

Stevenage Borough Local Plan

Public Examination

Matter 2 Statement

December 2016



Stevenage Borough Local Plan 2011 – 2031 - Public Examination

Statement by Stevenage Borough Council (SBC)

Matter 2 - Objectively Assessed Needs for Housing and Employment Land

NB: SBC responses set out in blue font

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?*

In particular:

(a) Has account been taken of the 2014-based CLG Household Projections? If so what were the findings?

1.1 The OAN figures were updated in the document¹ ED112. This update specifically considered the impact of the CLG 2014-based household projections, with two substantive variations from the SHMA Update 2015 (SHMA 2015) (HP2).

a) the population projections in the SHMA 2015 were based on migration trends for the period 2001-11; whereas the OAN Update 2016 (OAN 2016) (ED112) was based on trends for the period 2005-15.

b) the SHMA 2015 was based on fertility and mortality rates from the ONS 2012-based sub-national population projections (SNPP) and household representative rates (HRRs) from the CLG 2012-based household projections; whereas the OAN 2016 was based on equivalent rates from the 2014-based projections.

1.2 The table below provides a comparison between the SHMA 2015 and the OAN 2016.

¹ Updating the Overall Housing Need based on 2014-based projections for Stevenage & North Herts, August 2016.

Table 1: Comparison of SHMA Update 2015 and OAN Update 2016

Stage		SHMA Update 2015	OAN Update 2016
HOUSEHOLDS			
Demographic starting point: CLG household projections 2011-31		21,280	21,289
Adjustment for local demographic factors and migration trends 10-year migration trend		-2,067	-2,431
Baseline household projections taking account of local circumstances		19,213	18,858
DWELLINGS			
Housing need based on household projections taking account of local circumstances		19,714	19,347
Adjustment for suppressed household formation rates Concealed families and homeless households with allowance for vacancies		309 + 8 = 317	309 + 8 = 317
Baseline housing need based on demographic projections		20,031	19,664
Further adjustments needed...	In response to balancing jobs and workers Projected growth in workers exceeds forecast jobs growth and planned jobs growth therefore no further adjustment needed	0	0
	In response to market signals Dwellings needed (in addition to the adjustment for concealed families and homeless households) to deliver the overall percentage uplift proposed	10% x 19,714 = 1,971 1,971 - 317 = 1,654	10% x 19,347 = 1,934 1,934 - 317 = 1,617
Combined impact of the identified adjustments		+1,654	+1,617
Full Objectively Assessed Need for Housing 2011-31		21,685	21,281

- 1.3 Whilst the SHMA 2015 identified an OAN of 21,700 dwellings for the period 2011-31, the OAN 2016 identified a marginally lower OAN of 21,300 dwellings over the same period. This equates to a growth rate of 1.2% per annum across the HMA.
- 1.4 However, the OAN 2016 identified an increase in the overall housing need from 7,300 to 7,600 dwellings in Stevenage (an average of 380 per year).
- 1.5 The Housing Technical Paper Update 2 ([ED123](#)) paragraphs 2.14 to 2.17 set out the conclusions of the council in relation to the OAN 2016 ([ED112](#)).

(b) Does the OAN appropriately consider the likelihood of past trends in migration and household formation continuing in the future?

(c) Has account been taken of migration to the borough from London and the assumptions made in the London Plan about outward migration? Should a 5 or 10 year migration rate be used?

1.6 The OAN appropriately considers the likelihood of past trends in migration and household formation continuing in the future. Consistent with the PPG, the OAN is informed by household projections and these are based on past trends.

1.7 The OAN 2016 (ED112) was informed by household projections based on 10-year migration trends for the period 2005-15. This is a more appropriate period than the 5-year period 2009-14 which inform the ONS 2014-based SNPP on which the CLG 2014-based household projections (the PPG “starting point” for assessing housing need) are based.

1.8 In terms of household formation rates, the OAN 2016 assumes that 2014-based CLG HRRs continue. However, we would note that in addition to the household projections, the OAN calculation takes account of both the needs of concealed families and homeless households and also includes a market signals response to help address market pressures. Table 1 demonstrates an uplift of 317 dwellings to address this.

1.9 The SHMA 2015 addresses the merits of a 5 or 10 year migration rate at paragraphs 2.10-2.15 and concludes that the planning for long-term housing provision demands an approach based on more stable, long-term 10-year trends.

1.10 The use of long-term migration trends:

- Is an approach that is allowed by the PPG (so long as it is justified);
- Is an approach that is supported by PAS;
- Is an approach which has clear precedent from Inspectors examining Local Plans and hearing Appeals elsewhere;
- Is an approach that is commended by academic experts in demographic analysis; and
- Is an approach that is adopted by industry experts.

1.11 The Local Plans Expert Group (LPEG) has also recognised the importance of considering 10-year migration trends as well as the 5-year trends used for the PPG “starting point” estimate; and identified the need for consistency in migration assumptions between neighbouring areas, proposing that the same trend period should be used for migration across all local authorities within each HMA. Nevertheless, this need for

consistency extends to migration between HMAs to avoid double counting (which is overlooked by the LPEG approach) and there have been numerous consultation responses about the technical problems with the approach for assessing need that the LPEG advisor has proposed.

- 1.12 The Government has not yet responded to the LPEG report, so it would not be appropriate to place undue weight on the proposed methodology at this stage; but any recommendation to focus consistently on more stable long-term migration trends would be a sensible outcome.
- 1.13 In terms of migration trends between Stevenage and London, the table below shows the annual migration recorded each year over the period 2001-15.

Table 2: Annual Migration between Stevenage and London

Year	In-migrants to Stevenage from London	Out-migrants from Stevenage to London	Net migration from London to Stevenage
2001-02	800	350	+450
2002-03	830	270	+560
2003-04	900	340	+560
2004-05	800	330	+470
2005-06	310	690	+380
2006-07	360	730	+370
2007-08	390	810	+420
2008-09	380	720	+340
2009-10	430	640	+210
2010-11	361	713	+352
2011-12	376	621	+245
2012-13	313	657	+344
2013-14	343	622	+279
2014-15	369	785	+416
<i>10-year average 2001-11</i>	<i>763</i>	<i>352</i>	<i>+411</i>
<i>10-year average 2005-15</i>	<i>699</i>	<i>363</i>	<i>+336</i>
<i>5-year average 2007-12</i>	<i>701</i>	<i>387</i>	<i>+313</i>

- 1.14 The London Plan 2015 was underwritten by the GLA 2013-round Central Trend population and household projections. These predominantly reflected assumptions in the ONS 2012-based SNPP, but increased domestic out-migration from London by 5% and reduced domestic in-migration to London by 3% for the period from 2017-18 onwards. On this basis, net migration from London to Stevenage was increased from an annual gain of 313 persons to an assumed annual gain of 361 persons.

- 1.15 Therefore, for the Stevenage 20-year Plan period 2011-31, the GLA 2013-round figures were based on estimates of actual migration for the year 2011-12 (+245), short-term trends based on a 5-year average from 2007-12 for the initial 5 years of the projection period (+313 per year) and the adjusted figure of +361 for the remaining 14 years of the Plan. Together, these yield an annual average of +343 persons over 20 years.
- 1.16 ORS met the GLA to discuss cross-boundary migration on 20 January 2015 and the issue of the “knock-on” consequences of their assumptions formed part of this discussion. At that meeting, it was agreed that long-term migration trends would provide an appropriate basis for establishing OAN for areas surrounding London.
- 1.17 The SHMA 2015 was based on migration trends for the 10-year period 2001-11, when average net migration from London to Stevenage averaged 411 persons each year. This is higher rate than the average 343 persons assumed by the GLA in the 2013-round figures.
- 1.18 The OAN 2016 ([ED112](#)) was based on migration for the 10-year period 2005-15, and over this period migration from London to Stevenage was marginally lower at an average of 336 persons per year – but this remains broadly consistent with the rate assumed by the GLA 2013-round projections which informed the London Plan (a difference of 7 persons per year). This difference would account for around 60-65 dwellings over the whole Plan period (around 3 dwellings per year) which is notably lower than the market signals uplift that has already been incorporated. Further information is included in document² [ED105](#).

(d) Have formation rates been suppressed by historic undersupply and issues of affordability?

(e) Does the OAN take appropriate account of ‘market signals’?

- 1.19 SHMA 2015, chapter 3 considered in detail the market signals affecting the HMA. This demonstrated that dwelling growth rates in the HMA have been higher than both the national average and also the comparator areas. Therefore, there is little evidence of past under-supply. The OAN also incorporates an allowance for concealed families and homeless households who may not have been able to access an appropriate affordable dwelling.
- 1.20 PPG identifies that *“The more significant the affordability constraints ... the larger the additional supply response should be”*; but that *“plan makers should set this adjustment at a level that is reasonable”* (ID 2a-020). The

² ORS, Stevenage Borough Council Response to Home Builders Federation Submission to the Stevenage Local Plan Consultation: February 2016, June 2016.

SHMA 2015 identified that the affordability indicators for the HMA were above the national average, but were lower than those in other areas nearby (including other parts of Hertfordshire, Buckinghamshire and Essex, and Greater London). As such, a 10% market signals uplift was proposed.

- 1.21 This is consistent with responses that have been proposed across the country including:

ORS	
Milton Keynes	None
Bedford	5%
Aylesbury Vale	10%
Luton and Central Bedfordshire	10%
Outer North East London	15%
Camden	20%
Outer East London	20%
Southern Buckinghamshire	20%
West Essex and East Hertfordshire	20%
Others	
North Northamptonshire	None
South West Hertfordshire	3%
Welwyn Hatfield	6%
Cambridge and South Cambridgeshire	20%
Greater London	20% ³

- 1.22 While for the majority of areas these are proposed uplifts rather than figures from adopted Local Plans, the HBF recently endorsed 10% as an appropriate response for Luton and Central Bedfordshire at the Luton Local Plan examination hearings and the HBF also endorsed 20% as an appropriate response for Camden at their examination hearings.

(f) Is the OAN appropriately aligned with forecasts for jobs growth?

- 1.23 SHMA 2015, chapter 3 considers the balance between jobs and workers and concludes that the demographic projections are likely to result in a small surplus of workers when compared to forecast job growth.

³ The uplift for Greater London was based on housing backlog and suppressed household formation

(g) Does the OAN take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

1.24 PPG ID 2a-029 states that:

*The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. **An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes** (emphasis added).*

1.25 On this basis it is clear that an uplift to help deliver more affordable housing should be considered at the Local Plan stage as part of the housing requirement (policy on), not the OAN stage (policy off). The Stevenage Borough Local Plan (SBLP) has considered this. It has a housing target of 7600 homes, consisting of 7300 OAN and an uplift of 300 dwellings to take into account the need for affordable housing (paragraph 5.67⁴). The housing target of 7600 therefore includes an uplift to help deliver the required number of affordable homes. The updated OAN of 7600 dwellings ([ED112](#)) would provide the same number of affordable homes as the original housing target. As such, no further increase is proposed. Further information is provided in document⁵ [ED123](#), paragraphs 2.2-2.17.

(h) The regeneration of Stevenage is likely to attract people from outside the Borough to live there. Has this been taken account of?

1.26 The OAN takes into account the migration trends from 2005-15. The regeneration of Stevenage could attract more people, and this could yield a higher level of migration than past trends; however, the OAN already includes an uplift beyond the housing need based on household projections alone, which would enable future migration to be higher than the past trends on which the household projections are based.

⁴ SBLP

⁵ Housing Technical Paper Update 2

i) In terms of second/vacant homes, why has the period of 2016-2036 been modelled and not 2016-2031 (the Plan period)? The percentage applied for this is also vague.

1.27 The percentage for second/vacant homes is set out in the SHMA 2015, paragraph 2.74. The rate for Stevenage was 1.9%; based on data from the 2011 Census on the proportion of dwellings without a usually resident household.

1.28 The SHMA 2015 and the OAN Update 2016 were both modelled based on the period 2011-31. Any references to the period 2016-36 in the report should have referenced the period 2011-31.

2. The soundness of proposals for the land allocations for housing set out in policy HO1 (and the case for 'omission sites') will be considered at Stage 3 of the Examination. However, on the basis of the Plan as submitted, is it realistic that they 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, developable sites or broad locations for growth for years 6-10 from the point of adoption?

If you contend that the Plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?

2.1. The Housing Technical Paper ([TP2](#)) demonstrates that the SBLP identifies a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption (para's 4.21-4.39) and a supply of specific, developable and broad locations for growth for years 6-10 (housing trajectory, p15&16).

2.2. The Council's use of the Liverpool approach in calculating 5yr housing land supply is also justified within this paper (para's 4.25-4.29).

2.3. Sites have deliberately not been phased. The Plan is heavily reliant on a number of large sites, which will take a longer time period to be completed, therefore we recognise the need to encourage early delivery.

3. Is the Plan clear as to the identified need for additional pitches for gypsies and travellers (policy HO12) and is the identified need soundly based and supported by robust and credible evidence?

3.1. Policy HO12 allocates a site for 11-16 pitches. SBLP paragraph 9.90 sets out that our evidence identifies a need for 11-16 pitches.

- 3.2. The figure is derived from the data in para's 5.6-5.7 of document⁶ ([HP6](#)). Para 4.2 of the Housing Technical Paper update 2 ([ED123](#)) states that:

"The accommodation study identifies a requirement for three additional pitches over the period to 2018, with a further 3-5 pitches required in each five-year period thereafter."

The calculation is:

Plan period	Number of pitches	Total number of pitches
Net need for new permanent pitches to 2018	3	3
Following five year period 2019-2023	3-5	6-8
Following five year period 2024-2028	3-5	9-13
Remaining two year plan period 2029-2031	2-3	11-16

- 3.3. SBLP paragraph 9.95 sets out that the site is sufficient to meet all permanent needs arising within the plan period.

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?

- 4.1. Our Employment and Economy Baseline Study ([ER8](#)) provides the basis for determining the SBLP's target for employment provision. This tests a number of scenarios and sets out a requirement for between 20-30ha of employment land to be provided within the plan period. The Employment Technical Paper ([TP1](#)) goes beyond this, taking into account the wider plans for the Borough as well as the aspirations of the LEP for Stevenage to be a major growth area. Due to the acknowledged uncertainties in calculating employment need (para 2.14), this Paper recognises that a balanced and pragmatic approach is required to determining employment land requirements for the SBLP (para 2.54). It is considered that ensuring at least 30ha of employment land is provided is the most appropriate approach. This meets the higher end of the identified need, whilst also allowing for LEP aspirations to be met.
- 4.2. Further EEFM data was released in August 2016. As such, an update to the Technical Paper has been produced to ensure our target is still appropriate (Employment Technical Paper: Update 2016 ([ED124](#))). The 2016 data suggests a lower land requirement for the Borough than in previous model runs. However, para's 2.14-2.17 of this Paper identify a number of potential factors for this, and notes caution is required when considering any single run of the forecasts. Taking into account a three year rolling average of 26ha and an overall average of all six years of

⁶ DCA Gypsy and Traveller Accommodation Assessment, 2013

EEFM estimates (32ha), the Paper concludes that providing at least 30ha new employment land would still be appropriate (para 2.18).

- 4.3. The provision of 140,000m² new employment floorspace on allocated sites within the Borough is the maximum amount that can be achieved. This represents just over half of the floorspace required to meet the SBLP target (15.5ha)⁷.
- 4.4. A sequential approach has been followed ([TP1](#), para's 3.9-3.17), with the use of brownfield sites first. All positively assessed sites from the Strategic Land Availability Assessment ([ER3](#)) 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.
- 4.5. Despite another 3ha of supply being provided by SBLP policies to redevelop/intensify existing employment uses and through existing planning permissions, the Council acknowledges it is unable to meet the full employment needs of the Borough. A Functional Employment Market Area Study (FEMA) ([ER1](#)) identifies that Stevenage is located within a wider A1(M) corridor market area. The shortfall of 11.5ha has been discussed with authorities within the FEMA and both North Hertfordshire (NHDC) and Central Bedfordshire (CBC) have agreed to make provision on behalf of Stevenage. As such, the full employment land need can be met within the FEMA.

5. *How many jobs would this equate to? Should the need be expressed in job numbers in the Plan also, including the shortfall?*

- 5.1. Job numbers have deliberately not been provided in the SBLP. Estimates of jobs numbers would need to be based on assumptions around the nature and make up of uses to be provided on each site. Although the SBLP specifies the types of uses we will allow, in most cases the exact breakdown of uses is not yet known and is likely to be market-led. The Council considers it is appropriate to retain the current approach and to deal with employment needs and supply in terms of floorspace and land required, as opposed to jobs numbers (which will fluctuate and vary over time and will depend on individual occupiers), as these provide more reliable and accurate data.
- 5.2. We have, however, carried out work to provide an estimate of the number of jobs the allocated sites could theoretically provide and what

⁷ Once adjustments have been made to take into account how much land is available to meet baseline needs (as explained further in para's 3.5 to 3.6 of the Employment Technical Paper (ED124)).

this could mean in terms of the shortfall for the purposes of the Examination (Tables 3 and 4⁸)⁹.

Table 3: Jobs estimates for allocated sites

Site	Jobs estimate (rounded to the nearest 10)
EC1/1: GSK / Bioscience Catalyst	70
EC1/2: South of Bessemer Drive	670
EC1/3: West of Gunnels Wood Road	80
EC1/4: Land west of North Road	410
EC1/5: Stevenage Central	570
EC1/6: West of Stevenage	450
EC1/7: Land west of Junction 8	190
TOTAL	2,440¹⁰
<p>Note: Where sites are allocated with a flexible mix of potential B Use Classes, an even split across these uses has been assumed.</p> <p>Note: These calculations do not assume that 100% of the 140,000m² floorspace is available to meet the baseline trend-based requirement. Some of this floorspace (including at GSK and Stevenage Central) is considered to be available to meet a 'policy-on' or step change growth that is not factored into the baseline demand estimate.</p>	

Table 4: Shortfall in provision calculated as jobs numbers and floorspace

Employment land shortfall (ha)	Split of B use assumed		Gross floorspace		Gross job capacity		Total jobs estimate
	B1c/B2	B8	B1c/B2	B8	B1c/B2	B8	
11.5	50%	50%	23,000	23,000	535	354	889

⁸ These estimates are based on best practice methodologies to convert floorspace allocations and their likely uses into the number of jobs they are estimated to provide. However, as these are indicative floorspace capacity estimates and no site occupiers have been identified, the estimates may not be reflective of what the market actually delivers.

⁹ As explained in the Technical Paper (ED124, para's 3.5 to 3.6), there is a need to align the demand and supply side analysis to avoid over-counting, and these estimates are based on the level of floorspace that is likely to contribute towards meeting the identified needs and applying standard job density ratios consistent with the Employment and Economy Baseline Study ([ER8](#)). The shortfall that remains is also calculated in this way.

¹⁰ Of course, this only includes jobs coming from new 'B Class' allocations within the Local Plan. It does not include new employment opportunities arising from other Use Classes or those coming from the redevelopment/expansion of existing employment areas.

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?

- 6.1. An update to the Employment Technical Paper (ED124), to take into account the release of the 2016 EEFM data, identifies that the shortfall in provision being made by the SBLP will be approximately 11.5ha.
- 6.2. The Council has held previous discussions with NHDC and CBC, and both have agreed to provide employment land to meet Stevenage's needs¹¹.
- 6.3. CBC's response to the Publication consultation of the SBLP ([LP8](#), Consultee ID: 763103) states that they 'are happy to contribute to meeting the shortfall in employment land arising from Stevenage'. They raise some queries in terms of the exact level of shortfall that exists and that this should be reflected in the Plan, but the principle of making provision is clearly supported. The issues raised are currently being discussed with CBC. A MoU is being drafted to reflect this agreement between the two authorities. CBC are at an early 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. The FEMA ([ER1](#)) also recognises that both NHDC and CBC are anticipated to have a surplus of employment land to meet their own growth requirements over their respective plan periods (para 6.44).
- 6.4. NHDC's Preferred Options Local Plan¹² identified a 'safeguarded' (20ha) employment site at Baldock to take account long-term needs within the FEMA and to meet Stevenage's needs.
- 6.5. This site is now allocated (rather than safeguarded) within the Publication version of NHDC's Local Plan¹³
- 6.6. Although the NHDC Plan references the shortfall of employment provision, it does not explicitly state that this site has been allocated to meet some or all of Stevenage's needs. As such, the Council has raised objection to their Plan ([ORD2](#)). It is considered that this objection can be resolved as a result of further discussions.

¹¹ A higher figure of 14ha previously formed the basis of discussions with both authorities. The updated figure of 11.5ha has only recently been calculated and shared.

¹² http://www.north-herts.gov.uk/sites/northherts-cms/files/local_plan_preferred_options_december_2014_0.pdf para 3.12

¹³ <http://www.north-herts.gov.uk/sites/northherts-cms/files/Proposed%20Submission%20Local%20Plan.pdf>

- 6.7. A MoU ([ED130](#)), signed subsequently, sets out NHDC's commitment to providing employment land to meet Stevenage's needs.

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

- 7.1. Para's 4.28-4.30 of the FEMA ([ER1](#)) identify that commuting flows are recorded between Stevenage, NHDC and CBC and that the strongest flows are between Stevenage and NHDC. Flows into Stevenage from both authorities are currently stronger than flows out to those areas.
- 7.2. As Stevenage is a net attractor of labour, the necessary strategy set out in the Plan of providing additional employment opportunities within NHDC or CBC (or both), has the potential to increase self-containment within these areas by allowing people to work closer to home, thus reducing unsustainable travel patterns. Para 6.18 of the FEMA states that:

'This suggests that a scenario whereby unmet business needs from Stevenage are accommodated elsewhere within the study area would not have a significant impact on labour market dynamics within the principal study area, and indeed would help to retain labour within the existing travel to work area'.

- 7.3. Sites on the edge of Stevenage were explored and discounted in advance of the Baldock site being proposed (Sites A and D of the first consultation on the SBLP ([LPD4](#))). Site A, at Junction 7, would require a cross-boundary scheme to include land within NHDC. NHDC confirmed they would be unlikely to release this site from the Green Belt as the landowner did not support the site. NHDC strongly objected to Site D in terms of the erosion of the Green Belt.
- 7.4. Due to its close proximity to the Borough and excellent access to passenger transport links, Baldock provides a sustainable location within North Hertfordshire to make employment provision. The proposed site is within walking distance of the train station (a 14 minute service from Stevenage) and bus services, with scope to enhance access further through improvements to pedestrian and cycle routes. The site falls within the key Stevenage and Letchworth sub-market area, identified in the FEMA (para 7.15) as being most suitable for supporting any unmet growth requirements from Stevenage.
- 7.5. The employment allocation in Letchworth is not of sufficient size to accommodate Stevenage's needs and Royston is much less sustainable in terms of its proximity to Stevenage.
- 7.6. The FEMA also concludes that Eastern CBC provides an appropriate location for meeting these needs, but recognises its distance from Stevenage (13 miles) must be a consideration.

7.7. Thus, Baldock provides a sustainable alternative to making all of the employment provision within the Borough and is the most appropriate strategy.