The Planning Inspectorate

Report to Stevenage Borough Council

by Louise Crosby MA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004 (as amended)
Section 20

Report on the Examination of the Stevenage Borough Local Plan 2011-2031

The Plan was submitted for examination on 21 July 2016

The examination hearings were held between 17 January and 31 March 2017

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Abbreviations used in this report

AA	Appropriate Assessment
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

Non-Technical Summary

This report concludes that the Stevenage Borough Local Plan provides an appropriate basis for the planning of the Borough provided that a number of main modifications [MMs] are made to it. Stevenage Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Specific reference to the level of shortfall in employment land;
- Clarification that significant development proposals means 200 dwellings or more;
- A change in emphasis in relation to managing travel, including reducing the need to travel overall and increasing the proportion of journeys made by sustainable modes;
- Introduction of a new appendix entitled 'Mobility Strategy';
- Change in relation to the policy requiring the provision of self-build plots, in the event that they are not taken up;
- Remove reference to 'at least' 30% affordable housing;
- Changes in relation to a general traveller policy to ensure it complies with Planning Policy for Traveller Sites and changes to the traveller allocation to ensure that it is deliverable and not discriminatory.
- Various other changes to the Plan (including its appendices) to ensure that it is up to date, internally consistent, effective, justified and consistent with national planning policy.

Introduction

1. This report contains my assessment of the Stevenage Borough Local Plan (SBLP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The SBLP, submitted in July 2016 is the basis for my examination. It is the same document as was published for consultation in January 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alter the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies maps comprise the Stevenage Borough Local Plan Proposals Map 2011-2031 and Stevenage Central and Old Town Inset Maps.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

7. These further changes to the policies map (ED183) were published for consultation alongside the MMs.

8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in Stevenage Borough Local Plan Policies and Inset Map modifications and the further changes published alongside the MMs.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

10. The Council comments on this in its Duty to Co-operate Statement. This describes the activities that it has undertaken with other bodies in order to maximise the effectiveness of Plan preparation. This includes extensive work with North Hertfordshire District Council (NHDC) and Central Bedfordshire District Council (CBDC), particularly, including joint working to ensure Stevenage's employment needs are met in these districts.

11. The Council has identified, throughout the development of the SBLP, strategic planning priorities with their stakeholders and neighbouring authorities. Through meetings, discussions, memos of understanding and statements of common ground there has been co-operation throughout the plan-making process on these matters. These include: housing; gypsy and traveller accommodation provision; employment; Green Belt; retail; infrastructure and transport; community facilities; climate change, flooding and pollution; the natural environment; and the historic environment.

12. There are memos of understanding in relation to DtC with North Hertfordshire District Council and Central Bedfordshire District Council as well as Welwyn Hatfield Borough Council and East Hertfordshire District Council. The Council has also prepared a joint Strategic Housing Market Assessment (SHMA) with NHDC. Joint work with neighbouring authorities has also been commissioned, including: the Functional Economic Market Area Study (SBC, NHDC, & CBDC); and Housing Market Areas in Bedfordshire and surrounding areas, (including Central Bedfordshire Council, Bedford Borough Council, Luton Borough Council, Milton Keynes Council, North Hertfordshire District Council, Stevenage Borough Council and Aylesbury Vale District Council).

13. Being a two-tier authority, the Council also works closely with Hertfordshire County Council (HCC), particularly in their capacity as Local Highways Authority and Local Education Authority. Again their close collaborative working has been evident to me throughout the examination of the Plan.

14. No objections have been raised in respect of any failure to meet the Duty to Co-operate by any of the bodies prescribed in relevant legislation for the purposes of section 33A(1)(c) of the Act. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

15. Based on discussions that took place at the examination hearings I have identified a number of main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and/or legal compliance rather than responding to every point raised by representors.

Issue 1 – Whether or not the identified objectively assessed need (OAN) for housing in the Borough and the overall distribution of housing is soundly based and whether the Plan makes appropriate provision to meet that need.

16. The objectively assessed need (OAN) for housing in the Plan area has been established thorough the Council's SHMA, including an update in 2015. The Plan states that the OAN for Stevenage is 7,300 homes over the Plan period (2011-2031).

17. Representors have raised a number of concerns about the OAN figure for housing. Those seeking to have the number reduced seek to argue that this figure should take account of constraints, such as the Green Belt. The NPPF and PPG set out an approach which firstly looks at the need and then whether there are constraints that might prevent that being met in full. The Council has gone through this further stage and I will return to that later in my report.

Housing market area

18. Stevenage is a town and a borough in Hertfordshire. It is situated between Letchworth Garden City to the north and Welwyn Garden City to the south. It is around 30 miles north of London. Stevenage has a high level of self-containment (76.9%). This is based on household movements and is taken from census data. The main destination for those moving out of Stevenage was North Hertfordshire, followed by Central Bedfordshire, Welwyn Hatfield and East Hertfordshire. Travel to work patterns also suggest a relatively high level of self-containment, with 59.7% of residents working within the local authority area.

19. Each authority has some overlap with other local housing markets; however I agree that there is strong evidence to support Stevenage and North Hertfordshire being considered to be a single market.

Starting point to establish housing need

20. The housing needs assessment that underpins the Plan is derived from the joint North Hertfordshire District Council and Stevenage Borough Council Strategic Housing Market Assessment (SHMA). The first volume of the SHMA, which was published in 2015, is concerned with overall housing need in the 2 local authority areas. This reviewed key outputs from previous SHMAs undertaken in the area. Volume 2 of the SHMA was published in 2016 and reviews other SHMA aspects, including the need for affordable housing and the housing needs of specific household groups.

21. In terms of the starting point for assessing the OAN for housing, the Council's SHMA uses the DCLG (Department for Communities and Local Government) household projections which is in line with the requirement of the PPG. The SHMA considered the 2008-based household projections as well as the 2011-based interim projections and the 2012-based projections. They establish a starting point estimate of overall housing need of around 21,835 dwellings for the two local authority areas combined, with 7,575 (approx. 380 per annum) in Stevenage over the Plan period (2011-2031) .

22. Account has also been taken of the ONS 2014 Sub National Population Projections (SNPP) and the DCLG 2014-based household projections which were released after the submission on the Plan. The Council's assessment indicates that these projections could result in a difference of an additional 300 dwellings over the Plan period, or around 15 per annum. This is only a very small percentage increase on the baseline projections. In my view the scale of difference is extremely limited, and in this context is not meaningful. As such, the assessment has not been rendered out-of-date and a recalculation of the OAN figure is not required.

Migration assumptions

23. The PPG identifies DCLG household projections as the starting point for establishing housing need, but also recognises that these figures may need sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates, provided they are clearly explained and justified on the basis of established sources of robust evidence.

24. The Council favour the 10 year trend migration scenario because they say it provides a more realistic figure since it captures the highs and lows and does not depend on short term trends that are unlikely to be repeated. I have some sympathy with this view, particularly since the period of 2007-2012 coincided with a period of significant economic downturn. One has to be careful that this does not result in pessimistic assumptions about future growth and thus housing need.

25. In terms of migration trends between the SHMA area and London, the SHMA builds in an adjustment of -2,121 dwellings (for 20 year period), based on 10 year migration trends from 2001-2011. The SHMA explains this difference is due to the underlying population projections. The long-term migration trends suggest lower net migration rates for both Stevenage and North Hertfordshire. These migration rates are partly due to errors in the population estimates over the last 10 years which were corrected following the 2011 Census.

26. The Council's SHMA update 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 a higher rate than the average 343 persons assumed by the GLA in the 2013-round figures.

27. The Council met with the GLA to discuss cross-boundary migration and the issue of the "knock-on" consequences of their assumptions. It was agreed that long-term migration trends would provide an appropriate basis for establishing OAN for areas surrounding London.

28. Using a 10 year trend results in a combined figure for Stevenage and North Hertfordshire of 19,714 dwellings (21,835 – 2,121). I am satisfied that this figure has been arrived at based on a method that is robust and is consistent with the latest GLA figures and the assumptions made in the London Plan.

29. As such, I agree that a 10 year trend migration scenario is the most appropriate in this case.

Market signals

30. The SHMA 2015 considers other market signals affecting the HMA. This demonstrates that dwelling growth rates in the HMA have been higher than both the national average and also comparator areas. This does not indicate an under-supply of dwellings. The OAN also incorporates an allowance for concealed families and homeless households who may not have been able to access appropriate affordable housing.

31. House prices in Stevenage and North Hertfordshire are higher than the national average. They are higher than in some comparative areas and lower than in others. Rents are also higher than the national average, but lower than in comparator areas. Affordability indicators were identified in the SHMA as being above the national average, but lower than those in comparative areas. Census data indicates that 7% of households in Stevenage and North Hertfordshire are overcrowded which is less than the rate for England (8.7%) and similar to comparator areas.

32. The SHMA concludes that these indicators show that there is less housing market pressure in Stevenage and North Hertfordshire than other comparable areas; these other areas show greater pressures than the national average, particularly in relation to price.

33. The SHMA provides an analysis of the number of concealed families and homeless households. An adjustment of 317 dwellings is therefore necessary to account for the suppressed household formation rates across the SHMA area.

34. As such a 10% market signals adjustment is suggested as a response to help address market pressures and I agree that this is appropriate. This equates to an additional 1,971 dwellings (including the 317 dwellings necessary to deal with suppressed households) across the SHMA area over the 20 year period.

35. The SHMA 2015 concludes that the evidence about future jobs is roughly consistent with the evidence about likely future workers and therefore there is no need to apply an uplift to OAN as it would appear that there will already be enough workers for the likely increase in jobs in the area.

36. This gives a full objectively assessed need for housing across the SHMA area of 21,685 dwellings. Considering the needs of each local authority the SHMA concludes that the OAN for Stevenage is 7,300 over the 20 year period.

Conclusions on OAN

37. Establishing the future need for housing is not an exact science and this is acknowledged in the PPG. Reaching an OAN figure requires some reasoned

judgments to be made. In my view the Council has followed the approach set out in the PPG and done this. As such I find that the OAN figure of 7,300 (365dpa) is justified.

The housing requirement and meeting the objectively assessed need for housing

38. The Council are relying on a small number of sites to deliver the bulk of the housing in the Borough and they have also identified a need for a significant number of affordable homes, which I shall return to later. In order to address these 2 matters the Council has added 300 dwellings to the OAN. This results in a housing target for the Plan of 7,600, which is set out in policy SP7. I agree that this uplift is necessary to ensure that the OAN is met.

39. Since 2011 the Council has completed 746 new homes and granted planning permission for a further 1,686 homes, giving a total of 2,432 (as at 31 March 2016). This leaves a residual requirement of 5,168 to be planned for. In seeking to meet this requirement, the Council, through their Strategic Housing Land Availability Assessment has considered sites in a sequential manner looking first at previously developed land, then greenfield sites within the urban area, then greenfield sites outside of the urban area and then as a last resort, Green Belt sites.

40. Alongside this process the Council has also considered whether sites are constrained by issues such as flood risk and therefore reasonable assessment of potential sites has been made. Stevenage does not contain the same amount of brownfield sites as other urban areas because it is a new town. Older traditional towns generally contain disused employment sites which is not the case here because of the planned nature of the Borough. It is also under-bounded with very little land beyond the built up area of the new town, within the Borough's boundary.

41. On the basis of this assessment the Council are able to demonstrate that they can provide housing sites (excluding Green Belt sites) to accommodate in the region of 4,426 homes which falls far short of the 5,249 required and I accept that this is realistic.

42. Some representors argue that there is a potential supply of office conversions that have not been considered and one site in particular was drawn to my attention at the hearings sessions. There is no certainty that the site will come forward as it appears it would require planning permission. No planning application has been submitted and in considering such an application or indeed others for similar development, the Council would have to consider a number of factors, including the effect of the change of use on employment land provision.

43. Also, providing housing land is not just about 'numbers of homes'; these need to reflect the identified mix, so, houses of different types and sizes as well as apartments etc. There will be a limit on how many apartments are required and they are not a substitute for family housing with gardens. As such I do not find that this source would provide a reliable or comparable source of housing, such that the release of Green Belt land should not be explored.

44. The Council has carried out scenario testing in order to establish how the requirement could be most sustainably and effectively met by releasing any

suitable sites from the Green Belt. They have come to the view that to meet the housing requirement land will need to be released from the Green Belt. As such they have identified 3 sites they consider to be appropriate. I shall return to consider this matter in more detail later in my report, including whether exceptional circumstances exist to justify their release.

Conclusions on the housing requirement and meeting the OAN

45. Having regard to the considerations below about housing supply I conclude that the Plan makes appropriate provision to help ensure that the OAN will be met in full.

Distribution of housing

46. Overall it is estimated that around 2,700 homes will be provided in the large urban extension sites, around 900 on 18 smaller sites, approximately 2,000 on the mixed use town centre regeneration sites and around 200 on windfall sites. The total of all these sites equates to around 5,800 homes, compared to the residual requirement of 5,249 (based on a target of 7,600 homes). While this is a sizable buffer I consider this to be sensible given that the Plan relies on a small number of large strategic sites to deliver most of its housing. It will also provide greater flexibility in meeting the OAN which will require a step change in the rate of house building in the Borough.

47. Policy SP7 sets out the overall distribution of housing across the Borough and allows for at least 2,950 new homes in and around the town centre as part of the planned regeneration programme detailed in the Plan; 1,350 in a new neighbourhood to the west of the town; 1,350 to the north and south-east of the town on land removed from the Green Belt; 1,950 elsewhere in the borough; and 11 new, permanent traveller pitches on a new allocated site. As set out previously this will be a challenging target for the Council, but one that is necessary to meet the housing needs of the Borough.

48. Policy SP7 also sets out the strategy and target for providing homes on brownfield sites and the range of homes required in terms of tenure, type and size. The policy is very prescriptive and recent evidence produced by the Council indicates that the house sizes being sought in the policy are no longer a priority. In light of this, main modifications **(MMs11 & 12)** are necessary to make this element of the policy and the supporting text more flexible and based on up to date evidence.

Conclusions on distribution of housing

49. Having regard to the above and my findings below in relation to the allocation of sites, including those in the Green Belt I find that the distribution of housing is appropriate.

Overall Conclusion

50. Having regard to all of the above and my findings below in relation to the allocation of sites, including those in the Green Belt, I consider that the identified objectively assessed need (OAN) for housing in the Borough, the housing target for the Borough and the overall distribution of housing is

soundly based and that the Plan makes appropriate provision to meet that need.

Issue 2 – Whether the Plan appropriately identifies the overall level of affordable housing need and makes appropriate provision to meet it

51. The SHMA identifies a need for around 3,444 affordable dwellings in Stevenage over the Plan period. This equates to an average of 172 dwellings per year. The SHMA analysis takes account of newly arising needs and the existing backlog. This is the equivalent to around 47% of the full OAN and a real challenge for the Council. Clearly this figure is significantly higher than the amount of affordable housing that is likely to be delivered through the application of Plan policy and other means. The Council has uplifted the overall housing target in order to increase the potential supply of affordable housing.

52. Policy HO7 sets out the affordable housing targets for residential development. The target levels are 25% of new homes on previously developed sites and 30% of new homes elsewhere. Some concerns were raised by representors that the Council would impose the affordable housing targets regardless of whether it made the site financially unviable. This is not the Council's intention and so they have sought to address any concerns by inserting some additional text into the policy and supporting text to cover the matter of viability. This is dealt with by **MMs63 &64** and they are necessary for soundness.

53. The Plan also seeks affordable housing contributions from all residential schemes. However this is contrary to the advice in the PPG which says that: "contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)".

54. Analysis carried out by the Council shows that sites of 10 units or less would only be likely to yield around 3 or 4 affordable homes per year. Clearly the loss of any affordable housing has significance, particularly for those people it would have provided a home for.

55. While the Council are able to demonstrate they have an acute need for affordable housing, as do many other local authority areas, this government policy aims to increase housing supply by encouraging development on smaller brownfield sites and help to diversify the house building sector by providing a much needed boost to small and medium-sized developers. A proposed main modification **(MM65)** is necessary to ensure consistency with national policy.

Conclusions on affordable housing

56. Subject to the main modifications Policy HO7 is sound. The application of the policy will help achieve the Plan's objective of meeting the housing needs of the whole community, as far as this is realistic, having regard to viability considerations and national policy.

Issue 3 – Whether or not the plan sets out a strategy for employment land which is positively prepared, justified, effective and consistent with national policy

57. An Employment and Economy Baseline Study was commissioned by the Council. The report was published in March 2013 and provides, in my view, an objective assessment of future requirements for employment land within Stevenage Borough. In evaluating future requirements, five different scenarios were developed, Baseline job growth based on 2012 East of England Forecasting Model (EEFM); Higher enterprise job growth; Past take-up (baseline); Past take-up (high); and Labour supply (based on an assumed 300 dwellings per annum).

58. These scenarios generated a range of future job, floorspace and land requirements for B class uses. When compared with an existing supply allowance of 3ha being provided by SBLP policies to redevelop/intensify existing employment uses and through existing planning permissions, the scenarios generate a range of residual requirements ranging from a surplus of 6ha of employment land over the plan period to a shortfall of 47ha. The 6ha surplus scenario seems to arise from the latest EEFM release (2016) generating the lowest land requirement of all releases in the time series. This is partly explained by a potential anomaly relating to employment recorded within the business services sector.

59. The Council considered these two outliers (6ha and 47ha) to be less appropriate as bases for future planning and I agree. This left three scenarios which projected a net requirement for between 20ha and 30ha of employment land over the period 2011-2031. This takes account of an existing supply allowance of 3ha.

60. The Baseline and Higher Enterprise scenarios were underpinned by the autumn 2012 run of the EEFM. The Labour Supply scenario projected a higher requirement for industrial floorspace in the future, in contrast to the other options. These scenarios were considered as a minimum, with the potential to seek a more aspirational approach.

61. Since the Council's 2013 Employment and Economy Baseline Study, three further runs of the EEFM have been released. The Council's 2013 study contains a detailed explanation of the assumptions and ratios used to translate the 2012 EEFM forecasts into the requirements identified in the Council's Employment Topic Paper update. These assumptions have been applied on a broadly consistent basis by the Council to the other, more recent EEFM forecasts to give an indicative comparison of how the projected land requirements for the Borough have changed over time.

62. Using the same approach as the 2015 Employment Technical Paper to calculate estimates of land and jobs requirements arising from this data, the latest 2016 EEFM forecasts produce the lowest land requirement for the Borough of all sets of forecasts reviewed since 2009. Looking across all six years of EEFM estimates, the average gross floorspace requirement equates to just under 32ha, over the 20 year period 2011-2031, and the rolling average over the last 3 years equates to 26ha of land take-up.

63. Given the scope for significant fluctuation in growth assumptions between different EEFM data releases the Council has chosen to maintain a 20 year employment land target of around 30ha, which I agree is appropriate. This also aligns with the Local Enterprise Partnerships' (LEP) strategy for over 30ha of employment land to be delivered in this area. Reducing the target below 30ha would not only risk not meeting the needs of the Borough, but would also not align with Stevenage's ambitions for large-scale regeneration of the town centre.

64. The Framework and planning practice guidance sets out the need to achieve a broad balance between housing and employment growth. As set out above, the objectively assessed need (OAN) is for 7,300 homes over the plan period. The housing target in the Plan is slightly higher at 7,600 homes. The EEFM baseline forecasts include a 'demand for dwellings' measure.

65. The demand for dwellings measure arising from the EEFM has remained fairly consistent across the majority of recent model runs, indicating a requirement for around 6,500 new homes over the plan period (with the exception of the years 2013 and 2016). The methodology of the EEFM is such that low employment growth will effectively 'trigger' increased commuting to better performing areas (and vice versa).

66. The 2016 EEFM demand for dwellings figure is 7,150 (covering the 20 year plan period 2011-2031) which represents the highest figure across the six year time series. All of these demand for dwellings measures fall below the identified OAN of 7,300 or indeed the housing target of 7,600 with the latest 2016 EEFM figure (at 7,150) being closest to this target figure.

67. Taking all of the above into account, for the purposes of the Plan, the Council's approach of a trend-based B-class land requirement of 30ha over the period 2011-2031 seems to me to be a sensible and balanced approach, based on thorough analysis. This should limit the outward commuting of Stevenage residents to other, better performing areas.

68. However, the Council are only able to identify around 18.5ha of employment land within the Borough because of the constraints set out above and in particular the under- bounded nature of the area. Consequently, as a result of close working with North Hertfordshire District Council (an adjoining authority with existing commuting patterns with Stevenage), agreement has been reached that they will provide for the remaining 11.5ha, by allocating additional B1 employment land in their emerging local plan. This land is close to the boundary with Stevenage Borough Council. However, the amount of shortfall resulting from this Plan should be clearly set out and this is remedied by **MM4.**

69. North Hertfordshire District Local Plan is currently being examined and the allocated employment land is being examined as part of that process. It is partly within the Green Belt and so is not a straightforward allocation. Therefore as a precautionary measure the Council also have an agreement with Central Bedfordshire Council that they will provide land in the event that North Hertfordshire are unable to do so**.**

70. It was originally envisaged that Welwyn Hatfield Borough Council would perform a similar role, but this is no longer the case. Consequently, main modifications **(MM3, 5 & 6)** are required to remove references to Welwyn Hatfield Borough Council from Policy SP3 of the Plan and the supporting text.

71. The Plan allocates a number of employment sites, some of which are extensions and intensifications of existing sites, there is a site at North Road, and others are within the town centre and will be delivered as part of the town centre regeneration programme. I am satisfied that these sites are appropriate. There is also a relatively small site close to junction 8 of the A1(M) that is currently within the Green Belt. I shall deal with the Green Belt matter later in my report.

72. Site EC1/1 relates to an extension to the GlaxoSmithKline (GSK) site to allow for future phases to be developed. Planning permission has already been granted for some of this and includes B1(b) uses, as well as B1(a) uses. This needs reflecting in policy EC1 and is rectified though **MM16**. In addition, GSK have also provided evidence to show that more than the target floorspace provision of 50,000m² set out in policy EC1 may be achievable on the site. However, this would need to be tested through a formal planning application. A main modification **(MM17)** is necessary to ensure that this information is set out in the supporting text.

Conclusions on employment land

73. I find that the Council has made provision for an appropriate level of employment land over the Plan period and overall the Plan provides an effective and sound strategy in this regard subject to the main modifications which are necessary for the Plan to be effective.

Issue 4 –Whether or not exceptional circumstances exist to justify the plan's proposed revisions of the Green Belt boundary.

74. Policy SP10 endorses the Green Belt principles set out in the NPPF. It makes reference to the Green Belt Review carried out by the Council which informs this Plan. The Plan establishes defensible long term Green Belt boundaries within the Borough. These allow scope for the continued growth of Stevenage to at least the end of the Plan period (2031).

75. The Plan removes five areas of land from the Green Belt for different types of development, a total of around 90ha. Dealing first with housing sites, these are land to the North of Stevenage (HO3); land to the South East of Stevenage (HO4); and land to the north of Graveley Road for a traveller site (HO12). In terms of sites for other uses, a site for employment use close to Junction 8 of the A1 (EC1/7) would be removed and also an existing garden centre site in the Green Belt is allocated for a major new food store of up to 7,900m² (gross), post-2023 (TC11). A small site at Norton Green is put into the Green Belt.

76. Stevenage is a very small Borough. In places, the town is built right up to the Borough boundary, and to the north-east already spreads across it into the neighbouring North Hertfordshire district. The Green Belt boundary is, with the exception of the west of the A1(M), drawn tightly around the edge of the

urban area which is also, for much of its length, the administrative boundary with neighbouring districts. Previous releases from the inner Green Belt boundary have been made to allow for the development of Great Ashby/Burleigh Park and Stevenage West.

77. The Council's Green Belt review provides an assessment of the extent to which the land around the urban edge of Stevenage still fulfils the five purposes of Green Belt policy, as defined in the NPPF. It then evaluates the sensitivity of the land to any development and/or change and identifies broad areas for potential compensatory Green Belt provision, in the event that Green Belt releases are required around Stevenage. Finally it considers these broad areas in more detail as to their potential for release in light of their contribution to Green Belt purposes and recommends sites which could be released from the Green Belt or safeguarded for future development beyond the Plan period.

78. For the reasons I have already set out, accommodating future development needs within Stevenage Borough is far more difficult than in other areas where land is more readily available. It is also the case that because the town is relatively new (built post-war) there are few opportunities for redevelopment, other than on a small scale. Consequently the capacity of Stevenage is extremely limited. Moreover neighbouring authorities are also reviewing their Green Belt boundaries to meet their own needs. Therefore, it would be unlikely that Stevenage's needs could reasonably be met in neighbouring authorities on land outside the Green Belt.

Green Belt Housing Allocations (HO3 & HO4)

79. As referred to above, the Objectively Assessed Need (OAN) for housing in Stevenage is 7,300 dwellings over the period 2011-2031, with the Plan setting a target of 7,600 homes to be developed within this period.

80. Some representors suggest that the need should be met by a Garden City, beyond the Stevenage Borough boundary, but no specific area has been identified. Therefore it is very unlikely such a scheme could deliver housing in the short term and debatable whether it would provide any during the plan period at all and this might also involve Green Belt land.

81. The only way that Stevenage can meet its current identified housing need is to release any suitable land from the Green Belt. Through their extensive and thorough Green Belt review the Council have identified site HO3 (north of Stevenage), in the Plan as being suitable for housing development. In the assessment of defined areas of land against Green Belt purposes this site is considered (as part of a larger parcel of land – N4) to make a limited contribution to Green Belt purposes in all regards, with the exception of preventing merger where it is identified as making a significant contribution.

82. That said this site is only part of the area of land that was categorised in this way and importantly open land would remain beyond HO3 that would maintain separation from the nearest large settlement. I realise that some of this land is identified in North Hertfordshire's emerging Plan as housing land, but that will be examined separately. While that site would join with site HO3, along the border between Stevenage and North Hertfordshire, there is a gap

between the allocated site in North Hertfordshire's emerging Plan and the nearest village of Graveley such that it would prevent the coalescence of this village with Stevenage or indeed any other settlement.

83. Part 2 of the Council's Green Belt review identifies site HO3 as parcel N4(iii) and says that "notwithstanding its open aspect, this parcel could be released within the local plan period given its current containment by strong boundaries and opportunities to substantiate these through further landscaping" and I agree.

84. In summary, there is a pressing need for housing within the Borough that cannot be met outside of the Green Belt. The value of the Green Belt has been thoroughly assessed by the Council and although it found that here a significant contribution comes from preventing the merging of settlements, there would still be a gap between settlements, even if the site in North Hertfordshire is allocated in their Plan and subsequently developed. Taking into account all of these factors I find that this site would be the most suitable, along with others, to meet the housing need in Stevenage. As such, exceptional circumstances exist to justify the release of this site from the Green Belt.

85. Turning to consider site HO4 (south east Stevenage), this is part of the large parcel identified as E7 in the Council's Green Belt review. It is identified as making a contribution to Green Belt purposes in all regards, except for the purpose of preserving the setting and special character of historic towns. Part 2 of the review identifies the specific site HO4 as E7(i) and E7(ii). These parcels are described as well contained land that currently helps to contain the south eastern edge of Stevenage, but their release would not damage the overall function of the Green Belt in this location. I concur with this assessment.

86. As set out above the review that has taken place is robust and I agree with the results which indicate that these sites are best placed to accommodate some of the housing identified as being required in Stevenage.

87. Overall, in terms of site HO4, again there is a need for housing that cannot be met outside of the Green Belt. The value of the Green Belt has been thoroughly assessed by the Council, as set out above. So having regard to these matters I find that this site would be the most suitable, along with others, to meet the housing need in Stevenage. As such, exceptional circumstances exist to justify the release of this site from the Green Belt.

Green Belt Traveller Site (HO12/1)

88. As set out above there is a demonstrable need for gypsy and traveller pitches within the Borough that cannot be accommodated on the existing Dyes Lane site. The Council have therefore had to look for a new site to accommodate this need. The Council have explored various alternatives, but because of the constrained nature of the Borough, with very little undeveloped non-Green Belt land remaining, no suitable, available sites were identified outside of the Green Belt.

89. The Plan allocates a site that is currently within the Green Belt as a traveller site. It forms part of the parcel of land identified in the Council's Green Belt review as N8(ii). The site as a whole is identified as making a contribution to all of the purposes of the Green Belt, with the exception of the setting and special character of historic towns. It also finds that the wider parcel is "visually well contained by a mature tree belt to the north and woodland on the majority of the parcel and at this local scale is distinct in character from the open landscape immediately to the north towards Graveley. Given the extent of containment, in principle, development could take place within the parcel without undue damage to the strategic function of the Green Belt". I am satisfied that this would be the case.

90. To conclude on this site, there is a clearly demonstrated need for additional pitches in the Borough that cannot be met on sites outside of the Green Belt. The Green Belt review has shown that the removal of this parcel of land from the Green Belt would not undermine its strategic function. As such, I find that this is the most suitable site to meet the gypsy and traveller needs of the Borough. I find that exceptional circumstances exist to justify the release of this site from the Green Belt.

Green Belt Employment Site

91. The Council has always been committed to ensuring sufficient jobs are provided to meet the needs of its residents. Self-containment was a key feature of the original Masterplan when Stevenage was established as a New Town, and this has been carried forward, not only through the plan making process, but also corporately, as a key objective of the Council. As such, to ensure a sustainable approach, it is preferable for employment land to be provided within the Borough boundary, where possible.

92. This also reduces the amount of travel required and reduces reliance on motorised vehicles. Moreover, neighbouring authorities are also reliant on releasing land from the Green Belt to meet their employment needs. Stevenage is already dependant on neighbouring authorities to meet the shortfall of employment land provision in their Green Belt. It would be unreasonable to require them to provide any more than they already are planning to provide when they clearly have their own development pressures, resulting in the need to release Green Belt land.

93. Through the Green Belt Review, the Council identified a parcel (W2(i)) of land that is described as being a "tightly enclosed parcel bounded by the A1(M), A602 and railway line, physically separated from wider parcel to the west". It concludes that the "overall function of the Green Belt in this location would not be harmed" if this parcel were to be released for development. So, while the larger W2 parcel is described as making a significant contribution to Green Belt purposes, with the exception of preserving the setting and special character of historic towns where it is deemed to make a limited contribution, the finer grain analysis has identified this modest sized site as being suitable for release from the Green Belt for employment purposes and I agree.

94. There is an identified need for additional employment land in Stevenage. As I have already discussed above, this need cannot be met in full in the Borough, even with the release of Green Belt land in Stevenage. The release of this,

modest sized site would not undermine the purpose of the Green Belt here and reduces the amount of land that may need to be removed from the Green Belt in North Hertfordshire district. As such, exceptional circumstances exist to justify the release of this site from the Green Belt.

Green Belt Retail Site

95. The Council's evidence base demonstrates a need for 7,600m² (net) new convenience retail floorspace provision, towards the end of the plan period. Around 20% of this need will be provided as extensions to existing convenience stores and small-scale provision across the town in line with the retail hierarchy. However, a new site is required to accommodate the remaining 4,600m² (net) in a single new superstore. No alternative site of this size is available and the allocated site, whilst in the Green Belt, is already in A1 retail use as a garden centre. It is identified in the Council's Green Belt review as parcel N8(i) and is found to make a limited contribution to all of the purposes of the Green Belt.

96. The site is also identified as a site of small scale with a strongly enclosed character whose overall Green Belt function is limited. This seems to me to be an ideal location to meet the identified retail need given its current use as a garden centre, its location close to existing large housing developments as well as housing allocation HO3, the hospital and the strategic road network. As such, exceptional circumstances exist to justify the release of this site from the Green Belt.

Site to be put into the Green Belt (Land at Norton Green)

97. The Green Belt review identifies 3 sites that could be put back into the Green Belt. However two of these are beyond the Borough's boundary, in North Hertfordshire and East Hertfordshire Districts and so are not a matter for this Plan. Within Stevenage a very small area of land surrounding the hamlet of Norton Green is proposed to be put back in. Norton Green is a small settlement with a rural-village like character. Putting this parcel of land back into the Green Belt will help to protect it as such. It would address an anomaly relating to removal of land from the Green Belt in the past and appears eminently sensible and would strengthen the purpose of the existing Green Belt land adjacent to it. I consider that these amount to the exceptional circumstances required for this addition.

<u>Conclusions on revisions to the Green Belt boundary</u>

98. In summary, for the reasons I have set out in relation to the particular identified needs of the Borough, the extensive work that has been carried out to try to identify sites outside of the Green Belt and the findings of the Green Belt Review, I conclude that the exceptional circumstances exist to justify all of the Plan's proposed revisions to the Green Belt boundary.

Issue 5 – Whether the Plan deals adequately with Strategic Transport and other infrastructure services to support new development

Transport

99. The Council's most recent Transport Strategy is based on the reasonable assumption that building more roads and increasing highway capacity can encourage the use of cars and other vehicles. This in turn discourages a shift to public transport, walking and cycling.

100. To date the roads in Stevenage have been relatively uncongested compared to many other towns and cities and this may have discouraged a modal shift. The new strategy therefore represents a change of approach with an emphasis on encouraging the use of public transport, cycling and walking in preference to increasing highway capacity. It has been informed and refined through the use of traffic modelling and is supported by HCC, as Highway Authority. The spatial approach to the distribution of new development in the Local Plan is broadly consistent with this approach. However, a number of detailed changes are necessary to ensure consistency with the new strategy and to ensure that the approach taken in the plan is fully supportive of it. These are explained below.

101. To ensure that this approach is made clear the updated Transport Strategy will need to form an Appendix to the Local Plan. During the course of the examination of the Plan the Council has updated their Infrastructure Delivery Plan (IDP), so that it reflects the aspirations of the Transport Strategy.

102. As such £3.5m is identified in the IDP for cycleway improvements, behaviour management and a monitor and manage fund. This has been taken from the fund set aside in the previous version of the IDP for highway junction changes and this reflects the shift in emphasis in the Transport Strategy to one that it is predicated on mobility. It focusses most on growing a healthy, active and pleasant community throughout Stevenage, using the Plan, and the associated development growth, as the catalyst for achieving that. This is needed to ensure that the scale of development set out in the Plan can be achieved in a sustainable and cost effective way.

103. This includes Virtual Mobility (for instance working from home, or shopping online), walking and cycling and shared transport, including buses and car share. The emphasis will be on designing for, and encouraging, increased use of the higher capacity and more environmentally and socially sustainable transport networks. This is where investment will be prioritised. The highest capacity networks are active travel (walking and cycling) followed by shared transport, including buses and car share. It is likely that this will be achievable as it is estimated that many of the cars on the Stevenage network in the commuter peak are for trips of 2km or less.

104. Such an approach accords with the NPPF (chapter 4, para 29 onwards), and is realistic in terms of evidence of what is observed elsewhere, the focus of investment through the updated IDP and the fact that people act to minimise their inconvenience.

105. There will be a shift away from prioritising investment in highway capacity improvements, designed for the convenience of the car commuter, above investments in more sustainable and socially inclusive mobility. As a result, for the purpose of assessment, the Council's highway consultants left the highway network as it is, except for some minor modelling adjustments, and the Lytton Road closure which enables relocation of the bus station next to the railway station and an expansion of the town centre towards this new transport interchange i.e. no major highway capacity changes other than Lytton Way.

106. In this scenario, there is a general increase in journey times across the network of up to one and a half minutes during the commuter peak periods. This will be less if there is a greater shift, and more if the shift is less. I agree that this order of magnitude is not significant in the context of the NPPF, the need for social and economic growth and in particular given the potentially exemplar alternative mobility options.

107. Some people will choose private travel such as walking, cycling or driving a car. Stevenage has some of the very best high capacity private travel networks in the UK. It has a Dutch style cycle network, which the Council say is suffering as a result of a lack of investment over many years. However, this could be made excellent again with the investment that is planned. The proposal is for an investment of £3m in this network over the Plan period, in accordance with the emerging cycle strategy. The figure of £3m is an extrapolation of costs estimated for a good quality upgrade of a part of the cycle network. Importantly, the IDP also makes an allowance of £0.5m for an education, monitor and manage fund.

108. The change in emphasis from increasing road capacity to deal with peak commuter demand by car users, to a strategy that will lead to the creation of more attractive choice in movement than already exists, such as physical improvements to the cycle network, is a positive step. This shift in approach is also necessary to allow for the scale of development envisaged by the Plan to be achieved in a manner that does not require significant changes to the highway capacity. Consequently it is necessary to insert a new appendix into the Plan, entitled 'Mobility Strategy'. This shift in approach requires a number of main modifications **(MMs40,41,42,43,44,47,48,49 & 88)**, to ensure consistency with the NPPF advice and these are necessary for soundness.

109. The Plan includes an appendix on residential car parking standards. This will require review, to ensure it aligns with the Mobility Strategy. This is a soundness issue that needs resolving. The Council will be reviewing the standards for car and cycle parking to take account of the shift in approach to transport matters in the Borough. So, for this reason and to provide the ability to respond to changes in the future, main modifications to policies and supporting text **(MMs10,45,46 & 89)** are necessary to reflect the Council's intention to set out its detailed policy in this regard within a review of the Parking Provision Supplementary Planning Document and this is clearly justified.

110. Some main modifications to the transport related policies are necessary. Policy IT1 is currently inflexible in terms of when alternative access points and solutions are permissible. This is remedied by main modifications **(MMs37 &**

38). Policy IT3 covers 'significant development proposals', but does not say how 'significant' is defined. **MM39** satisfactorily resolves this.

Drainage and water infrastructure

111. In terms of drainage the Plan advises that the capacity in the wastewater system to Rye Meads Sewage Treatment Works (RMSTW) is constrained in the long-term, but is currently adequate to meet needs up to 2026 and that new works are planned to deliver a sustainable long-term solution. Indeed the 2015 Rye Meads Water Cycle Strategy Review concluded that Rye Meads should now have capacity to treat all wastewater arising from within its catchment over the period to 2026, with a reasonable prospect of being able to accommodate demand to 2031. For precautionary reasons a main modification **(MM9)** to Policy SP5 is required to make clear that new development post 2026 will only be permitted if the required capacity is available at RMSTW, including any associated sewer connections.

112. A Main Modification **(MM1)** is required to make developers aware of the need to contribute towards the Water Framework Directive actions on sites adjacent to watercourses and to improve the quality of water that enters groundwater aquifers across the Borough.

113. Flooding related issues are dealt with under the section on development management policies later in my report.

Green Infrastructure

114. In terms of natural environment and landscape the Plan deals with this in general terms and where necessary in individual allocations policies. A main modification **(MM2)** to the general wording is necessary to provide a commitment to protecting and enhancing the natural environment and landscape of the Borough through a number of means. Policy SP11 needs to include a reference to the provision of green space and this is remedied by **(MM13).** Changes to Policy SP12 and supporting text are also necessary to ensure reference is made to the landscape, wildlife sites and the influence development in the Borough could have on Knebworth Woods SSSI, Rye Meads SSSI, Chilterns AONB and Lee Valley SPA. This is resolved though **(MM14 & 15)**. These are necessary to ensure that the Plan accords with the NPPF.

Conclusions strategic transport and infrastructure

115. In summary, the Plan deals adequately with Strategic Transport and other infrastructure services to support new development subject to the main modifications I have referred to that are necessary for soundness.

Issue 6 – Whether or not the housing allocations are soundly based

116. A number of the same main modifications are necessary in relation to the allocations policies for the urban extensions (HO2, HO3 & HO4). Firstly the reference to 'at least' 30% affordable housing is to be removed as this implies that potentially more will be sought even though this has not been adequately viability tested and it is out of step with the wording in Policy HO7. The

testing that took place looked at 30%, as per policy HO7 which I have discussed above. This lack of consistency across the Plan is a soundness issue.

117. Secondly, an additional criterion is required to ensure that electrical car charging points are provided within the sites to support a reduction in CO2 emissions and support Government proposals for electric cars and therefore ensure consistency with National policy; and thirdly an explanation in the supporting text that if self-build plots are not taken up by the public after being marketed for at least 2 years, they can revert to conventional build plots. This will ensure that allocated land is not left undeveloped. All of these changes **(MMs 54, 56, 57, 59, 60 & 62)** are required to make the Plan sound.

Policy HO1/2 - Bragbury End sports ground car park

118. This is a parcel of land that forms the car park of Bragbury End Sports Ground, which is covered by Policy HO4. This small site is expected to be able to accommodate around 8 dwellings. A main modification **(MM51)** is necessary to remove the requirement for the mitigation against the loss of sports facilities as the car park does not itself provide sports facilities.

Policy HO1/6 - Former Pin Green school playing field

119. This is a former school playing field that is identified as being suitable to accommodate around 42 dwellings. The Council considered there was a need to mitigate against the loss of the sports facilities here and sought to deal with this through **MM52**. However, it has come to light that the school playing field has not been used as a sports facility and is not needed as a playing field. This requirement would therefore be unreasonable and so this main modification is not necessary for soundness.

Policy HO1/11 – Land west of North Road (Rugby Club)

120. This site is allocated as being suitable to accommodate 149 dwellings. Table 3 in the Plan sets out a number of criteria that will need to be taken into account when developing the site. One of the criteria relates to the relocation/re-provision of the existing sports facilities. This however lacks sufficient detail and does not suitably reflect the advice in paragraph 74 of the NPPF. This omission is resolved though **MM53**.

Policy HO2 – Stevenage West

121. The adopted District Plan for Stevenage already allocates this site for residential development. This Plan allocates it for approximately 1,350 dwellings. The western boundary of the site borders North Hertfordshire District and land within the neighbouring district may also be developed in the future.

122. This is likely to be a complex site to deliver given the site is in multiple ownership and there are access issues. For these reasons, the Council is not relying on it to meet its 5 year housing land supply.

123. Given the complexity of the site and in particular its delivery some main modifications **(MMs54, 55 & 56)**, are necessary to increase the flexibility of the policy and thus increase the likelihood of it being developed in the Plan period. **MM55** makes reference to demand. I have changed this to need/insufficient need as this more accurately reflects what it intended.

Policy HO3 – North of Stevenage

124. This is a large site on the northern edge of Stevenage which is within the Green Belt and partly within the St Nicholas and Rectory Lane Conservation Area. My findings in relation to the exceptional circumstances that exist to justify the release of this land from the Green Belt are set out above.

125. In addition, there are a number of listed buildings in the surrounding area (outside of the site, but also in the Conservation Area). The Plan allocates the site for around 800 dwellings. The intention is that it will be integrated with a proposed residential development on an adjacent site that is beyond the Borough boundary, in North Hertfordshire. That site is allocated within the emerging North Hertfordshire Local Plan. The site in this Plan is of such a size that it will incorporate a range of services and facilities and not be dependent on the other site being developed.

126. Access to the site is from North Road and so there would be no traffic impacts on the conservation area or listed buildings. Policy HO3 requires that the larger houses, with a maximum height of 2 storeys, set in more spacious plots are located within the conservation area and that development within this area should be heavily landscaped. The Council conclude that the development of this site will have some impact on the character and appearance of the conservation area, but that this will not be significant and it will be outweighed by the social and economic benefits of the residential use of the site. Indeed, the Council's 2005 conservation area review found that the land within this housing allocation contributed only to distant views of the heritage assets, and into the conservation area.

127. One of the listed buildings, Rooks Nest House Howards, which is listed Grade I, was home to EM Forster for a period of time. Hence the site and the surrounding area is known locally as 'Forster Country'.

128. Moreover, EM Forster took inspiration from the landscape here in writing his book Howards End and hence the name of the property. The other key listed building is St Nicholas Church, which is also listed grade I. The Council has undertaken an exercise to understand what contribution the site makes to the significance of the heritage assets and this forms part of the evidence base for the Plan.

129. There is no doubt that the landscape contributes to the setting of the listed buildings to some degree. However taking the listed buildings in turn, St Nicholas Church has a sizeable churchyard that is heavily wooded and contains numerous monuments. When walking around the churchyard, one gets a sense of enclosure within the well planted churchyard. There are glimpsed views of the fields to the north of the Church through the trees, but in terms of views of the wider landscape these are only achieved by leaving the churchyard.

130. The Church building and in particular its tall spire are visible from a wide area, and the appreciation of its contained, heavily wooded churchyard reflect its central role within the Parish. However, the setting of the building that is experienced from the allocated site is that of a confined, wooded churchyard, with glimpsed views to land outside the churchyard. The wider landscape is within the setting of the Church, but due to the nature of the churchyard, site HO3 contributes little to its significance, compared to the land immediately north of the churchyard. Additionally, built development on the site would be located some distance from the Church and churchyard and would certainly not hinder the ability to appreciate it or its setting. Indeed there is modern built development much closer to the Church than this proposed development would be.

131. Rooks Nest House Howards is located on Weston Road, a narrow lane. It is set back from the road within maturely landscaped gardens which enclose it and significantly limit views of it. To the west of Rooks Nest House Howards and the adjacent Rooks Nest Farm (listed grade II) are agricultural fields. Nevertheless, this is an agricultural landscape of open fields as a result of modern farming practices. Consequently, much of the historic character of these fields has been lost, with the removal of field boundaries and hedges and so it appears different to how it would have done when EM Forster resided here. Also visible in this landscape is the housing development to the south of the allocated site, the extensive Lister Hospital complex to the west and numerous tall electricity pylons that straddle the fields.

132. A detailed heritage assessment will need to be undertaken at the master planning and planning application stage, once a detailed scheme has been prepared. Also, the policy advises of the need for development proposals to preserve or enhance the conservation area, including the setting of adjacent listed buildings. To this end, it also sets out a number of mitigation measures designed to help achieve this. An area of land adjacent to site HO3 is allocated as a country park (policy NH8). This is closer to the listed buildings than the housing site, is within the conservation area and would be retained within the Green Belt. This area is covered by policy NH8 which designates it as North Stevenage Country Park. One of the aims of this policy is to protect the openness and accessibility of this area. The supporting text to this policy does not clarify the point that the open space provision arising from the development allocated under HO3 will be provided by this country park. This omission is remedied by **MM85**.

133. There is currently no vehicular access to the site. The main access route will be from North Road, but an additional access point is likely to be required for phases of development beyond 300 units, or equivalent traffic generating uses. It is important that the policy is clear about this threshold for it to be effective. This is remedied through **MM58**.

134. Overall, whilst built development here would increase significantly, I am confident that the site could be developed in a manner that protects the significance of the designated heritage assets. Also, for the reasons set out above, exceptional circumstances have been demonstrated to justify the release of this site from the Green Belt.

Policy HO4 – South East Stevenage

135. This site is currently within the Green Belt and would accommodate in the region of 550 homes. My findings in relation to the exceptional circumstances that exist to justify the release of this land from the Green Belt are set out above.

136. The site is split into 2 parts, that to the south of the A602 is the larger of the 2 sites and will take around 400 of the homes. Erroneously the Plan currently refers to part of this site within table 3, below Policy HO1. This is corrected by a main modification **(MM50)**. There is also a need for a reference in the supporting text to the Hertfordshire Minerals Plan as both parts of this site are within the Sand and Gravel Belt. This is remedied by **MM61**.

137. It would appear that this site may contain badgers. There is currently conflicting evidence on this matter. However, if, at the planning application stage, evidence emerges of protected species this would need to be considered against Policy GD1 of this Plan which seeks, among other things, to create, enhance or improve biodiversity. Moreover, badgers and their setts are protected species and so there are a number of layers of protection should they be present at the time the site is progressed to development stage. This would ensure that they are not harmed, but instead accommodated as part of the development. In addition, as set out above, exceptional circumstances have been demonstrated to justify the release of this site from the Green Belt.

Conclusions on housing allocations

138. I conclude on this issue that all of the housing allocations in the Plan are soundly based, subject to the main modifications I have referred to. These are necessary for the policies to be justified and effective. Where necessary, exceptional circumstances have been demonstrated to justify the release of land from the Green Belt to meet housing need in the Borough.

Issue 7 – Whether or not the Plan is likely to provide for a rolling 5 year supply of housing land throughout the Plan period

139. The Council's reliance on a small number of large strategic sites makes early delivery of a large quantum of housing very challenging. This is because of the lead in time for housing to be built on these sites, following the adoption of the Plan and the rate at which the developers can build. Using the Sedgefield approach to dealing with previous shortfall would require the delivery of around 700 homes per year for the first 5 years. This is wholly unrealistic when considering previous delivery rates. Spreading the delivery of the previous shortfall over the Plan period is not ideal as it delays providing the shortfall over an even longer period. However, in this case there are a particular set of circumstances that mean it is the only sensible option.

140. The NPPF requires Councils to identify a rolling 5 year supply of deliverable housing sites. It also requires them to have an additional buffer of 5%, or 20% (moved forward from later in the Plan period, depending on the level of previous level of under delivery) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

141. The past under-supply of housing in Stevenage is significant due to a combination of factors, including an ambitious housing target, the large areas of Green Belt land which cannot be developed unless released through the local plan process and the lack of an up to date local Plan which has caused uncertainty in the market. Consequently, the Council readily accept that they have a record of persistent under delivery and therefore need to have a buffer of 20% and I agree.

142. The Council's housing target is set at 7,600 homes in the Plan, which equates to 380 homes per year. For the first five years, this equates to 1,900 homes. The previous shortfall (from 2011) amounts to a deficit of 1,154 homes, when measured against the annualised housing target. The deficit divided over the remaining plan period (16 years), amounts to 72 homes per year. So this provides a 5 year requirement of 2,260 (1,900 +360). When a 20% buffer is added to this a five year requirement a figure of 2,712 is reached and this is planned for by the Council in their trajectory using their committed supply of deliverable housing sites and those allocated within the Plan and identified as being able to deliver housing within the following 5 years.

143. It seems likely that more than the number of houses set out in the trajectory will come forward in the next 5 years as the Council has been suitably cautious in their approach, particularly with regards to windfall estimates and also projecting the delivery of housing from the town centre regeneration sites. On the basis of the evidence before me I am content that the Council has been very thorough in their consideration of every site in the trajectory and particularly those in the first 5 years following adoption of the plan, having regard to the likelihood of the sites coming forward, when this will happen and at what rate they will deliver.

144. The Council can demonstrate exactly a 5 year supply of deliverable housing sites when a 20% buffer is applied to reflect the persistent under-supply of housing land (in accordance with the NPPF) and based on the Liverpool calculation method i.e. dealing with the previous shortfall over the Plan period.

Conclusions on housing land supply

145. To summarise, I am satisfied that the Plan provides sufficient sites and a robust strategy such that it is likely to provide a rolling 5 year supply of deliverable housing land available throughout the Plan period.

Issue 8 – Whether the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.

Need

146. The Council's Gypsy and Traveller Accommodation Assessment (GTAA) 2013 finds that there is a need for 3 additional new pitches for the period 2013 to 2018. This is derived from 2 factors. Firstly, at the time of the assessment there was a waiting list need for 4 pitches in Stevenage from households who do not currently live in the Borough. Secondly, the need arising from household formation from households on the Dyes Lane site (County Council traveller site in Stevenage) is estimated as being 4 pitches in the period up to 2018. On the basis of previous experience, there will be some turnover on

the Dyes Lane site which will be around 1 vacant pitch per year, so 5 pitches over 5 years.

147. An attempt is made in the GTAA to forecast beyond 2018, but it acknowledges that this is difficult. It estimates that there will be a need for 3 to 5 pitches in each 5 year period and so a need for 6 to 10 pitches in total by 2028.

148. In my view at least this number will be required given the waiting list for Dyes Lane has grown significantly since the 2013 GTAA, as has the number of unauthorised encampments. These are both clear signs of under-provision. While there was evidence provided at the hearing sessions from both the Council and representors about what the current situation in terms of need is, this need will be assessed in a methodical and balanced manner through an updated GTAA next year (2018).

149. The Council has committed to beginning work on a new GTAA in 2018. This is particularly important given that the 2013 GTAA is based on the advice and definition of gypsies and travellers in the superseded Planning Policy for Traveller Sites (PPTS) (March 2012). The latest version of PPTS (August 2015) includes a definition in annex 1 that excludes some gypsies and travellers (compared to the March 2012 version). Nevertheless, the need for caravan accommodation is unlikely to dissipate and the Council will need to address this and how the needs of residents identifying as travellers are met following the completion of its new GTAA.

150. I find that the OAN figure of 3 pitches up to 2018 and then 3 to 5 pitches every five years thereafter is sound. To clarify this gives a total for the Plan period of between 11 and 16 pitches.

Supply

151. The Plan allocates a site HO12/1 – Land north of Graveley Road for traveller provision and is clear that any other uses will be refused planning permission. This is important to ensure that the site remains available for travellers, since PPTS requires Councils "in producing their Local Plan to identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets". The provision in the Plan is based on the current GTAA, which is still up to date at the present time, but will need updating shortly. Moreover, the allocated site is large enough to accommodate more than the current identified requirement for 11-16 pitches over the plan period.

152. It appears from the evidence before me that this site may not be easy to deliver in the short term. Nevertheless, I am satisfied that this site is the Council's best option in this regard and the Council are unequivocal that they will see this site developed as they propose in the Plan. It may be that for this to happen the Council have to compulsorily purchase the site and this is reflected in main modification **MM71**. I have corrected a typographical error in this MM. It erroneously referred to 'section 236' of the Town and Country Planning Act 1990, but it should have said 'section 226'. As such, I am satisfied that the gypsy and traveller need will be met.

153. Also, as referred to above, the Council's current GTAA pre-dates the most up-to-date PPTS. Consequently, the GTAA was undertaken on the basis of the

gypsy and traveller definition in the superseded PPTS which included those members of the community that have ceased to travel permanently. It is widely recognised that the sector of the gypsy and traveller community who have ceased travelling permanently will still require a pitch on a site, as they are unlikely to move to bricks and mortar housing.

154. Moreover these people will not have been included in the Council's objectively assessed housing need assessment. In order to overcome this issue, until a revised GTAA is prepared and the Council determine how they are going to deal with the effects of the change in definition of gypsies and travellers, a change to Policy HO12 and the supporting text is necessary. **MMs71& 72** introduce changes to the wording which seeks to clarify that until the review of the GTAA in 2018 they will effectively use the 'old' PPTS definition.

Conclusions on the needs of gypsies and travellers

155. Subject to the recommended MMs, I find that the Plan makes adequate provision to meet the needs of gypsies and travellers and that the Council have demonstrated that exceptional circumstances exist to justify the release of land from the Green Belt to meet these needs.

Issue 9 –Whether or not the development management policies in the Plan are soundly based

156. Policy HO9 seeks to ensure that a range of house types and sizes are provided in the Borough and builds upon policy SP7 which I have already covered briefly, above. As with SP7, this policy needs amending as a result of up to date evidence on the types of homes people require in this Borough. This is dealt with through **MMs66, 67 & 68**.

157. Policy HO11 seeks to ensure that 50% of new dwellings are 'category 2: wheelchair accessible and adaptable dwellings'. However, wheelchair accessibility has not been viability tested and the cost of such provision would be very high. The Council has proposed main modifications **(MMs69 & 70)**, which remove reference to wheelchair accessibility and thus overcomes this soundness issue. Notwithstanding this deletion, the Plan makes sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the NPPF. Also Policy SP8 of the Plan says that the Government's optional Technical Standards will be implemented to ensure that schemes deliver, among other things, accessibility. In reaching these conclusions I have had due regard to my public sector equality duty.

158. The Plan contains some generic retail policies relating to new convenience provision, new comparison retail provision and retail impact assessments. I am content with them, subject to a number of main modifications being promoted by the Council. Changes to Policy TC11 and the supporting text **(MMs28, 29 & 30)** provides greater clarity about the level of identified future need for additional convenience retail floorspace, where is it expected to be provided and when. I have amended **MM28** to ensure that the split between comparison and convenience goods floorspace in policy TC11 is clear.

159. A correction to the amount of new comparison retail floorspace expected to be required is needed in policy TC12 and the supporting text and this is remedied through **MMs31 &32**.

160. I turn now to traveller sites and policy HO13 that will be used by the Council in dealing with and assessing planning applications for traveller accommodation on unallocated sites. The policy requires applicants to demonstrate a local need for accommodation, which is at odds with the advice in PPTS. This is remedied through **MM73**.

161. Also, because the GTAA is based on the superseded version of PPTS, which included a different definition of 'gypsies and travellers', a main modification **(MM74)** is included to cover this until a revised GTAA is prepared in 2018. It effectively says that until the GTAA is reviewed – when assessing the need for additional pitches the Council will define gypsies and travellers as per the superseded PPTS. This provides a short term solution to this issue which will need to be resolved fully in the near future. It is likely the Council will eventually need to provide accommodation for travellers meeting the definition in the most up to date GTAA as well as ethnic gypsies and travellers who do not meet the definition but are in need of caravan accommodation.

162. In line with the NPPF, the Plan, through various policies, including GD1 contains generic design requirements that will be applied to all developments. For consistency throughout the Plan a change of wording is needed in relation to the reference to parking and access standards. It is also necessary to remove the reference to 'exceeding where possible' the nationally described space standards as this would conflict with the advice in the PPG. These matters are resolved though **MM75**.

163. Policy TC13 and the supporting text, which deals with retail impact assessments, erroneously requires an impact assessment for town centre uses in the town centre. This is corrected by **MMs33, 34 & 36** which include a threshold which will require an impact assessment for any proposals in excess of 300m² for main town centre uses outside the town centre as set out in the NPPF. The threshold is based on a robust and up to date assessment. In addition, **MM35** is necessary to the supporting text to take account of the Council's policy shift towards reducing dependency on the use of motorised vehicles and towards other multi-modal means.

164. A number of changes are needed to policy HC3 which covers The Lister Hospital Health Campus to take account of the staff residential accommodation and other ancillary accommodation within the hospital site. A reference is also needed to confirm that a small parcel of undeveloped land within the campus could provide the opportunity for additional healthcare uses. These are resolved through **MMs76, 77 & 78**.

165. Policy HC7 covers new and refurbished leisure and cultural facilities. A main modification **(MM79)** is necessary to clarify that a sequential approach to site selection does not relate to schemes for sports facilities as these may be suitable away from identified centres i.e. in areas of open space.

166. The Council are intending to introduce Community Infrastructure Levy in the future and so this necessitates a change to some of the supporting text to policy HC8 which covers commuted sums in relation to the provision of sports facilities in new developments. This is dealt with through **MM80**.

167. Additional educational capacity is proposed through policy HC9 to be provided at the former Barnwell East Secondary School, that was previously used as a

school. Some flexibility is needed in terms of the type of agreement that will be required to ensure the sports hall is available for use by the public. This is remedied through **MM81**.

168. The Plan contains a number of policies related to flood risk. Policy FP2 deals with development in flood zone 1. A change **(MM82)** to this policy is required to reflect the Planning Practice Guidance.

169. Policy FP3 deals with flood zones 2 and 3 and among other things requires an appropriate fluvial flood risk assessment is submitted which demonstrates a number of points. These requirements need to be made more robust and this is done through **MM83**.

170. Pollution control is dealt with by policy FP7, but it omits a reference to water pollution. Main Modification **MM84** remedies this.

171. As set out above there are a number of development management style employment related policies. Policy E2 relates to Gunnels Wood employment area and edge of centre zone. These are 2 distinct areas and so they need to be covered separately within the policy. This is resolved through **MM18**.

Conclusions on development management policies

172. Subject to the main modifications identified above, which are necessary for soundness, the development management policies in the Plan are soundly based.

Issue 10 – Whether the town centre regeneration plans are soundly based

173. A key part of the strategy of this Plan is the regeneration of the town centre. When it was constructed it was the UK's first wholly pedestrianised shopping centre. The original phase 1 of the town centre development now forms the core of the Town Square Conservation Area. The centre currently appears tired and in need of regeneration to bring it up to modern standards and thus a desirable place for businesses to locate and for people to live and shop. There is clear evidence that the town centre is under-performing, uses land inefficiently and is not an attractive prospect for investors.

174. In 2015 Stevenage First partnership commissioned a new vision for the town centre from a team of consultants who specialise in master planning. This covers a larger area than just the shopping streets in the core of the town centre. It also encompasses the bus and train station, the arts and leisure centre and a number of surface car parks. Recent evidence indicates that housing prices are rising in this area, developer interest is growing in the town centre and also the land is mainly in public sector ownership, with some belonging to the Homes and Communities Agency. This should prevent delays in development commencing as a result of land ownership issues and negate the need for any compulsory purchase orders or land assembly.

175. Moreover a significant amount of funding has been made available by the Government under the 'Growth Deal' initiatives to help fund these ambitious regeneration proposals and this will be administered by the Local Enterprise Partnership (LEP). This will need to be supplemented by a significant amount

of private sector funding and, taking account of all the evidence, I have every reason to believe this will happen.

176. In general terms the town centre has been split into six different areas (major opportunity areas) and each of these will be guided by a specific policy in the Plan. Overall these will help deliver the relocation of the bus station and the closure of part of Lytton Way to enable a better interface between the railway station and the current leisure park beyond it to the town centre.

177. Car parking will be provided in a less hungry manner, the arts and leisure facilities which are in need of updating will be re-provided on new sites. A new platform is planned at the railway station and further non-essential works are planned for the station subject to funding and agreements with Network Rail. In addition, provision is made for new residential apartments to be provided, along with new office space, hotels, leisure facilities, bars and restaurants, new cultural and civic buildings and retail units.

178. The specific policies and overall vision for the town centre are well thought out and have the potential to improve the town centre significantly in a number of ways.

179. While a number of respondents are dissatisfied with the town centre proposals, it is principally the closure of part of Lytton Way that concerns people most. However this partial road closure will be of great benefit to the overall regeneration programme planned here and importantly provide an additional development site that will provide new offices and housing close to the station. It will also allow a new frontage to be inserted on the eastern side of the train station. I have not been presented with any alternative solutions to providing the much needed regeneration here. There are concerns that some facilities will not be replaced, such as the theatre, but there are specific policy requirements in policies TC4 and TC5 to ensure that the replacement happens.

180. A number of main modifications are required to update and clarify sections of policies and text relating to the town centre as a result of further work and the passage of time. These include **MMs7 & 8** which relate to policy SP4 and the supporting text. I have amended **MM7** slightly to ensure it is clear in the policy what floor space amounts relate to convenience and comparison goods. **MMs19, 24 & 25** provide some word changes necessary to bring the text in policies TC2, TC5 and TC7 relating to the conservation area in line with the policy advice in the NPPF.

181. Policy TC3 and the supporting text needs amendment to correct some errors and alter the emphasis in terms of the changes that will definitely take place to the rail station. It is also necessary to make developers aware of the need to consider noise attenuation in new residential properties close to the rail station. These are addressed by main modifications **MMs20, 21 & 22**.

182. A change to policy TC4 is necessary to clarify the railway station will be extended as well as regenerated and this is resolved by **MM23**.

183. The Plan contains a number of policies within the 'Vital Town Centre' section that are development management policies seeking to protect the vitality and viability of the new town shopping area and the old town High Street. There

are some errors in the lists of premises covered by policy TC8 and these are corrected through **MM26**. Policy TC9 needs additional text to ensure that the protection to designated heritage assets that it seeks to provide will also extend to the setting of those assets. This is dealt with through **MM27**.

Conclusions on town centre regeneration plans

184. To summarise on this issue, I conclude that that town centre regeneration plans are soundly based, subject to the inclusion of the main modifications set out above.

Issue 11 – Whether or not the Plan is soundly-based in terms of economic viability issues and its delivery and monitoring arrangements

185. A whole Plan viability assessment was carried out by the Council in line with the advice in the NPPF. This has led to some changes, such as the reduction in the affordable housing target. The assessment has also been scrutinised as part of this examination in relation to other policy matters, as set out above. I am satisfied that a robust assessment of viability has been undertaken such that scale of obligations and policy burdens will not prevent development being delivered in a timely manner.

186. The Plan commits to monitoring the policies in it. The Council will do this through their annual monitoring report.

187. Given that the IDP is a 'living document' that is reviewed and updated on a regular basis it is unwise to have this within the Plan. It is merely a snapshot in time and could be misleading. This is remedied by main modifications **(MMs86 & 87)** to remove the entire table from the delivery and monitoring chapter and amend the preceding text which refers to it being within the Plan.

Conclusions on economic viability, delivery and monitoring

188. Subject to the inclusion of **MMs 86 & 87**. I find that the Plan is soundly-based in terms of economic viability issues and its delivery, monitoring and contingency arrangements**.**

Climate Change

189. For the avoidance of doubt I am satisfied that the Plan's policies, taken as a whole, will help to ensure that development and use of land in the borough contributes to the mitigation of, and adaptation to climate change.

Assessment of Legal Compliance

190. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Stevenage Borough Local Plan has been prepared in accordance with the Council's LDS June 2016.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in May 2012. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report (May 2016) sets out why AA is not necessary. Natural England support this.
National Policy	The Stevenage Borough Local Plan is consistent with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Stevenage Borough Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

191. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the SBLP satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Louise Crosby

Inspector

This report is accompanied by an Appendix containing the Main Modifications.