

Examination of the North Hertfordshire Local Plan 2011-2031

Statement of Stevenage Borough Council (SBC)

Matter 11 – The housing allocations and the settlement boundaries: the Category A Villages

Graveley (including North of Stevenage) NS1

11.21 Are all of the proposed housing allocations deliverable? In particular, are they:

a) confirmed by all of the landowners involved as being available for the use proposed?

1. No comments.

b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

2. As outlined in our Matter 16 – Transport and infrastructure policies statement, the volume of housing identified in the North Hertfordshire Local Plan (NHLP) to the north of Stevenage, including site NS1 (900 dwellings), is significant.
3. Site NS1 functionally attaches to the urban area of Stevenage and requires a joint approach to masterplanning and mobility between Stevenage Borough Council (SBC), North Hertfordshire District Council (NHDC) and Hertfordshire County Council (HCC). It is therefore crucial that site is designed in accordance with the Stevenage Mobility Strategy (ORD7).
4. Given the significance of site NS1 to Stevenage and North Hertfordshire's new Transport Strategy, the site allocation requirements set out within Policy SP16 require updating to refer directly to the Transport Strategy and the Stevenage Mobility Strategy. **An amendment is requested to Policy SP16, criterion b., to state the site is designed in line with the Transport Strategy and the Stevenage Mobility Strategy** (detailed wording set out in Appendix A).
5. In addition, the Borough Council welcomes the recognition in the Transport Strategy (ED14, para 4.5 second bullet and para 7.6) that approach needs to accord with the Stevenage Mobility Strategy (ORD7). **Accordingly, the wording of SP16, criterion c., requires amendment to make it clear that any work to the junction will be designed in line with the Stevenage Mobility Strategy.**

6. Related to this, there is currently a reference in the supporting text at para 4.196 to the junction and a possible roundabout. Any work to this junction will need to be designed to promote active travel (cycling and walking) in line with the Stevenage Mobility Strategy. **The Borough Council request that paragraph 4.196 is updated to reflect the newly agreed position.**
7. The Borough Council has serious concerns about the current wording of criterion b. and the final sentence of Para 4.195, which appear to suggest that the allocation within North Hertfordshire could rely on access, education, retail and other necessary social infrastructure provided on the adjoining Stevenage site (allocated under Policy HO3 of the emerging Stevenage Borough Local Plan (SBLP)). SBC made detailed representations at Regulation 19 that made clear that NS1 should make provision for the needs of its future occupiers and should not place reliance on the adjoining site in SBC. Whilst a cross-boundary masterplan is supported, the SBC plan does not make provision for infrastructure to serve NS1.
8. In relation to access to the wider site (including land in both NHDC (NS1) and in SBC (Policy HO3)), SBC agreed an approach to this with HCC, which formed a document at the Stevenage Borough examination, see Appendix B. This states that:

“The sites will provide a co-ordinated access strategy across all modes of travel. It is likely that three accesses to the combined site will provide vehicular access, controlled in such a way to be consistent with the Stevenage Transport Strategy and the emerging North Hertfordshire Transport Strategy. It is intended that access will be provided for active travel and public transport access into, and out of the site, with consideration being given to one of the accesses being dedicated to active travel and public transport access, to provide priority for these more sustainable forms of transport.”
9. The emerging SBLP (Policy HO3) requires two access points and that these link effectively into the existing road, cycleway and pedestrian networks.
10. Policy SP16 as currently worded does not require access to link effectively into the existing pedestrian and cycleway networks, public transport and road networks or make clear that access for active travel and public transport into and out of the site is to be a priority. **The policy wording will benefit from an update to reflect the new Transport Strategy (ED14) and the Stevenage Mobility Strategy (ORD7).**
11. **Suggested updates to Policy SP16 and paragraph 4.195, to reflect these comments, are set out in Appendix A.**

12. **There is also a typographical error in the table on Page 155, line 2, for site NS1, the text refers to Policy SP15, rather than Policy SP16, which requires correction.**

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

13. As discussed in relation to access, above, SBC have major concerns relating to the wording of Policy SP16 and its supporting text. Criterion b., in particular, requires integration with adjoining development in Stevenage and 'site-wide solutions' to infrastructure, with paragraph 4.195 suggesting that some or all facilities to serve the NHDC development could be located in Stevenage, on the adjoining site. SBC have serious objections to this approach. Whilst the Stevenage Borough Local Plan (SBLP) encourages the developers of these adjoining sites to work together to create a holistic masterplan, and encourages facilities to be provided on the joint boundaries of the sites so they can be combined, the relevant SBLP policy (Policy HO3) makes no provision for any infrastructure to meet the needs of NS1. This is not a joint allocation and it should not, therefore, be treated as such within this policy.

Primary school provision

14. In terms of primary school provision, we have concerns that, although Policy NS1 requires 'site-wide solutions' for education, there is no specific policy requirement for the developers of this site to make primary school provision.
15. The IDP that informs the NHLP makes clear that additional school places are required to serve this development (TI1, Table 6.3).
16. The relevant policy of the SBLP (Policy HO3), which allocates the adjacent site in Stevenage, sets out a requirement for the developers of this site to meet the educational demands arising from this development in terms of providing a primary school on-site (in a location that allows for a cross boundary solution), but the SBLP does not make any additional primary school provision on this site to meet the needs of the adjoining development in NHDC.
17. As written, the NHLP is unsound in relation to this issue, as it will result in a shortfall of primary school provision to meet the needs resulting from NS1.
18. **SBC would request that wording is added to make clear that primary school provision will be required as part of any development scheme, under a new criterion within Policy SP16.**

19. **In line with the modification proposed above, the supporting text to SP16, at paragraph 4.195, also requires amendment. We would request the last sentence is deleted and replaced with text appropriate to reflect the requirement for a primary school to be provided on-site.**

Design principles

20. Policy SP16 allocates NS1 as an extension to the urban area of Stevenage. Despite this, the Policy contains no requirement for development at NS1 to take into account the design principles of Stevenage.
21. As Britain's first New Town, Stevenage was specifically designed around the principle of self-containment, incorporating a series of distinct neighbourhood areas, each with their own neighbourhood centre comprising community facilities and services. This is a key feature of the town and something SBC feels strongly should be continued and reflected in all major development around the edge of the town.
22. Whilst NHDC recognises the Garden City design principles should be followed in a policy allocating a site on the edge of Letchworth (Policy SP15), no similar requirement is made within Policy SP16.
23. **SBC would request that Criterion b. of SP16 is amended to require the Stevenage design principles to be considered and reflected in any development scheme.**

Neighbourhood centre facilities

24. In line with the above comments on design principles and our objections relating to the lack of infrastructure being provided to meet the needs of NS1, SBC makes specific objection to the lack of neighbourhood centre facilities being required on-site, particularly with regard to retail and healthcare provision.
25. In terms of healthcare, the IDP suggests a requirement for an additional 2.2 GP surgeries to meet the needs of the proposed sites on the edge of Stevenage. Paragraph 4.123 of the NHLP also suggests that healthcare facilities will be required on larger sites. However, we cannot see any policy requirement within the NHLP that ensures this provision will be made. None of the policies allocating housing around the edge of Stevenage (NS1, GA1 or GA2) make any mention of this provision.

26. **SBC request that a specific criterion is added to SP16 to make the provision of a GP surgery a requirement of this development scheme, subject to demand at the time of development.** Without this, the policy cannot be considered sound as it does not meet the identified needs of the development.
27. In terms of retail provision, no reference is made under the allocation of NS1 (Policy SP16) to the provision of retail floorspace within the site. This is in contrast to the approach taken by NHDC to the five other strategic housing allocations, where specific retail allocations are made.
28. SBC believe this is due to NHDC placing undue reliance on facilities being provided on the adjacent SBC site allocation. This is not a joint allocation and, whilst a cross-boundary approach to design and layout is encouraged within the SBLP, it does not make any additional provision to meet the needs of site NS1 allocated within the NHLP.
29. As such, NHDC need to ensure sufficient retail provision is being made to meet the identified needs of site NS1 in order for this policy to be considered sound. The North Hertfordshire Retail Study Update (E1) identifies the potential for NS1 to make provision for around 300m² (net) convenience goods floorspace and 750m² comparison goods floorspace, as well as 300m² of Class A2-A5 non-retail services (para 5.45). Paragraph 5.42 of this study recognises the importance of providing local shopping facilities: *“new local shopping facilities will be required within the urban extensions in order to ensure residents have access to day to day shops and services”*. It is unclear from the NHLP how the retail needs of this development are to be met.
30. **SBC request that a new criterion is added to SP16 to make retail provision a specific requirement of NS1.**

Transport and access

31. At the time of preparing this statement, whilst the new Transport Strategy, October 2017, is available (ED14), there is no updated Infrastructure Delivery Plan to reflect the new Transport Strategy. It is not clear from the Transport Strategy what approach will be taken to mitigation for sites that impact on Stevenage.
32. From the information currently available, it is not clear how the delivery of site NS1 will be approached to ensure it is delivered in a way which accords with the new Transport Strategy (ED14) and the Stevenage Mobility Strategy (ORD7).
33. Particularly for sites which adjoin or are close to the existing urban area of Stevenage such as NS1, it is important that necessary infrastructure for mobility is delivered in

conjunction with SBC. The expectation of SBC is that these sites will place a high emphasis on active travel (cycling and walking) in line with the Transport Strategy and Stevenage Mobility Strategy, that the sites will provide appropriate contributions for active travel (cycling and walking) to improve the existing active travel networks in Stevenage and to support achieving behaviour change in Stevenage, and that a formal mechanism will be put in place for NHDC, SBC and HCC to work together to agree the approach to mobility. **SBC propose an amendment to the supporting text at para 4.196 to provide a framework for this.**

34. **Revised policy wording, to reflect these comments, is set out in Appendix A.** Additional paragraphs of supporting text would also be supported, to reflect the policy amendments proposed within this statement in relation to secondary school provision, community facilities and retail provision. SBC would be happy to work with NHDC to agree some appropriate wording.

11.22 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

35. No comments.

11.23 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

36. No comments.

11.24 Sites NS1 and GR1 both comprise of land in the Green Belt. For each:

37. No comments.

11.25 Is the proposed settlement boundary:

- a) consistent with the methodology for identifying the settlement boundaries?
- b) appropriate and justified?

38. No comments.

Appendix A: Suggested updates to Policy SP16 and its supporting text

In summary, SBC recommends the following modifications are made to Policy SP16 and its supporting text, in order to resolve our objections and to make the plan sound with regards to this policy:

Policy SP16

Land to the north of Stevenage within Graveley parish, as shown on the Proposals Map, is allocated as a Strategic Housing Site for approximately 900 homes. Planning permission for residential development will be granted where the following site-specific requirements are met:

- a. A site masterplan to be approved prior to the submission of any detailed matters;
- b. Integration with adjoining development in Stevenage Borough, **including consideration of the Stevenage New Town design principles for neighbourhood centres and self-contained communities; including site-wide solutions for access, education, retail and other necessary social infrastructure;**
- c. **The site is designed in line with the Transport Strategy and the Stevenage Mobility Strategy and integrates fully with adjoining development in Stevenage Borough, linking effectively into the existing pedestrian and cycle networks, public transport and road networks;**
- d. An upgraded junction at the intersection of Graveley Road / North Road, **designed in line with the Stevenage Mobility Strategy;**
- e. **A primary school is provided in line with the most up-to-date evidence of need;**
- f. **Local facilities to serve the community are incorporated, including a GP surgery, subject to demand;**
- g. **Neighbourhood-level retail facilities providing approximately 1,350m² (net) of A-Class floorspace;**
- h. A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;
- i. At least 9 serviced plots for self-build development;
- j. Structural planting to create a sense of place, integration into surrounding landscape and a long-term, defensible Green Belt boundary to the north as informed by detailed assessments;
- k. Integration of existing public rights of way to provide routes through the site to the wider countryside including
 - i. footpath Graveley 006 and Bridleway Gravely 008 along the perimeter of the site; and
 - ii. footpath Graveley 007 as a south-east to north-west route through the site and link path from the urban area to the Stevenage Outer Orbital Path; and

- I. Sensitive consideration of existing settlements, landscape features and heritage assets including:
 - i. Graveley village and Conservation Area;
 - ii. the St Nicholas & Rectory Lane Conservation Area;
 - iii. Chesfield Park;
 - iv. Church of St Etheldreda; and
 - v. Manor Farm.

Supporting text

4.915 “... A masterplanning exercise for this site will need to consider the implications of these ~~cross-boundary~~ **adjoining** allocations and demonstrate appropriate solutions. ~~This may lead to some facilities which will serve the whole development being located wholly within either North Hertfordshire’s or Stevenage’s administrative areas.”~~

4.196 **“The site will be designed in line with the Transport Strategy and Stevenage Mobility Strategy, placing a high priority on active travel (walking and cycling). The approach will be agreed in conjunction with Stevenage Borough Council and the highway authority.** It is envisaged that principal access to the site will be in the form of a looped estate road, one end of which will be in Stevenage Borough. The Northern end of this road will emerge at, or close to, the existing junction of the B197 at Graveley Road / North Road. ~~A~~**Any** new arrangement **will be designed to promote active travel (walking and cycling) in line with the Stevenage Mobility Strategy,** ~~possibly a roundabout, will need to be provided.”~~

Additional paragraphs of supporting text would also be supported, to reflect the policy amendments proposed within this statement in relation to secondary school provision, community facilities and retail provision. SBC would be happy to work with NHDC to agree some appropriate wording.

Appendix B: Statement between Stevenage Borough Council, Hertfordshire County Council as Local Highway Authority, WSP Group on behalf of Bellway and Miller in respect of Stevenage Site HO3: North of Stevenage and Croudace Homes in respect of North Hertfordshire Site NS1: North of Stevenage in respect of Stevenage Borough Local Plan 2011-2031. [Stevenage Borough Local Plan reference ED172]

Statement between Stevenage Borough Council, Hertfordshire County Council as Local Highway Authority, WSP Group on behalf of Bellway and Miller in respect of Stevenage Site HO3: North of Stevenage and Croudace Homes in respect of North Hertfordshire Site NS1: North of Stevenage in respect of Stevenage Borough Local Plan 2011-2031.

Date of Agreement: 22 March 2017

This statement relates to Land North of Stevenage i.e. sites Stevenage Borough Local Plan Site HO3: North of Stevenage and North Hertfordshire Local Plan Site NS1: North of Stevenage. Its purpose is to set out the joint approach to masterplanning and mobility that will be taken by the sites.

The combined sites are capable of forming a sustainable extension to the existing community of Stevenage in such a way as to promote living at the local scale, which means enabling people to undertake day to day activities such as going to school, visiting friends, shopping at local convenience shops.

There will be permeability by active travel, that is walking and cycling, into and through both of these sites for the benefit of new and existing residents. The sites will be designed to promote low speeds and provide a high quality infrastructure for pedestrians and cyclists. This will act to create a legible and cohesive network of walking and cycle routes that can be integrated into the existing urban fabric of north Stevenage and also provide connections and permeability to existing and emerging routes in North Hertfordshire.

The sites will provide a co-ordinated access strategy across all modes of travel. It is likely that three accesses to the combined site will provide vehicular access, controlled in such a way to be consistent with the Stevenage Transport Strategy and the emerging North Hertfordshire Transport Strategy. It is intended that access will be provided for active travel and public transport access into, and out of the site, with consideration being given to one of the accesses being dedicated to active travel and public transport access, to provide priority for these more sustainable forms of transport.

The extension to Stevenage also creates the opportunity to provide much improved linkages, particularly along North Road connecting into the Stevenage walking and cycle network, linking to the town centre and public transport interchanges. North Road will be improved to become a place for people at a pedestrian scale, rather than a vehicular conduit as it is today.

In line with the Stevenage Transport Strategy and emerging North Hertfordshire Transport Strategy, the focus of any mitigation for the combined sites is to be on prioritising active travel and sustainable travel and not catering for the convenience of the car commuter.

With this in place we are satisfied that the effect of traffic to and from this extension of Stevenage is satisfactory and controlled in such a way that it does not adversely affect the operation of the

highway network in this part of Stevenage and its approach is consistent with the aims of the Stevenage Transport Strategy and emerging North Hertfordshire Transport Strategy.



pp Gerry Corrance

Technical Director

Signed on behalf of
WSP Group and Savills



Richard Kelly

Strategic Land Promoter

Signed on behalf of
Croudace Homes



Councillor John Gardner

Deputy Leader of the Council

Signed on behalf of
Stevenage Borough Council



Mark Youngman

Development Management
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Signed on behalf of
Hertfordshire County Council