

## Examination of the North Hertfordshire Local Plan 2011-2031

### Statement of Stevenage Borough Council

#### Matter 16 – Transport and infrastructure (Policies SP6, SP7, T1 and T2)

##### 16.1 Is Policy SP6 justified, effective and consistent with national policy?

- 1 The volume of housing identified in the North Hertfordshire Local Plan (NHLP) on sites immediately to the north of Stevenage, NH1 (900 dwellings), GA1 (330 dwellings) and GA2 (600 dwellings), is significant, totalling 1830 new dwellings. Whilst Stevenage Borough Council (SBC) does not object to these allocations in principle, the mobility implications of these sites will be significant for Stevenage, existing residents of North Hertfordshire and future occupiers of the dwellings.
- 2 The sites functionally attach to the urban area of Stevenage and require a joint approach to masterplanning and mobility between SBC, North Hertfordshire District Council (NHDC) and Hertfordshire County Council (HCC). It is therefore crucial that the sites are designed in accordance with the Stevenage Mobility Strategy (ORD7).
- 3 The Stevenage Mobility Strategy, accords with national policy, HCC's Vision 2050 (TI8) and has been agreed by HCC. It will form an appendix to the Stevenage Borough Local Plan (SBLP). The Strategy *"steers away from the historic, and now contra-policy, predict and provide car commuter peak as a proxy for transport and Mobility. Instead of prioritising road building schemes to satisfy a theoretical short lived car commuter demand, the strategy is to design for and prioritise Mobility as a whole. It is to create even more attractive choice in movement than already exists, committing funds to physical improvements to the higher capacity cycle network, ..., invest in public transport and make huge inroads in influencing behaviour by significant funding of new measures to promote and use the mobility options that already exist and will improve"* (page 1, para 2).
- 4 The Strategy places a high emphasis on active travel (cycling and walking). *"Stevenage Borough Council will place a high priority on active travel. For the purpose of this local plan and beyond, it will plan on the basis that the proportion of travel by active travel will increase, that commuter demand will remain broadly static and therefore that the proportion of travel by car driver will decrease. The strategy is to further encourage this shift through the creation of an active travel / car differential whereby it is more attractive to cycle for short journeys than drive. The existence of the extensive, segregated cycle infrastructure means that Stevenage is*

*better equipped than many towns to facilitate safe and convenient cycling and encourage this change in emphasis” (page 2, para’s 8 - 10).*

5 To accord with the Stevenage Mobility Strategy, the focus of any mitigation for the sites needs to be on prioritising active travel and sustainable travel and not catering for the convenience of the car commuter.

6 Given the significance of these sites to Stevenage, Policy SP6 should be updated to refer directly to the Stevenage Mobility Strategy. The Borough Council would also recommend amendments to the opening sentence and criterion a, so that the policy is worded more positively, reflecting national policy (NPPF para 29 onwards), the North Hertfordshire Transport Strategy (ED14), and the Stevenage Mobility Strategy, as follows:

**“We will deliver accessibility improvements and promote the use of sustainable transport modes ~~in so far as reasonable and practicable~~. We will:**

**a. Comply with:**

- i. the Transport Strategy; and**
- ii. the Stevenage Mobility Strategy, for sites which are functionally attached to, or in close proximity to, Stevenage; and**
- iii. the provisions of the Local Transport Plan and other supporting documents as relevant ~~considered necessary~~;”**

7 The Borough Council is keen to continue working effectively with NHDC, HCC and any site promoters to ensure the best approach to sites adjoining the urban area of Stevenage is achieved. Given the large volume of development allocated in the NHLP to the north of Stevenage, and the need to work effectively together to deliver this, SBC would request that Policy SP6, criterion c. is amended to specifically refer to Stevenage Borough Council, as follows:

**“Work with Hertfordshire County Council, Stevenage Borough Council, Highways England, and service providers to ensure that a range of sustainable transport options are available to all potential occupants or users. This may involve new or improved pedestrian, cycle and passenger transport (including rail and/or bus) links and routes;”**

8 The Policy as currently worded, at criterion d, only seeks the early implementation of sustainable travel infrastructure on ‘Strategic Housing Sites’. Strategic in the Plan is defined as 500 or more dwellings (LP1, para 1.3). This approach will not allow the council to seek early implementation on housing sites just below this arbitrary

threshold, or on sites in any other use. It also fails to address the cumulative impact of sites.

- 9 The Borough Council believe it is reasonable to seek early implementation on all major sites, particularly considering national policy to facilitate sustainable development (NPPF para 29), encourage solutions which support reductions in emissions and which facilitate the use of sustainable modes of transport (NPPF para 30), and manage growth to make the fullest possible use of active travel and shared travel (NPPF para 17, bullet 11).
- 10 **In light of this, the following amendment is requested to criterion d.: “Seek the early implementation of sustainable travel infrastructure on ~~Strategic Housing S~~ major sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage;”**
- 11 As detailed in our response to question 16.5, Policy T2 (see further below), the Borough Council suggest that reference to the parking standards set out in the plan is replaced with reference to the parking standards SPD. This will provide more flexibility in the policy and ensure that it does not become out of date. **Stevenage Borough Council therefore request Policy SP6, criterion f. is amended to read as follows: “Assess development proposals against the parking standards SPD ~~set out in this Plan~~ and relevant supplementary advice;”**
- 12 With the amendments outlined above proposed by SBC, the policy, as a whole, would read:  
“We will deliver accessibility improvements and promote the use of sustainable transport modes ~~in so far as reasonable and practicable~~. We will:
- a. Comply with:
    - i. the Transport Strategy; and
    - ii. the Stevenage Mobility Strategy where sites are functionally attached to, or in close proximity to, Stevenage; and
    - iii. the provisions of the Local Transport Plan and other supporting documents as relevant ~~considered necessary~~;
  - b. Encourage development in locations which enable sustainable journeys to be made to key services and facilities;
  - c. Work with Hertfordshire County Council, Stevenage Borough Council, Highways England, and service providers to ensure that a range of sustainable transport options are available to all potential occupants or users. This may involve new of improved pedestrian, cycle and passenger transport (including rail and/or bus) links and routes;

- d. Seek the early implementation of sustainable travel infrastructure on ~~Strategic Housing S-~~ major sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage;
- e. Assess development proposals against the parking standards SPD ~~set out in this Plan~~ and relevant supplementary advice;
- f. Require applicants to provide assessments, plans and supporting documents to demonstrate the safety and sustainability of their proposals; and
- g. Protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, require replacement routes to the satisfaction of the Council.”

13 These proposed amendments will improve the policy and assist with the policy being justified, effective and consistent with national policy.

16.2 Policy SP6 says that “*We will comply with the provisions of the Local Transport Plan and other supporting documents as considered necessary*”. What does that mean?

14 As set out in response to question 16.1 above, the Borough Council believes that this policy should specifically refer to the Stevenage Mobility Strategy for sites that are functionally attached to, or in close proximity to, Stevenage.

16.3 Is Policy SP7 consistent with the relevant statutory provisions and national policy, and justified? In particular:

a) Is it consistent with the limitations on the use of planning obligations set out in the Community Infrastructure Levy Regulations 2010 (as amended)?

b) Criterion f. says that “*We will take a stringent approach where developers consider that viability issues impact the delivery of key infrastructure and/or mitigation measures*”. What does this mean? Is the stringency referred to justified?

15 No comment.

16.4 Is Policy T1 justified, effective and consistent with national policy?

16 The principles in criterion b. and d. are in line with our comments above.

- 16.5 Is Policy T2 justified, effective and consistent with national policy? In particular:
- a) What is the justification for each of the parking standards set out in Appendix 4 of the Plan?
- 17 Stevenage Borough Council's expectation is that sites which are functionally attached to Stevenage (NS1, GA1 and GA2), will be designed and delivered in accordance with the Stevenage Mobility Strategy (ORD7). These sites will require a joint approach to masterplanning and mobility between Stevenage Borough Council, North Hertfordshire District Council and Hertfordshire County Council.
- 18 Parking Standards have a key role in prioritising active travel and sustainable travel in all development. To this end, Stevenage Borough Council is keen for the existing SPD, Vehicle Parking at New Development, to be reviewed at the earliest opportunity, to increase the requirements for cycle parking across all types of development.
- 19 Stevenage Borough Council has concerns about an extract of the September 2011 Supplementary Planning Document, Vehicle Parking at New Development, being replicated in Appendix 4 of the North Hertfordshire District Council Local Plan. This approach is likely to cause confusion if/when the current SPD is updated and will not provide NHDC with much flexibility. The following wording is suggested:
- "Parking is provided in accordance with the [Vehicle Parking at New Development SPD minimum standards set out in this Plan;](#)"**
- b) Given that the parking standards in Appendix 4 relate only to residential developments, should Policy T2 address parking in relation to other developments?
- 20 With regard to criterion a. we refer to our answer to question 16.5 a) above.
- c) In relation to criterion c., is it enough that applicants clearly identify how they provide for parking demand? Should it be necessary to demonstrate that parking will be safe and of a design/layout that will function satisfactorily?
- 21 SBC consider the criterion would be strengthened by the addition of a specific reference to cycle parking. This will assist with making the expectation clear, facilitating sustainable development and promoting active travel (cycling and walking) in accordance with national policy (NPPF para 29 onwards) and NHDC's strategic policy SP6.

22 The Borough Council believe the following amendments would improve the effectiveness of the policy:

**c. Applicants clearly demonstrate that cycle and car parking will be safe and of a design/layout that will function satisfactorily ~~identify how they provide for all likely types of parking demand.~~**