

## **Response to Stephen McPartland MP's statement of 3 March**

Many of the comments made in the statement of 3 March have been heard previously at the examination.

In total the comments cover topics dealt with under Matters 3, 5, 7, 9, 10, 19, 20 and 21. The comments on Matter 10 [employment land] are wholly new and did not feature in his Regulation 19 representations.

The Borough Council's original responses to representations received during the Regulation 19 consultation, our matters' statements and our evidence in chief during hearing sessions have addressed [or will address, in the case of Matters 19, 20 and 21] the identified concerns.

Overarchingly, the Borough Council has demonstrated that the Stevenage Borough Local Plan is deliverable and that the plan has met all of the statutory tests. Assertions to the contrary lack any material substance.

### **Matter 10 – employment land**

The Borough Council has worked hard to identify sufficient land within its own administrative area to meet its anticipated employment needs to 2031. Nonetheless, there remains a residual amount which it has been unable to meet. Thus, it has followed NPPF guidance and exercised the Duty to Co-operate. The Borough Council has worked with three of its neighbours in the A1 FEMA corridor – Central Bedfordshire, North Hertfordshire and Welwyn Hatfield – to this end.

Our evidence has demonstrated that we do not need the provision of employment land in the latter in order to meet our outstanding employment land requirement. Both Central Bedfordshire and North Hertfordshire have indicated a willingness to meet some, or all, of the unmet employment land requirement. This is reflected in the Memoranda of Understanding signed with those councils [ED130 and ED140]. There is no evidence that the required land will not be made available to meet the needs of the Borough.

Mr McPartland's argument appears to be that the council cannot adopt a Local Plan until plans for all areas which might be required to make provision to meet its needs have been adopted. That is an absurd proposition. Unless and until the Stevenage Borough Local Plan [SBLP] has been tested and found sound, the precise extent of any overspill need will not be known and it would be unrealistic to expect other areas to make provision for it. This is why the Duty to Co-operate exists. This approach would effectively frustrate the spatial planning of all of the relevant areas from progressing. It is entirely unclear from Mr McPartland's various representations quite what planning objective this would serve.

The Borough Council has done all that is expected of it under the Duty to Co-operate.

### **Matters 9, 19 - Deliverability of the Town Centre proposals**

The regeneration plans for Stevenage Town Centre have been based upon professional place-making input from David Lock Associates (DLA) and incorporating commercial expertise from DTZ and Cushman Wakefield. The letter, to which Mr McPartland refers, from BEIS/DCLG to the Hertfordshire LEP [ED13], simply highlights a requirement to re-format

Town Centre regeneration governance arrangements to include more business representation. These arrangements are being updated to focus on the move into delivery phase. The key consideration, as has always been the case, is that the Borough Council, the County Council, the LEP and the principal landowners are all supportive of the Town Centre strategy of the SBLP.

The Town Centre regeneration plans are both rational and evidenced. They have been evolved by a series of professional organisations working with the Borough Council over time and with the input of many stakeholders. The paucity of objectors to the Town Centre proposals is testament to the efficacy of these proposals.

Others may have different thoughts for the regeneration plans for the Town Centre, but no credible, deliverable alternative plans are before the examination.

The £19M is allocated to projects identified in the LEP's GD3 bid, with a set of schemes agreed in principle by the LEP Board in December 2016. The Borough Council will work with government and other partners to reformat the governance arrangements for the delivery phase and do all that it can to attract inward investment to move regeneration of the Town Centre forward.

As we identified in our Stage 2 response, if the government did not support the SBLP proposals for the regeneration of the Town Centre, they would not have granted £19M to bring them to fruition.

### **Matters 3, 20, 21 – Transport infrastructure and funding sources**

The Borough Council reaction to the Stage 2 statement clearly responds to the objector's misunderstanding about the proposed alterations to Lytton Way and their role in Town Centre regeneration.

It is also worth noting that the SBLP is supported by a Whole Plan Viability Study (T3), an Infrastructure Funding Strategy (T2) and an Infrastructure Delivery Plan, July 2016 (T1), shortly to be updated. These demonstrate adequate funding for the period of the local plan.

In addition, the recent LEP funding award demonstrates additional funding for the regeneration of the Town Centre, bringing the total figure awarded in GD1 and GD3 to £31M. None of the points raised affects the robustness of the council's highways modelling.

### **Matter 5 – Green Belt**

The Green Belt Technical Paper [TP3] clearly sets out the Borough Council's assessment of the 'exceptional circumstances' test and demonstrates the need to review the inner boundary of the Green Belt around Stevenage.

All of Stevenage's close neighbours, East Hertfordshire, North Hertfordshire and Welwyn Hatfield councils are also reviewing their Green Belts and revising the inner boundaries outwards to release sufficient land to meet OAN and other local needs, in line with the NPPF. All of these councils are releasing significantly more Green Belt land for development than is Stevenage, demonstrating the difficulties of delivering housing numbers in a heavily constrained Green Belt environment, such as exists in Hertfordshire.

For instance, the North Hertfordshire Local Plan intends to remove in the order of 1,000 hectares for development, in-setting and other designations. The SBLP is proposing the removal of, in the order of, 86 hectares net for various developments.

It is difficult to rationalise the allegation that the Borough Council has somehow been 'incompetent' in failing to deliver housing numbers, when Stevenage is an intensely urban New Town without the fund of brownfield sites that traditional towns afford and, to complicate matters, it is tightly surrounded by Green Belt. The council is not a housing developer: it is a facilitator of development, rather than a delivery agency. It is ironic that Mr McPartland should be seeking to frustrate the only realistic means of improving housing delivery: early adoption of the Local Plan.

### **Matter 7 – Affordable housing**

The affordable home ownership requirement proposed within the Housing White Paper under A.126 is not yet in force and is subject to further consultation in advance of any legislative changes being made. As such, it would not be appropriate for the SBLP to be assessed against this proposal as part of the consideration of its soundness.

Nonetheless, the SBLP offers a flexible approach to the provision of affordable homes, requiring at least 70% to be for rent, and requiring the tenure of the remaining provision to be agreed by the Council's Housing Team, in line with up-to-date evidence of need. Thus, this allows for any future legislative changes to be taken into account.

It is incorrect to say that there is almost no affordable housing in the Town Centre. Whilst our evidence shows that viability within the Town Centre is difficult, and that the provision of affordable homes is less likely, Policy HO7 sets out a requirement for 25% homes to be affordable on all previously developed sites. This includes the Town Centre. Affordable housing will be required unless developers can robustly demonstrate that the targets cannot be achieved due to site-specific viability constraints, as with all other sites.

Notwithstanding this, whether provision is, or is not, made on sites within the Town Centre, will have no impact on the level of provision being sought on sites being removed from the Green Belt. Policy HO7 sets a target for 30% affordable homes on currently greenfield and Green Belt sites. This is in line with the recommendations of the Whole Plan Viability Study (T3), which demonstrates that this target is appropriate.

In summary therefore, none of the points raised are points of substance and none demonstrate any unsoundness in the painstakingly prepared strategy of the Local Plan.

**13 March 2017**