

EAST HERTFORDSHIRE DISTRICT PLAN CONSULTATION

Stevenage Borough Council representations

December 2016

Summary

The East Hertfordshire District Plan [EHDP] is the equivalent of the Stevenage Borough District Plan [SBLP], providing the framework for controlling development in East Hertfordshire District through until 2033. It proposes, inter alia, a major new housing development on the eastern boundary of Stevenage. This raises a number of issues, which the Borough Council needs to carefully consider.

The East Herts District Plan [EHDP] provides for 18,040 new homes [against an OAN of 16,390] across the 22 year period to 2033. This equates to a need for 745 new homes per annum.

REPRESENTATION: WHOLE PLAN

In response to the consultation, the Borough Council advises East Hertfordshire Council that it generally welcomes the new EHDP, the spatial strategy set out within it and, specifically, the development proposed in policy EOS1, subject to the reservations set out in its other representations.

East Hertfordshire Council is advised that SBC will be pleased to work with it to address the objections that it has made to the EHDP and that it would hope to be able to advance this joint working to the point that agreed modifications can be put to the EHDP Inspector such that, subject to the adoption of those modifications, the objections can be withdrawn.

Chapter 12 of the EHDP specifically deals with the proposed development East of Stevenage. The site, to be subject to master-planning, is designed as a neighbourhood with:

- A mixture of house types and sizes
- Care home, flexi-care or sheltered housing
- Homes for older people
- 5 serviced plots for Travelling Showpeople
- 2FE primary school with Early Years provision
- Educational contributions towards secondary school places at the Collenswood site
- Neighbourhood centre, providing local retail and community uses, including a possible healthcare facility
- Bus route through the site
- Cycle and footpath links to Stevenage and into the Beane Valley
- Highway mitigation, including at the Gresley Way/A602 junction

The EOS1 site represents a significant change in direction for EHC policy towards Stevenage expansion since 1990 and this is welcomed. We recognise that this is an attractive proposition for EHC, as the proposal can make use of the infrastructure of Stevenage at little cost to most of the East Herts community. Also, it is considered that it can come forward quickly [before 2022] and make an important contribution towards meeting the council's five year housing land supply requirements.

The promoters of the site, Pigeon Investment Management, are also keen to bring the site forward at an early date.

However, there is evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education] which was not designed to accommodate development in East Hertfordshire District.

These representations refer to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

REPRESENTATIONS: POLICY EOS1

The Borough Council advises East Hertfordshire Council that it is concerned that the proposed Gresley Park development may place an undue reliance on infrastructure provided within Stevenage Borough and that this development was not taken into account, or provision made for this development, within the SBLP.

Whilst there has been a significant scale of investigation of the infrastructure provision needed for the scale of development being proposed in the EHDP, new information suggests that some of the assumptions may need to be revisited.

There is potentially some evidence that undue reliance is being placed on infrastructure within Stevenage Borough [such as highways, education] which was not designed to accommodate development in East Hertfordshire District.

No provision was made in the submitted SBLP for this development, as it had not been confirmed that its allocation in the EHDP would proceed.

EHC need to be confident that they have given full and proper consideration to the infrastructure necessary to support this allocation.

This representation refers to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

The Borough Council makes objection to the lack of certainty about whether sufficient secondary school provision has been made to meet the needs generated by this development.

The proposed development at Gresley Park makes its own primary school provision, but relies upon the availability of places at the [planned to be re-opened] Collenswood School site in Stevenage Borough. This reliance needs to be seen within the broader context of secondary education provision for the Stevenage urban area.

The County Council are known to be concerned about the nature of the educational provision being provided for the area in and around Stevenage, specifically to the north of the town.

Whilst County Education's comments upon the SBLP were that the Borough Council had made adequate schools' provision, it identified that there was a short-fall of secondary places that would best be made-up in North Hertfordshire, probably in the Great Ashby area. It has long been identified that there is a deficit of secondary school provision in the north-east quadrant of the town.

At the time of the Building Schools for the Future programme [2005 – 2010], it was intended to relocate the Thomas Alleyne's School from the High Street to a large Green Belt site [for a 10FE school] in North Hertfordshire District at Great Ashby. This proposal proceeded a long way towards delivery – against the wishes of the District Council - before being abandoned.

The NHLP now allocates the relocation site [together with adjacent land] for housing development as Policy SP18/GA2. The NHLP says of the educational provision on this site:

“Great Ashby’s existing primary school is significantly oversubscribed...There is also no district secondary school...development of this site provides the opportunity to address these issues. 2FE of primary-age provision will exceed the requirements from the site....a modest level of provision, potentially in the form of an all-through school, could provide a district solution for Great Ashby and create a more sustainable residential neighbourhood”

However, Hertfordshire County Council [HCC] does not accept that an all-through school is a viable or deliverable option. If they are right, the short-fall of secondary school provision in Great Ashby will be exacerbated. Also, the NHLP proposals do not provide enough capacity to make good the identified deficit in secondary school provision in the North East Stevenage area more generally.

In this context it is not clear whether HCC agree that there are sufficient secondary school places across the town to meet the needs generated by development proposed in the SBLP, the NHLP and the EHDP. EHC should be asked to demonstrate that there is the capacity at Collenswood to accommodate the needs generated by the Gresley Park development.

This goes to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.

The Borough Council makes objection to the lack of references to Stevenage neighbourhood principles or Stevenage design principles being applied in policy EOS1.

Whilst the proposed development appears to be following, broadly-speaking and in illustrative form only, Stevenage neighbourhood principles, which is to be welcomed, the policy makes no provision for the development to adhere to either Stevenage neighbourhood principles or Stevenage design principles.

This omission is made despite the fact that EHC is aware of the Borough Council’s view that all urban extensions to Stevenage should be both sustainable and should be seen as new neighbourhoods following New Town principles established in 1947.

This recommendation also needs to be seen in the light of the Hertfordshire Design Review Panel’s view [22 November] that the illustrative design needs to be radically changed to:

- **Increase the housing density**
- **Fell the entire tree-line along Gresley Way**
- **Re-orient the houses on the western edge of the development so that they face onto Gresley Way**
- **Move and down-size the neighbourhood centre so that it is placed on Gresley Way**

These are unlikely to be changes that the Borough Council would welcome.

This goes to the issues of the Duty to Co-operate and effectiveness.

The Borough Council makes objection to the transport mitigation measures being proposed in policy EOS1 (III), on the basis that those measures may be inadequate when considered against the latest transport modelling work undertaken by Hertfordshire County Council.

One of the potentially biggest issues for the SBLP, and for the Gresley Way housing allocation to the East of Stevenage, is traffic and transport.

EHC commissioned Aecom to undertake transport modelling of this development proposal. Their work uses the HCC SHUM model as updated in March 2014. The results of the modelling work were delivered in June 2016 and showed that

“..the development trips put little extra stress onto key junctions in the vicinity of the scheme...new development will generally not have a significant effect on network performance. Where congested junctions have been identified, the development is only a small contributor to already overloaded junctions.”

The EHC/Aecom report suggests some de minimis mitigation works at certain key junctions away from the site.

However, HCC’s transport modelling [August 2016] of only two months later suggests a less resilient situation. Its work identifies that in 2021 there are significant congestion issues at, amongst others, A1(M) junction 8, Hitchin Road and in the town centre in the evening peak. By 2031 the same model shows that in the evening peak A1(M) junction 8 is gridlocked in both the Do Minimum and Do Something scenarios, with the town centre congested in the Do Minimum scenario and gridlocked in the Do Something scenario.

It is important to bring these issues to the attention of EHC. Tri-partite discussions with the County Council and the District Council may result in a mutually acceptable resolution to these otherwise quite serious issues.

This goes to the issues of the Duty to Co-operate, positive preparation, justification and effectiveness.
