

## North Herts District Council Local Plan EIP Statement

### Statement from Graveley Parish Council

#### Matter 6 – Deliverability (the housing trajectory, infrastructure and viability)

### Statement by Graveley Parish Council

#### ***6.2. Is the level and distribution of housing and other development based on a sound assessment of infrastructure requirements and their deliverability, including expected sources of funding? In particular:***

**Comment:** Graveley Parish Council considers insufficient information is provided in the Local Plan to determine the adequacy of improvements to the local road network to meet growth in existing traffic volumes let alone cope with proposed residential and commercial development, the adequacy of Secondary School places or how any future expansion of the Lister Hospital to meet the increase in population / demand within its catchment area under the various proposed Local Plans can be accommodated.

#### **1. Road Infrastructure**

1.1 The focus of NHDC and Stevenage's proposed Mobility Strategies do not seek to address the constrained nature of the local road network, the impact of existing traffic congestion or the impact of development proposed under NHDC's Local Plan.

1.2. The proposed Mobility Strategy as a standalone policy may be in keeping with National Policy but it does not recognise or seek to address the reality of the cumulative impact of current increasing traffic congestion or development going forward.

1.3. The AECOM Traffic Report undertaken by Stevenage as part of its Local Plan underlined that based on existing traffic policies proposed development was unsustainable\* and that therefore a new strategy was required to facilitate development.

\*(AECOM Report dated August 2016, Stevenage Town Centre Model S-Paramics Model Forecasting Report (10.3.5 (page71) and Table 10.1 Network Performance for each scenario (page 72)). Please note that as per 10.4.2, that "2021 scenarios do not include the new developments that are included in 2031 in the north area of Stevenage. The absence of these developments reduces the traffic issues in this area when compared to 2031 scenarios." (*Stevenage Examination Document 109 Appendix 1, extract of pages 75-78*)).

1.4. The proposed Mobility Strategy which seeks to progressively influence behaviour over the life of the plan should be used in conjunction with other policies to address existing road capacity issues. Heavy traffic congestion is already an issue for a number of villages neighbouring Stevenage (ED14, 5.31) and modelling indicates further increases going forward (ED14, 6.18).

1.5. As Stevenage's Mobility Strategy was only recently introduced it is currently reassessing the impact this change in policy will have on mitigation schemes in and around Stevenage

previously identified to improve traffic movement (TI1 5.105). As noted in TI1 5.105 the requirement for many of these schemes is triggered by background growth in traffic levels alone. This coupled with Stevenage's stated intention to utilise some of existing road space to support sustainable modes of travel (ED14, 4.1 & 4.3) would suggest a reduction in road capacity thereby further increasing road congestion.

1.6. Development of the BA10 19.6 hectare Employment Area, given 11.5 hectares (originally 14 hectares was sought by Stevenage MOU 11a, 5.6) is to support Stevenage's employment needs (equating to some 1,818 jobs) will increase both commuter and commercial traffic in the area with a strong likelihood that the B197 will be heavily used.

An increase in commercial travel in the locality between the BA10 site and a new 5 hectare site under the Stevenage Plan (EC1/4) south of Graveley, west of the B197 is also likely. Stevenage also has a further estimated shortfall of 3.5 hectares, estimated at 553 jobs. This increase in employment travel to / from Stevenage may be mitigated to the extent that NHDC residents travelling to Stevenage take up employment locally creating vacancies in Stevenage.

1.7. Given the significant level of development (residential and commercial) proposed north of Stevenage it is not possible to assess the impact these changes will have on the local road network or its utilisation but it is considered that it will be substantial. Improvements to the A1 (M) are likely to result in increased traffic through adjacent local roads to avoid congestion (ED14, 6.18).

HCC is currently in the process of developing a Growth and Transport Plan (GTP) for consultation in mid-2018 (ED14, 5.79) for North Hertfordshire which will build on the Transport Strategy, and will be aligned with growth proposals in Local Plans and Neighbourhood Plans. Once completed (expected mid-2018 (ED14, 1.16) the situation should become clearer as to the proposed configuration of the road network, its potential impact on traffic movement and how sustainable it is.

**Recommendation: The EIP review of the Plan be suspended until HCC has reported the results of the GTP.**

## **2. Lister Hospital**

**Comment:** Development under the Stevenage Plan is proposed up to the boundaries of the current campus, with very limited opportunity for further expansion within existing campus boundaries which will severely restrict Lister's ability to meet the demands of proposed population increases within the hospital's catchment area and to provide for new facilities and treatments as they are developed going forward

2.1 Pursuant to MOU11a (9.1) both councils agree that the Lister Hospital is a facility of sub-regional importance serving many people who live outside the borough. They also agree in principle that it is appropriate to make provision for the expansion of the hospital. However proposals to date by Stevenage are wholly inadequate to meet future needs.

2.2 A small parcel of land allocated under MM78 of the Stevenage Plan for expansion is considered wholly unsuitable / difficult to develop (differing site levels, low lying subject to heavy flooding, site traversed by electricity pylons) as well as being some distance from existing hospital facilities.

2.3 Inadequate Staff Car Parking is also an ongoing issue and is also thought to be causing recruitment problems. Currently the hospital has rented additional space at the local garden centre but this is only an interim measure until the site is developed around 2021 as a Supermarket pursuant to the Stevenage Plan.

2.4 Neither Council has proposed any measures to resolve the above issues, indeed Stevenage had the opportunity to do so but instead chose to approve the development of housing.

2.5 Despite a recent upgrading costing £150mm completed in 2014, the hospital is already experiencing capacity issues with heavy patient demand, most visibly evidenced in the Emergency & Accident Department, with the hospital receiving a Care & Quality Commission rating of “Requires Improvement” Report dated 26/8/2016.

### **3. Provision of Secondary School Educational Facilities**

3.1 As proposed the Plan does not propose an adequate level of Secondary Educational facilities.

3.2 Proposals contained in ED17 fall short of Herts County Council’s minimum criteria. The GA2 proposals are a compromise, dependent on the release of further green belt land to render the site feasible. As proposed no provision will be made for 6<sup>th</sup> form education, with a constrained school foot print.

3.3 The proposed schools are to address educational needs of the new developments in which they located and do not seek to address the existing shortfall in secondary school places in the area or the cumulative impact of the level of development in and around Stevenage.

### ***6.2. (a) Does the Infrastructure Delivery Schedule at Appendix 1 of the Infrastructure Delivery Plan (T 1) represent a comprehensive list of the infrastructure needed to facilitate the successful delivery of the housing and other development planned?***

**Comment:** No. As noted above in 1.5 above, the change in Stevenage’s Transport Strategy has resulted in all of Stevenage’s identified traffic mitigation schemes (10 out of a total of 20 identified, costed at £5.85 million) being put on hold pending a review by Stevenage under the newly adopted strategy.

Reflective of its position as a centre of employment in the area, the road network around Stevenage and local villages suffers from significant congestion. Absent information of

HCC/Stevenage's proposals how it is intended to address the traffic / congestion at these sites the Infrastructure Delivery Schedule cannot be considered comprehensive.

***6.2 (d) Does the Plan do all it should to help ensure the delivery of the necessary infrastructure?***

No. The adequacy of the local road network is crucial to the achievement of a sustainable plan. NPPF 32 states "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

Given the Stevenage Mobility Plan proposes to reallocate existing road space to sustainable modes of travel (ED14, 4.3) and potential cancellation / changes to recommended junction upgrades (ED14, 4.5) it is presently not possible to assess the impact the proposed changes will have on the severity of traffic movement and future congestion levels of traffic flows to / from Stevenage and therefore what additional infrastructure might be needed.

Education: See 3.1 above.

**Graveley Parish Council, October 2017.**

Attachments:

Matter 6: Appendix 1: Extract pages 75 to 78 from AECOM Report dated August 2016, **Stevenage Town Centre Model S-Paramics Model Forecasting Report (Stevenage ED 109)**, dated August 2016.