

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

### Statement of Stevenage Borough Council

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

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:*

- a) Does the Infrastructure Delivery Schedule at Appendix 1 of the Infrastructure Delivery Plan (TI1) represent a comprehensive list of the infrastructure needed to facilitate the successful delivery of the housing and other development planned?*
- b) What reassurances are there that these elements can and will be delivered when and where they are needed?*
- c) Were, when and how will the infrastructure required as a result of the housing and other development planned for be delivered?*
- d) Does the Plan do all it should to help ensure the delivery of the necessary infrastructure?*

1. The NHDC Local Plan allocates a number of housing sites around the edge of Stevenage. Whilst Stevenage Borough Council (SBC) does not object to these allocations in principle, our previous representations did raise some concerns with regard to undue reliance being placed on infrastructure within Stevenage to meet the needs of these developments.
2. In terms of transport and mobility, we have dealt with our general concerns within our statement for Matter 16, and we understand our site specific infrastructure and deliverability concerns, relating to neighbourhood-level facilities and mobility will be dealt with at the site specific sessions under Matters 10 and 11.
3. Therefore this statement relates to one of our key objections to the NHDC Plan, being the lack of certainty around education provision.

#### Primary school provision

4. In terms of primary school provision, we have concerns that, although Policy NS1 (which allocates land to the north of Stevenage) requires site-wide solutions for education, there is no specific policy requirement for the developers of this site to make primary school provision.

5. The IDP that informs the NHLP makes clear that additional school places are required to serve this development (TI1, Table 6.3).
6. The adjoining land is allocated within the Stevenage Borough Local Plan (SBLP) (ORD6) for housing (Policy SP3), and the SBLP Policy sets out a requirement to meet the educational demands arising from this scheme 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 provision in terms of primary school provision on this site to meet the needs of the adjoining development in NHDC.
7. As written, we believe 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.
8. **SBC would recommend 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 NS1.**
9. We recognise that this may be considered a site specific issue, as opposed to a more general 'deliverability' issue, so we would be happy to discuss at the Matter 11 session on NS1, if this is considered more appropriate.

#### Secondary school provision

10. In relation to the north of Stevenage sites, we have concerns that insufficient secondary school provision is being made.
11. In their representations to both the SBC and NHDC plans, Hertfordshire County Council (HCC) confirmed that there is a requirement for at least an 8FE school in NHDC, to meet the needs arising from growth to the north of Stevenage. This need is also recognised within NHDC's IDP (TI1), which states for the Stevenage North West area '*Additional secondary school places required by 2020/21*' (Table 6.4).
12. Work undertaken by HCC in 2016 (Appendix G of HCC's Reg. 19 representation) to identify the most appropriate site to meet this need looked at sites in SBC, EHDC and NHDC. This work identified site GA2 as the most appropriate to meet secondary school needs. However, this site no longer presents an option for NHDC or HCC, as its allocation for housing within the plan means that it would now be unaffordable for educational use.

13. NHDC's approach to meeting these needs within the plan has been to identify 4ha of land to the North of Stevenage (GA2) and 4ha at Knebworth (KB4) for 'educational purposes'. It is not made clear (either within the plan or within any supporting evidence) the quantum of secondary school provision this would provide and whether it equates to the 8FE requirement. It seems doubtful that this would be a large enough site area to meet these needs. **SBC would request that the level of provision is made explicitly clear within the plan policies, and expressed in terms of FE** (to ensure consistency with the evidence of need being relied upon).
14. SBC understand that since the Local Plan was submitted, additional land has been identified at GA2 which could enable a 4FE secondary school to be provided on this site. **SBC would welcome a modification, in principle, to expand the site area for educational use, to enable this to be achieved.**
15. The location of the secondary school provision is also a cause for concern. Whilst Policy GA2 requires some educational needs to be met (with the remainder of the requirement being provided in Knebworth), HCC have made clear in their Regulation 19 representations to the NHDC plan, that this would be insufficient to meet the identified needs for the North of Stevenage area.
16. As such, the NHLP, as drafted, would result in a significant shortfall in secondary education places to the north of Stevenage and cannot be considered to be positively prepared.
17. In various MoU's between NHDC, EHDC and SBC, the three local authorities have committed to working together, with HCC, to try to identify a solution to this issue. At present a solution has not been agreed.
18. The most recent discussions have been around an alternative site at Back Lane/Chesfield Park, proposed in representations made by Pigeon Investment Management Ltd. to the Regulation 19 version of the plan. The landowners are promoting a site of around 45ha for a 6-8FE secondary school, as well as aspirational homes. It has been made clear that the landowner will only make the secondary school site available if the remainder of the site is developed for residential use. SBC would strongly object to this proposal for a number of reasons:
  - The site has never been consulted upon within the Local Plan and has not been included within the SA process;
  - It is Green Belt land:
    - The site lies partly within the Stevenage Borough Boundary, on land that is not proposed for release within the SBLP, as such, demonstration of very

special circumstances would be required (these have not been demonstrated);

- Exceptional circumstances have not been demonstrated to justify the release of the remainder of the site (in NHDC);
- Developing this site would leave a parcel of Green Belt land in Stevenage completely cut off from other Green Belt land. It would undermine the Green Belt in Stevenage in terms of preserving its openness and preventing coalescence;
- The Review of the Green Belt around Stevenage, Part 2 (ORD5) recommends that this parcel of land is retained within the Green Belt (Table 2.11) and not released for development;
- The SBLP recognises the importance of the land known locally as 'Forster Country' and its connections to the wider countryside. The development of this site would completely cut off these wider connections;
- Access and transport is likely to be a cause for concern, particularly with the quantum of development already proposed North of Stevenage – it is not clear that this has been fully assessed (in conjunction with SBC);
- An assessment of the impact on existing historic assets has not been provided;

19. Overall, this site has not been properly considered in terms of its impacts on the surrounding area or its contribution to Green Belt purposes, and does not provide an alternative solution in terms of meeting secondary school needs within this area.

20. Ideally Stevenage would like to see a resolution to this issue, to ensure all of the needs arising within the plan period are met through the allocation of a suitable site(s) in the NHLP.

**21. If this is not possible, then the only outcome SBC can envisage being acceptable at this time, is for NHDC to commit to an early review of the Plan, on the basis that sufficient secondary school provision can be identified for the first 10 years of the submitted plan period – if indeed this can be demonstrated. SBC would need to be satisfied, by further evidence, that both HCC and NHDC agree that sufficient secondary school places exist (or will be provided) to meet the demands of the first 10 years of the plan period, in order for this to resolve our objections.**