

Standing up for Hertfordshire's countryside

Stevenage Local Plan Representation Form – Jan 2016

Please complete a separate form for each representation you wish to make.

1. To which part of the Local Plan does this representation relate?

Paragraph9.1..... (please specify)

PolicyHO1..... (please specify)

Proposals Map

2. Do you consider the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

No

Yes

3. Do you consider the Local Plan has met the legal requirements? (please select one answer)

No

Yes

4. Do you consider the Local Plan has met the procedural requirements? (please select one answer)

No

Yes

5. Do you consider the Local Plan is sound? (please select one answer)

No (if no go to question 6)

Yes (if yes go to question 7)

6. If no, do you consider the Local Plan is unsound because it is: (please select all that apply)

Not positively prepared

Not Justified

Not Effective

Inconsistent with national policy

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

CPRE Hertfordshire considers that the Housing Target of 7,600 dwellings by 2031 set out in paragraph 9.1 is excessive, and that the proposed removal of Sites HO3 and HO4 from the Green Belt set out in Policy HO1 is both unnecessary and unjustified in the context of National Planning Policy. All references to these sites should be removed from the Plan and the Proposals Map.

No demonstration that exceptional circumstances exist has been set out in Chapter 9 of Plan for the removal of these sites from the Green Belt. Separate representations have been submitted in respect of these proposed allocations, HO3 and HO4.

The Proposed Housing target is unsound because in setting it, Stevenage Council failed to carry out the balancing process required by paragraph 14 and footnote 9 of the NPPF between meeting objectively assessed housing needs, and the constraints that apply to Stevenage, in particular the designation of nearly all the land around the existing built up area of the town as Green Belt with the exception of land to the west of the A1(M). The omission of this step is surprising, as prior to the current draft Plan, the Council had been emphasising its vital importance.

This key step of adopting a balanced approach is fundamental in determining the Council's Housing Target, and following which, if the target cannot be met without removing some land from the Green Belt, the Council must demonstrate that exceptional circumstances exist for the removal of specific areas of land.

SBC's "Green Belt Technical Paper" dated December 2015, shows that (paragraph 2.1) the Council has simply adopted the approach of meeting all the housing need identified in their SHMA Update 2015. This is, in effect, to adopt the approach that the Judge in the Calverton case (Calverton Parish Council v Nottingham City Council and Broxtowe Borough Council and Gedling Borough Council - April 2015 Ref. CO/4846/2014) says is impermissible, that is, to conclude that housing need alone can constitute "*exceptional circumstances*" that can justify removal of land from the Green Belt for development. Clearly, the Judge had in mind a much more detailed and sophisticated analysis than that adopted by Stevenage Council so as to look at issues such as the 'acuteness' and or 'intensity' of the 'need'. For example how much of the 'need' is from "*households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market*" (to adopt CPRE's recommended formula).

The question should also have been asked as to how much of the "need" is from people living outside Stevenage but who aspire to live there, rather than 'need' to live there? Since they have a choice where to live, their "need" is not so acute, but the Council has not balanced this need against the loss of Green Belt, and the harm that arises from doing so, in setting its Target.

However, at paragraph 2.4 of the Technical Paper, the Council increases the proposed housing target above the identified need, to 7,600 new homes rather than the assessed 7,300. The sole explanation for this is because it *“takes into account the Government's latest household projections for the Borough, which suggest that just over 7,600 new homes will be required”*, but there is no explanation of how the key constraint of the Green Belt has been taken into account in setting the Target. Clearly if sufficient land and specific sites to meet this number of dwellings can be developed within the limitations of key constraints including Green Belt, there would be no disagreement with it. But the Council believes that is not the case.

The Council also say that the higher figure *“ties in with our wider regeneration plans for the Borough and should help us to put forward a positive message, helping us to attract investment and achieve sustainable patterns of development”* and that *“setting a challenging target provides a clear signal that we are serious about delivering regeneration and change in the Borough”*. Such aspirations for regeneration do not, in CPRE Hertfordshire's view, outweigh Green Belt policy.

Paragraph 2.5 of the Technical Paper states that the proposed site allocations also provide an appropriate buffer above the 7,600 target, without explaining how this is balanced against constraints. The SHMA Update 2015 already includes a 10% uplift to allow for “market signals” (see paragraphs 3.75 and 4.10 of the Update). A further buffer is not justified in the view of CPRE Hertfordshire.

The Technical Paper, in paragraph 2.15 states that the Council accept that *“it would appear that we can just about meet our OAN without the need to use Green Belt land.”* This statement demands that the information provided by the Council to support its proposals is tested to determine whether in fact sufficient housing can be built in Stevenage without using land currently designated as Green Belt either within Stevenage or elsewhere.

In attempting to check this, CPRE Hertfordshire has concluded that the Council has underestimated the likely number of new dwellings that will be built in the town on sites other than those allocated in the Plan. In particular the allowance for ‘windfall sites’ in Policy HO1 is derisory when compared with the number arising over the past two years. As paragraph 9.43 of the draft Plan states, *‘Windfall development can make a valuable contribution towards housing supply’* so why does the Council only include a total of 200 dwellings on windfall sites, and only for the period after 2021, when over 400 dwellings were approved on such sites in 2014/15 and 152 by 1 October 2015 in the current municipal year? A further proposal for 68 dwellings is currently awaiting approval, demonstrating the ongoing nature of this source of housing supply.

The impetus for this substantial increase in housing supply from previously developed sites has been the relaxation of controls over changes of use from offices to residential, which in Stevenage still applies to all but the Gunnel Wood area. The Plan has ignored the Government decision to make that relaxation permanent, and to extend it to the replacement of office premises, and the extension of the provisions to sites in other uses, including small industrial premises.

CPRE Hertfordshire estimates that, based on the information on the Council's website, there are likely to be hundreds of new homes created in this way in Stevenage during the Plan period, that are not included in the Council's calculations in Chapter 9, possibly sufficient to obviate the need for any land to be taken out of the Green Belt during the Plan period.

CPRE Hertfordshire will continue to monitor the number of windfall dwellings to seek to demonstrate that that housing supply for the Plan period would enable Stevenage to meet an appropriate Housing Target without the loss of established Green Belt to the North and South East of the town.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The references to Policies HO3 and HO4 should be deleted from Policy HO1 and the dwelling total for urban extensions reduced by 1,350 accordingly. The Local Plan Proposals Map 2016 should be amended to remove these two sites and show the Green Belt boundary in its current location.

The 'Dwelling Capacity' for Windfall Sites in Policy HO1 should be increased to at least 1,000, dependent on the monitoring of this source for the period of the Plan to the end of the current municipal year.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

Yes, I wish to participate at the oral examination

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