123](#)), to consider these sites alongside each other and to reconcile any potential competing and conflicting objectives, ensuring the most appropriate overall balance is achieved.
- 1.4 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 (Housing SLAA, [HP3](#), para's 6.9-6.12). The SBLP has exhausted all possible opportunities in terms of using previously developed and Greenfield sites (Housing Technical Paper ([ED123](#), para's 3.3 – 3.7, p18). All positively assessed sites from the SLAA have been brought forward for residential use, where possible. This includes the allocation of Green Belt sites, as justified by the Green Belt Technical Paper ([TP3](#)), which sets out the demonstration of exceptional circumstances.

- 1.5 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 and ED144).
- 1.6 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.
- 1.7 Two of the housing sites: Land north of A602 (HO4) and Bragbury End Sports Ground car park (HO1/2) 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 (subject to the areas of highest risk of flooding within these sites being undeveloped).

**2. Are the assumptions regarding the capacity of the sites justified, what is this based on?**

- 2.1 As explained further in the SBC response to Q19, Matter 15, site capacities have generally been determined according to information submitted by the landowners/developers of these sites. The figure for the town centre was taken from the Stevenage Central Town Centre Framework. These provide a best estimate in terms of what can and will be delivered on these sites.

**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?**

- 3.1 Those open spaces which were put to us as part of the "call for sites", thus demonstrating availability, were considered via the SLAA.
- 3.2 Many sites were excluded following this assessment as they did not meet some/all of the suitability, availability and achievability tests.

- 3.3 The only public open space site (as designated by the Open Space Strategy, [E6a](#)) identified within the SBLP is:
- HO1/15: Shephall View (located in the Bedwell study area and identified as an amenity greenspace)
- 3.4 The Open Space Strategy identifies Bedwell as being '*by far, the best served neighbourhood for open spaces*' containing much of Fairlands Valley Park, Hampson Park, Town Centre Gardens, King George V Playing Fields, Whomerley Wood and Monks Wood, amongst others. It is also recognised as having a good balance of typologies ([E6a](#), p57). The site is in very close proximity to Fairlands Valley Park, the largest open space within the Borough, which provides an amenity greenspace function, as well as being a formal park. The loss of Shephall View would not cause a deficiency of open space within the Bedwell area.
- 3.5 The SBLP allocates two other sites that would result in the loss of green space that is currently accessible to residents (but not designated as public open space in the Open Space Strategy):
- HO1/5: Ex-play centre
  - HO1/14: Shephall Centre and adj. amenity land
- 3.6 In terms of the play centre, the open space within the allocation boundary, along with the adjacent play area/open space to the south of the site, were identified for disposal in the Open Space Strategy, p78 (Site ID:598). The loss of a small part of this open space (as allocated under HO1/5) will enable improvements to be made to the open space and play area that will remain, which is currently of poor quality and underused. As such, it will enable part of a site currently identified for disposal to be bought back into use.
- 3.7 In terms of HO1/14, the open space here, although not fenced off, is for use by occupiers of the Shephall Centre and is not public open space. A designated public open space lies directly adjacent to the site (to the west). As such, the loss of this space will not create a deficiency in this area.
- 3.8 Several other sites contain green spaces that are fenced off and not publicly accessible (HO1/6, HO1/7, HO1/10 and HO1/13). These will, therefore, have no impact on the amount of public open space that is available within the town.
- 3.9 Two allocated housing sites contain sports (recreational) facilities that are currently in use: Land West of North Road (Rugby Club) (HO1/11) and the town centre (Arts and Leisure Centre) (TC4). Policies HO1 and TC4 both require the re-provision of facilities on these sites as part of any development proposal, in line with the recommendations of the Sports Facility Assessment and Strategy ([CF1a](#)). The Strategy suggested proposals would provide significant opportunities in terms of improved facilities, as both facilities are in need of significant works if they are to remain.

- 3.10 The South East Stevenage site (HO4) contains a redundant sports facility. Our evidence shows that there is no requirement for this facility to be reprovided (para. 22.69), but contributions to improve other facilities are being sought.
- 3.11 The SBLP approach to open space and recreational facilities is entirely NPPF compliant. It is based on up-to-date assessments of existing facilities and future needs, and policies are in place to ensure facilities will be provided where there is a loss and the relevant facility/space cannot be demonstrated to be surplus to requirements.

**4. Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?**

- 4.1 The detailed requirements for each of the housing allocations are clearly set out within the SBLP.
- 4.2 Policy HO1 requires the site specific considerations (set out in Table 3 of the supporting text) to be addressed/incorporated.
- 4.3 Specific policies for each of the new neighbourhoods (HO2 to HO4) provide a more detailed set of criteria, which need to be met if planning permission is to be granted.
- 4.4 Policies TC2 to TC7 set out the detailed requirements for the housing allocation within the town centre.
- 4.5 Although these provide an overview of what is likely to be required, the Plan should be read as a whole and all policy requirements should be met.
- 4.6 All site specific requirements are either based on the evidence studies that inform the SBLP or have been requested following initial discussions with the Development Management Team, or other Borough Council/HCC teams.
- 4.7 Our Development Management Team actively engage with prospective developers, offering opportunities for developers/landowners to get pre-application advice at an early stage in the planning process, which ensures site specific requirements are clear.
- 4.8 Viability considerations have been adequately assessed. The Whole Plan Viability Study (TI3) assessed viability and its recommendations informed the Local Plan. The study was prepared following a consultation process with landowners, agents and developers. The approach to viability testing, including the requirements of the CIL regulations, NPPF and PPG is set out in chapter 2. The Whole Plan Viability Study considered the development viability of the site types that are most likely to come forward over the

plan period. The Local Plan followed the study's recommendation for affordable housing. The study concluded that *"Set at these levels residential development is not put at serious risk by the cumulative impact of the Council's policies and would be able to bear developer contributions in the range as set out ... without threatening development"* (para 12.29).

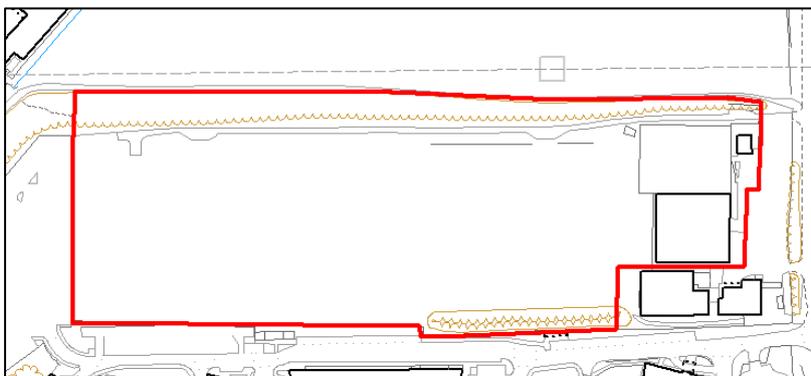
4.9 One main modification in terms of housing site boundaries is proposed by SBC, to correct an error made on the Proposals Map. The boundary of HO1/11 currently excludes an area to the east of the site that accommodates the tennis club. This parcel of land was included in the SLAA submissions made by the Rugby Club and was included when calculating the site's capacity. As such, an amended boundary is proposed to include the tennis club facilities within the red line boundary. Figures 1 & 2 (below) reflect this proposed modification.

4.10 All other site boundaries are correctly defined.

Figure 1: Existing boundary as drawn on the submitted Proposals Map



Figure 2: Revised boundary as proposed within the SBC schedule of proposed main mods ([ED114](#)).



## **Urban Extensions**

### **Policy HO2 – Stevenage West**

#### ***1. Is the scale of this development appropriate?***

- 1.1. The scale of development proposed for Stevenage West is based on a high level illustrative Masterplan for the site, submitted by the prospective developers as part of the SLAA.
- 1.2. The level of development has been maximised to meet the needs of the Borough, whilst also ensuring a high quality, mixed use scheme can be achieved in line with other SBLP objectives.
- 1.3. Discussions between the potential developers and HCC (Highways) have previously confirmed that this level of development could be supported by improvements to existing access points: Meadway and Bessemer Drive. A higher number would be likely to require a new access across the A1(M). The response to Q2 below provides further details on the highways impacts of this scheme.
- 1.4. The SBLP recognises that land adjoining this site, in NHDC, has been allocated within the emerging North Herts Local Plan and has the ability to provide further housing within this area. The Borough Council is supportive of this wider scheme and Policy HO2 requires an applicant to demonstrate that development can be expanded beyond the Borough boundary in the future, to create a comprehensive scheme. The SBLP also safeguards a parcel of land, under Policy IT2, to provide the necessary access into this wider development area.

#### ***2. Would it give rise to any highway safety issues or traffic congestion that could not be mitigated?***

- 2.1. No. It would not give rise to any highway safety issue or unacceptable transport impact that could not be mitigated.
- 2.2. The Mobility connections between the site and the rest of Stevenage can be accommodated via the existing Meadway underpass and the existing Bessemer Drive. Both routes are of sufficient size to accommodate attractive Active Travel (walk and cycle) routes, linking the routes that will form part of the development with the active travel network throughout the rest of the town. Vehicular access through the Meadway underpass can be controlled by traffic signals operating on a one way at a time shuttle basis.
- 2.3. We are satisfied that the site is accessible by active travel and by public transport.
- 2.4. The developer will be required to design the development, the access arrangements, and the management of the site in such a way as to maximise the propensity for use of active travel, and

shared travel over single occupancy car use, and to prioritise the available capacity accordingly. It will be required to demonstrate the effectiveness of the measures that it proposes to achieve this, and where necessary to commit to implementation of such measures.

### ***3. Is the required recreational open space sufficient to meet the needs of the development?***

- 3.1. Open space will be required in accordance with Policy NH7. This is based on the recommendations of the Open Space Strategy ([E6a](#)), which provides an up-to-date evidence base for the Borough.
- 3.2. The exact level of provision cannot be determined until the detailed planning stage, as the open space standards are based on the population of a new development and requires information relating to housing types and sizes.
- 3.3. The Sports Facility Assessment and Strategy ([CF1a](#)) also requires this site to provide youth facilities (in the form of a skate park or a MUGA) and it recognises the potential for the site to deliver new cricket facilities (subject to a further needs assessment/feasibility work), in line with Policy HC8.
- 3.4. Both requirements are based on up-to-date assessments of need and thus are considered sufficient to meet the needs of the development.
- 3.5. In order to ensure we achieve the most appropriate outcome in terms of open space and sports facilities, a strategic approach is required.
- 3.6. Discussions have previously been held with the developers of this site about increasing the level of sports facilities provided (which would align with the need for a new cricket facility) and reducing open space requirements accordingly (and making increased open space provision at HO3 – in line with objectives to protect the remainder of Forster Country). Further discussions will be required at the application stage to agree the most appropriate solution to meeting the identified needs.

## **Policy HO3 – North of Stevenage**

### **1. *Is the development of this site dependent upon the allocation of adjacent land for housing in North Hertfordshire district?***

- 1.1. No. The development of the North of Stevenage site can come forward entirely independently of the adjacent site in NHDC.
- 1.2. However, Policy HO3 recognises the potential for development of the adjoining site and requires demonstration that the development proposed within Stevenage can be fully integrated into a wider scheme.
- 1.3. The development of the adjacent site allocated in NHDC's draft plan is dependent upon an access point that lies within Stevenage Borough and as such, would be difficult to develop without the allocation of HO3.

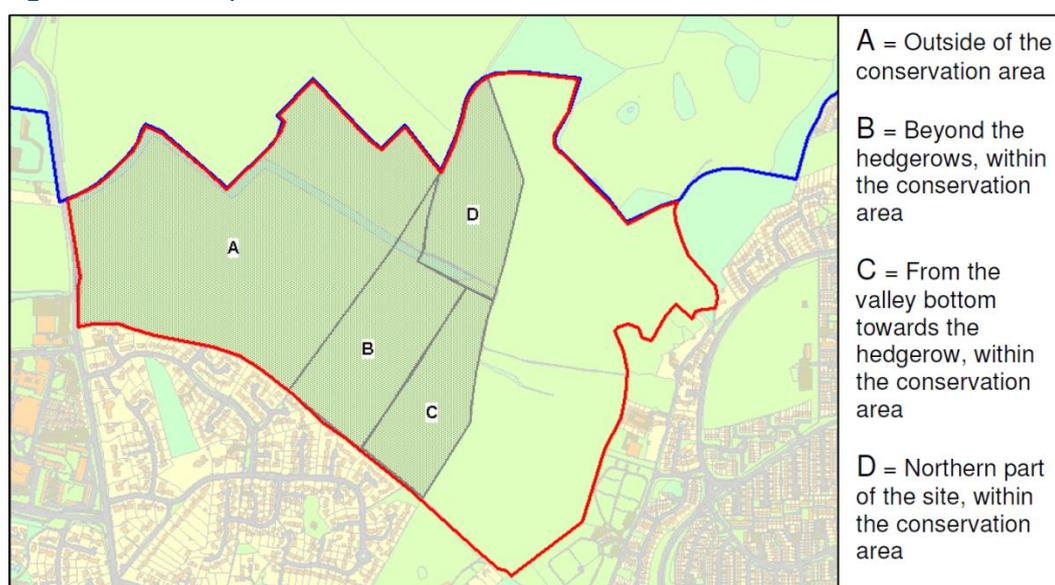
### **2. *Has the impact of the proposal on the character and appearance of the surrounding area been formally considered?***

- 2.1. The Stevenage Landscape Sensitivity and Capacity Study ([E9](#)) was jointly commissioned by Stevenage and North Hertfordshire, to help inform decisions about the future extent and directions of residential and employment growth around Stevenage. Although this study was completed a number of years ago (2006), the situation has not changed since this time, and the conclusions are still valid.
- 2.2. This study concludes that the North Stevenage site would have moderate sensitivity to residential development. It recommends that residential development could be accommodated without unacceptable adverse impact on the landscape.
- 2.3. Impacts on the character and appearance of the conservation area are assessed within the Heritage Impact Assessment (HIA) of this site ([CH2](#)) and are discussed in more detail in the response to Q3 (below).
- 2.4. The prospective developers of the North Stevenage site have prepared a Landscape and Visual Impact Assessment (LVIA) to support the imminent planning application. This assessed the predicted impacts of the proposed development on the landscape character of the surrounding area. It concludes that development will result in some adverse impacts on landscape character, due to a loss of arable fields and a change to the openness of this area. However, mitigation will limit these impacts and improvements will be made to the landscape character of the remaining Green Belt land to the east as a result (Matter 12 Statement submitted by Bellway/Miller).
- 2.5. It is considered any harm will be outweighed by the significant benefits of providing new housing within the Borough.

### 3. Would the proposal result in harm to heritage assets?

- 3.1. The North of Stevenage site lies adjacent, and partly within, the St. Nicholas / Rectory Lane Conservation Area. The site is also within the setting of a number of listed buildings.
- 3.2. The Heritage Impact Assessment (HIA) carried out for this site ([CH2](#)) has been used to inform the SBLP in terms of the likely impact of this proposal on the contribution made by the setting of heritage assets to their significance and upon the land within the conservation area.
- 3.3. This assessment identifies that development up to the boundary of the conservation area would have '*very minimal impact upon the significance of the heritage assets*' (p15).

Figure 3: Land parcels assessed within the HIA



- 3.4. The HIA recognises that the development of that part of the allocated site within the conservation area (Parcel B) would affect the character and appearance of this part of the conservation area, by allowing houses to be built on an open field, but the contribution of the field to the significance of the Conservation Area is not fundamental.
- 3.5. In accordance with the findings of this assessment, the development area was reduced to exclude further land within the conservation area (Parcels C and D). These parcels were considered to have more impact upon the heritage assets.
- 3.6. Both the HIA and the SA recognise that some harm to heritage assets will arise from the development of this site. As stated in the HIA (p7), our

previous evidence<sup>1</sup> identified that the open fields provide the setting to the heritage assets of Rooks Nest/ Howards and Rooks Nest Farm.

- 3.7. A recent case<sup>2</sup> clarifies that substantial harm is set at a high threshold equating to '*something approaching demolition or destruction*'. This approach is consistent with the Planning Practice Guidance, which acknowledges that the test of substantial harm is a high test, so may not arise in many cases, and the example provided in terms of listed building works being substantial if the adverse impact seriously affects a key element of the building's special architectural or historic interest.
- 3.8. The assessment concludes that in relation to paragraphs 133 & 134 of the NPPF, harm to the contribution made by setting to the significance of the designated heritage assets would be 'less than substantial' (p15). That harm has been given considerable importance and weight in balancing the considerations relevant to the allocation of this site and the Council has concluded that the benefits of the development, principally its contribution to the long term housing supply of the Borough clearly outweigh the harm to the Conservation Area.
- 3.9. The conclusions of this work are supported by the assessment of the effects and impacts on heritages assets undertaken by the applicants. Their Heritage Statement concludes that the minor adverse impacts identified are considered to result in 'less than substantial harm' to the significance of the designated heritage assets (the conservation area and listed buildings) and that the SBLP is sound in terms of its consideration of heritage assets (Matter 12 Statement submitted by Bellway/Miller).
- 3.10. It is also worth noting that the development area shown within the most recent scheme drawn up by the developers (submitted as an appendix to the Bellway/Miller Matter 12 statement) does not extend as far into the conservation area as the HO3 site boundary on the Policies Map. No homes are being proposed beyond the pylon buffer of land within parcel B (the part of this land parcel identified in green, figure 4 below).

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<sup>1</sup> A Review of Stevenage Conservation Areas (2005); St. Nicholas / Rectory Lane Conservation Area Appraisal (2009).

<sup>2</sup> Bedford Borough Council v Secretary of State for Communities and Local Government (2013), para. 42.

Figure 4: Land parcel B of the HIA, with actual development area shown

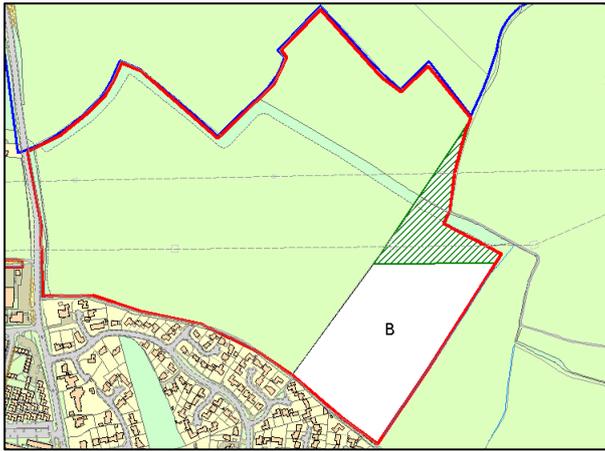


Figure 5: Draft development scheme (Jan 2017)



- 3.11. The HIA considers that the development can be effectively mitigated through increased planting and screening (particularly using the existing hedgerow), alongside specific site layout/design requirements, including lower densities and building heights, and building styles and materials that reflect the key features of the conservation area and its heritage assets. This is reflected within Policy HO3, which sets out a list of mitigation measures under criterion m.
- 3.12. The allocation of this site also provides the opportunity to ensure the preservation and enhancement of the remaining open fields (that will stay within the Green Belt). Discussions are underway with the developers around a transfer of land ownership to the Borough Council. Plans are being developed to reinstate the field patterns and an orchard that existed when E.M Forster lived in Rook's Nest House, and to maintain the land as informal/natural meadows.

**4. Do exceptional circumstances exist to justify the removal of the site from the Green Belt?**

- 4.1. Yes. The Green Belt Technical Paper ([TP3](#)) sets out the exceptional circumstances that exist to justify the removal of this land from the Green Belt. There is a compelling need for additional housing development, the site is in highly sustainable location and it can be developed with no significant harm to the Green Belt. There are no reasonable alternatives to the site's development.
- 4.2. The Part 2 Green Belt Review ([GB2](#)) recommends this site (parcel N4(iii)) for release from the Green Belt within the plan period. It identifies this parcel as having a relatively limited connection with the open countryside to the north, due to mature boundary planting. It recognises the site is contained by strong boundaries, with opportunities to substantiate these through further landscaping (p23-26).

**5. Would the increase in houses in this area generate the need for a new secondary school?**

- 5.1. New development within the town will create demand for secondary school places. The needs arising from the level of growth proposed within the SBLP has been fully considered by HCC.
- 5.2. HCC consider the allocation of the former Barnwell East secondary school (under Policy HC9) sufficient to meet the needs of the Borough, along with other facilities proposed outside of the Borough boundary, in neighbouring local authority areas.
- 5.3. Hertfordshire County Council (HCC) has made no objection to the level of secondary school provision being made by the SBLP.

**6. Would it give rise to any highway safety issues or traffic congestion that could not be mitigated?**

- 6.1. No. It would not give rise to any highway safety issue or unacceptable transport impact that could not be mitigated.
- 6.2. We are satisfied that this site can be connected by active travel routes to the wider Stevenage active travel network. We are satisfied that the development is capable of prioritising movement capacity in such a way as to favour active travel and public transport. We are confident that in light of this, traffic impact can be mitigated by sustainability measures and some junction works in such a way that it does not result in unacceptable adverse effects.
- 6.3. North Road can accommodate a dedicated active travel route, linking directly with the Stevenage active travel network at [Coreys Mill Lane].

- 6.4. The current proposal is for two vehicular points of access to the site and four active travel points of access (including the two vehicular points of access). In due course, and with the delivery of the adjacent North Herts Local Plan site NS1, there is the opportunity for one of these two points of vehicular access to be restricted to active travel and public transport only.
  
- 6.5. The developer will be required to design the development, the access arrangements, and the management of the site in such a way as to maximise the propensity for use of active travel, and shared travel over single occupancy car use, and to prioritise the available capacity accordingly. It will be required to demonstrate the effectiveness of the measures that it proposes to achieve this, and where necessary to commit to implementation of such measures.

## **Policy HO4 – South East Stevenage**

### **1. Is the site in a sustainable location?**

- 1.1. The South East Stevenage site has been tested through the SA and, notwithstanding the loss of Green Belt land, was identified to be an appropriate option for meeting the housing needs of the borough.
- 1.2. Being a Greenfield (and Green Belt) site, the development of this land will have some negative environmental impacts. However, the role of the Local Plan, and the SA process, is to balance these objectives and to provide an effective and sustainable overall strategy for the town. The environmental impacts are outweighed by the positive social and economic impacts the development of this site will have, particularly in meeting our OAN for housing.
- 1.3. The site is adjacent to existing residential uses to the west, so residential development here would not conflict with any surrounding uses.
- 1.4. The site is directly adjacent to the A602, a main vehicular route into Stevenage. A new roundabout will be required to serve both parts of the site (north and south of A602), as identified in the Infrastructure Delivery Plan ([TI1](#), Para. 2.41). HCC have previously provided an 'in principle' confirmation that this would be an appropriate approach.
- 1.5. In line with the Transport Technical Paper ([ED127](#), Section 4), a modal shift is being promoted by the SBLP, to reduce reliance on the private car and encourage sustainable modes of transport.
- 1.6. The site is within 2km of a primary school and within 1km of the nearest neighbourhood centre, providing shopping facilities. It is in close proximity to bus stops along the A602, with the most recent feasibility work carried out by the landowners recognising the potential for a bus loop to be run through the site. A connection to the existing cycle and pedestrian network is a requirement of Policy IT7 as well as Policy HO4.
- 1.7. With an excellent cycle network across the town, and the site being less than 3 miles (4.7km) from the town centre and Gunnels Wood employment area, it is a sustainable location for development.

### **2. Do exceptional circumstances exist to justify the removal of the site from the Green Belt?**

- 2.1. Yes. The Green Belt Technical Paper ([TP3](#)) sets out the exceptional circumstances that exist to justify the removal of this land from the Green Belt. There is a compelling need for additional housing development, the site is in highly sustainable location and it can be developed with no significant harm to the Green Belt. There are no reasonable alternatives to the site's development.

2.2. The Part 2 Green Belt Review ([GB2](#)) recommends the land parcels that make up this site, E7(i) and E7(ii), for release from the Green Belt within the plan period. The Review considers both parcels are contained by strong boundaries – the railway line to the south, the A602, and Astonbury Wood to the north, meaning they have limited connections to the wider countryside. Both are also shown to make a ‘limited contribution’ to three of the five green belt purposes, with no ‘significant contributions’ identified. As such it concludes they can be released without damage to the overall purposes of the Green Belt in this location (p10-12).

**3. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?**

3.1 The flood risk<sup>3</sup> associated with development at South East Stevenage is fully considered in the Level 2 SFRA ([E3a](#) and [E3b](#)), section 4.2 and para 4.2.2.

3.2 Table 1 below summarises the conclusions in the SFRA for the ‘more vulnerable’<sup>4</sup> use proposed at South East Stevenage and Map 1 shows the extent of flood risk on site.

Table 1 – HO4 summary of conclusions

Flood Zones	Flood Zone 1	Flood Zone 2	Flood Zone 3	Flood Zone 3b
Area of extent	25.66ha	2.45ha	1.50ha	0.61ha
‘More Vulnerable’ suitability	✓	✓	Exception test required	✗

3.3 The SFRA recommends that development of the South East Stevenage site includes:

- The sequential approach to development allocation (directing development to the area of lowest flood risk on any given development site);
- Flood Warning and Evacuation procedures as part of a site specific FRA;
- A detailed drainage strategy as part of a site specific FRA report;
- The consideration of SuDS at all stages of the planning and design process to reduce surface water runoff to less than greenfield runoff rates.
- The setback of development to a minimum of 8 metres from the bank of the Stevenage Brook.

<sup>3</sup> Fluvial, surface water and groundwater

<sup>4</sup> NPPF Vulnerability classification

Map 1 – HO4 flood risk extent



3.4 The landowners/developers of this site are aware of the results of the Level 2 SFRA and the resulting site constraints. Whilst the red line boundary of the site covers a wider area, development will only be permitted within areas that are not affected by Flood Zone 3 and 3b. The Masterplans submitted reflect this consideration and avoid development within these areas.

**4. Has the impact of the proposal on the character and appearance of the surrounding area been formally considered?**

- 4.1. A Landscape Sensitivity and Capacity Study was undertaken in 2006 (E9). Since this time, there has been very little change in the landscape of this area, so its findings remain valid.
- 4.2. This identifies the Bragbury End and Hooks Cross area as having potential for development, with moderate sensitivity to residential use.
- 4.3. Criteria n. of Policy HO4 requires a network of green infrastructure to be incorporated into any development scheme, and the tree boundary to the north retained as far as possible, to reduce the visual impact of development on the surrounding environment.

**5. Is the scale of development appropriate?**

- 5.1. The scale of development proposed within the SBLP accords with draft, high level Masterplans submitted by the landowners/developers of both parts of this site, requested as part of the SLAA process. It appropriately reflects the site's context. The level also reflects the site specific

requirements such as levels of affordable and aspirational housing, which will impact upon dwelling estimates.

- 5.2. The site is constrained by flood risk, as discussed under Q3 of this matter. This has been taken into account when determining the scale of development likely to be appropriate.
- 5.3. The Borough Council will actively encourage higher dwelling numbers, where this would be in accordance with other HO4 policy requirements and requirements of the Plan as a whole.

**6. Have the environmental impacts of the development been assessed?**

**7. Is the proposal likely to affect the any protected species?**

- 6.1. The SA assesses the environmental impacts of the proposed development (p377). The Assessment recognises that the development will have an adverse impact the environment (biodiversity in particular) in this area, as it involves the irreversible loss of a Greenfield (and Green Belt) site. However, it also recognises the significant positive social and economic gains of developing this site (p100).
- 6.2. As a result of representations received relating to this issue (asserting badgers were present on the site, in particular), the Borough Council, as landowner of the southern part of the site, has carried out an ecological assessment to identify whether any protected species exist on the site. In the main (Fields 1 and 2 as identified in Figure 6 below), the site was assessed to be of limited wildlife value and no further detailed surveys were recommended.
- 6.3. For the small parcel of land to the west of the site (Field 3), the assessment suggests there is a very low risk of Great Crested Newts and a detailed survey could usefully be undertaken in the spring. In accordance with this assessment, we will require a detailed survey to be undertaken, as recommended, before any development is permitted on this part of the site.
- 6.4. No sign of use of this land by badgers was found.



Figure 6: Land parcels assessed for ecology

## HO1/2 – Bragbury End sports ground car park

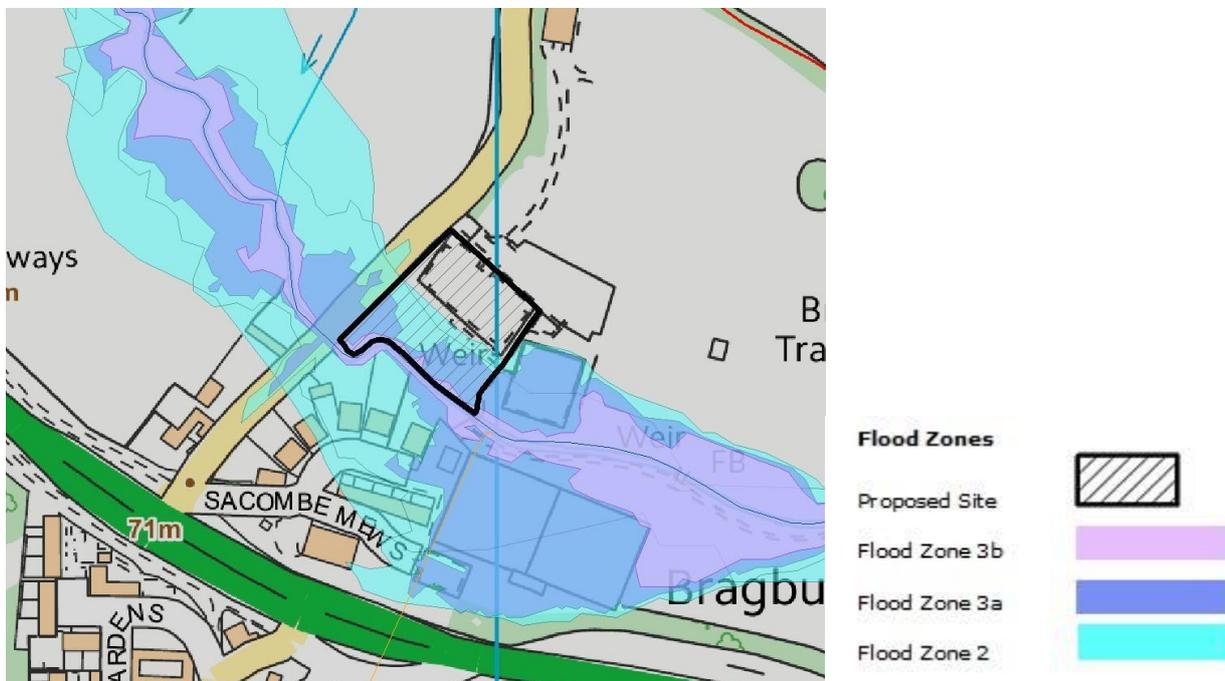
### 1. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?

- 1.1 The flood risk<sup>5</sup> associated with development at Bragbury End sports ground car park is fully considered in the Level 2 SFRA ([E3a](#) and [E3b](#)), section 4.2 and para 4.2.1.
- 1.2 Table 2 below summarises the conclusions in the SFRA for the 'more vulnerable'<sup>6</sup> use proposed at Bragbury End sports ground car park and Map 2 shows the extent of flood risk on site.

Table 2 – HO1/2 summary of conclusions

Flood Zones	Flood Zone 1	Flood Zone 2	Flood Zone 3	Flood Zone 3b
Area of extent	0.21ha	0.23ha	0.13ha	0.03ha
'More Vulnerable' suitability	✓	✓	Exception test required	x

Map 2 – HO1/2 flood risk extent



<sup>5</sup> Fluvial, surface water and groundwater

<sup>6</sup> NPPF Vulnerability classification

- 1.3 The SFRA recommends that development of the Bragbury End sports ground car park site includes:
- The sequential approach to development allocation (directing development to the area of lowest flood risk on any given development site);
  - Flood Warning and Evacuation procedures as part of a site specific FRA;
  - A detailed drainage strategy as part of a site specific FRA report;
  - The consideration of SuDS at all stages of the planning and design process to reduce surface water runoff to less than greenfield runoff rates.
  - The setback of development to a minimum of 8 metres from the bank of the Stevenage Brook.
- 1.4 The landowners/developers of this site are aware of the results of the Level 2 SFRA and the resulting site constraints. Whilst the red line boundary of the site covers a wider area, development will only be permitted within areas that are not affected by Flood Zone 3 and 3b. The Masterplans submitted reflect this consideration and avoid development within these areas.

## **2. *Would the proposal result in the unacceptable loss of trees?***

- 1.1 Although a wider area is identified, due to flood risk constraints, only the northern part of the site is actually proposed for development. As such it is not likely that any trees will be lost to this development. However, if, during the detailed application stage, any trees on the boundary of the site are proposed for removal, a full tree survey will be carried out and replanting can be secured as part of any landscaping scheme.

## **3. *Could the site accommodate development without harming nearby living conditions?***

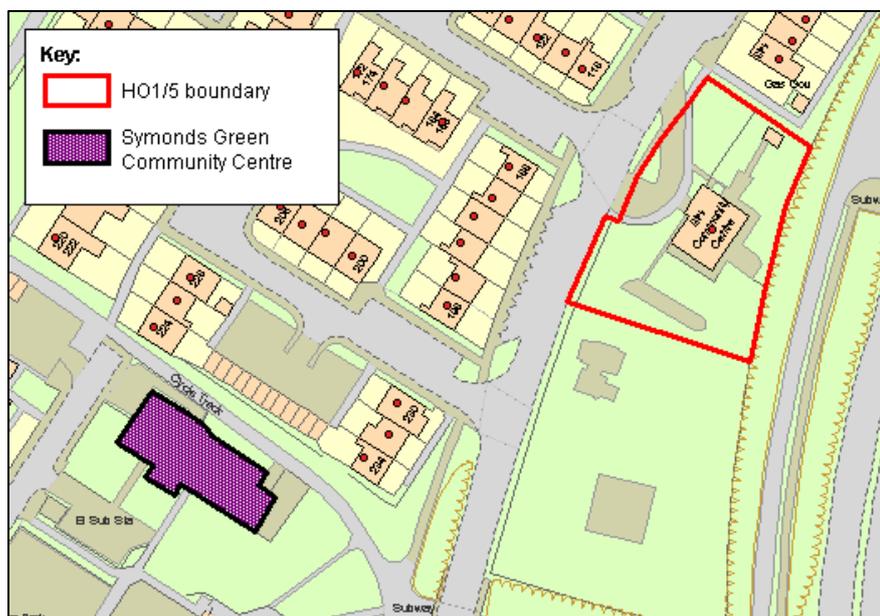
- 3.1. The site lies within a wider gated area used by Stevenage Football Club as their training ground. As discussed in questions 1 and 2 (above), only the northern part of HO1/2 is to be developed due to flood risk constraints. The site specific Flood Risk Assessment, that will be required as part of the planning application process, must ensure that any development will not increase the risk of flooding in the immediate vicinity nor further up or downstream. The nearest existing residential uses are to the south of the site. As such, development would be separated from existing properties by at least 30m (back garden to back garden) and over 60m (property to property), which by far exceed the separation distances set out in the Stevenage Design Guide SPD ([HP8](#), para. 5.1).

## HO1/5 Ex-play centre, Scarborough Avenue

### **1. Will the proposal result in the loss of the play centre and park and if so is this justified?**

- 1.1. For housing to be delivered on this site, the loss of the play centre is likely to be required. Policy HC6 requires community facilities to be retained or reprovided, or their loss justified. This is also reflected in the site specific considerations for this site, under the supporting text of HO1 (Table 3). The complete loss of this facility will only be permitted if it can be demonstrated that it is no longer required.
- 1.2. HO1/5 is a site owned by the Borough Council, which enables a strategic approach to community facilities to be taken.
- 1.3. It is proposed that the existing community facility will be relocated to the nearby Filey Close Neighbourhood Centre, as an extension of the existing Symonds Green Community Centre. Figure 7 shows the location of the existing site (red line) and the relocation site (shown in purple), which are under 200m away from one another.

Figure 7: Existing community facility and proposed relocation site



- 1.4. Work on the community centre extension is currently underway, due to be completed in August 2017.

## **H01/6 Former Pin Green School playing field**

### **1. *Is the loss of the school playing field justified***

### **2. *Will it be replaced elsewhere?***

- 1.1. The former school playing field is currently fenced off, so it is not a publicly accessible facility. As such, it was not considered directly as part of the Sports Facility Assessment and Strategy ([CF1a](#)). However, this evidence identifies a surplus of playing pitch facilities within the town and does not require any additional facilities of this type. As such, the loss of this playing field is considered to be justified with no requirement to replace the facility elsewhere. Instead contributions will be sought to improve the status of existing playing pitch facilities, in line with the recommendations of this evidence.

## **HO1/7 Fry Road day nursery**

### **1. *Would the proposal result in highway safety issues that could not be mitigated?***

- 1.1 No. It would not give rise to any highway safety issue or unacceptable transport impact that could not be mitigated.
- 1.2 The site is well connected to the active travel network, providing convenient access to Stevenage town centre, bus station, railway station and employment sites. The site is in a highly sustainable location with good access to a choice of mobility options. We are satisfied that the development is capable of prioritising active travel and public transport.
- 1.3 The allocation is for six dwellings and the site has one vehicular access point, an existing access on Fry Road and three active travel points of access (including the vehicular point of access). As shown on Map of HO1/7 at Appendix A.
- 1.4 The developer will be required to design the development and the access arrangements, to maximise the propensity for use of active travel over single occupancy car use, and to prioritise the available capacity accordingly.

### **2. *Would the proposal result in the loss of a green space and if so is it justified?***

- 2.1. This site comprises a community facility (day nursery) and the play area associated with this use. The green space is fenced off and so does not contribute towards open space provision within the town. The loss of this small area of green space is justified in terms of the Plan providing an acceptable overall balance between social, environmental and economic objectives, as the site will provide much needed new homes.

## **HO1/10 Land at Eliot Road**

### ***1. Has access to wastewater infrastructure been investigated and if so what were the findings?***

- 1.1 The site at Eliot Road is a brownfield site that accommodates a now closed independent school. The site is allocated to provide for 16 new dwellings.
- 1.2 The area is already serviced by the Thames Water wastewater network that supports the rest of Stevenage.
- 1.3 As set out in our response to Matter 15, Question 13, Thames Water are committed to continued early and proactive engagement with councils, land owners and developers to discuss their development plans and the different routes of delivering drainage infrastructure and agree with the developer a drainage strategy ahead of a planning application being submitted.

## **HO1/11 Land west of North Road Rugby Club**

### ***1. Is the site needed for future hospital expansion?***

- 1.1. The SBLP recognises the importance of Lister Hospital within the town, both as a key healthcare facility for the Hertfordshire and Bedfordshire area and as the town's largest employer.
- 1.2. Policy HC3 seeks to protect the existing hospital site and the secondary healthcare uses to the north of this allocation (providing specialist care homes and mental health facilities). It also allocates an undeveloped parcel of land, which has the potential to be used for future expansion of the hospital, if required.
- 1.3. The East and North Herts NHS Trust have not provided any robust evidence to show that a hospital expansion is definitely required, or that it is capable of being delivered within the plan period. The Statement submitted by the Trust in relation to Matter 11 (p2, para. 1.7) makes clear that no funding is in place for any potential expansion.
- 1.4. The Borough Council has written to the Trust on a number of occasions, asking for confirmation that a site is required for future expansion and that this will be delivered in the plan period. No robust evidence has been provided.
- 1.5. The SBLP cannot allocate sites for uses it does not believe will be delivered within the plan period.
- 1.6. The Borough Council have attempted to facilitate negotiations between the landowner of the Rugby Club site (HO1/11) and the Trust. However, no agreement has been reached.
- 1.7. Site HO1/11 has been promoted by the landowner (to the Borough Council) for residential use only. A developer has an option agreement on the whole site. The Rugby Club have made it clear that they will not make any part of the land available to the Trust for hospital expansion.
- 1.8. Providing homes on this site will make a valuable contribution towards our OAN for housing.
- 1.9. As stated by the Trust in their Matter 11 Statement (Appendix 1, para. 9), if the site allocated under HC3 is not deemed to be appropriate by the Trust, an alternative option does exist, in terms of the nurses accommodation to the north east of the existing hospital site. The leaseholders of this site have recently held discussions with the Borough Council about options to redevelop this site and to reprovide the existing accommodation, as well as a proportion of market housing to fund the works. Instead this parcel of land could be used to expand the hospital facilities and housing could be provided in an alternative location – perhaps as part of one of the two housing sites proposed along this road (HO1/11 or HO3).

**2. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?**

- 2.1 The SFRA does not identify any flood risk associated with this site. However, the use of SuDS will be considered at all stages of the planning and design process to address any surface water issues that may arise.

**3. Is the site boundary correctly drawn?**

- 3.1. As discussed under Q4 of Matter 16, the site boundary drawn on the Proposals Map for this site is not consistent with the landowner SLAA submission and the dwelling capacity stated in Policy HO1/11.
- 3.2. As such, a main modification has been proposed by the Borough Council, to correct this error and to expand the boundary to include the tennis club facilities that are currently accommodated on the site.
- 3.3. This reflects discussions held previously with the landowner, and the agreement they have with the prospective developer of this site.

**4. Are there electricity pylons within the site that could affect its development potential?**

- 4.1. There are no electricity pylons within the development site allocated under HO1/11.
- 4.2. One pylon lies to the north of the site, outside of the boundary. A draft Masterplan illustrates a buffer between the pylon and any residential properties to be developed. Guidance relating to buffers around electricity pylons will be followed at the detailed planning application stage. It is not considered this will have any impact upon development capacity.

## **HO1/12 Marymead neighbourhood centre**

### ***1. Has the impact of the proposal on the character and appearance of the surrounding area been formally considered?***

- 1.1. Marymead neighbourhood centre was designated as part of the Broadwater Conservation Area, designated to preserve its status as the best surviving example of a Stevenage New Town neighbourhood. As such it forms a focal point for this conservation area.
- 1.2. A Heritage Impact Assessment (HIA) was carried out for the Marymead site ([CH1](#)) to inform the Local Plan. This concluded that development of Parcels 2,3 and 4 (as identified in the HIA) would have minimal impact on the character and appearance of the conservation area, providing community facilities were retained or reprovided.
- 1.3. The HIA recognises the potential opportunities that arise from redevelopment in terms of addressing some of the existing negative features of this area, such as vacant properties and safety concerns. It is considered that the redevelopment of the land parcels identified above will improve the character and appearance of the area.
- 1.4. The HIA recommends that the historically significant landmark buildings in parcels 1 and 5 are retained. The table of site specific considerations (Table 3) within the supporting text of HO1 requires the conservation area to be preserved or enhanced, and the Broadwater Conservation Area SPD provides further guidance, alongside the HIA, to guide the development of this site as appropriate.

## **H01/13 Scout Hut, Drakes Drive**

### ***1. Will the proposal result in the harmful loss of trees?***

- 1.1. It is not envisaged that the proposal will result in the loss of any trees. However, any trees likely to be affected by the development will be assessed by the Borough Council's arboricultural officer and the findings of this work will be used to inform any decisions made at the detailed planning stage.

## **HO1/14 Shephall Centre and adjacent amenity land**

### ***1. Is the relocation of the community centre justified?***

- 1.1. Community centres are protected under Policy HC4 of the SBLP. This requires any loss of community centres to be justified, or requires relocation either within the site or in a suitable alternative location. This is also set out under the site specific considerations for this site (Table 3) in the supporting text of Policy HO1.
- 1.2. The site is owned by the Borough Council and, as such, a corporate, strategic approach can be taken to the provision of community facilities. In this case, it is likely that the community centre will be reprovided on-site, as part of any redevelopment scheme.
- 1.3. The reprovision of the community centre will enable much needed housing to come forward and will not result in any loss of facilities, unless it can be demonstrated that the facility is no longer required to meet the needs of the Borough/this area, in which case its loss will be satisfactorily justified.

## **HO1/18 The Oval neighbourhood centre**

### **1. Has access to wastewater infrastructure been investigated and if so what were the findings?**

- 1.1 The site at the Oval neighbourhood centre (HO1/18) is a brownfield site that accommodates residential and retail units and two community centres. The site is allocated to provide for 275 new dwellings along with the re-provision of community and retail facilities.
- 1.2 The area is already serviced by the Thames Water wastewater network that supports the rest of Stevenage.
- 1.3 As set out in our response to Matter 15, Question 13, Thames Water are committed to continued early and proactive engagement with councils, land owners and developers to discuss their development plans and the different routes of delivering drainage infrastructure and agree with the developer a drainage strategy ahead of a planning application being submitted.

### **2. Is there sufficient infrastructure nearby to support the development?**

- 2.1. The site is well located within the existing urban area of Stevenage, within walking distance of schools, principal open spaces and other services and facilities. The site also has easy access onto the cycleway system, providing convenient access to Stevenage town centre, where a wide range of facilities and services are available, employment sites and railway station and bus station. The site is in a sustainable location with good access to a choice of mobility options. The Local Plan seeks the retention or re-provision of community facilities on the site or their loss to be justified. The Council considers that there is sufficient infrastructure nearby to support the development. Infrastructure providers have been consulted as the local plan and supporting infrastructure delivery plan have been developed and the Council is not aware of any infrastructure need for the development which cannot be met. In addition, Policy IT3 will apply because the site is more than 200 dwellings.

### **3. Would the proposal result in highway safety issues that could not be mitigated?**

- 3.1. No. It would not give rise to any highway safety issues that could not be mitigated.
- 3.2. The site is well connected to the active travel network, providing convenient access to Stevenage town centre, bus station, railway station and employment sites. The nearest bus stops are on Vardon

Road a short walk from the site. Frequent local bus services are available as well as a variety of services to nearby towns. The site is in a highly sustainable location with good access to a choice of mobility options.

- 3.3. The allocation is for 275 dwellings including a children's playground and open space. The existing site has four vehicular points of access to the site, two on Vardon Road and two on Jessop Road, and nine active travel points of access (including the four vehicular points of access). As seen on Map of HO1/18 at Appendix A.
- 3.4. We are satisfied that the site is accessible by active travel and by public transport.
- 3.5. The developer will be required to design the development, the access arrangements, and the management of the site in such a way as to maximise the propensity for use of active travel, and shared travel over single occupancy car use, and to prioritise the available capacity accordingly. It will be required to demonstrate the effectiveness of the measures that it proposes to achieve this, and where necessary to commit to implementation of such measures.

**4. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?**

- 4.1 The SFRA does not identify any fluvial flood risk associated with this site (HO1/18). However, the use of SuDS will be considered at all stages of the planning and design process to address any surface water issues that may arise.

## Appendix A: Maps of HO1/7 and HO1/18 showing access points

### HO1/7: Fry Road Day Nursery



# HO1/18: The Oval neighbourhood centre

