

Examination of the Stevenage Local Plan (2011-2031)

Stage 2 Hearing Sessions

Statement of Welwyn Hatfield Borough Council (ID: 970870)

Matter 10 – Employment

1. The following is intended to address the questions raised by the Inspector under Matter 10. Welwyn Hatfield Borough Council is content that questions 2 and 3 are of mainly local interest within Stevenage, and this Statement only addresses questions 1 and 4 to 8.

The position to date between the two authorities

2. Welwyn Hatfield Borough Council made one representation on Employment at the Regulation 19 stage. Whilst Stevenage were clear about what the employment need for the borough across the plan period was, it was not clear to what extent this need could be met and to what extent this would rely on the delivery of new floorspace in other local authority areas. On this basis, we did not consider the Plan to be **positively prepared**. We also considered that the Plan was not **justified**, because of references to us potentially assisting in meeting the need when we had no sites available to do so.
3. Stevenage's response to our comments on employment in the August 2016 summary of Regulation 19 consultation representations (document [ED113](#)) set out that agreement had now been reached with Central Bedfordshire and North Hertfordshire Councils on meeting need, and that the Plan would no longer seek to rely on Welwyn Hatfield. The subsequent Memorandum of Understanding ([ED116](#)) between Stevenage and ourselves further confirmed this, and we note that main modifications have been proposed ([ED114](#)) to remove all references to Welwyn Hatfield and Welwyn Garden City from Policy SP3 and its supporting text.
4. This immediately satisfies a major part of our concerns, although we do not necessarily require the total deletion of any reference to Welwyn Hatfield from the policy and supporting text and consider that some reference to the economic links between the two authorities may be beneficial to still include (see response to Q8 below). We remain interested in how Stevenage's employment needs will be met given that both Stevenage and North Hertfordshire are within this authority's Functional Economic Market Area (FEMA).

Q1: Paragraph 2.55 of the Employment Technical Paper says that at least one further iteration of the East of England Forecasting Model is anticipated prior to the Plan's examination. Has this been published and if so what were the key findings in relation to Stevenage and this Plan? Are there any serious implications from this?

5. Stevenage's latest Employment Technical Paper ([ED124](#)) discusses the 2016 run of the EEFM and its implications. It is apparent that this produces some rather unexpected conclusions in terms of projected B Class job growth, and we do not dispute

Stevenage's conclusion at para 2.17 of ED124 that the 2016 EEFM figures for Stevenage are anomalous. At para 2.18, Stevenage reach the conclusion that the EEFM 2016 should not inform the borough's need for employment land and there are therefore not any serious implications. Again, we are satisfied with this conclusion.

Q4: What are the implications of the identified employment land needs not being met within the Borough's boundaries?

6. If employment needs cannot be met within a local authority area, efforts need to be made to meet them elsewhere through the duty to cooperate in order for a Plan to be positively prepared (and therefore sound). It is evident from Stevenage's Memoranda of Understanding with North Hertfordshire and Central Bedfordshire ([ED130](#) and [ED140](#) respectively) that both authorities are willing to assist Stevenage in meeting any unmet needs, and we note that a specific allocation is proposed in North Hertfordshire's Regulation 19 Local Plan to meet this need to the north of Baldock. Given Baldock's closer proximity to Stevenage than potential sites in Central Bedfordshire and the fact that it is therefore within this authority's FEMA, we would prefer to see the that site come forward. Nevertheless, the willingness of Central Bedfordshire to also assist puts Stevenage in a more robust position.
7. Stevenage's approach to planning for the economy is focussed around needs for land, rather than *jobs*. Stevenage is the only authority in our FEMA for which the target provision of jobs over the plan period is not implicit, and given that different approaches can be taken in translating jobs needs to land needs it is the extent to which Local Plans aim to provide for jobs that is of greater concern to us. However we are content, given Stevenage's choice to select an employment land target at the upper end of its need range and the options to meet need elsewhere, that the relatively modest EEFM jobs projections for Stevenage over the plan period can be met.

Q5: What are the implications on Welwyn Garden City [sic] refusing to assist with providing employment land to meet some of the unmet demand from Stevenage Borough?

Q6: Does this have implications for Central Bedfordshire and North Hertfordshire who have agreed to assist in this regard?

Q7: Do they now need to contribute more than previously agreed and if so has this been discussed?

8. As a point of clarification, we consider it somewhat erroneous to describe Welwyn Hatfield Borough Council (NB the question refers to Welwyn Garden City, which is merely a town within Welwyn Hatfield) as 'refusing' to assist in meeting employment land needs for Stevenage. This seems to imply that we had a choice in whether to assist, whereas in reality we find ourselves unable to by virtue of having a very limited number of promoted employment sites – and in any case may only just be able to meet our own needs. We understand that the Plan originally made reference to meeting need in Welwyn Hatfield because at one stage we did expect to have a slight oversupply of employment land, but the modifications in ED114 suitably address the current position.

9. Given that Stevenage is unable to meet its own need, the implication of Welwyn Hatfield being unable to assist is that Stevenage must rely on the authorities in its Functional Economic Market Area (North Hertfordshire and Central Bedfordshire). Welwyn Hatfield's inability to assist has been known since the time of our Regulation 19 representations on the Plan, and it is clear from Stevenage's Memoranda of Understanding with North Hertfordshire and Central Bedfordshire in [ED130](#) and [ED140](#) that discussions between those authorities have been proceeding on that basis since then.

Q8: Does this need to be reflected in the Plan?

10. Given the progress that been made between Stevenage, North Hertfordshire and Central Bedfordshire in agreeing to meet employment needs, **we request that para 5.26 of the Plan is amended** to clarify that the strategic allocations listed outside Stevenage are specifically to meet its unmet needs, rather than merely stating they will be 'supported'. This will provide a clearer articulation of Stevenage's strategy, and help to solidify the roles of North Hertfordshire and/or Central Bedfordshire in meeting Stevenage's unmet need by enshrining them in an adopted plan. With such a change made, we would be satisfied that this aspect of the Plan is positively prepared.
11. In addition, whilst we support Stevenage's proposal to main a main modification in how Welwyn Hatfield is referred to in para 5.26, we do not consider it necessary to delete the entire third bullet point and would welcome some continued reference to the economic links between our two authorities. **We therefore request that the only deletion is the second sentence**; *'Welwyn Hatfield's emerging plan and evidence base identifies a small surplus of employment land over the plan period, though also recognises the need to flexibly respond to 'real world' demand'*, as this is the only part on which circumstances have changed.